

Dear Committee

I am responding on the government's proposal to raise Warragamba Dam's wall 14-17 metres so developers can build houses on low-lying floodplains in Western Sydney. I am opposed to this proposal.

Raising the dam wall will flood pristine wild rivers and important bushwalking areas west of Sydney that are irreplaceable and once lost can never be restored. I live in Sydney and this proposal to raise the walls of the Warragamba Dam will cause damage to a world heritage listed site. I strongly urge you to stop and reconsider whether this project is needed at all. With the overdevelopment of urban sprawl in western and south-western Sydney areas, preserving these remaining natural environments is important, to the community and tourism.

I value the beauty of our country and especially our state of NSW and this area of the Greater Blue Mountains is an irreplaceable 'natural gem'.

Huge areas of World Heritage-listed National Park and culturally significant land in the Blue Mountains and thousands of hectares of Critically Endangered Regent Honeyeater breeding habitat would be at risk of extended flooding and potential destruction. Flood experts, the International World Heritage Committee, and even NSW Government members continue to raise significant questions about the need for this project.

1. Environmental issues:

- An Environmental Impact Statement (EIS) confirms that this proposal would have a significant impact on numerous threatened species, identifying up to 76 threatened plant species and 16 threatened species of birds and other animals that could be impacted.
- Upstream inundation would also destroy the mighty Kowmung River, 6,000 hectares of the World Heritage-listed Blue Mountains National Park, and further endanger already threatened species (Regent honeyeater and the Camden white gum).
- It is an area of outstanding biodiversity. The grassy woodlands of Burratorang would be threatened by this proposal to raise the dam wall and flood more of the valley. The proposed raising by 17 metres for flood mitigation will flood a further **5,700 hectares** of the Warragamba catchment and **inundate 65 kilometres** of wild rivers. This falls within the Blue Mountains and Nattai National Parks, which are part of the World Heritage Area, and parts of the Yerranderie and Burratorang State Conservation Areas. This is World Heritage listed National Park and 1,800 hectares of declared Wilderness Areas will be forever scarred from sedimentation, erosion, and invasion of exotic plants.
- Platypus and rakali inhabit the streams and rivers of the Wollondilly, Nattai and Kowmung areas of the Greater Blue Mountains. A landmark assessment by scientists at UNSW Sydney has recommended the platypus be listed as a threatened species under Australia's and NSW environmental legislation. In NSW, the number of **platypus observations declined by around 32 per cent**, so their survival is already compromised.
- The Blue Mountains area is the home of many species ranging from ground and tree frogs, bush birds, swallows, swifts, kingfishers, parrots, waterway birds, birds of prey, nocturnal birds, geckoes, turtles, skinks, bandicoots, kangaroos, wallabies, possums, gliders, monotremes, koalas, wombats, fish and more and this proposal will affect their survival by changing their habitats. These species depend on the Greater Blue Mountains habitats remaining intact, due to the impact from greater Sydney residential development where they have already lost much of their habitats. More than 400 animal species such as the Spotted-tailed Quoll, Koala, Yellow-bellied Glider, Long-nosed Potoroo, Green and Golden Bell frog and the Blue Mountains Water Skink will be negatively impacted by this proposal.
- Populations of kangaroos, wallabies (including the endangered brush-tailed rock wallaby) and emu live in a natural equilibrium with their predators the wedge-tailed eagle, dingo, and spotted-tailed quoll. This proposal would disturb this natural balance and these inter-connected ecosystems, where if one species becomes extinct and it was a food source for another species, this then affects their ability to survive.
- Much of the area to be flooded supports grassy woodland and dry open forest ecosystems *identified as priority conservation habitats by the NSW National Parks and Wildlife Service*. There is concern for the loss of threatened woodland ecosystems, threatened flora species, wild rivers, declared wilderness, and World Heritage Areas. Wet and dry sclerophyll forest, Mallee heathlands, localised swamps, wetlands, and grasslands all need to be

protected. The flora **biodiversity** is extensive with 10% of the vascular flora, large numbers of rare or threatened species (The Wollemi pine) and 96 species of eucalypts that must be protected habitat for our wildlife to survive.

