

The Secretary
Senate Rural and Regional Affairs and Transport
Parliament House
Canberra ACT 2600

Sisters of Mary
C/- 81 Taylor Rd
Gympie 4570
Ph: 075483 6904

4 April 2007

Dear Sir/Madam,

Re: Inquiry into Additional Water Supplies for South East Queensland - Traveston Crossing Dam Information

The purpose of this submission is to provide information for the Senate Inquiry.

We are a group of concerned residents of Gympie and the surrounding area. Although most of us are not directly impacted by the dam decision, all of us as members of the community are deeply concerned by the short and long-term impacts of the Queensland State Government's ill-considered decision to dam the Mary River.

We see the impacts of this decision every day as we go about our normal business. Many people are suffering anxiety about the future of this area. Many businesses depend on the patronage of residents of the Mary Valley who would be displaced by the damming of the river. Their future is now in doubt. Those who are dependant on downstream water supply are also anxious about the viability of their enterprises in the future. Because of the lack of proper consultation with the community prior to and since the announcement of the decision to dam the Mary River, a lot of residents of this area and downstream are not fully aware of what the future holds for them. Much important information has still not been shared with the community by the State Government. We hope that your inquiry will help to ensure that this information is released without further delay.

The Mary Valley demonstrates the successful accommodation between the natural environment and agricultural pursuits. Much of the environment has survived a century and a half of white settlement, but the dam puts all this in jeopardy. As you are no doubt aware, there is a significant number of endangered species which still survive in the Mary River. Our concern is to ensure the survival of these creatures and their remaining habitat, for the health of the river and of the planet. The dam would exacerbate these problems at a time when we are all concerned about climate change and when every action should be being taken to reduce human impact on the environment. Australia has the highest greenhouse gas emissions rates per capita in the world. Each person contributed the equivalent of 27.9 tonnes of CO₂ in 2000. This is 27% more than US citizens and more than double the average for industrialized countries. Australia's emissions have increased 10% in the last decade, and are set to rise by an additional 17% by 2020 according to the Australian Greenhouse Office, mostly because of coal-fired power plants and land clearing. Meanwhile, experts agree we need deep cuts of at least 50% by 2050.

In relation to water consumption, the 2006 State of the Environment report compiled by the Australian Department of Environment and Water Resources indicates that the Brisbane population needs to reduce its average water consumption by 32% by 2030 to stay within the sustainable yield of water resources in the region. The decision to build

the Traveston Crossing dam, however, has been ostensibly based on little reduction in average per capita water use.

In fact, the South East Queensland average of 300 litres per capita per day water consumption is considerably higher than the average for other cities including Sydney and Melbourne. The problems associated with high water consumption are summarized by the OECD:

High levels of water use cause both environmental and economic problems. On the environmental side, high consumption places stress on rivers, lakes and groundwater aquifers and *may require dams* and flooding *with serious ecological impacts*. As well, the discharge of polluted water once it has been used damages aquatic ecosystems (emphasis added).

On the economic side, high levels of water use require ever-increasing and expensive investments in water system infrastructure needed to gather, deliver and dispose of water (dams, reservoirs, water treatment facilities, distribution networks and sewage treatment).

Therefore we implore the Senate Inquiry to thoroughly investigate the potential economic, social and environmental impacts of the proposed dam and the alternative solutions to the water supply and consumption issues of South East Queensland.

We include in our submission to your inquiry, the submission we made in regard to the draft terms of reference for the Environmental Impact Study which has ten issues and recommendations. These include the following concerns we expressed in regard to the draft terms of reference:

- *Indigenous issues, in particular the reference to progressing a native title agreement or a cultural heritage management plan with Aboriginal parties:* This does not adequately capture the importance of Indigenous cultural practices and understandings of the environment, or the importance of preserving the biological diversity of the Mary River area.
- *The likely impact of the dam on the salinity of the Mary Basin Catchment:* Consideration needs to be given to the likely loss of extensive further areas downstream from the impoundment resulting from likely increased salinity.
- *Aquatic weeds:* in particular risk assessment and the costs of controlling outbreaks of weeds known to infest the waterways upstream of the proposed inundation area, such as water hyacinth, salvinia. and cabomba, because of its close proximity at Lake McDonald
- *The effects of climate change:* Modelling used by the Government to date has not included data from the last seven years, the inclusion of which would considerably alter projections in relation to the availability of water and the maintenance of adequate flows in the river if the dam were to be built. In addition, the projected effects on climate change of greenhouse gases methane, CO₂ and nitrous oxide produced by the dam must be considered.
- *The social impact of the dam proposal requires a lot more emphasis:* To date there has been a failure to recognise the scale and depth of social impact, the

differential social impact for people of different cultural backgrounds or significant attachment to land, or the need for full and proper public consultation about the social impacts of the dam proposal and its future construction.

