

Warragamba Dam EIS

- Strongly opposed to the proposal.

I am opposed to the proposal and it should not proceed because:

- It pushes biodiversity at risk closer to extinction because of the potential cumulative impacts of the proposal, in compounding the stress caused by the 2019/2020 mega-fires, particularly for already threatened species, including the Regent Honeyeater.
- It is not aligned with the World, National and Commonwealth heritage principles to “protect, conserve, present and transmit, to all generations...’.
- It is not able to satisfy WHL requirement to successfully ‘rehabilitate’ affected World Heritage values of the property. The biodiversity values of flooded areas cannot be restored, particularly Regent Honeyeater core habitat. Additionally, the loss of Aboriginal cultural heritage cannot be ‘rehabilitated’ as once lost it is destroyed.
- It is unable to satisfy Ecologically Sustainable Development (ESD) EPBC principles
- It cannot satisfy the principle of intergenerational equity because it will cause irreparable damage to intangible cultural heritage links.
- It has significant and irreversible potential impact to critically endangered Regent Honeyeater
- Burragorang is a critical feeding ground for the Regent Honeyeater. Any impact to this plus the impact of the recent fires would drive Regent Honeyeater towards extinction. This is unacceptable and not aligned with intergenerational equity, and not aligned with its World Heritage Listing status and the corresponding commitment made by Australia to ‘preserve it for future generations’.
- It has significant and irreversible potential impact to Camden White Gum. Raising Warragamba is a listed threat for this Vulnerable species. Additionally it would impact a *priority* management site (Kedumba) for this species within its action plan to stop it from going extinct in the next century. Impact to this site is unacceptable.
- Does not justify EPBC need for Intergenerational equity. Particularly for continuity of Aboriginal cultural heritage links.
- It does not support the EPBC ESD principle for ‘Conservation of biological diversity and ecological integrity’. Particularly for the Regent Honeyeater and Camden White Gum.
- It is not aligned with the ‘Zero Extinctions target’ set for National Parks.
- It is not aligned with the WHL goal for protection of this area as the ‘most important and significant area for in-situ conservation, including threatened species of outstanding universal value’. Not justified because it is not possible to recreate the lost biodiversity or cultural heritage value of these impacted areas because they are so critically significant to so many species.
- It is unable to satisfy the requirement that “Offsets must deliver a conservation gain” - This is not achievable because it is not possible to recreate the lost biodiversity (or cultural heritage value) of these impacted areas because they are so critically significant to so many species.
- It is unable to satisfy the requirement that “Offsets must deliver a conservation outcome that improves or maintains the viability of the protected matter”
- There is scientific uncertainty about the cumulative impact of the environmental harm caused by this proposed activity added to the recent impacts of the 2019/2020 megafires in

this area. Therefore adopting the ESC Precautionary Principle, the proposal should not proceed.

- The proposal has high threat of serious and irreversible environmental damage to biodiversity and cultural heritage
- Options evaluation process is flawed.
- The options process is skewed to the interest of development of the Sydney basin. It is not wholly independent. A number of working assumptions on Sydney basin development should be excluded to consider its need in isolation. The argument that it is warranted on Climate Change needs is not supported, and does not adequately consider the opposing argument that the proposal would contribute to increased climate change pressure on biodiversity (i.e. the combination of impact to the Camden White Gum survival from intermittent flooding from the proposal, in addition to its existing risk from Climate change).
- A wholly independent planning panel should be developed to review the need, options and justification.
- The options process does not genuinely consider all potential alternatives.
- As pointed out by Cr Gould of Wollondilly Council, “even if there were not a drop of water in the dam, there would still be massive flood risk in the Hawkesbury-Nepean Valley. It is possible to have a very significant flood without Warragamba Dam Waters. There will always be a flood risk and to try to pretend otherwise is disingenuous”. This statement is supported.
- The need and justification for the proposal are skewed to facilitate residential development in a high risk area where development should not proceed, and is misleading.
- Recent IUCN listing updates to species such as Bogong Moth and Grey-Headed Flying Fox should be considered
- Strong concern about irreversible impact to Glossy Black Cockatoo
- The EPBC status of a number of species has recently been reviewed following the 2019/20 megafires. Conservatively the biodiversity assessment should complete an EPBC assessment for all these nominations based on their recommended listing status. This includes Threatened Species Committee recommendation for Glossy Black Cockatoo for Vulnerable listing under the EPBC Act.
- Any project decision would precede the development of a recovery plan for species nominated and in the process of becoming EPBC listed and would be making decisions prior to fully understanding the potential impacts of the action (and before fully understanding the impacts of the bushfire event). This is not aligned with the precautionary ESD principles.
- Impact to Glossy Black Cockatoo is irreversible and unable to be offset. Species information is also highly data deficient therefore potential for any impact to be significant. *“Most of the Glossy Black-Cockatoo’s population now exists in state forests and NSW National Park Estate. The species is data deficient for the purpose of assessing population recovery (if any) in NSW, and it is also conservation dependent with respect to security of nest sites and feeding patches; notably protocols that protect nest sites and foraging habitat in state forests. Its remaining habitat, especially isolated inland patches, is also vulnerable to fire and may become increasingly so with climate change (Cameron 2008).”* NSW SCIENTIFIC COMMITTEE, report for Glossy Black-Cockatoo *Calyptorhynchus lathami*, Review of Current Information in NSW, September 2008
- Concern for potential irreversible impact on platypus both upstream and downstream. This includes flooding of burrow sites, placing further survival stress on a species already under substantial threats.

