

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Submission far north coast regional water strategy 2020

Submission-FNC Water Strategy 2020

Dear Sir/Madam,

My name is [REDACTED] and I am a farmer and retired solicitor from The Channon on the far north coast of New South Wales.

I would like to thank and acknowledge the work done so far by the DPIE on the FNC Water Strategy.

Firstly I would like to state that the Strategy must not rely too much on Rous's Future Water 2060 Project, especially since the plan hinges on the contentious Dunoon Dam and that the Dunoon Dam should no longer be an option in the Strategy.

There is widespread opposition to the proposed Dunoon Dam and Rous has not been open with you the DPIE and government.

Rous and Lismore City Council failed to provide the DPIE with an accurate appraisal Of the Dunoon dam.

The dam is highly controversial, and resisted. There is widespread concern about the destructiveness of Dunoon dam and also the failure of Rous to plan for water resilience using modern technologies.

91% of 1290 written and online submissions to Rous oppose the dam option.

Social rejection demonstrates the dam option fails the triple bottom line test being economic, environmental and social. A broad suite of other effective options were preferred by respondents.

Dunoon Dan will leave us vulnerable and a warming climate.

Water Services Association of Australia describes new dams as high risk investments because they depend on Rain. (WSAA, All Options on the Table, 2020).

Professor Stuart Khan (UNSW) has said a resilient water system would have 30 to 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 New South Wales productivity green paper 2020 recommends water efficiencies, and the uptake of new sources such as purified recycled water. (New South Wales Treasury, productivity commission green paper, continuing the productivity conversation 2020).

Rous's Future Water 2060 fails to mention system resilience is important, and seriously examined only groundwater and Dunoon dam. Rous County Council, future water project 2060, 2020.)

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 recycle water in desalination.

Rous failed to provide leadership in increasing knowledge of innovative water management. There is a lack of familiarity with the options showcase by WSAA in "all options on the table" (WSAA) and on the "Cooperative Research Centre Water Sensitive Cities" website. The narrow focus on Dunoon Dan has stunted water literacy in the region. This is a deficit that DPIE needs to rectify in the Regional Strategy New housing developments can build in innovative water systems from the ground up -the cost of which can be born by developers. Because of this failure of leadership and governance, Rous Future Water is a flawed plan that reflects an outdated, standard approach to water system planning and must not be used to underpin the Regional Strategy.

Rous has ignored systemwide water efficiency which is cheap and recommended

Water efficiency is cheap and effective (All Options on the Table, WSAA p3). It is also recommended by the 2020 NSW Productivity Commission Green Paper. (NSW productivity commission green paper, continuing the productivity conversation 2020)

Rous omitted water efficiency from its 2020 Integrated Water Cycle Management Development options for increasing supply And undertook no specialist Studies is on it.

Professor Stuart White identified significant potential increase in Rous supply through efficiency measures neglected by Rous. (See - Brief Review Rouse water augmentation PDF on water Northern rivers.org website).

The lack of attention to water efficiency is evident from the fact that during the past two years there was a significant amount of time in which Rous did not employ Demand Management Officer -the position is now filled part time reflecting how the low priority that Rous still

attaches to water efficiency.

The destructive impacts of Dunoon dam have been noted in numerous reports.

In 2010 Terrestrial Ecology, Aquatic Ecology, and Cultural Heritage reports oh found serious impacts from a dam in this location on Rocky Creek. Members of a Public Reference Group voiced their concerns in oppositions (SMEC, Dunoon Dam Terrestrial Ecology Impact Assessment, 2011). In 2011 A Technical Report noted that the dam was constrained by significant environmental and social impacts, high capital cost in the fact that it was highly climate influenced (page 52).

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 Dunoon dam is unacceptable

The 2011 Cultural Impact Assessment states " Aboriginal stakeholders are of the opinion that the site 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 Impact Assessment (CHIA2013)

To supersede the 2011 CHIA). It seems that very few Wijabul Wia-Bal stakeholders have seen the 2011 or the 2013 CHIA or has been aware of their existence. Rous are now asking that to repeat the CHIA process yet again until they get the Result they want. When Rous promotes the dam is the cheapest option it must be noted that the 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" unacceptable when set against these potential extinction pressures.

Destruction of Big Scrub rainforest and it's threatened species
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 micro bats and eight birds and one frog).

Extinction pressures on koala

North coast koalas were under extinction pressure even before 70% of our regional koala population was killed in the 2019 summer fires. The 2011 Terrestrial Ecology Of mpact Assessment (TEIA), Identified 72 ha of Tallowood and flooded gum koala habitat. Koala corridors would be severed by the Dunoon dam brackets (TEIA). Habitat fragmentation contributes to the decline in koala population, Woolworths and the stress disease problem and lead to more deaths. Koalas are commonly seen and heard in the area of the proposed and wall and the Channon. Whian Whian Landcare has planted almost 3000 koala food trees to rebuild corridors in the proposed dam area, linking two tracks of forest to the north the southern corridor would be destroyed.

Extinction pressure on platypus

Platypus is facing extinction because of habitat destruction, dams and weirs (Bono et al, A stitch in time-Synergistic impacts to platypus Meta population extinction risk, Biological Conservation, Feb 2020).

There are breeding Platypus on Rocky Creek. The Dunoon dam Would hasten the decline of the species.

Construction of the dam Woodward cheese platter Puss habitat downstream, due to sediment loading smothering. (The 2012 Aquatic Ecology Assessment, p61).

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, Cod Recovery Plan, 2004). This plan aims to restore the species to the Rocky Creek in Richmond River systems how ever it depends upon quality habitat and natural flows.

Another 16 native species are also threatened by a significant and permanent loss of the 17.5 km of habitat including the Oxleyan Pygmy Perch and purple spotted gudgeon (2011 Rous Aquatic Survey).

Regards

