Nature Conservation Council

Submission on the Everlasting Swamp Blue Carbon Demonstration Project Options

31 January 2026

Nature Conservation Council

About NCC

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 200 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

www.nature.org.au

For further information about this submission, please contact:

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Acknowledgement

The Nature Conservation Council of NSW acknowledges that we live and work on the land of First Nations. This land has been cared for since time immemorial by Traditional Owners, whose sovereignty was never ceded. We pay our respects to the Traditional Owners past and present of the many Countries within so-called New South Wales.

We respect the leadership of Traditional Owners in caring for Country and support the development of treaties that meaningfully empower them to do so. We acknowledge the dispossession of First Nations People, and the harm inflicted on people and Country since colonisation began. We acknowledge that colonisation is an unjust and brutal process that continues to impact First Nations people today. As people living and working on First Nations Country it is incumbent on us to play our part in righting the historical and ongoing wrongs of colonisation. Indeed, our vision of a society in which nature and communities thrive together depends upon it.

The Nature Conservation Council of NSW respects and supports all First Nations people's right to self-determination as outlined by the UN Declaration of the Rights of Indigenous Peoples (UNDRIP), which extends to recognising the many different First Nations within Australia and the Torres Strait Islands. NCC commits to maintain open lines of communication and to build respectful mutual relationships with First Nations people in all the work we do and wherever possible, seek aligned outcomes with and support the goals of First Nations groups.

We commit, as an organisation, to empower and work together with First Nations people to protect, conserve and restore the land, waters, air, wildlife, climate and culture of the many First Nations people in NSW.

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NSW Department of Climate Change, Energy, the Environment and Water
via email: everlasting.bluecarbon@dcceew.nsw.gov.au

To whom it may concern,

SUBMISSION: EVERLASTING SWAMP BLUE CARBON DEMONSTRATION PROJECT OPTIONS

The Nature Conservation Council of NSW (NCC) is pleased to provide comment on the Everlasting Swamp restoration options as outlined in '*Wetland restoration options assessment'*, published November 2025. NCC commends NSW Government's necessary investment into wetland restoration at Everlasting Swamp, as well as through broader statewide projects and programs, particularly those under the Marine Estate Management Strategy and Blue Carbon Strategy.

NCC strongly supports option 5B – the full removal of the weir, floodgates and levees. This option would maximise the potential benefits presented by this opportunity, including the abatement of 244,000 tonnes of carbon by 2060, as well as the restoration of vital wetland habitats, the fastest disappearing ecosystems on the planet.

Outcomes of Coastal Wetland Restoration

Since 2023, NCC staff have undertaken field excursions to, and met project representatives of, numerous coastal wetland restoration sites throughout NSW and interstate. The maturity, scale, and methodologies of these restoration projects were variable, but they provide strong tangible evidence for the benefits of wetland restoration, as well as valuable learnings from past experiences.

Water quality

One key benefit to the full restoration of tidal flows at Everlasting Swamp would be a significant increase in long-term water quality, both locally and downstream through the Clarence Estuary. The Sportsmans Creek subcatchment, within which the majority of Everlasting Swamp is situated, has been identified as the top contributor of acid runoff in the Clarence River catchment, alone contributing 35% of the catchment's acid risk. In addition, it was found to be the catchment's second largest contributor of blackwater pollution[1].

Nearby wetland restoration projects, such as at Yarrahapinni Wetlands in the Macleay River catchment, have proven the efficacy of full tidal reintroduction in mitigating sources of acid and blackwater pollution. They provide case studies for the benefits that come with this increased water quality – a reduction in mass fish kills after high rainfall (as observed across the Clarence River in March 2025), improved conditions for oyster farmer and commercial fishing livelihoods, and cleaner rivers for communities to swim in.

[1] Clarence River Floodplain Prioritisation Study, UNSW Water Research Laboratory, 2020, accessible at: https://www.marine.nsw.gov.au/__data/assets/pdf_file/0006/1484097/Clarence-River-Floodplain-Prioritisation-Study-Main-Body.pdf

Blue carbon

Everlasting Swamp's intended status as New South Wales's first ACCU-accredited project under the '*Tidal restoration of blue carbon ecosystems method*' makes it particularly consequential. **Not only will it become an NSW Government flagship for environmental restoration, but it will also influence the trajectory of blue carbon projects in the state more broadly.**

The globally acclaimed 'Blue Heart' project on Kabi Kabi Country (Sunshine Coast) in Queensland demonstrates the role pilot restoration projects can play in overcoming barriers and setting a precedent for blue carbon markets at a state level.

Maximising the extent of tidal re-inundation at Everlasting Swamp will yield the biggest possible impact in this regard. As well as contributing to NSW's emissions reduction targets, abating as much carbon as possible will also result in higher monetary returns through generated ACCUs, increasing the perceived value of blue carbon projects amongst potential project proponents and market actors. Furthermore, if the project results in existing private landholders earning carbon credits from their marginal land, this perception could be further strengthened.