- The water catchment area of Warragamba Dam is **one** of the most *intact* grassy box woodlands in south-east Australia, having revealed these rare and threatened woodland birds that breed here.
- Of serious concern is the Critically Endangered Regent Honeyeater. **The draft EIS concludes that the project poses potential significant impacts to contemporary breeding habitat for the Regent Honeyeater that “cannot be avoided or minimised.”** The Regent Honeyeater is listed as Critically Endangered at both a state and federal level, with as few as 350 individuals remaining in total in the wild. It is the most threatened bird in NSW. There are only a handful of contemporary breeding sites for Regent Honeyeater and during the assessment of the project, active nests were recorded within the impact area. The destruction or degradation of a contemporary breeding site for Regent Honeyeaters would have dire consequences for the species.
- **Regent Honeyeaters are one of Australia’s most threatened species.** If this amazing bird is going to survive and recover, we must then obviously protect the precious places where they breed and raise their young. Leading ecologists have said flooding the Burratorang Valley will be tantamount to signing off on the **bird’s extinction**. *It would be an embarrassment as well as sadness that we destroy one of the most important breeding sites left for this species in the world. The Burratorang Valley is considered a key site for the conservation of the Regent Honeyeater into the future. We must protect every breeding site, especially those situated inside and around a World Heritage-listed National Park.*
- Regent Honeyeaters and many other animals are deserving of our attention. Under the Biodiversity Conservation Act 2016- the purpose of the Act was to *effect biodiversity reform in New South Wales, and to provide better environmental outcomes*. This proposal **will not** provide better outcomes for this already struggling species of bird and let alone the many other animal species that call this area home like the platypus, brush tail wallaby, eagle, and spotted-tail quoll also facing challenges to survive.
- Any breeding habitat is considered *habitat critical for survival* of the species, and under the **National Recovery Plan** for Regent Honeyeater it states, **“It is essential that the highest level of protection is provided to these areas and that enhancement and protection measures target these productive sites”**. If the NSW government proceeds with this dam wall raising, they will be **acting in direct contradiction to the stated objectives of the National Recovery Plan**, including the Regent Honeyeater Captive Breeding and Release program.
- **It is unacceptable with a National/Federal Recovery Plan in place (in effect under the EPBC Act from 2016) for this bird, to deliberately cause loss or degradation of breeding habitat.** This dam wall raising proposal is in complete contradiction to firstly, the recognition of this species that it is critically endangered and accepted as so, by both state and Federal governments, and secondly the time and financial commitment that has already been invested in its recovery plan.

2. Cultural/historical issues:

- If the dam wall is raised, sites of immense cultural and historical significance in the beautiful Burratorang Valley — irreplaceable Indigenous cave art galleries and occupation and burial sites — will be drowned under metres of muddy water.
- **Indigenous heritage studies are insufficient and fail to recognise the need to protect Gundungurra sacred sites.**
- All owners of this area must be acknowledged and respected in any decision making- the Dharug, Gundungurra, Wanaruah, Wiradjuri, Darkinjung and Tharawal Nations who are the traditional owners of the Greater Blue Mountains World Heritage Area.
- Gundungurra Traditional Owners have NOT given free, prior, and informed consent for the dam proposal to proceed. If we are to restore Indigenous rights to ‘Country’ and mend relationships with First Nations People, we must respect them and their land in any formal process and give them a say.
- Over **1541 identified cultural/ Aboriginal heritage sites** would be inundated by the Dam proposal.
- The Aboriginal Cultural Heritage Assessment Report has been *severely and repeatedly criticised* by both the Australian Department of Environment and the International Council on Monuments and Sites (ICOMOS) for not appropriately assessing cultural heritage in meaningful consultation with Gundungurra community members. This demeans their cultural heritage.

3. Valid concerns made by different agencies and organisations:

The NSW Government's Environmental Impact Statement (EIS) downplays, minimises, and denies the environmental and cultural damage this project will cause. It has not fully considered the environmental protections necessary to protect species and valuable ecosystems. The impact assessment was heavily condemned by several agencies including-

