

## The Raising of the Warragamba Dam wall – Submission

I am a medical practitioner living in Freemans Reach and I am extremely concerned about the proposal to raise the Warragamba Dam Wall because of its unavoidable impact on upstream species and Aboriginal cultural heritage in an area which is listed as World Heritage status by UNESCO.

I have read the proposals in detail.

The biodiversity section of the EIS acknowledges that areas of Critically Endangered and Endangered Communities of fauna and flora will suffer 'serious and irreversible impacts. The statement is made that 'the project would be impacting on state significant biodiversity linkages. Furthermore, the risk to 75 flora communities and 16 fauna communities has been calculated as 'extreme' without mitigation and 'high' with mitigation.

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.

There are only a few contemporary breeding sites for Regent Honeyeater and during the assessment of the project a total of twenty-one (21) Regent Honeyeaters, including active nests, were recorded within the impact area. Any breeding habitat is considered habitat critical for survival of the species according to the National Recovery Plan for the Regent Honeyeater. The plan 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"<sup>1</sup>.

The Regent Honeyeater has breeding sites within the Capertee and Wolgan Valleys, the Mudgee-Wollar district, the lower Hunter Valley and the Burragorang Valley. The birds frequently move between these key areas and breed in different locations in different seasons. In any given year, flowering conditions may mean that only one of these locations is suitable for breeding. The Regent Honeyeater population is therefore dependent upon this small network of key nesting sites to persist. Crucially, the specific habitat requirements of the Regent Honeyeater mean that birds cannot simply 'nest elsewhere' if key breeding habitat is lost<sup>2</sup>.

In the case of this species there is no known way of mitigating the loss of a species to the threat of extinction, using offsets. This is not addressed in the environmental impact statement. The surveyed area reveals clear evidence of habitat for the Regent Honeyeater which will be destroyed by the upstream impact of the development.

The destruction and degradation of breeding habitat for Regent Honeyeaters is 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. Raising the dam wall will undermine decades of conservation effort and will eliminate conservation returns on these significant financial investments.

It is unacceptable and inconsistent with the National Recovery Plan for any avoidable loss or degradation of breeding habitat to occur.

I note that the extent of the survey is insufficient to fully document the impact on this and so many other species. I also note that there is no mention of the effect on the critically endangered Swift Parrot. This species is listed as being known to be present in the Burragorang area by the NSW Government of Office and Heritage, updated in June 2021<sup>3</sup>.

There is scant notice given to the effect on Koalas which are listed as vulnerable and are listed as known to be present in the Burragorang area by the NSW Government Office of Environment and

heritage updated in May 2021<sup>4</sup>. There are numerous other species of fauna listed as endangered or vulnerable occurring in this area which will be affected by loss of food and habitat resources.

As stated in the EIS there is only 5% remaining of pre-1750 levels of the Yellow Box Red Box Blakely's Red Gum Woodland. This also critically endangered with only 0.05% of this endangered ecological community remaining in near original condition in NSW. 430 acres will suffer the impacts of inundation. There is no clarity given to the survival of this endangered community due to the impact on soil properties, surface water changes and the effect on nutrient cycling.

It is noted that the quality of the areas surveyed is described as moderate to good with little weed invasion and with numerous plant species present that are listed as endangered or vulnerable.

Because of this we have an obligation to care for our World Heritage areas. They are pristine environments, listed as such for this very reason. They are windows back in time to allow us and future generations to still enjoy biodiversity, which is preserved in these areas, as well as the ancient human records maintained in Aboriginal sites, still present in the area.

At a time when our environment is under increasing pressure, we should be finding alternatives which do not contribute to the gradual whittling away and consequent destruction of our heritage.

Numerous alternatives have been outlined to raising the dam wall. It is an investment in our environment, and consequently ourselves, and requires only the will and the moral imperative to do so.

I strongly oppose the raising of the dam wall. I strongly oppose the concept of offsets as a strategy for the Regent Honeyeater, a critically endangered species. There is no evidence that breeding habitat for Regent Honeyeaters can be successfully offset. This approach is vague and inappropriate. Hope is not a strategy when dealing with the potential extinction of a species.

#### References

1. <https://www.awe.gov.au/sites/default/files/documents/national-recovery-plan-regent-honeyeater.pdf>
2. <https://www.parliament.nsw.gov.au/lcdocs/submissions/65539/0368%20Dr%20Ross%20Cra%20tes%20et%20al.pdf>
3. <https://www.environment.nsw.gov.au/threatenedspeciesapp/profileData.aspx?id=10455&maName=Sydney+Basin>
4. <https://www.environment.nsw.gov.au/threatenedspeciesapp/profileData.aspx?id=10616&maName=Sydney+Basin>