

Submission - draft Far North Coast Water Strategy

My background, and how this informs my view that Rous County Council has failed to provide vision and leadership in water governance.

I am a retired health professional, having worked in NSW Population Health. I have a keen interest in resilient communities, and the use of applied network theory in community development. In 2008 I helped launch *Sustain Northern Rivers*, a collaboration of 26 peak regional organisations to address climate change. One of our working groups *Sustain ENERGY* (with DPIE, community and local government participation) has, over 12 years, supported the emergence of innovative renewable energy projects in our region. The attitude that made these developments possible was vision PLUS a commitment to dissolve problems together. There was no formal structure. In sharp distinction, Rous County Council has exhibited 'problem saturated' thinking when it comes to alternatives to the Dunoon Dam. Yes, there are governance issues with Rous County Council (RCC) and the four general purpose councils, but the example of *Sustain ENERGY* shows what is possible when we have leadership and a genuine willingness to explore options and problem-solve.

I commend DPIE for the 'all options' approach in the draft FNC Water Strategy. This submission will focus on the Rous County Council proposal for Dunoon Dam.

I urge you to not rely on Rous planning processes which suffer from tunnel-vision. In particular, I strongly urge you to remove Dunoon Dam as an option in the strategy. My reasons are below:

1. There is widespread opposition to Dunoon Dam, which RCC has attempted to downplay

RCC and Lismore City Council have not been open with DPIE about the highly contentious nature of the dam due to environmental and heritage impacts. (FNC draft Water Strategy p131). The dam has been resisted for many years. In 2020, RCC sought community feedback on *Future Water Project 2060* (henceforth FWP2060). The result was overwhelmingly opposed to the dam - 91% of 1250 submissions in total (VAXA, FWP2060 Outcomes from Public Exhibition, 2020).

2. Dunoon Dam fails to create a climate-resilient water system

Water utilities are responsible for providing water security under conditions of drought and climate disruption. The most recent drought is a wake-up call, with ~50 communities in NSW coming close to water system failure. Climate-resilient water security is not a niche concern. It is vitally important to industry, businesses and households.

Rous plans for Dunoon Dam should be rejected on these grounds. An online search for the words 'climate resilience' in FWP2060 reveals that this fundamental responsibility is absent, apart from a misleading statement in the FWP brochure that the plan centred on Dunoon Dam would provide "resilient water supply in the face of changing climate conditions".

RCC has failed to take on board recommendations that climate resilience involves a diverse portfolio of strategies, including those that don't depend on rain. Instead, Rous proposes constructing a 50GL dam on the same creek as Rocky Creek Dam, and with a significantly smaller catchment. This, despite Water Services Association of Australia (WSAA) describing new dams as high-risk investments, due to rain-dependence (*All Options on the Table 2020*), and the 2020 NSW Productivity Commission Greenpaper that recommends water efficiencies and uptake of new water sources such as Purified Recycled Water (PRW). In relation to this, Professor Stuart Khan stated that a climate-resilient water system would ideally have 30-50% of water from rainfall-independent sources such as desalination or PRW (ABC Radio 22/10/20).

Our climate has heated 1.4C already (BOM State of the Climate 2020). We are on a trajectory for hotter climate conditions each decade of the FWP2060 plan, yet RCC fails to properly consider drought-resilience under these conditions. In his presentation to a conference which I attended on purified recycled water 3/12/20, Brendan Guiney, Executive Officer, NSW Water Directorate, stated *'every water supply system needs a Plan B'*.

We are at a crucial pivot point. RCC is responsible for providing water security as climate disruption intensifies. As a resident of this region I urge you to intervene, to remove the Rous proposal for Dunoon Dam from the draft Far North Coast Water Strategy, and to provide guidance to Rous County Council to re-examine options in line with the recommendations of Water Services Association of Australia in *All Options on the Table*, and the 2020 NSW Productivity Commission Greenpaper.

I ask you to consider the opportunity lost if our region builds in rainfall-dependence with Dunoon Dam. If we invest \$245m in another dam, we lose the opportunity to build a water system fit for the 21st century. The cost is high in dollar terms, and higher in opportunity lost to invest in new technologies to provide water security in a hotter, drier climate. Failure to develop a climate-resilient water system would have serious consequences for industry, businesses and families.

3. The developmental process for Future Water 2060 was flawed by tunnel vision on Dunoon Dam

Examination of Rous planning processes reveals a pattern in which Rous (or the consultants they briefed) have framed alternatives as problematic or not worth in-depth investigation.

For example, Rous have repeatedly asserted that NSW Health is a barrier to PRW projects (FWP2060 p74). The Integrated Water Cycle Management Development Assessment of Augmentation Scenarios (2020) states that *'IPR schemes have a low yield benefit and a potentially high cost. There is also a significant risk that the scheme would not meet public health requirements. Hence IPR has not been considered further.'*

On 3/12/20 I attended a conference on PRW in which [REDACTED] from NSW Health described the misperception of regulatory barriers as the *'elephant in the room'*. All water needs to meet standards, and NSW Health has to be satisfied that these standards have been met. I followed up with a phone call and Ms Wall confirmed this. I then phoned [REDACTED] in the North Coast Public Health Unit who confirmed this as well. I share this to show that it is not difficult to shed light on the *'elephant in the room'* if one is motivated.

