

To whom it may concern

Re: Submission – Warragamba Dam Raising Project – SSI-8441

I write to express my objection to the proposal to raise the Warragamba Dam wall, with reasons as outlined below. I have not made any reportable political donations.

I do not want any of my personal information to be published in connection with my submission.

I appreciate the need to better manage risks associated with flooding in the Hawkesbury-Nepean Valley, however I do not believe that the Warragamba Dam Raising (WDR) Project is an appropriate way to do this. It seems that the basic logic of this project is to introduce an artificial structure that will cause flooding in an area that is not naturally flooded, in order to reduce (but not totally avoid) the impacts of flooding an area that naturally floods; then purchase other land to 'offset' the damage caused by doing so. This seems absurd. It makes more sense to move the people away from the area that naturally floods, and avoid damaging the unique upstream area in the first place.

I am concerned that the Environmental Impact Statement (EIS) underestimates the impacts of upstream inundation, both in terms of the area that will be inundated and the number and significance of cultural sites in that area. This is apparent in many of the comments in Appendix 7 to Appendix K of the EIS. Furthermore, I am concerned that the project contravenes Articles 8, 11, 12, 13, 19, 29 and 31 of the United Nations Declaration on the Rights of Indigenous Peoples, which Australia has endorsed. The WDR Project also undermines First Nations' self-determination, which is central to the intent of the Partnership Agreement on Closing the Gap 2019-2029, to which the NSW Government is a partnership party.

Notwithstanding the concerns about under-representation of upstream impacts, I object to the WDR proposal for the following reasons based on the impacts claimed in the EIS:

- Upstream inundation at full supply level will damage a considerable area of Gundungurra Country, including irreparable damage to many sites of cultural significance, and will cause unnecessary and ongoing harm to Gundungurra people who have already suffered considerable losses. This will substantially constrain the ability to practice culture and fulfil cultural obligations, and will be detrimental to the social, emotional and cultural wellbeing, as well as physical health¹ of Gundungurra people. This is unacceptable.
- According to Chapter 29 of the EIS, the operational impacts of the WDR project would result in increased inundation extents, depths and durations of a substantial area of Country which has not evolved to cope with such inundation. The EIS also states the alteration of flows in downstream areas will negatively impact on biodiversity in those areas. While all native species and ecological communities that live on and comprise Country are important, it is particularly concerning that the project will cause further harm to endangered and critically endangered vegetation such as the Forest Redgum – Yellow Box woodland, Mountain Blue Gum – Thin-leaved Stringybark open forest, and Narrow-leaved Ironbark – Forest Red Gum. It is unacceptable to subject this endangered vegetation to further harm, when instead we should be protecting it.

- According to Chapter 29 of the EIS, the construction phase of the WDR project would result in the removal of 22.42 hectares of habitat for 17 threatened fauna and 51 threatened flora species, 1.64 hectares of which is a threatened ecological community. It is unacceptable to knowingly cause harm to these threatened communities and species, when instead we should be protecting them.
- That these damages would occur anywhere is frightening, but to knowingly inflict them on a unique World Heritage Listed area is particularly egregious.
- While raising the dam wall may provide some flood mitigation, it does not completely mitigate risks given the significant contribution of flows from other catchments (such as the 40% of flows in the March 2021 event, for example, as stated in the EIS). Thus, the above-mentioned damages would be incurred without certainty of avoiding all of the downstream costs of flooding. This burden is unacceptable given the presence of multiple feasible alternatives, including those detailed by Professor Jamie Pittock² such as a combination of lowering the full storage level of Warragamba Dam by 12 metres to create additional airspace, coupled with desalination plants to bolster and diversify Sydney's drinking water supply³ (which could be powered by renewable energy), relocating residents from flood-prone areas and engaging in lower-risk flood-resilient activities of value in the flood-prone areas. Chapter 4 (s4.7.9) of the EIS claims that alternative packages of options such as this were tested, however no details are provided and these options are ruled out on the basis of being 'cost prohibitive' without elaboration of those costs, nor a systemic analysis of benefits, or how they compare with those of the WDR Project. This is unacceptable.

In summary, I believe the damage caused by the WDR Project would outweigh the benefits. Given the existence of feasible alternatives for managing flood risk in the area, it would be imprudent and unethical to proceed with the proposal to raise the dam wall. I urge the NSW Government to give proper consideration to combinations of alternatives, to adopt a holistic systems perspective when doing so, and to honour its commitments to Aboriginal and Torres Strait Islander self-determination, health and wellbeing in all areas of Government activities.

Thank you for the opportunity to comment on the proposal.

References

1. Salmon, M., Doery, K., Dance, P., Chapman, J., Gilbert, R., Williams, R., and Lovett, R. 2019. *Links between Aboriginal and Torres Strait Islander Culture and Wellbeing: What the Evidence Says*. The Australian National University and the Lowitja Institute.
2. Pittock, J. 2018. *Managing flood risk in the Hawkesbury – Nepean Valley*. Australian National University.
3. Turner, A., Sahin, O., Giurco, D., Stewart, R., and Porter, M. 2016. The potential role of desalination in managing flood risks from dam overflows: the case of Sydney, Australia. *Journal of Cleaner Production*, 135, 342-355.