

Warragamba Dam Assessment Team
Planning and Assessment Department of Planning, Industry and Environment
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24th November, 2021

Dear Sir/Madam

RE: Submission – Warragamba Dam Raising Project – SSI-8441

Friends of Ku-ring-gai Environment (FOKE) welcomes the opportunity to make a submission to the Warragamba Dam Raising Project.

It is FOKE's view that the Warragamba Dam Raising Project is ill advised and needs to be immediately abandoned because it will:

- place the Greater Blue Mountains World Heritage Area (GBMWhA) 'in danger'
- destroy Gundungarra heritage
- fail as a flood mitigation project

FOKE was founded in 1994 to promote, protect and enhance the Ku-ring-gai local government area's environment and heritage. It proudly follows the tradition laid down by many past Ku-ring-gai conservation pioneers who advocated for Greater Sydney's environment, including Western Sydney and the Greater Blue Mountains.

These Ku-ring-gai conservation pioneers include:

- Eccleston Du Faur (1832-1915) who contributed to protecting the Blue Mountains' Grose Valley before working to establish Ku-ring-gai Chase National Park in 1894.
- Annie Forsyth Wyatt (1885-1961) who founded the National Trust (NSW) in 1945 that today has properties in Western Sydney (Old Government House and Experiment Farm Cottage) and in the Blue Mountains (Norman Lindsay Gallery & Museum, Woodford Academy and Everglades House and Garden).
- *Charles Edwin Woodrow Bean* (1879-1968) who led the Parks and Playground Movement's call for protected green, open spaces, bushland reserves and national parks across Greater Sydney including the Nepean-Hawkesbury and Blue Mountains area.
- Paddy Pallin AM (1900-1991) bushwalking and camping equipment retailer and founding member of the National Parks Association of NSW that was instrumental in creating the NPWS Act (1967) that led to the gazettal of the Blue Mountains national parks including the Kanangra-Boyd National Park.
- Alex Colley (1909-2014) secretary of the Colong Foundation for Wilderness and FOKE member who worked to ensure the Greater Blue Mountains was World Heritage Area in 2000.

The Warragamba Dam Raising Project places the Greater Blue Mountains World Heritage Area (GBMWA) ‘in danger’

FOKE strongly believes that the Warragamba Dam Raising Project needs to be immediately abandoned. If it proceeds it risks placing the GBMWA on the World Heritage ‘in danger’ list.

Australia has already diminished its international reputation because of inaction on climate change as demonstrated at the recent Glasgow COP 26 conference. Nor has it supported a United Nations Educational, Scientific and Cultural Organisation (UNESCO) recommendation to keep global warming to 1.5C in order to protect world heritage sites - including the GBMWA - from climate change. In 2014 and 2021 Australia lobbied UNESCO to prevent the Great Barrier Reef being placed on the world heritage ‘in danger’ list. Australia is now under pressure to deliver a progress report on the health of the Great Barrier Reef to UNESCO by February 2022. In light of this international spotlight on Australia it would be unwise to allow the Warragamba Dam Raising Project to proceed.

The Warragamba Dam Raising Project will flood, bury, and scar 65 kilometres of wilderness streams and rivers with sediment, weeds and water in 6,000 hectares in the GBMWA.

Currently the pristine and wild rivers and creeks that flow into Warragamba Dam contain rich and irreplaceable biodiversity. Their sheltered bays and shallow inlets are ideal habitat for native animals such as turtles, water rats, native fish and crayfish. Long-finned eels live in their creek pools. They migrate all the way to Vanuatu to breed and then return as young hatchlings. Sydney’s last remaining platypuses can be found in the Wollondilly and Cox’s Rivers.

