

6 September 2021

Mr Stephen Bromhead MP, LLM
PO Box 272
TUNCURRY NSW 2428

Email: myalllakes@parliament.nsw.gov.au

Dear Mr Bromhead,

Re: Campaign for Permanent Opening of the Manning River

Manning Coastcare Group (MCCG) is a community-based, not-for-profit Incorporated Association with around 100 active members committed to achieving the best environmental management along the Manning coast. With support from NSW Landcare and Local Land Services, MCCG is a foundation member of the Midcoast2Tops Landcare Connection along with Manning Landcare and Karuah Great Lakes Landcare.

As a non-partisan organisation without political affiliation, MCCG strives to ensure that its members, and members of the public, have access to balanced information on which to base their opinions on issues which could impact our outstanding coastal environment.

We are very concerned at the groundswell of public information and opinion which appears to be biased towards hypothetical economic, commercial and recreational outcomes from permanent openings of the Manning River, with little accuracy in terms of likely environmental and ecological impacts.

We also wish to impress upon you that we believe that a significant number of Manning residents, your constituents and others, are deeply concerned at the likely degradation of both coastal and estuarine ecosystems if permanent openings were to go ahead.

As you will be aware, Recommendation 2 of the '**Report of the Manning River Taskforce: Investigating options to Improve Safety and Navigability of the Manning River Entrance**', November 2020 states:

'It is recommended that any future process should be supported by an **extensive stakeholder consultation** process that includes the local community and impacted industries and stakeholders as well as consideration of progress in the development of **Mid-Coast Council's two CMPs**.'

Stakeholder consultation

We are concerned that the petition 'Join our campaign today', being extensively promoted by you, is giving a biased picture of community opinion. As such, the petition should not be taken to show majority community support for the proposals. Those people who do not agree with the proposals are, naturally, not signing - and these may well be the silent majority. By your vigorous support of this petition, we feel that you could be failing to understand and represent the wishes of a significant proportion of the community.

In addition, we think it is highly likely that the signatories are not aware of the recommendations of the taskforce report nor understand the likely financial costs and environmental repercussions of permanent river openings. Rather they are responding to hearsay and publicity hype.

Surely all sectors of the community – vocal or otherwise – must be involved in a transparent and measured stakeholder consultation process as recommended by the report. Hopefully an open consultative process will be instigated before decisions are made, and those people who have yet to express an opinion will be encouraged to come forward.

MidCoast Council CMPs

The MidCoast Council recently released the first of its two Coastal Management Program (CMP) reports, on the **Manning River Estuary and Catchment Management Program**. This report, prepared under the Coastal Management Act 2016 to achieve the objects of both the Coastal Management Act 2016 and the Marine Estate Management Act 2014, states that:

‘Modified entrances are still influenced by tides waves, currents, sediment movement and freshwater flooding. Entrance modifications can cause significant changes to coastal and estuarine processes and require detailed environmental impact assessment.

Estuary entrance modification was rated as the top priority threat to the environment for the Northern region of NSW in an evidence-based Threat and Risk Assessment completed for the Marine Estate Management Authority. Estuarine entrance modification and associated works were listed as the highest threat to species protected under NSW legislation.

In other locations where the entrances to estuaries have been trained, scientific evidence has demonstrated significant environmental impacts such as:

- Increased tidal ranges, increased inundation of floodplains, stormwater infrastructure, coastal wetlands, reduction in estuarine habitats, species and exposure of acid sulfate soils;
- Scouring of riverbanks and channels, changes to siltation and shoaling patterns;
- Exacerbated down drift beach erosion;
- Loss of breeding grounds for migratory birds and significant alteration of aquatic flora and fauna assemblages around the entrance and within the estuary.’

Manning Coastcare members, and other groups and local community members, have been working over many years to reduce and offset the excessive erosion of Old Bar Beach. It is clear from this CMP report, and the accumulated expert evidence that it references, that there is very real potential for erosion and environmental and ecological degradation to be exacerbated by river entrance modification. At the very least, the outcomes are unpredictable and therefore a threat to an already stressed system.