Whilst the sequestration of 244,000 tonnes of carbon by 2060 is a valuable outcome, **the precedent set at Everlasting Swamp will have implications for blue carbon restoration far beyond the project boundaries.**

Habitat and biodiversity

Whilst coastal wetland restoration is often motivated by the significant benefits it yields for local communities and society, it also produces outsized improvements in biodiversity, habitat provision, and threatened species abundance. Most coastal wetlands in NSW have been drained, cleared, or destroyed, consistent with international trends that make them amongst the most threatened ecosystems on earth. Saltmarsh has faced existential global declines in recent decades, and in NSW it is listed as an Endangered Ecological Community (EEC). This is further worsened by their vulnerability to climate change-induced sea level rise. **Coastal wetlands must be given space to thrive in abundance, if they are to survive climate change and the multitude of other synergistic threats they face.**

Coastal restoration projects throughout NSW have consistently proven their ability to bring back threatened flora, as well as high quality habitat for conservation priority species. This includes many of Australia's threatened migratory birds, which rely on these environments as refuge following 250,000km journeys from Alaska and Siberia each year. NSW has a long history of delivering positive environmental outcomes through coastal wetland restoration, and so case studies are numerous, from Hexham Swamp near Newcastle, to Cattai Wetlands on the Mid-North Coast, to the recent Wagonga Inlet Living Shoreline project near Narooma.

Maximising the extent of tidal re-inundation and returning site hydrology to as natural a state as practicable, will yield sizeable returns for nature, including in measurable metrics such as biodiversity, threatened species abundance, and habitat quality for target species. This is crucial during a biodiversity and extinction crisis, particularly in Australia where these problems are particularly acute.

Discussion of Options

As evidenced in the '*Wetland restoration options assessment*', **option 5B delivers the strongest long-term outcomes for both nature and local communities**, maximising the impact of this important pilot project. This option involves the removal of Sportsmans Creek Weir, all internal floodgates, and constructed levees to reconnect the southern part of the swamp.

These combined actions restore whole-of-system tidal and floodplain processes, as opposed to incremental modifications that do not fully resolve the harms being caused by aging water management infrastructure.

The assessment finds that options which remove artificial barriers and activate the southern swamp (3B and 5B) perform best for restoring natural hydrology, improving habitat connectivity across the entire wetland and increasing ecosystem resilience to climate change. Although these options may have larger initial impacts on the Threatened Ecological Communities (TECs) that have established within the artificial freshwater landscape, this does not negate the overall long-term benefits of restoring natural ecosystems and processes. Further, it is preferable that these impacts are managed intentionally through this project, than left unmanaged as sea level rise and infrastructure decay slowly reverse these artificial freshwater conditions regardless.

Option 5B represents true landscape-scale restoration, not ineffective piecemeal modification. Compared with options that leave levees or gates in place, option 5B:

- Restores tidal influence across the largest area of the wetland, including the southern swamp,
- Creates the largest area of threatened coastal wetland communities (saltmarsh and supratidal forest), and
- Improves connectivity for fish, waterbirds, and migratory species between the Clarence River and the entire swamp.

Option 5B delivers the best blue carbon and climate outcomes. Alongside option 3B, it delivers the maximum forecast carbon abatement of all options, equivalent to ~244,000 ACCUs by 2060, with very substantial additional abatement beyond 2060. That is approximately 25% more carbon sequestration than options that do not activate the southern swamp. **This option would allow this project to serve as a flagship example of nature-based climate solutions that combine emissions reductions with ecological repair.**

Particularly when compared to options that do not fully remove the weir and floodgates, **option 5B delivers the best possible management of key environmental risks** that NCC has long highlighted and advocated against. The report identifies these major ongoing risks at Everlasting Swamp to include acid sulfate soil mobilisation, bushfire risk, and blackwater events during flood–dry cycles.

Option 5B performs best because sustained tidal inundation prevents the drying and oxidation of acid sulfate soils, permanent wetness dramatically reduces fire risk, and restored hydrology improves water quality and reduces blackwater impacts. Further, it does not raise the risk of hyper-salinity, as is the case with options that open but do not fully remove the weir and floodgates.

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The assessment explicitly notes that full tidal restoration across the entire system presents the lowest long-term environmental risk, making option 5B the most precautionary choice.

Option 5B avoids the long-term problems associated with bunding and partial solutions. Options involving bunds (3C and 5C):

- Score lower in the MCA,
- Introduce new infrastructure that may be rendered obsolete by sea-level rise,
- Risk future maintenance burdens, acid discharge, and stakeholder conflict, and
- Construct bunds around private property which are unlikely to prevent naturally occurring inundation from seeping up through the ground once tidal flows have been restored.

Option 5B avoids these pitfalls by removing infrastructure rather than adding more, accepting and planning for natural wetland migration under climate change, and aligning with NCC's long-standing opposition to hard coastal engineering works that lock in and exacerbate future risks.

It is also noted that **option 5B presents the best outcome for Aboriginal heritage values and items**, which is highly important if this project is to involve genuine partnership with local First Nations – a prerequisite for any successful restoration project on Country. Further, **5B is the only option that projects maximum possible benefit for local fisheries.** This is not just a positive environmental outcome, but also one that will produce the best outcomes for (and thus most social license amongst) primary industries and recreational fishers, both key stakeholders for this project.

Option 5B is the most ecologically sound, climate-effective, socially beneficial, and future-proof option. It restores Everlasting Swamp as a functioning coastal wetland system, maximises biodiversity and carbon benefits, and minimises long-term environmental risk. NCC agrees with the multi-criteria assessment's finding that option 5B produces the best possible outcomes overall, and will publicly support any decision to undertake such a project at Everlasting Swamp.

Thank you for the opportunity to participate in this consultation.

Your key contact point for further questions and correspondence is Sam Johnson, Coastal Wetlands Community Organiser, available via sjohnson@nature.org.au and (02) 9516 1488. We welcome further conversation on this matter.

Yours sincerely,

Jacqui Mumford
Chief Executive Officer
Nature Conservation Council of NSW