- The National Parks and Wildlife Service which said that the EIS had failed to address impacts on species and ecological communities affected by last year's catastrophic bushfires, the worst in living memory.
- Heritage NSW said the EIS failed to properly consider cultural heritage values or adequately consult Traditional Owners.
- The Federal Environment Department last year said the EIS failed to consider impacts on iconic species like the platypus and told the NSW Government to redo the entire environmental and heritage assessment. The EIS is flawed and misleading and is intentionally hiding the real facts. The entire EIS Plan is unacceptable and dangerous.
- Fluvial flooding experts and Federal Government officials have also raised several concerns about the proposal to raise the height of the dam wall.
- Local government criticism from Wollondilly Shire Council and the immediate community has condemned the inadequacies of the recently released Environmental Impact Statement (EIS) for the Warragamba Dam Wall raising project, by the Department of Planning, Industry and Environment and Water NSW. There has been inadequate consultation with Wollondilly Council, and it appears the government is rushing ahead without considering the negative impacts. Wollondilly Council is opposed to the proposal due to the major issues and concerns within the EIS. Councillor Matthew Gould said the EIS "shows bias towards the project" rather than being objective, highlighting the benefits downstream and "downplaying" the impacts upstream. Wollondilly communities also will be impacted by heavy vehicles, noise, and dust during construction phase to raise the wall. There is a need to also protect Warragamba businesses and the tourism economy of this region. Raising the dam wall will not achieve this goal.
- Environmental conservation groups like Nature Conservation Council, Blue Mountains Conservation Society, Total Environment Centre, and the Wilderness Society are among many that along with the wider community have expressed very serious concerns on this development proceeding. BirdLife Australia and Colong Foundation for Wilderness are voicing opposition to the raising of the dam wall with an incorrect EIS.
- The Australian Department of Energy and Environment have said they believe ***"the impact of increased flood water levels within the dam is likely to have extensive and significant impacts on listed threatened species and communities and world and national heritage values of the Greater Blue Mountains World Heritage Area (GBMWH)."***
- "The EIS consultants for the Warragamba Dam concluded that there are significant impacts that can't be mitigated against, and we agree with their assessment," said Samantha Vine, BirdLife Australia's Head of Conservation. "These findings potentially understate the impact, given that the threatened species surveys were conducted before the devastating 2020 bushfires." So current data being used in the EIS is incorrect as it has not been updated to factor in the loss of habitat and species due to these fires. And the *impacts 'can't be mitigated against'*- meaning that any *'biodiversity offset'* will not be successful and will not replace the *irreplaceable habitats that are lost in the Greater Blue Mountains, if this proposal proceeds.*
- NSW Government's own leaks on crucial information has revealed that raising the dam walls would be largely ***ineffective at mitigating severe floods*** anyway in the Hawkesbury Nepean Valley. The leaked graphs show the anticipated billion-dollar dam project only offers a ***very small reduction for the probable maximum flood.*** Billions of dollars of taxpayer money for minimal results to reduce flooding in low-lying residential areas, but massive destruction to a World listed heritage site and the ecological communities.
- The International World Heritage Committee have raised significant questions about the damage to this World Heritage listed area. **The UNESCO committee have said the proposal to raise the dam wall is incompatible**

with Blue Mountains world heritage listing. UNESCO has stated that *"such inundation of any areas within the [Blue Mountains] property is likely to impact on its outstanding universal value (OUV)."*

- Conservation groups have stressed if the dam enlargement were to go ahead, the volume of water held behind the wall during future flood events would inundate a vast area of bushland in the Blue Mountains World Heritage Area. In the process, the habitats of many unique and threatened plants and animals — including the Critically Endangered Regent Honeyeater and Swift Parrot — would be flooded. This would have significant *impact on 16 threatened species of birds alone*. Crucially, the area in question is one of the **few sites** where Critically Endangered Regent Honeyeaters are known to have bred successfully in recent years, and hundreds of hectares of this critical breeding habitat would be flooded.

In summary despite receiving severe criticisms the government have refused to redo this work and have carried out no further field studies.

This is the most significant threat to Australia's World Heritage in decades. There are few times in Australian history when Governments have undertaken such callous attacks on protected areas.