- *Concerns about references by the Community Futures Taskforce which imply that the dam will go ahead and that the impacts commence from its construction:* In fact the social and economic impacts commenced on the day of the announcement of the proposed dam. In the event that the dam does not proceed, the community and the local economy will need to be restimulated and action taken in restitution for losses to the local community and economy.
- *Due consideration to the alternatives of any planned intervention, but especially in cases where there are likely to be unavoidable impacts:* This needs to include comparison of the impacts of the proposed dam and other possible solutions to the “water crisis” such as desalination, rain water tanks, demand reduction, control of water consumption through pricing or other mechanisms and recycling of water from waste water treatment plants.
- *Inadequacy of consideration of downstream impacts from the dam:* The river is already overallocated, water quality for dissolved oxygen and salinity not meeting the Queensland EPA guidelines and the barrage between Tiaro and Maryborough has already impacted on the fisheries, and the extent of these impacts are not adequately known.
- *The six-month time frame for the EIS is inadequate to fully assess the impact of the dam on long-lived species and to collect data on the large number of threatened and endangered species.*
- *Reference to the Queensland Government’s Water Resource Plan when this plan is flawed, does not have community support and provides no protection for environmental flows downstream of the proposed area.* Local area representatives on this panel felt misinformed and deceived by its eventual recommendations.

Our recommendations for each of these issues can be found in the attached submission. We would be prepared to answer questions in front of the Senate Inquiry.

Sisters of Mary can be contacted through Dr Rae Norris whose details appear above, or by replying by email to raen@cooloola.net, Glenda Pickersgill at pickerg@tpgi.com.au, Zela Bissett at zela@spiderweb.com.au, Sue Johnson at sandharma@hotmail.com and Joolie Gibbs at Gallery@cooloola.qld.gov.au.

Yours sincerely

Dr Rae Norris

18 February 2007

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**Re: Draft Terms of Reference for Environmental Impact Statement – Proposed
Traveston Crossing Dam**

Dear Sir/Madam,

The purpose of this letter is to provide feedback on the Draft Terms of Reference for an Environmental Impact Statement dated December 2006 regarding the proposed Traveston Crossing Dam.

We are an interdisciplinary group committed to the appreciation, celebration and preservation of the Mary River. Our members belong to a wide range of professions and endeavours and strive to provide a multi-disciplinary forum for the examination of issues impacting on the Mary River. In the following we have identified the issues of greatest concern to us in regard to the draft Terms of Reference and our recommendations to resolve those issues. We request to be included as “Stakeholders” to this EIS process.

Issue 1: We are unsatisfied with the way the draft ToR deal with Indigenous issues, in particular the reference to progressing a native title agreement or a cultural heritage management plan with Aboriginal parties. This does not adequately capture the importance of Indigenous cultural practices and understandings of the environment, or the importance of preserving the biological diversity of the Mary River area.

Recommendation 1: Australia is a signatory to the International Convention on Biological Diversity under which stand the *Akwe: Kon Voluntary Guidelines for the Conduct of Cultural, Environmental and Social Impact Assessment Regarding Developments Proposed to take place on or which are Likely to Impact on, Sacred Sites and on Lands and Waters Traditionally Occupied or Used by Local and Indigenous Communities*. These Guidelines are a tool for achieving a reduction in the current rate of loss of biological diversity and should be used in this environmental assessment process to develop an accurate and internationally credible estimate of the likely impact of the construction of the dam on Indigenous heritage, on local communities and on biological diversity.

Issue 2: The likely impact of the dam on the salinity of the Mary Basin Catchment is not adequately reflected in the ToR. The terms of reference do provide for calculation of the loss of Good Quality Agricultural Land resulting from the inundation process; however consideration needs to be given to the likely loss of extensive further areas

downstream from the impoundment resulting from likely increased salinity if no longer drained by a free-flowing river.

