

Is raising the Warragamba Dam wall a good idea?

There once was a time when scientific evidence guided policy decisions and when all tiers of government collaborated to maintain environmental safeguards. The year was 2000 and the UNESCO World Heritage nomination of the Greater Blue Mountains National Park nomination succeeded because it was rational, across-party lines, inter-jurisdictionally supported and therefore received global endorsement.



Covid and climate change, instead of uniting and strengthening such principles, have recently contributed to the demise of such basic understandings of how democracy works. Government decisions have splintered along self-interested party lines leaving governance lacking transparency and accountability more than ever before in the history of NSW and Australia. Bypassing stakeholders - the public - is the new normal.

Nowhere can this be better illustrated than by Australia's current approach to its own natural heritage, and the egregious lack of care paid to the preservation of two of its now endangered UNESCO World Heritage sites, the Great Barrier Reef and the Blue Mountains National Park (BMNP).

There are several combatants in the fight to preserve or further encroach on the BMNP: the State Government of NSW proposes to raise the dam wall (built in 1960 to supply Sydney with water) by up to 17 metres which will directly risk the Blue Mountains World Heritage Status. *The Environment Protection and Biodiversity Conservation Act 1999* was introduced by the then Liberal Federal Environment Minister Robert Hill. What was Liberal in 2000 is vastly different from what Liberal means in 2021.

State Legislation introduced by Bob Carr (NSW Premier in 2000) and Bob Debus (Attorney General for NSW and Member for Macquarie at the time the UNESCO nomination was submitted) ensured the creation of the BMNP. Today these two Labor men publicly oppose raising the dam wall. The councils of Blue Mountains City and Wollondilly are also flatly opposed, as are the Colong Foundation, the current local Member for Macquarie Susan Templeman, and several local interest groups including indigenous voices, most notably from the Gundungurra people. Last but not the least important stakeholder is the public who have witnessed bush fires and floods in recent years which, if anything, should be reinforcing the need to protect rather than further encroach and reduce this pristine wilderness area.

The cavalier disregard paid by the NSW State Government to preserving the BMNP can best be shown by the Environmental Impact Statement (EIS) it released on 19 September 2021. After the emergence of innumerable leaked documents, it became clear that the company commissioned to produce this report (SMEC) was asked to write an EIS favourable to raising the dam wall (terms of reference have not been disclosed). No fewer than 87 PDF documents of hundreds of pages are conspicuous in their absence of any meaningful or factual environmental or cultural heritage so that "direct" impact was changed to "indirect"; phrases like "potential impact" replaced foreseeable actual impacts. No modelling has been undertaken.

Consultation of stakeholders? What is that? SMEC discusses numbers of people affected by the current and proposed dam walls during times of heavy downpours but does not consult any key stakeholders. Indeed, SMEC has been banned from working on World Bank projects in other countries. While there are many and diverse grounds for opposing the raising of the dam wall

including consideration of several alternatives, this brief article names the three most obvious: environmental, legal and demographic.

Other Alternatives

The unscientifically written EIS does not even convince on the argument of intended flood mitigation on the grounds of the rarity of such events (1 in 100 years) and the fact that shires downstream from the dam have falsely allowed construction of residential and rural dwellings on flood-prone land. If this had been and would continue to be more rigorously regulated, flood damage could well have been and continue to be minimized. Raising a dam is an excuse for having allowed downstream development to go unchecked and there is no plan in place to control these ratings. In fact, NSW plans to increase residential dwellings in flood prone areas over the next 30 years. Nor is it made clear that raising the dam wall would avoid flooding, simply give people a little more time to evacuate.

Environmental Objections

Page 12 of the EIS Executive summary states that the proposal raises the dam wall by “up to 17 metres”. No budget is provided. Compensation alone is estimated at \$2.8b. While key benefits are shown, no list of key deficits is made, thus leaving the reader with a one-sided and unbalanced statement. Page 31 of the same document states that “there is (sic) about 300 hectares of the upstream impact area within the listed Greater Blue Mountains World Heritage Area”. *Give a Dam* (Colong Foundation) alleges that “over 65 kilometres of wilderness rivers, 5700 hectares of National Parks and 1300 hectares of the GBMWA would be inundated by the project”. Who to believe? An incomplete EIS or stakeholders who wish to preserve the BMNP?

Legal Objections

The NSW Environmental Planning and Assessment Act 1979 mandates a quality EIS which has not yet been provided. No fewer than seven layers of legislative protection are afforded to the areas that a raised dam wall would inundate: National Park, Wilderness, National Heritage, Special Catchment Area. None have been addressed in this supposed EIS. UNESCO Conservation of Nature Guidelines have not been addressed. UN Sustainable Development Goals have not been considered. Climate change is ignored. It is as if there is selective or collective blindness, not just lack of accountability or justification in having published such a dreadfully inadequate and damningly poor quality EIS. A Clayton's EIS, an EIS when you clearly don't want an EIS to get in the way of unchecked development.

Demographic Objections

The NSW Government plans to house 134,000 new residents on the Hawkesbury-Nepean floodplain over the next 30 years. Good idea? What about public opinion? The Commonwealth Government estimated at least 1500 indigenous cultural heritage sites would be inundated. Is this mentioned in this new low of an EIS? Impact on koala and platypus populations? Unstated and therefore unpredictable and unknown. Consultation with stakeholders large or small is simply absent. The international standard for EIS criteria has simply been abrogated and bypassed in this proposal. Some alternatives have been canvassed, but no rigorous analysis of the environmental impact of the alternatives has been undertaken or if undertaken, shown.

The NSW government is allowing the conditions to be created for a major ecological disaster to the ancient ecology of the Blue Mountains and has allowed a systemic undermining of governance processes to enable this including a serious neglect of its own code of conduct concerning objective advice and conflicts of interest. Thomas Clarke (Professor of Corporate Governance, University of Technology Sydney UTS)

The wild rivers of the southern Blue Mountains form a landscape that has been largely untouched by modern society. The environmental devastation caused by raising the dam would see the lower Kowmung, Cocks, Nattai, Kedumba, Wollondilly and Little Rivers smothered beneath weed-infested dam mud. Australia is already a global leader in wildlife extinction and species loss. Infringing on and damaging this protected World Heritage Area would further lower Australia in the eyes of all countries endeavouring to reign in temperature rises caused by anthropogenic activity. Among developed nations, Australia comes last on climate performance and pledges.