4. Systematic Failings of the EIS process:

- The engineering firm (SMEC Engineering) who undertook the environmental and cultural assessments for the project have an established history abusing Indigenous rights, recently being *barred from the world bank*. There is obviously underlying bias that could and does hamper this process. **On this basis alone a revised EIS should be commissioned by another company without bias.**
- Threatened species surveys are **substantially less than guideline requirements**. Where field surveys were not adequately completed, expert reports were not obtained. Therefore, the data is incomplete to make a full correct assessment of threatened species.
- Severe fires during the summer of 2019/20 devastated 81% of Blue Mountains Heritage Area. **No post-bushfire field surveys have been undertaken.** This is appalling considering the 2019-2020 bushfires were a natural disaster on world heritage listed lands. The NSW state government act as custodians to protect this area for Australia and indeed the world. At the very least this should have been carried out. Recovery of this environment and our wildlife will take decades due to the severe damage of vital habitats and ecosystems. This is no time to further compromise this area with more destruction, with a development that already has dire warnings from multiple organisations.
- Only 27% of the impact area was assessed for Aboriginal Cultural Heritage.
- No modelling of the stated flood and economic benefits of the dam wall raising are outlined in the EIS. The supposed benefits must be outlined to justify the enormous financial and environmental costs of this proposal. This crucial information was omitted, to support this development proceeding, which is simply a developer wanting land for urban residential housing.
- Modelling by BirdLife Australia suggested that up to **50% of contemporary Regent Honeyeater foraging and breeding habitat was burnt in the 2019/20 bushfires**. Protecting remaining unburnt breeding habitat is of the *highest conservation priority*. This was **not** even considered in the EIS.
- The Project's biodiversity offset strategy for the Regent Honeyeater must be considered more closely. Offsets are rarely an appropriate response to proposed biodiversity loss and especially for critical habitat for the survival of a species, in this case their breeding habitat. Offsets in this case to provide such a **unique** habitat to replace the loss of this habitat would be implausible, as this bird has become critically endangered because it has already lost its unique habitats and there are few habitats remaining for this species if any. Destroy this last remaining habitat and you herald the extinction of this species.
- 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, as offsets rarely are the same quality exchange.
- Independent experts working on the Government's Environmental Impact Statement (EIS) say that their findings were watered down. Ecologists say their input detailing the threat to endangered species in the world heritage-listed region was either watered down or ignored altogether or reworded in changes made to WaterNSW. One ecologist researching threatened species was so concerned by the Government's efforts

to change their findings, they requested their name be removed from the EIS, which was refused so they then self-reported to government officials at the DPIE (Department of Planning, Industry and Environment) and then resigned. There were substantive changes to their environmental impact assessment. Is this then a reliable scientifically robust report if changes were made to the ecologist's initial assessment? **Rachel Musgrave**, a former primary assessor for biodiversity surveys and analysis for the EIS, said she had resigned out of concern for her accreditation as an ecologist if she signed off on the report as proposed. Musgrave said she was worried the consultants hired by WaterNSW wanted her to interpret the impacts of the wall raising as "indirect" rather than 'direct' to reduce or eliminate the cost paid under the scheme. It's timely that the Perrottet government may be looking to reform environmental offsetting due to appalling practices such as shown by this example. Musgrave produced the biodiversity offsets cost for the project of about \$2 billion. She also said she was overruled on issues, including the terminology used in the EIS from "would likely" to "may" affect dozens of threatened plant and animal species through upstream inundation. Her report was viewed by government agencies, who backed her assessment, but that didn't change WaterNSW's position. These word changes are an attempt to minimise the degree of impact on the environment and this is deceitful.

