

Submission  
No 32

**INQUIRY INTO RATIONALE FOR, AND IMPACTS OF,  
NEW DAMS AND OTHER WATER INFRASTRUCTURE IN  
NSW**

**Organisation:** BirdLife Southern NSW

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## **Rationale For, and Impacts of, New Dams and Other Water Infrastructure in NSW inquiry**

This submission is made by Southern NSW Branch of BirdLife Australia, the peak conservation organisation representing Australian birdLife and birders. We welcome the opportunity to comment on the inquiry into this project. For BirdLife Australia, the likely impacts on threatened bird species and their habitat are our primary concern.

### **1 Fast-tracking of planning process**

Construction is scheduled to commence in October. Planning approvals are being fast-tracked under the project's classification as Critical State Significant Infrastructure.

We recognise the need to create security for the water supply of the Cowra area. While preliminary consultation highlighted community views that the proposed action will deliver better management of flood and drought events, we are concerned that no alternative water security options or more beneficial regional investment projects have been considered. In addition, no business case or cost benefit analysis has been conducted for the proposal.

A further concern is the likelihood of the environmental impact statement (EIS) being rushed because of the construction schedule. Sufficient information, with extensive on-ground work, needs to be available for the EIS to be an adequate assessment of the project's impacts. The Preliminary Biodiversity Assessment is largely based on desktop analysis with minimal field work and covers a limited area.

### **2 Impacts on threatened ecological community**

The vegetation of the dam site and nearby is classified as white box-yellow box Blakely's red gum grassy woodland (often referred to as Box-Gum Woodland TEC), which is listed as an Endangered Ecological Community under state legislation and as Critically Endangered under the EPBC Act 1999. Disturbed remnants are still considered to form part of the community.

The area upstream to be directly affected is described as in a degraded condition. Nevertheless, all Box-Gum Woodland is valuable for its potential to be restored to an

improved condition. The cumulative impact of destruction of comparatively small areas ultimately results in losses on a significant scale. Any habitat loss is an undesirable outcome, especially loss of a TEC.

According to the EPBC referral, the proposed action is expected to result in the loss of the full 1,391 ha of Box Gum Woodland TEC within the project footprint, through clearing and inundation. Further loss is possible due to changes in water hydrology further upstream and downstream of the site.

The Preliminary Biodiversity Assessment failed to account for impacts downstream, which are likely to be severe. Impacts include loss of natural flows to 9 nationally important wetlands listed under the Directory of Important Wetlands in Australia. The Booligal Wetlands and Great Cumbung Swamp have met all five criteria for identification as environmentally important assets in the Murray-Darling Basin, requiring management of environmental water. These wetlands are listed among 18 key environmental assets in the Murray-Darling Basin. The submission by Professor Richard Kingsford of UNSW on the referral of the project to the Australian Government outlined the importance of the Lachlan River and its dependent ecosystems. There are 471,000 ha of wetlands dependent on flows from the Lachlan River.

### **3 Impacts on threatened bird species**

Two of Australia's rarest woodland bird species, the Regent Honeyeater and Swift Parrot, will potentially be adversely affected. Both are listed as Critically Endangered under the EPBC Act 1999 and are nomadic, moving widely through the landscape in search of food. They are likely to find the eucalypt species in the Wyangala area an attractive food resource when conditions have promoted a good flowering period.

The EIS needs to address these two species. We also draw attention to the Superb Parrot and Painted Honeyeater, both classified as Vulnerable under the EPBC Act. The proposed project footprint has habitat potential for all these four species.

The project area is approximately 10 kms from the South-West Slopes of NSW Key Biodiversity Area (KBA). This large KBA is defined by the distribution of the south-west slopes population of Superb Parrots and key areas for wintering Swift Parrots. KBAs are areas known or thought regularly to hold significant numbers of a globally threatened species and are identified by BirdLife Australia in accordance with a global standard. <https://www.birdlife.org.au/projects/KBA/iba-kba-faqs> Though without legal status they indicate the conservation value of an area. The boundary of the South-West Slopes KBA is somewhat arbitrary and an update may well consider incorporating the Wyangala locality.

The enlargement of Wyangala Dam will impact on dependent downstream ecosystems and their dependent species.

The submission by Professor Richard Kingsford of UNSW on the referral of the project to the Australian Government identifies waterbirds which use the 471,000 ha of wetlands dependent on flows from the Lachlan River. These include 3 species Australasian Bittern, Australian Painted Snipe and Curlew Sandpiper, listed as Endangered or Critically Endangered under the EPBC Act 1999. The Booligal Wetlands and Great Cumbung Swamp are recognised in international agreements designed to conserve migratory bird species. Waterbird breeding is triggered by inundation and large water flows. Breeding has suffered as a consequence of river regulation which has increased the maximum period between large flows.

#### **4 Climate Change**

It should be mandatory that project proposals take into consideration the future influence of climate change. The allocation of water in the Lachlan River under water sharing plan rules does not take climate change into account. The drought of record before 2004 is the basis used, not the Millennium Drought or recent intense drought. Water security is unlikely to be improved by the dam wall raising. Natural areas are certain to become further stressed.

#### **Conclusion**

The proximity of the South-West Slopes of NSW KBA is an indicator of the habitat significance of the area close to and upstream of the dam site. There are likely to be significant impacts on declining woodland birds and their habitats should this proposal proceed.

Additional floodwater captured by raising the dam wall of Wyangala Dam will exacerbate ecosystem decline in the creek and wetland systems of the lower Lachlan River.

This proposal is likely to have a significant impact on nationally threatened waterbird species. They rely on the habitat created by the Lachlan River and its floodplains, resulting from overland flows and sufficient flows to reach the lowland areas of the river and its distributary creek systems.

We believe that the proposal is flawed and should be halted until a business case or cost benefits analysis and full EIS are completed.

Thank you for the opportunity to submit to the inquiry.

Conservation subcommittee  
BirdLife Southern NSW