Viable pockets of White Box-Gum Woodland still remain despite over 90% of these Sydney’s woodlands cleared. Dingoes still roam these valleys searching for grazing brush-tailed rock-wallabies. The lower Nattai Valley is home to one of Sydney’s last koala populations. The valleys contain the last viable remnant of two threatened eucalypt species - *Eucalyptus benthamii* (Vulnerable NSW & Nationally) and *Eucalyptus mollucana*. Sydney’s last wild population of emus can be found in these valleys. NSW’s most beautiful and rarest of birds, the Regent Honeyeater also finds sanctuary in these valleys.

The Warragamba Dam Raising Project’s offset strategy is no solution to their loss. Offsets can never provide the compensation for the extinction of species. World Heritage is irreplaceable

The Warragamba Dam Raising Project must be abandoned in light of the twin threats of a warming climate and biodiversity collapse. The Summer Blackfires of 2019-2020 must be recognised as a reason why the Warragamba Dam Raising Project must not proceed. Eighty-one percent of the Greater Blue Mountains World Heritage Area was burnt, followed by post-fire flooding that contaminated Warragamba Dam’s drinking water. As many as 800 million wildlife were killed by the fire in NSW with estimates that three billion were killed nationally.

The Warragamba Dam Raising Project will destroy Gundungarra heritage

The Juukan Caves tragedy that resulted in the destruction of 46,000 year old caves in the Pilbara region of Western Australia must not happen again. Yet the Warragamba Dam Raising Project threatens to destroy Gundungarra rock art sites, burial site, ochre sites and sacred waterholes. Article 11 of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) says “Indigenous peoples have the right to . . . maintain, protect and develop the past, present and future manifestations of their cultures, such as archaeological and historical sites, artefacts”. The Gundungarra have already lost so much of their heritage sites when the Burratorang Valley was first flooded to make way for Warragamba Dam that opened in 1960.

The Warragamba Dam Raising Project fails as a flood mitigation project

The Warragamba Dam Raising Project cannot stop flooding of the Hawkesbury-Nepean floodplains. About half of the floodwaters to the plain come from rivers outside the Warragamba catchment from the Cordeaux, Cataract, Avon, Nepean, Grose, Macdonald and Colo Rivers, as well as from South Creek.

The Hawkesbury-Nepean floodplain is no place to expand development. Yet the Warragamba Dam Raising Project's principal purpose is to allow more development in a floodplain. The Project plans to put an additional 134,000 people in danger. It would be wiser to earmark the Project's budget for alternative flood safety measures such as high level escape roads and other flood management techniques.

Warragamba's Dam is Sydney's primary drinking water. Sydney has some of the safest drinking water in the world because of the pristine catchments flowing into Warragamba Dam. This is because they are one of Australia's most protected areas with declared World Heritage, National Parks, National Heritage, Wilderness, Special Catchment Areas and Wild Rivers legislation. The Warragamba Dam Raising Project undoes these environmental protections and therefore threatens Sydney's water quality.

Conclusion

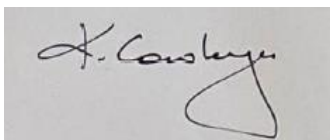
Sydney's GBMWA valleys show how Nature works. Their free-flowing pristine rivers and eucalyptus lined valleys are wondrous global 'miracles'. They are places of cultural significance for the Gundungurra people. They are revered, respected and valued by the world.

The NSW Government does not have the right to flood and destroy the GBMWA. It has a responsibility to protect it.

For these reasons FOKE calls on the NSW Government to immediately abandon the Warragamba Dam Raising Project.

FOKE also calls on the Federal Government to intervene if the NSW Government decides to proceed with the Warragamba Dam Raising Project as required by the *Environment Protection and Biodiversity Conservation Act 1999*. If the Federal Government does not intervene in this project then every world heritage site in Australia is under risk.

Yours sincerely



Kathy Cowley
President

FOKE accepts the Department's submissions disclaimer and declaration and has not made a reportable political donation in the past two years.

cc The Hon Jonathan O'Dea MP Member for Davidson
cc The Hon Alister Henskens SC MP Member for Ku-ring-gai
cc The Hon Paul Fletcher MP Member for Bradfield