- The state government's WaterNSW, has the prospect of at least \$2 billion in costs of offsetting the likely damage caused by inundating as much as 6,000 hectares in the Blue Mountains world heritage region. The raised wall itself may cost as much as \$1.6 billion. Therefore raising the Warragamba dam wall by 14 metres total costs have risen to \$3.6 billion which includes the offsetting costs to compensate damage to this world heritage listed area. However, costs are expected to rise even more. This incredible amount of money should be spent on alternatives that won't flood the Blue Mountains National Park but direct these funds to **protect existing floodplain communities from future flooding using a combined approach of multiple options.**
- A second ecologist, Australian National University researcher **Ross Crates**, an expert on the critically endangered Regent Honeyeater, told the committee his findings had been "watered down" by the consultants. He was an expert hired by SMEC, the consultancy outsourced by WaterNSW to gauge the threat the project posed to the *critically endangered Regent Honeyeater*, who said there had been "significant editing" to his work. Dr Crates, who has been studying Regent Honeyeaters for several years, said *whole paragraphs had been excluded from his report* when presented as part of WaterNSW's environmental impact statement (EIS) on the proposal. Suppressing the truth therefore questions the accuracy of the EIS. While words such as "will" were changed to "could" to significantly dilute envisaged impacts of the proposed development in conveying the gravity of impacts which is misleading. There was significant editing to the initial wording proposed for the upstream biodiversity assessment reports. He said there were as few as 350 of the birds left in the wild, most of them in the Blue Mountains region. A survey of only one-fifth of the proposed impact site had identified a minimum of 21 of the birds and seven nests.
- Crates said he was also concerned the EIS had been designed to exclude a major area – between zero-2.78 metres and 10.25-14 metres above the current maximum flood level – from calculations for offsets. This will be a huge area of mapped important Regent Honeyeater habitat that would **not** be offset in the current offset calculation strategy. The lake's edge of the Burrator catchment was a critical breeding ground for these birds.
- Both reports (Musgrave and Crates) were altered to downgrade the environmental impacts of raising the dam's wall by at least 14 metres with these subtle word changes. But these word changes could have such detrimental effects on the environment that complete species of fauna and flora could be wiped out. The plan to raise this dam wall to that height is 'un-tested' and there is nothing to compare to, the damage being done could be irreversible just by the changes to these words to minimise impacts. Very misleading.
- **Steve Douglas**, an ecologist who made an independent review of the draft and final versions of the EIS, said *"there's multiple instances of selective editing to favour the proponent's interests"*. He also agreed with the dilution of impacts and the problems with the inability of offsets to achieve their intent for fauna and endangered plants.
- **Government staff raised concerns internally last year in 2020 that WaterNSW was pushing its ecological consultants to downgrade the dangers to threatened species.**
- The community have a right to question after statements from these ecologists whether the EIS process assessment and consultation work was fully compliant with the highest standards met. We hope concerns raised about the report would be properly investigated. The EIS released last month significantly reduced the expected toll on World Heritage bushland and stated up to 92 threatened plant and animal species could

potentially be impacted by upstream inundation. There are 96 species of eucalypts alone that must be protected habitat for our wildlife to survive. With glaring omissions of information and word changes to minimise impacts, the public and the government should be concerned.

5. Community safety concerns:

- \$2 billion in costs of offsetting is the figure that has been assessed as the damage caused by inundating as much as 6,000 hectares in the Blue Mountains world heritage region. So extensive are the project impacts to endangered plants, animals and ecosystems, **leaked** documents however show that the figure is closer to \$3 billion for environmental damage which is expected to occur as part of the plan to raise the dam wall. It already amounted to \$2.88 billion in a draft assessment in 2019 to offset the damage. Comments by Minister Stuart Ayres that the government doesn't need to pay the bill because the inundation is temporary is not helpful and indeed incorrect when the ecological impacts **are** permanent.
- Biodiversity offsetting presents its own challenges as it is often not a fair exchange of the same environmental quality that is 'like for like'. The raised wall itself may cost as much as \$1.6 billion alone. Warragamba Dam was **never intended to be a flood mitigation dam**. Its purpose was only to provide 80 per cent of Sydney's drinking supply. When not full, it can mitigate floods by *catching only **some** of the rainwater* that would otherwise flow into parts of western Sydney. The government's plan is very expensive and will not solve entirely the flooding of these low-lying areas. Hence community concerns that *flooding of residential areas will still occur* even with a raised dam wall.
- If the dam wall is raised, a false sense of security could result and encourage massive over- development on flood-prone areas in Penrith, Londonderry, Riverstone, and Windsor – further residential development sustaining flood damage, could cost the government more into the future. The Minister of Western Sydney Stuart Ayres strongly supports the raising of the dam wall because developers will be able to house an additional 134,000 people on western Sydney floodplains which more than likely has a 'high water table' anyway. This is very dangerous and could lead to even more people experiencing flood in the future on these low-lying areas and will exacerbate a problem even more. Regardless of the dam issue, there should be no further housing developments on these low-lying flood prone areas as it is unsafe.
- The negative impacts for the community will result in high-density housing, traffic congestion, or overcrowded schools and hospitals. The infra- structure cannot accommodate these population increases.
- Floodplain property developers are set to benefit financially from the raising of Warragamba dam wall. Developers believe if the Warragamba Dam wall is raised, flood waters would be held behind a raised dam wall and therefore not flood their (currently) flood-prone land that they wish to develop. It appears that the Minister of Western Sydney is actively satisfying therefore these developer's aspirations of financial gain at a cost to the environmental damage caused to this Greater Blue Mountains region. And potential future property owners will not be protected from future floods in these low-lying areas anyway.
- The State Emergency Services (SES) have warned that new developments around Penrith and the Hawkesbury **should not go ahead** as it will risk the lives of thousands of people, even if the dam wall is raised. They are the professionals whose advice we should take not greedy property developers.
- Scientific investigations have also revealed that *raising Warragamba Dam wall would have little impact on floods*, with **major flooding still occurring** downstream, due to the creeks and rivers that flow into the Hawkesbury-Nepean River and hence the overflow onto floodplains anyway. The community would not be protected. Alternatives to raising the dam wall must be considered instead. Otherwise, this simply becomes a smokescreen excuse for the real intent of this proposal, being solely for a developer to capitalise on massive residential developments in a flood prone area.
- Raising the dam wall will put thousands more lives at risk on the Hawkesbury-Nepean floodplain and cause massive over-development in western Sydney that is not supported by the local community.