Further to this, it would appear that Rous, or their consultants, have dismissed PRW on the basis of flawed and incomplete data. In their submission to FWP2060, [REDACTED] noted that *'potable reuse investigations undertaken to date have not accurately represented some key attributes of potable reuse, and further, that these issues in the analysis have prevented potable reuse from being considered on its merits'*. In particular, they note a failure to accurately assess greenhouse gas emissions, to accurately assess yield, to

consider [REDACTED], failure to consider new non-RO treatment train technology, substantial over-estimation of electricity consumption of PRW compared to existing schemes, unsupported and likely overestimation of capital and operating costs, and mis-identification of regulatory barriers. They state that *'Depending on the findings of additional analysis...potable use alone, or in combination with the Alstonville groundwater source, may have the ability to meet the projected demand through to 2060 (and beyond)'*. ([REDACTED] submission to FWP2060 Sept 2020).

4. Dunoon Dam would destroy very significant Aboriginal Heritage. This cannot happen.

I am a non-Aboriginal person and cannot speak on behalf of Widjabul Wia-bal people. However I can speak about the actions of organisations controlled by non-Aboriginal people, and have observed what seems to be a pattern of Rous County Council downplaying the significance of Heritage and of concealing reports that should surely be available to Widjabul Wia-bal people.

The 2011 Cultural Heritage Impact Assessment (CHIA) described strong objection by Widjabul Wia-bal Traditional Custodians to Dunoon Dam. *"Aboriginal stakeholders are of the opinion that the sites should remain undisturbed and that no level of disturbance is considered acceptable to them, especially when concerned with the impacts upon the burials, which they see as serving a direct link to the ancestors...the other sites located are also considered significant as a collection, showing a clear pattern of use for the valley by Aboriginal people over time"* (2011 CHIA, Executive Summary)

RCC withdrew the 2011 CHIA, and conducted another in 2013. It has now downgraded this 2013 CHIA as 'preliminary' therefore requiring another yet another report. The pattern of 'wearing down' opposition through commissioning endless reports has been noted as a pernicious process that does not respect the stated wishes of Aboriginal people.

As I submit this submission, I have been made aware of a statement from the Widjabul Wia-bal people that they do not accept the obliteration of their Heritage, and that they want the opposition they expressed in the 2011 Cultural Heritage Assessment to be respected. They have unequivocally stated their objection to the destructive Dunoon Dam.

I appreciate the elevation of Aboriginal rights in the draft Far North Coast Water Strategy. This is to be applauded. Given the clear statement from Widjabul Wia-bal Traditional Custodians, it would be inconceivable for DPIE to include, in the final Far North Coast strategy, a dam that would obliterate their Heritage. This would be reprehensible while we are reeling from the destruction of Juukan Caves, and the publication of a report titled 'Never Again'.

5. The environmental destruction of Dunoon Dam is unacceptable.

We are in an era of extinctions. Month after month we learn of ecosystems in retreat and species that are on a trajectory to oblivion. Given this, DPIE has a responsibility to halt the fragmentation of habitat that drives this. 'Offsets' and 'mitigation' are a figleaf for the continuing and relentless habitat degradation.

Dunoon Dam would impact

- 62ha of Lowland Rainforest Endangered Ecological Community (EEC) on the site. This represents 6.6% of the remaining 940 ha of the original Big Scrub. Only 1% of the remarkable Big Scrub Rainforest remains.
- The Channon Gorge which contains rare and endangered Warm temperate rainforest (EEC). Construction of the dam wall would almost totally destroy this unique refugium.
- Nine threatened flora species would be severely impacted by Dunoon Dam.
- 17 fauna species (one frog, one mammal, one fruit bat, six microbats and eight birds) listed as threatened under the TSC Act NSW identified. Loss of food resources for the Grey Headed Flying Fox, Rose-crowned Fruit dove and White-eared Monarch. Destruction of dry sclerophyll forests would remove foraging resources for the Glossy-black Cockatoo and Scarlet Robin.
- Destruction and fragmentation of 72 ha of koala habitat and movement pathways. North Coast koalas are under extreme extinction pressure, even before 70% of koalas in North Coast firegrounds were killed in the 2019 summer fires, according to Dr Steve Phillips, principal research scientist at Biolink. <https://www.abc.net.au/news/2020-03-07/koalas-losses-post-bushfires-bigger-than-modelled/12033834>
- Extinction pressure on platypus, which are present in Rocky Creek. Dr Gilad Bino, principle researcher for the UNSW report that recommends platypus is listed as a threatened species, has visited the proposed inundation zone and publicly stated that the dam would increase extinction pressure on this iconic and loved species.

For all of the reasons enumerated above, there is strong community opposition to Dunoon Dam. Of 1250 submissions to the public exhibition of Rous Future Water 2060, 91% were opposed to the dam. The destructive nature of the dam is such that this opposition will grow.

For all of these reasons, I urge you to remove Dunoon Dam from the options in the final Far North Coast Water Strategy.