- The premise that climate change provides basis for the proposal need is unreasonable. It is founded on assumption that Sydney basin development continues into floodplain risk area. Remove this assumption and the proposal need/justification is weakened.
- The proposal unfairly weighs all disadvantages to Camden and Wollondilly Councils natural heritage.
- The EIS is inadequate because it shows clear bias. It is not neutral and does not show rigorously scientific method.
- The boundaries of the flood assessment model are not considered to be conservative enough to assess impacts to the fullest extent
- ALL of the Regent Honeyeater habitat within the boundary of the assessment area needs to be declared an Asset of Intergenerational Significance. Same applies to Camden White Gum.
- Other - Additionally the 'Asset of Intergenerational Significance' powers by the Minister need to be given proper legislative planning provisions for them to provide meaningful protections. Currently they have no legislative framework and are purely a tokenistic public relations exercise.
- Will the business case be published? As well as cost estimates at each gateway review in the proposal's development?
- GIPA request for the unedited draft SMEC reports to be released, and all progressive revisions of the Biodiversity Offsetting calculations.
- The financial business case and options evaluation should have done a more detailed and genuine review of the alternative option of using allocated funds money to buy back high risk flood land that should not have been developed and creation of floodplain open space corridors.
- The financial business case and options evaluation should have done a more detailed and genuine review of the alternative option of increasing use of recycled water sources
- The financial business case and options evaluation should have done a more detailed and genuine review of the alternative option of using allocated funds money to improve existing flood evacuation routes in Penrith and Hawkesbury which are already insufficient
- The proposal is completely contradictory and fundamentally misaligned with the principles of Sydney Water Reconciliation Action Plan. Which includes statement of showing gratitude "by embedding and embracing reconciliation in EVERYTHING that we do". The key commitment of "respecting and celebrating the cultural heritage of First Nations people" is not demonstrated by this proposal.
- Consultation with Aboriginal cultural heritage stakeholders was not adequate. The Sydney Water Reconciliation Action Plan talks about a commitment to "engage in deep listening with Aboriginal" stakeholders which clearly would be shown to be tokenistic and meaningless if this proposal were to proceed.
- The survey coverage for the field work for Aboriginal cultural heritage was not adequate, and not representative. This is shameful and is not aligned with Water NSW environmental policy commitment to "*Conserve or enhance the natural, Aboriginal and European heritage values of our assets*". An exceptional survey effort would have been warranted for a WORLD heritage area.
- The proposal would have serious and irreversible impact on World Heritage. I agree with UNESCO statement condemning the proposal on the basis it is fundamentally 'incompatible with its world heritage area' status and seriously and irreversibly degrade its 'outstanding universal values' (July 4 2019 UN World Heritage Committee meeting in Azerbaijan)

- The proposal is completely contradictory to many of the principles outlined in the Water NSW Environmental Policy including primary commitment to preserving the environment by minimising the risk of environmental impacts from its activities, preventing pollution and conducting its operations consistent with the principles of Ecologically Sustainable Development". It .to *"Conserve or enhance the natural, Aboriginal and European heritage values of our assets"*.
- The proposal goes against Sydney Water principles and policies, state and federal government principles and policies, Reconciliation statements, as well as a commitment made to the world and future generations to conserve and protect this area now and into future generations. The cultural heritage and biodiversity cost are too great and irreversible and it should not proceed.

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