Where is the economy?

With reference to the purported economic, commercial and recreational outcomes from permanent openings of the Manning River, we note:

- The Report of the Manning River Taskforce southern entrance breakwater option (2) states ‘an estimated price tag in the order of **\$170 million** in construction costs, and further maintenance costs would be incurred over the life of the breakwater. This figure does not include any potential costs flowing from compensation or acquisition costs of agricultural land.’ The preferred Manning Point twin breakwaters option (3) is ‘estimated to cost in the order of **\$100 million** in construction costs and further maintenance costs will be incurred over the life of the breakwater.’

Given the ongoing community outcry over road deterioration and poor medical services in the Manning area, if more people were aware of the costs involved in permanent river openings we feel there could be a distinct cooling of enthusiasm for this project.

- The negative return on investment from permanent openings to the Manning was concluded back in 2016 in the authoritative **Manly Hydraulics Laboratory (MHL)** report ‘Manning River Entrance Investigations: Manning River Southern Breakwater Feasibility Study’ commissioned by the NSW Department of Industry. The executive summary of this report states:

‘This report includes a compliance check of the southern breakwater option against the capital business case criteria and government priorities. The cost-effectiveness of the southern breakwater option is not compliant with the criteria. This option would, under current criteria, be assessed as a low priority for government investment unless significant future benefits in the order of \$200 million can be demonstrated.’

We understand that, in response to your Parliamentary lobby, the Department of Regional NSW and Transport for NSW are now compiling a **Strategic Business Case** for government review – which will probably reach the same conclusion – at considerable expense of public monies.

- Recreational boaters would be the first to acknowledge that it is not leaving the river which is dangerous, it is entering the ocean, particularly with a southerly wind blowing. This issue will not be solved by breakwaters at the river mouth. A far better option would be to upgrade boat launching facilities at Crowdy Bay, giving improved safety without the staggering price tag. Again, the MHL report stated that 'While not having an influence on the condition of the Manning River, alternative options to provide boating access via an alternative nearby harbour (Crowdy Head) are also likely to be preferable compared with the southern breakwater construction option.'
- Even back in March 2003 the Healthy Rivers Commission's Independent Inquiry into the North Coast Rivers stated:

'Training walls have the effect of moving the confluence of those currents, and so the location of the entrance bar, to the end of the training walls. Thus, although the walls tend to create a deeper channel, as flows are concentrated along them, they do not remove the entrance bar. Dredging of the entrance bar provides only temporary removal because it is quickly replaced by the sand continually moving along the coast and deposited at the confluence of the river and ocean currents.'

It is important that councils and citizens understand the implications of these processes. Safe navigation is, and will continue to be, hampered by these natural coastal processes and the Commission has been advised that estuary entrances on the north coast are, and will always be, dangerous under certain conditions despite the presence of training walls and regardless of the amount of dredging undertaken.'

You state in the NSW Legislative Assembly Hansard of 10 February 2021 that 'The million and one studies on floodplains and sand movement are gathering dust in the council chambers. Environmental impact statements and other studies have been done but nothing has occurred'. Perhaps nothing has occurred because the cost and potential environmental damage have never been warranted.

The Strategic Business Case investigation in response to the Report of the Manning River Taskforce presents an opportunity for these reports to be 'dusted off' and objectively reviewed to give the Manning community a definitive answer - based on scientific understanding of the processes of the Manning River delta and economic facts, not emotion and hearsay - to the questions that have been raised, as you say, 'for over 140 years'.

In conclusion, we hope that by detailing some of our reservations and observations regarding the campaign to make permanent openings to the Manning River, we have encouraged you to revisit your understanding of both the likely impact of this project and community opinion on this issue.

Anne Rorke
Secretary
On behalf of Manning Coastcare Group Inc.

Email: secretary.manningcoastcare@gmail.com