6. Alternatives to raising the dam wall

- Keeping residents on the floodplain safe is vitally important, but other alternatives to raising the wall should be considered. These other alternatives to better protect western Sydney from flooding should be less costly. The real problem is that raising the dam wall does not guarantee these low-lying areas will be even protected from flooding. It seems that in trying to solve one problem, a bigger problem of damage to a world heritage listed area, threatening even further endangered fauna and flora with biodiversity offsets that may

not be successful anyway, could mean permanent damage that can never be repaired, and still flooding of low-lying areas continuing.

- On average, 45% of floodwaters are derived from areas outside of the upstream Warragamba Dam catchment. This means that no matter how high the dam wall is constructed, it will **not be able to prevent flooding in the Hawkesbury-Nepean Valley downstream**. Houses in the Hawkesbury-Nepean Valley will not be protected by raising the Warragamba Dam wall, the main reason given to justify this proposal in the first place. *Almost half of the flooding in the valley comes from waters that are not controlled by Warragamba Dam.*
- The NSW Government should not allow further development on the Hawkesbury-Nepean floodplain and should implement international best-practice flood management, as put forward by the Australian National University, to ensure the safety of existing communities.
- **There are other options to raising the Warragamba Dam wall that would protect existing floodplain communities. A combined approach of multiple options has been recommended as the most cost-effective means of flood risk mitigation and these initiatives are encouraged rather than destroying a world heritage site that will not achieve the desired result to reduce flooding anyway.**
- Insurance Council of Australia boss Andrew Hall said the public money spent raising the wall would be better used buying back flood-prone land that never should have been developed in the first place- historically poor planning decisions were made.

- Alternatives could be:

-Establishing extra evacuation routes and roads for people living in the Penrith and Hawkesbury areas.

-Stop allowing further development in the floodplain, thereby worsening the situation.

-Construct spillways.

-Develop a program of *compulsory acquisition* of existing downstream flood affected properties over time to *create floodplain open space corridors to capture water. These areas should never have had houses on them.*

- Increasing the use of recycled water uptake.

- These alternative options were **not even** comprehensively assessed in the EIS. Any assessment of alternatives does not consider the economic benefits that would offset the initial cost of implementation. In other words, the long- term benefits will far outweigh the initial costs. The success of biodiversity offsetting cannot even be proven and with an assessed cost by an ecologist at \$2 billion at least, this is a big gamble to raise the dam walls.

7. An attack on a World Heritage and Cultural site

- The **integrity of the environmental assessment is fundamentally flawed**. Of all areas in the Greater Sydney region the Greater Blue Mountains for the reasons stated above **MUST** be protected. It is irreplaceable and was inscribed on the World Heritage listing recognised by UNESCO because of its Outstanding Universal Value for the whole of mankind on 29 November 2000 and is one of Australia's 19 World Heritage properties.
- This area has unique plants and animals and shows the evolution of Australia's unique eucalypt vegetation. It is an integrated system of protected areas in New South Wales. The aim of this listing is to provide international protections and preserve significant landmarks and natural areas for future generations to appreciate. The main reason for the Blue Mountains listing as World Heritage is for its biological diversity. By the government proceeding with the raising of the dam wall, they are contradicting and working against this world listing to protect this unique area.
- Raising the Warragamba Dam wall will cause consequent damage to natural and cultural values and would be a clear breach of these undertakings and Australia's obligations under the World Heritage Convention.
- Raising the Warragamba Dam wall by 17 metres would **drown and scar 5,700 hectares of world heritage** listed Blue Mountains National Park and **65 kilometres of wilderness rivers** upstream from the raised dam wall. The raising of the dam wall is simply a developer-driven move that will make it easier to build on flood-

