

Submission
No 120

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

Organisation: National Parks Association of NSW

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Chair
Portfolio Committee No 7
Parliament House
Macquarie St Sydney NSW 2000

22 September 2020

Submission to Portfolio Committee No 7 Inquiry into new dams and other water infrastructure in NSW

Dear Cate,

The National Parks Association of NSW (NPA) was formed in 1957 and sixty three years later we have 15 branches, 4,000 members and over 20,000 supporters. NPA's mission is to protect nature through community action. Our strengths include state wide reach, deep local knowledge, evidence based approach to conservation advocacy and commitment to the creation and professional management of protected areas in NSW.

NPA believes that healthy and resilient river systems are vital for our collective wellbeing. We have consistently advocated for sound environmental and community outcomes through participation in government processes and collaborative projects with other environmental groups and academic bodies.

NPA welcomes the opportunity to comment upon the NSW's Government's current proposals for further interventions into the state's river systems through the construction of dams and other engineering interventions.

The Water Management Act

The key to delivering better water security into the future is not new infrastructure, but instead a renewed focus on the Objects of the *Water Management Act*. These require that water is managed consistent with the principles of Ecologically Sustainable Development and in ways that (3b) '*protect, enhance and restore water sources, their associated ecosystems, ecological processes and biological diversity and their water quality*'.

The Portfolio Committee must consider whether the proposed new dams and infrastructure are consistent with the statutory Objects. In evaluating this issue, it is important to consider both the upstream impacts of dams on inundated catchments as well as the downstream impacts associated with the loss or regulation of natural flows. NPA recommends the following principles be applied to the selection of potential dam sites:

- Dams should not be constructed in catchments that include significant areas or remnants of native vegetation, threatened species or Aboriginal cultural heritage;
- Dams should not be constructed in locations where they would divert water from water dependant ecosystems that support significant areas or remnants of native vegetation, threatened species or Aboriginal cultural heritage, including but not

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- limited to sites that form part of the Protected Area Network or listed under the Ramsar convention;
- Any proposal to construct dams must be preceded by a strategic analysis of water management at the bioregional scale, including the identification of existing dams and diversions that should be removed to restore environmental flows and a more equitable allocation of water.

In proposing these principles NPA notes:

- Rivers, especially those in western NSW, are critical to the maintenance of ecosystem health;
- The massive extent, scale and impacts of existing engineering and other interventions into the flow of waters across NSW;
- Despite those changes, our rivers and associated water dependant ecosystems remain some of the most important habitats for biodiversity conservation in western NSW;
- The significant upstream environmental impacts of dams through the inundation of remnant native vegetation, including the loss of connectivity, species, habitats and large scale erosion;
- The significant adverse environmental impacts of dams in relation to the disruption of downstream water flows, including reduced water volumes, periodicity and temperature and the denial of unregulated waterflows.

Environmental water

NPA appreciates that dams capture water for use by regional communities. However, in the light of river health decline and increasing climate change, it is essential to ensure any new works installed are limited to locations that minimise the upstream and downstream environmental impacts and are managed to minimise adverse social and ecological impacts and which in the long term impinge on economic viability.

NPA recommends that the Portfolio Committee critically appraise the NSW Government's claim that additional dams and mass storage offers the best way to deliver improved water security while meeting essential human needs and avoiding adverse impacts on the health of rivers and water dependant eco systems.

It is our view that such interventions are likely to exacerbate, rather than reduce, the environmental and community harm arising from the water management regimes that currently apply in NSW. The mass fish deaths and water shortages over recent years are not the result of too few dams or insufficient capacity to divert water flows across the landscape. Instead, such disasters are the result of the poorly planned capture and diversion of water, combined with the accelerating effects of climate change induced drought.

Existing dams and diversions are already capturing an excessive portion of the waters flowing through the Murray Darling Basin. The construction of additional dams will not create additional water, but instead increase an already unsustainable level of consumption. This view is consistent with the Academy of Science assessment of the root causes of the dramatic fish deaths in 2018 2019, which concluded that the under the present management

regime there is simply not enough water in the Darling system to avoid catastrophic environmental crashes during dry periods.

The Western Weirs Program

This program offers the opportunity to improve environmental outcomes through the removal of defunct barriers and thereby enhance connectivity and opportunities for fish passage. While each weir needs to be evaluated on a case by case basis, it is imperative that the cumulative impacts of weirs not result in increased extraction, especially during low flow periods.

NPA supports a systematic review of existing structures, subject to:

- Effective consultation with affected communities;
- Minimising barriers to ecological connectivity in the river and wetland system;
- A review of the cumulative environmental impacts of operating and/or modifying the entire network of “Western Weirs” to ensure that they have minimal adverse on environmental flows. This includes the replacement Wilcannia Weir;
- The decommissioning of all defunct and inappropriate weirs;
- Provision for effective fish passage on all weirs;
- Clarity on the ownership and management and financial responsibility for each weir;
- A continuing program of review of the Western Weirs to optimize their natural river run and to minimize saline intrusion from aquifers.

Macquarie Re-Regulating Storage

The deteriorating condition and changing ecological character of the Macquarie Marshes Nature Reserve and Ramsar site places Australia in breach of international obligations under the Ramsar convention. WaterNSW claimed that the Macquarie Re regulating Storage Project will not have adverse impacts on the Ramsar site in their referral of the project under the *Environment Protection and Biodiversity Conservation Act*. NPA commends the submission by Professor Richard Kingsford on the referral (2020/8652) for a more credible assessment of the severe threat to the future of this internationally significant wetland. NPA recommends that this proposal be rejected or, if feasible, modified to guarantee that there is no adverse impact on the Macquarie Marshes.

Dungowan Dam

The claimed benefits of this dam are highly questionable given the recent investment in the Chaffey Dam upgrade to improve Tamworth’s water security. The proposal is not consistent with the objects of the *Water Management Act* as the Peel River is already significantly over allocated and further storage will only increase adverse downstream impacts.

Wyangala Dam expansion

The proposed raising of the dam wall will have significant environmental impacts through the reduction of flows into Mt Davis Nature Reserve and will potentially have far reaching implications for other reserves further downstream along the Lachlan River, especially at low flow times. It is noted that cold water pollution is already an existing problem with this dam due to the lack of multiple level intakes. For these reasons NPA opposes the expansion of the Wyangla Dam.

Conclusion

NPA commends the conduct of this Inquiry as an opportunity to dismiss the myth that dams and diversions are the most appropriate way of providing water security, community wellbeing and environmental health. Rather than facilitating a truncated environmental impact assessment process, NSW must make a fundamental shift from excessive interventions and over extraction of water to an approach that recognises that healthy river systems retain water in natural landscapes and support biodiversity, our quality of life and natural sequestration of carbon.

NPA can be contacted at

Yours sincerely,

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National Parks Association of NSW
protecting nature through community action