

21 November 2021

Warragamba Dam Assessment Team  
Department of Planning Industry and Environment  
<https://www.planningportal.nsw.gov.au/major-projects/project/10571>

### **Warragamba Dam Wall Raising SSI-8441 EIS Consultation**

The Southern NSW Branch of BirdLife Australia welcomes the opportunity to comment on the EIS for this project.

BirdLife Southern New South Wales (BLSNSW) is a community group comprising local people concerned with the protection of native birds and their habitats. We are part of BirdLife Australia, the national partner of BirdLife International, the world's largest nature conservation partnership with over 13 million supporters. BirdLife Australia is independent and not-for-profit, with over 200,000 active supporters nationally including 72,000 in NSW.

BLSNSW strongly oppose the proposal to raise Warragamba Dam due to its unacceptable environmental impacts on the Blue Mountains World Heritage Area and threatened species. In particular we are concerned about the impact on the Regent Honeyeater for which one of the few remaining breeding sites occurs within the area of upstream impacts of this project.

The Regent Honeyeater is listed as Critically Endangered at both a state and federal level, with as few as 350 individuals remaining in the wild. Modelling by BirdLife Australia suggested that up to 50% of contemporary Regent Honeyeater foraging and breeding habitat was burnt in the 2019/20 bushfires and therefore protecting remaining unburnt breeding habitat is of the highest conservation priority.

Given that the Regent Honeyeater is Critically Endangered, that any breeding habitat is considered critical for the survival of the species under the National Recovery Plan for the species and there are only a handful of contemporary breeding sites for Regent Honeyeater remaining, destruction or degradation of any of these sites would have dire consequences for the species as a whole. It is unacceptable and inconsistent with the National Recovery Plan for any avoidable loss or degradation of breeding habitat to occur. It is also incongruous with the time and money that the Federal and NSW Governments have invested into the recovery program, including the Regent Honeyeater Captive Breeding and Release program. This matter is particularly important to BLSNSW as our volunteers have donated a significant amount of time for more than 25 years in monitoring and habitat restoration activities.

BLSNSW is concerned that the EIS exhibited is not an accurate assessment of the impact of the project on the Regent Honeyeater. While the EIS

concludes that the project is likely to have a significant impact on this species we understand that details of the magnitude of this impact have been altered from that of the original expert advice and that the scale of impact will be far greater than what is claimed in the EIS. In particular we refer to the impact assessment for the Regent Honeyeater commencing on page 356 of Appendix A Assessments of significance of Appendix F5: Matters Of National Environment Significance – Biodiversity. We request this be revised to reflect the original reports of the ecologists as published by the ABC.

Finally we would like to bring your attention to the conclusion of the EIS in S29.10 Project justification and conclusion of the EIS synthesis, Project justification, and conclusion. This section claims a conservative approach and that impacts will be addressed through biodiversity offsetting. Offsets are rarely an appropriate response to proposed biodiversity loss and especially for habitat critical for the survival of a species, in this case breeding habitat for the Regent Honeyeater. There is no evidence that breeding habitat for Regent Honeyeaters can be successfully offset and any offsets would be unlikely to provide direct benefits for both the local affected population and the species. BirdLife and associated groups have for many years been undertaking efforts to improve Regent Honeyeater habitat and if breeding habitat could be rapidly produced and birds would subsequently appear and breed there then it would have simply occurred already. However this has not occurred as there is no reliable way to rapidly create alternative breeding habitat and to relocate the birds within the time it would take for impacts to occur from this project.

We find this conclusion to be false and consider that from our analysis of impacts on the Regent Honeyeater in particular that the project's impacts will be far more significant than are purported in the current version of the EIS. This section also fails to consider the magnitude of the impact on biodiversity with no mention that this project is likely to impact on 85 threatened species and threatened ecological communities (TECs), including significant impacts on 63 species and TECs that are already threatened with extinction. This level of impact from a single project is absurd and completely unacceptable.

On the basis of the significance of the impact of this project on the Regent Honeyeater and threatened species more broadly, we request that the government abandon this project and investigate the alternative methods available to mitigate floods in the Hawkesbury-Nepean Valley.

Yours sincerely

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