prone areas in Western Sydney for financial gain – against the wishes of local communities. It will destroy hundreds of ancient cultural and natural heritage sites, threatened fauna and flora and ecological communities.

- This site includes irreplaceable wilderness:
 - the **Kowmung River** - declared a 'Wild River', protected for its pristine condition under the National Parks and Wildlife Act 1974.
 - Unique **eucalyptus species** diversity recognised as having Outstanding Universal Value under the area's World Heritage listing such as the Camden White Gum
 - Threatened Ecological Communities**, notably Grassy Box Woodland
 - Habitat for endangered and critically endangered species including the **Regent Honeyeater and Sydney's last Emu population**. Woodland birds like the Regent Honeyeater rely on native mistletoes which is susceptible to drought and fire and as the climate changes these threats are exacerbated. These birds are already fighting to survive due to habitat destruction and fragmentation. Whilst this species has a federal recovery plan the NSW government must work with the Federal Threatened Species Committee to ensure this bird has a future. Destroying its habitat will mean extinction!

The Blue Mountains of Australia are over a million hectares of exceptional biodiversity, abundant wilderness, and stunning topography, recognised globally for their outstanding natural and cultural heritage values. The ecosystems of the Blue Mountains serve clean air and water to Greater Sydney while providing a healthy escape into nature for over 8 million visitors a year. This area acts as a carbon capturer to assist in decreasing the effects of climate change. Like most protected areas, the ecosystems of the Blue Mountains are threatened by the global issues of climate change, bushfires, habitat loss and species extinction. Responding to these threats is a government and community responsibility. For this reason alone, it is incumbent upon the NSW government to not proceed with this proposal of raising the dam wall. This area is under sustained ongoing pressure to survive. Man-made interference in this natural environment will further damage these ecological communities and Indigenous sites. Our Indigenous history of Country and our unique wildlife and environment should and must be treasured above the insatiable need by governments and developers to destroy what can never be replaced. This area already has complex challenges of conservation. Don't add to these challenges.

I urge the NSW government to re-consider this proposal. I therefore **strongly oppose the proposal to raise Warragamba Dam wall due to the project's unacceptable potential impacts on the environment** including to the Blue Mountains World Heritage Area, threatened species and the community who need proper flooding protection measures implemented.

This is simply an economic based wrong proposal with an incorrect EIS. Multiple warnings have been provided with enough evidence to scrap this idea in its entirety. There is growing opposition from Aboriginal groups, the community, the insurance industry, and environmentalists.

The true cost of this project is growing by the day. This taxpayer-funded plan is just more support for Sydney's property developers to extend residential housing on these low-lying areas. The dam cannot 100% prevent flooding even with an extended wall, due to the natural flow of water to streams that connect to the Nepean and the Hawkesbury Rivers. The flood experts and insurance companies have warned that these homes should never have been built on these low-lying floodplains of western Sydney in the first place, and to build more homes will expose many more people to this natural disaster. The cost of damaged homes and more displaced people will be an enormous financial burden on the government.

This proposal will also cause **irreversible damage** to this complicated ecosystem in the Blue Mountains and devastate threatened native species. Species that are endangered or critically endangered are in that position because their habitats have been taken away from other areas that have already been developed. For some like the Regent Honeyeater, Platypus, Brush-tailed Rock Wallaby, spotted tail Quoll, Koalas and Wedge-tailed Eagle have a Federal Recovery Plans due to lost habitats, and this is their last untouched natural habitat because it has been protected for years. The variety of unique native fauna and flora, this World Heritage site, and the Indigenous heritage is deserving of our continued protection. This area must be protected forever.

Yours sincerely

Martin Derby