

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: [REDACTED]
Attachments:

SUBMISSION - FNC Water Strategy
Platypus.mov

SUBMISSION - FNC Water Strategy

Dear Department of Planning, Industry and Environment,

clean healthy water and fresh air, is in my opinion, a fundamental right for all the inhabitants of our home, our Planet Earth.

I am a concerned citizen and environmentalist working predominantly with; the Waorani tribe in the Ecuadorian Amazon documenting their fight for territorial landrights, documenting the Tiputini Biodiversity Research Station and all its important scientific discoveries, and, for the healthy future of our Earth by acting in any way I can for clean water and fresh air.

I live in Dorrroughby, NSW and am very concerned about the proposed Dunoon Dam.

I acknowledge the work done so far by DPIE in developing the Far North Coast Water Strategy. It's a wide-ranging strategy and seeks to address healthy water security for the future.

However, in my opinion the Strategy must not rely too much on Rous's Future Water 2060 project, especially because that plan hinges on the contentious Dunoon Dam. This proposal is flawed and it is obvious that the Dunoon dam should no longer be an option in the strategy.

I state this for many valid and scientifically supported reasons;

Rous and Lismore Council failed to provide the Department of Primary Industries and Environment with an accurate appraisal of Dunoon Dam. The dam is highly controversial, and resisted. There is widespread concern about the destructiveness of Dunoon Dam and also the failure of RCC to plan for water resilience using modern technologies.

There is widespread opposition to Dunoon Dam, and Rous has not been open with DPIE and government 91% of 1290 written and online submissions to RCC opposed the dam option. Over 300 of the written submissions are identified as individual and not pro-forma submissions, demonstrating a high level of engagement. The exhibition ran for 2 months "with strong promotion" (VAXA, FWP2060 Outcomes from Public Exhibition - 2020, 2020).

Social rejection demonstrates the dam option fails the "triple bottom line" test [economic/environmental/social]. A broad suite of other effective options were preferred by respondents.

Dunoon Dam will leave us vulnerable in a warming climate. This proposal does not consider forecasted weather changes in our region.

Water Services Association of Australia describes new dams as high-risk investments because they depend on rain. They recommend a mix of complementary water strategies. (WSAA, All Options on the Table, 2020).

Professor Stuart Khan (UNSW) has said a resilient water system would have 30-50% of supply from sources that don't depend on rain, such as Purified Recycled Water and desalination, both of which can be powered by renewable energy. (ABC North Coast Radio, 22/10/20)

The NSW Productivity Greenpaper 2020 recommends water efficiencies, and the uptake of new sources such as purified recycled water. (NSW Treasury, Productivity Commission Green Paper: continuing the productivity conversation, 2020. Accessed at <http://productivity.nsw.gov.au/green-paper/water-energy>)

Rous Future Water 2060 fails to mention system resilience as important, and seriously examined only groundwater and Dunoon Dam. (Rous County Council, Future Water Project 2060, 2020.) Significantly therefore, Rous County Council have failed to show leadership in contemporary water management

All options need to be given serious attention including water efficiency, roof and stormwater harvesting (including tanks), and water sources that don't need rain such as purified recycled water and desalination.

RCC failed to provide leadership in increasing knowledge of innovative water management. There is a lack of familiarity with options showcased by WSAA in All Options on the Table (WSAA) and on the Cooperative Research Centre Water Sensitive Cities website. The narrow focus on Dunoon Dam has stunted water literacy in the region. This is a deficit that DPIE needs to rectify in the Regional Strategy.

It is in our future interest that new housing developments create building plans which build in innovative water systems from the ground up, the cost of which can be borne by developers.

Because of this failure of leadership and governance, Rous Future Water 2060 is a flawed plan that reflects an outdated, stunted approach to water system planning, and must not be used to underpin the Regional Strategy. RCC has ignored system-wide water efficiency which is cheap and recommended

Water efficiency is cheap and effective (All Options on the Table p3). It is also recommended by the 2020 NSW Productivity Commission Green Paper. (NSW Treasury, Productivity Commission Green Paper: continuing the productivity conversation, 2020. Accessed at <http://productivity.nsw.gov.au/green-paper/water-energy>)

Rous County Council omitted water efficiency from its 2020 Integrated Water Cycle Management Development options for increasing supply and undertook no specialist studies on it. (<https://rous.nsw.gov.au/page.asp?f=RES-HOV-71-65-36>)

Professor Stuart White identified significant potential increase in Rous supply through efficiency measures neglected by Rous.

(<https://waternorthernrivers.org/wp-content/uploads/2020/11/Prof-Stuart-White-Brief-Review-Rous-Water-augmentation-20200904-1.pdf>)

The lack of attention to water efficiency is evident from the fact that during the past 2 years there was a significant amount of time in which RCC did not employ a Demand Management officer! The position is now filled part-time, reflecting the low priority that RCC still attaches to water efficiency. continued 2 The destructive impacts of Dunoon Dam have been noted in numerous reports. It has been noted that current technology (eg.filters) can create far more efficient water usage in many public buildings such as universities, pools, hospitals, etc.

