To:

DPIE W Regional Water Strategies Mailbox

Cc: office@pavey.minister.nsw.gov.au; DPIE Water Enquiries Mailbox Subject:

SUBMISSION - Far North Coast Water Strategy

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Brief introduction of myself:

I have a Degree from RMIT in Environmental Assessment and Policy; I have worked and continue to work in land management, particularly governance of Australian tropical savanna land management agencies and organisations. I have worked in this field form the past 35 years, including Social/environmental impact assessment.

Draft Regional Water Strategy and Reason for my submission:

While I acknowledge the work done so far by DPIE in developing the Far North Coast Water Strategy to address reliable water supply for our region into the future, it is important that governments do not create a situation that relies on short term solutions for long term problems. This means looking to a future water supply that does not simply rely on the 'silver bullet' of dams. Dams that rely on a consistent rainfall, a reality that is not assured given the increased frequency of reduced rainfall climate change drivers we have been experiencing (ie. reliance on extraordinary weather events to get rivers running and to fill dams).

The Strategy must not rely too much on Rous's Future Water 2060 project, especially because that plan hinges on the contentious Dunoon Dam, and that the Dunoon dam should no longer be an option in the strategy. I contend a substantially more broadscale strategic water harvest and management approach is required. For example: shifting all new housing onto grey water (and existing housing over time), innovative reuse and recycling of grey water, encouragement of better industrial/farming water usage and management, collective rooftop storm water harvest, collection, treatment and management. We have to creatively use and recalibrate the assets we already have: why is drinking water trucked in to water macadamias in drought, when grey water could easily be used for that purpose?

Reasons for Rejecting Dunoon Dam Option:

I further tender the following reasons for not proceeding with the Dunoon dam option:

There widespread opposition from Northern Rivers residents demonstrates that there is **no social licence** for such a solution, and the reasons for the opposition are both valid and numerous (and expressed in submissions and elsewhere to date).

The ecological impacts are unacceptable: the destruction of 62 hectares of one of the few remaining small parcels of remaining Big Scrub Rainforest together with its 9 threatened flora species and 17 fauna species, should be sufficient reason alone for not proceeding. Additionally the cutting of koala corridors, destruction of platypus habitat, negative effect of cold water pollution on threatened native fish species, and the collateral damage of construction linked erosion and loss of human amenity to the area is appalling.

Most importantly, cultural heritage sites of the Wijabul Wia-bal people would be destroyed by the dam. This is not acceptable for cultural reasons alone, and even more so when much more viable and long term sustainable options exist. A 2011 Cultural Heritage Impact Assessment acknowledge that Aboriginal stakeholders considered the sites should remain undisturbed. Rous is seeking via renewed questioning to overturn that assessment to meet its own needs, literally in the footsteps of Juynkan Gorge. When there are clearly other solutions available to meet the region's water needs, destruction of Aboriginal heritage sites should not be under consideration.

The public is well aware that the Department's own Draft Regional Strategy encompasses numerous other non-dam options which can clearly achieve the stated objective of maintaining and diversifying water supplies. Since these other options do not have the same suite of negative effects that the Dunoon Dam would have, they should be fully explored, and the most sustainable, cost effective solutions adopted, and without further consideration being given to the dam. The dam represents what amounts to a tokenistic silver bullet approach that will simply do damage and no good.

Conclusion:

A new Dunoon Dam has no social licence; would irretrievably damage our valuable environment, fauna and flora; and conversely would place our future water security at risk. This is a fail, socially, ecologically and economically. There are other options to address the objectives of the DPIE's Far North Coast Water Strategy, and the needs of Rous County Council to delivering regional water security. I respectfully commend the Department and the NSW Government to pursue a long term and viable solution that is socially, ecologically and economically accountable and sensible by not pursuing the Dunoon dam option.

Yours Faithfully.



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