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Friday 5 June, 2020

Comment on Referral 2020/8653: WaterNSW/Water Management and Use/Near Cowra/New South Wales/Wyangala Dam Wall Raising

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

We appreciate the opportunity to comment on the referral of the Wyangala Dam Wall Raising Project for consideration of impacts on Matters of National Environmental Significance (MNES).

The assessment information provided with the referral is very limited and fails to recognise the impacts of the proposed action on wetlands that support migratory bird populations.

These impacts are likely to be significant. Therefore the controlled action must also include assessment of impacts on MNES listed as migratory species.

CWEC does not support the justification for the proposed action and consider that there are numerous alternatives to secure water supply in the Lachlan Valley.

We do not support that the proposed action is assessed using an accredited process under section 87(4) of the EPBC Act, wherein the Commonwealth accredits the assessment process under Division 5.2 of Part 5 of the EP&A Act.

It is critical that the Commonwealth not accept the NSW assessment process as an adequate basis for decision-making required under the EPBC Act in regard to the impacts on threatened species. The NSW environmental assessment requirements

are unlikely to properly cover all the matters that should be assessed. The Commonwealth should specify its own requirements including in relation to assessing operation of the dam and its impacts on the downstream environment.

We note that the controlled action occurs within the NSW South Western Slopes Bioregion, one of the most heavily cleared bioregions in Australia.

The proposed loss of a further 1,391 ha the critically endangered Box Gum Woodland ecological community from this bioregion is unacceptable. This loss will not be able to be suitably offset.

We are also concerned that the proposed increased inundation area caused by the Wyangala Dam Wall Raising Project will impact on the Mount Davies Nature Reserve and significant Aboriginal cultural heritage sites, including burial sites.

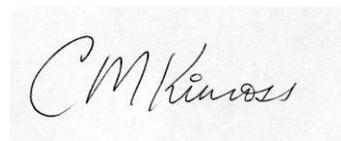
The consultation on this proposed action has been very poor. The proponent has not provided Central West Environment Council with any information on this project.

CWEC does not consider WaterNSW to be a responsible environmental manager. The severe nature of cold water pollution caused by the Wyangala Dam has not been addressed and is not referred to in regard to impacts on threatened fish populations in the Lachlan River.

The impacts of climate change and lower inflows will exacerbate the impacts of this proposed action while causing a failure to improve more conservative water management.

CWEC strongly objects to the proposed action and considers that all environmental and social impacts should be assessed through rigorous assessment requirements under the EPBC Act.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cilla Kinross', is centered on a light-colored rectangular background.

Cilla Kinross
President.