In 2010 Terrestrial Ecology, Aquatic Ecology, and Cultural Heritage reports all found serious impacts from a dam in this location on Rocky Creek. Members of a Public Reference Group voiced their concerns and opposition. (SMEC, Dunoon Dam Terrestrial Ecology Impact Assessment, 2011)

In 2013 a Technical Report noted that the dam was constrained by significant environmental and social impacts, high capital cost, and the fact that it was 'highly climate influenced" (p52).

An Integrated Water Planning report in 2014 noted that although the dam was 'technically viable', it had 'significant environmental and social constraints associated with threatened and endangered terrestrial ecology and culturally significant Aboriginal heritage'. The destruction of Aboriginal Heritage by the implementation of the Dunoon Dam is unacceptable and not in accord with proper recognition of our Indigenous peoples.

The 2011 Cultural Heritage Impact Assessment states "Aboriginal stakeholders are of the opinion that the sites should remain undisturbed and that no level of disturbance is considered acceptable to them". This heritage would be destroyed by any dam.

In 2013, Rous County Council commissioned another Cultural Heritage Impact Assessment (CHIA 2013) to supersede the 2011 CHIA). It seems that very few Wijabul Wia-bal stakeholders have seen the 2011 or the 2013 CHIAs, or have been aware of their existence. Rous are now asking the Wijabul Wia-bal to repeat the CHIA process yet again, apparently until they get the result they want. This is unacceptable behaviour and echoes colonisation tactics.

When RCC promotes the dam as the 'cheapest option' it must be noted that destruction of the Juukan Rock Shelters was also thought the 'cheapest option' by Rio Tinto, at the time.

The ecological impacts of Dunoon Dam are unacceptable. "Offsets" are unacceptable when set against these potential extinction pressures.

In regards to the destruction of Big Scrub Rainforest and its threatened species; are we in the Northern Rivers to ignore past transgressions by big business when it comes to caring for our ecology and history?

There are 62 ha of Lowland Rainforest Endangered Ecological Community (EEC) on the site. Only 1% of the Big Scrub Rainforest remains. This rainforest is of global significance.

The Channon Gorge contains warm-temperate rainforest on sandstone, a rare occurrence. The dam wall construction would destroy 92% of it.

Nine threatened flora species would be severely impacted by Dunoon Dam. (2013 Terrestrial Ecology Impact Assessment Report). The destruction of

these plants and an increase in the threats against them is a very serious matter with international scientific consequences. 17 fauna species have been identified that are listed as threatened under the TSC Act NSW (the koala, one fruit bat, six microbats and eight birds and one frog).

Extinction pressure on koalas

Koalas were under extinction pressure even before 70% of koalas in North Coast firegrounds were killed in the 2019 summer fires.

<https://www.wwf.org.au/news/news/2020/new-wwf-report-koalas-suffer-decline-across-fire-grounds>

The 2011 Terrestrial Ecology Impact Assessment (TEIA), identified 72 ha of Tallowwood and Flooded Gum koala habitat.

https://waternorthernrivers.org/wp-content/uploads/2020/11/Dunoon_Dam_Terrestrial_Ecology_Impact_Assessment.pdf 3

Koala corridors would be severed by the Dunoon Dam (TEIA 2011). Habitat fragmentation contributes to the decline in koala populations, which will worsen the stress-disease problem and lead to more deaths.

Koalas are commonly seen and heard in the area of the proposed dam wall and The Channon. This iconic animal is part of the national identity of Australia. Are we to be seen by the global community as ineffective when it comes to preserving their existence?

Whian Whian Landcare has planted almost 3000 koala food trees to rebuild corridors in the proposed dam area - linking to tracts of forest to the north. This southern corridor would be destroyed.

Extinction pressure on platypus

Platypus is facing extinction because of habitat destruction, dams and weirs (Bino et al, A stitch in time – Synergistic impacts to platypus metapopulation extinction risk, Biological Conservation, Feb 2020)

Recently on a biomapping exercise of the Rocky Creek River I observed a known Platypus nursery. (Footage attached) The Dunoon Dam would hasten the decline of this species.

Construction of the dam will reduce platypus habitat downstream, due to sediment load smothering (The 2012 Aquatic Ecology Assessment p.61).

https://waternorthernrivers.org/wp-content/uploads/2020/11/Aquatic_Ecology_Assessment_Final_Report-1.pdf Extinction Pressure on Native Fish

A Dunoon dam would extinguish nearly all of the endangered Eastern Freshwater Cod's Rocky Creek habitat due to cold water pollution downstream (NSW Fisheries, Eastern (Freshwater) Cod(Maccullochella ikei) Recovery Plan, 2004). The existing NSW DPI Eastern Freshwater Cod Recovery Plan aims to restore this species to the Rocky Creek and Richmond River systems. It depends on quality habitat and natural flows.

[<https://www.dpi.nsw.gov.au/fishing/fish-species/endangered-species/eastern-freshwater-cod>]

Furthermore, another 16 native fish species are also threatened by a significant and permanent loss of this 17.5 kms of habitat, including Oxleyan Pygmy Perch and Purple Spotted Gudgeon (2011 Rous Aquatic Survey)

I sincerely urge you not to consider the Dunoon Dam as a feasible response to our water security.

The points outlined above are deeply important to me and of international significance to our global ecology.

For our Earth,

