

Submission  
No 60

## INQUIRY INTO IMPACT OF THE WESTERN HARBOUR TUNNEL AND BEACHES LINK

**Organisation:** Underwater Research Group of NSW

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3<sup>rd</sup> June 2021

**Re: Parliamentary Inquiry into the impact of the  
Western Harbour Tunnel (WHT) and Beaches Link**

The Underwater Research Group of New South Wales, or URG Dive Club, and is a non-commercial organisation of people who share an interest in, and a commitment to the underwater world. Its aim is to further all aspects of underwater exploration, research, safety, photography and conservation. The URG Dive Club was formed in September 1953 and is still going strongly today, with over 50 members in the Greater Sydney region.

URG members have been diving in Sydney Harbour and surrounds for over 50 years, and have a particular interest in the health of the Harbour and its marine life. We have reviewed the plans and potential impacts of the proposed WHT and have a number of serious concerns:

1. The WHT Environmental Impact Statement (EIS, January 2020) and subsequent Submissions Report (September 2020) did not sufficiently consider the impacts of tunnel construction to the marine environment and natural resource assets of Sydney Harbour. Resuspension and redistribution of contaminated sediments, and the spread of dissolved toxic chemicals in the water were not adequately assessed and have the potential to harm and kill Sydney's unique, often rare and threatened marine life.
2. The Contaminants Report (Golder-Douglas 2017) was commercial in confidence until after the public submission period was closed, so the project was not subject to appropriate levels of transparency.
3. As detailed in the Sydney Morning Herald article (Feb, 2021) (<https://www.smh.com.au/national/nsw/harbour-sludge-to-be-dug-up-for-new-tunnel-contains-alarming-levels-of-toxins-20210212-p5721z.html>) very high levels of banned toxic chemicals (tributyltin - TBT, dioxins, arsenic, mercury) are in the sediments of the Harbour and especially Berrys Bay. These have the potential to re-enter the environment as a result of the proposed construction activities.
4. The impact of toxicants on marine life includes death, accumulation of contaminants in benthic animals and movement of toxins up the food chain to birds, fish and humans.
5. Proposed mitigation measures, such as shallow silt curtains, will not contain toxic chemicals in the sediment plume as the construction and staging sites experience high waves, currents and wind activity. The potential for accidents, such as dredge spoil spills, must also be considered.
6. The Environmental Risk Analysis and Revised Environmental Measures should be reassessed to include the risk of poisoning of the environment, marine life and humans.

7. Highly valued, threatened and protected marine life that resides in the Harbour or near the heads, within the locality of the WHT impacts, includes (source: diver photographs):

<b>Marine organism</b>	<b>Scientific name</b>	<b>Known location(s)</b>
Little fairy penguin	<i>Eudyptula minor</i>	North Head
Black cod	<i>Epinephelus daemeli</i>	North and South Head
Grey nurse shark	<i>Carcharias taurus</i>	Outside heads, feed on Harbour fish
Weedy seadragon	<i>Phyllopteryx taeniolatus</i>	Inside and outside North and South Head
Eastern blue devil	<i>Paraplesiops bleekeri</i>	North Head
Eastern blue groper	<i>Achoerodus viridis</i>	North and South Head and Middle Harbour
White's seahorse	<i>Hippocampus whitei</i>	Clifton Gardens, Watsons Bay
Tiger pipefish	<i>Filicampus tigris</i>	Clifton Gardens, Camp Cove
Pink soft coral	<i>Dendronephthya australis</i>	Fairlight, Camp Cove, North Head
Kelp forests	<i>Ecklonia radiata</i>	Harbour foreshores
Coral	<i>Coscinaraea mcneilli</i>	Middle and North Heads
Coral	<i>Plesiastraea versipora</i>	Fairlight, South Head, North Head
Sea fans	<i>Mopsella sp.</i>	North Head
Australian fur seal	<i>Arctocephalus pusillus</i>	Opera House steps, Clifton Gardens
Green sea turtle	<i>Chelonia mydas</i>	Fairlight, Quarantine Bay

We would like our concerns to be considered as part of the Parliamentary Inquiry.

Sincerely

Duncan Heuer  
 President  
 Underwater Research Group of NSW