



Nature Conservation Council

The voice for nature in NSW

28 October 2021

Submission regarding the Warragamba Dam Raising Project

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 170 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

The Blue Mountains World Heritage area is a national treasure – an iconic landscape of mountain tops, sandstone cliffs, and lush forest filled valleys with immense natural and cultural value.

NCC opposes the proposed Warragamba Dam Raising Project. The raising of the dam wall will inflict unacceptable environmental and cultural damage.

The Environmental Impact Statement is inadequate

The Environmental Impact Statement is not an appropriate basis for further decision-making by the Minister. Adequate consideration has not been given to several relevant issues.

- No post-bushfire field surveys have been undertaken despite 81 percent of the Blue Mountains Heritage Area being devastated during the 2019-20 bushfires.
- Only a mere 27 percent of the impact area was assessed for Aboriginal Cultural Heritage.
- Threatened species surveys do not meet guideline requirements.
- There has been no modelling that describes any economic benefits of raising the dam wall.

Serious allegations about the integrity of the EIS on exhibition have come to light through the NSW parliamentary inquiry on the proposal to raise the Warragamba Dam wall. Individuals who contributed to the EIS have claimed that ecological assessments were watered down at the request of the proponent to minimise environmental impacts. These revelations cast serious doubts over the scientific validity of the EIS and must be fully investigated and resolved before the development approval process proceeds any further.

The potential impact to World Heritage sites and the environment is unacceptable



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The environmental and cultural damage caused by raising the dam wall would be a clear breach of Australia's obligations under the World Heritage Convention. The proposal risks the listing of the Greater Blue Mountains as a UNESCO World Heritage site, such is the likely damage on the values of the park.

The proposal places 65 kilometres of wilderness streams and rivers in the World Heritage site under direct threat from inundation. Crucial threatened species habitat will be inundated for weeks at a time. This includes:

- the Burragoorang Valley floor which is the most fertile regional habitat and a key breeding site for the critically endangered Regent Honeyeater
- the lower Nattai Valley, home to one of Sydney's refuge koala populations

Gundungurra Traditional Owners have not given Free, Prior and Informed Consent for the Dam proposal to proceed

The Aboriginal Cultural Heritage Assessment report does not demonstrate appropriate assessment of cultural heritage, nor meaningful consultation with Gundungurra community members. It is unacceptable to risk the inundation of over 1500 identified cultural sites. NSW must learn the lessons of recent history and enquiry. Destruction of cultural heritage without appropriate assessment, consultation and consent from Traditional Owners would extend the breadth and depth of 'widespread destruction of tangible and intangible cultural heritage' across Australia, and is a completely indefensible and unacceptable course.¹

Alternative options to raising the Dam wall must be considered

Flooding in the Hawkesbury-Nepean Valley is inevitable no matter the height of the dam wall. Alternative flood-management options that cause less impact to the environment and that do not involve increased development in high-risk flood areas must be prioritised. These alternative options include international best practice floodplain development controls, flood evacuation routes, property repurchase schemes, construction of downstream flood diversion structures, and integrated dam management and climate forecasting.

Recommendations

- Rejection of the proposal to raise the Warragamba Dam wall



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- Protection of World Heritage natural and cultural sites, especially the habitats of listed threatened species
- Adoption of alternative flood-management options that do not involve increased development in high-risk flood areas and that cause less impact to the environment
- An updated, comprehensively assessed EIS that adequately considers all environmental and cultural impacts before any decision whether to progress the proposal is taken
- Adequate consultation with the Gundungurra Traditional Owners to obtain Free, Prior and Informed Consent if and before the dam proposal proceeds

We join with the Colong Foundation for Wilderness, and the many groups and individuals across the state, united in their opposition to this attack on the Blue Mountains World Heritage area.

Thank you for the opportunity to participate in the consultation.

Your key contact point for further questions and correspondence is Jacquelyn Johnson, available at jjohnson@nature.org.au. We welcome further conversation on this matter.

Yours sincerely,

Chris Gambian
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Nature Conservation Council of NSW

ⁱ Parliament of the Commonwealth of Australia, 2021, A Way Forward, Final report into the destruction of Indigenous heritage sites at Juukan Gorge.
https://parlinfo.aph.gov.au/parlInfo/download/committees/reportjnt/024757/toc_pdf/AYayForward.pdf;fileType=application%2Fpdf