Recommendation 2: The Intergovernmental Agreement on the Environment (IGAE) and the National Action Plan for Salinity and Water Quality must be referenced in the ToR. Costing for loss of GQAL should include downstream areas lost to salinisation.

Issue 3: The ToR do not adequately cover issues of weeds, in particular risk assessment and the costs of controlling outbreaks of weeds known to infest the waterways upstream of the proposed inundation area, such as water hyacinth, salvinia, and cabomba, because of its close proximity at Lake McDonald.

Recommendation 3: The ToR need to include detailed weed population modelling, risk assessment and costs of control of potential weed outbreaks of at least the above three species.

Issue 4: The effects of climate change are not adequately referenced in the ToR. Modelling used by the Government to date has not included data from the last seven years, the inclusion of which we believe would considerably alter projections in relation to the availability of water and the maintenance of adequate flows in the river if the dam were to be built. In addition, the projected effects on climate change of methane, CO₂, nitrous oxide and other greenhouse gases produced by the dam are not covered by the ToR.

Recommendation 4: The ToR need to take full account of climate change, referencing to the National Biodiversity and Climate Change Action Plan. Greater weight needs to be given to recent years' rainfall and river flow data. Greenhouse gas emissions resulting from inundation and pumping water should be modelled to compare with other alternatives being investigated. This must include baseline data for the current production of greenhouse gases in the proposed dam area and then modelling the production of greenhouse gases that would be emitted if the area were to be inundated and water pumped to Brisbane.

Issue 5: The social impact of the dam proposal requires a lot more emphasis and should be strengthened in the TOR. To date there has been a failure to recognise the scale and depth of social impact, the differential social impact for people of different cultural backgrounds or significant attachment to land, or the need for full and proper public consultation about the social impacts of the dam proposal and its future construction.

Recommendation 5: A comprehensive socio-economic baseline study needs to be conducted by suitably qualified independent social scientists using modern internationally acceptable social impact assessment and management principles; and the data collection and analysis methods must be outlined in the TOR.

Issue 6: We are concerned about references to the Community Futures Taskforce which imply that the dam will go ahead and that the impacts commence from its

construction. In fact the social and economic impacts commenced on the day of the announcement of the proposed dam. People in the proposed impoundment areas and their families and associates have already suffered a great deal of anguish and uncertainty as a result what we would regard as a premature and poorly considered announcement of the project, before any feasibility study had been carried out. In the event that the dam does not proceed, the community and the local economy will need to be restimulated and action taken in restitution for losses to the local community and economy.

Recommendation 6: The ToR should not assume that the project will be approved. They must refer to assessment of the actions that may need to be taken to compensate the community for disruption caused from the day of the announcement of the dam if construction of the dam does not proceed. They must also consider the requirements needed to rebuild the local community in social as well as economic terms.

Issue 7: We note the eighth principle of social impact assessment recommended by the International Association of Impact Assessment: “The [Assessment] must give due consideration to the alternatives of any planned intervention, but especially in cases where there are likely to be unavoidable impacts”. The ToR do not allow for the comparison of the impacts of the dam and other possible solutions to the “water crisis” such as desalination, rain water tanks, control of water consumption through pricing or other mechanisms and recycling of water from waste water treatment plants.

Recommendation 7: The ToR need to enable comparison of the social, economic and environmental impacts of the dam with those of other solutions to the “water crisis”.

Issue 8: We are concerned about the inadequacy of consideration of downstream impacts from the dam. The barrage between Tiaro and Maryborough has already impacted on the fisheries but the extent of its impact is not adequately known and is not taken into account in the ToR.

Recommendation 8: The ToR must include reference to baseline studies of all downstream aquatic communities all the way to Fraser Is and the Great Sandy Straits Ramsar wetlands and need to include full and proper consideration of the downstream impacts of the dam.

Issue 9: The six-month time frame for the EIS is inadequate to fully assess the impact of the dam on long-lived species such as the lungfish. The impact of the dam on the viability of the species may not be known for a considerable period.

Recommendation 9: The EIS time frame must be extended to allow for sufficient data to be collected on all the endangered species and ecosystems both within the proposed inundation area and downstream to prove via population viability analysis and population and habitat viability assessments that threatened species under the EPBC act will not be driven to extinction. The impact on threatened species must consider loss of habitat, connectivity and fragmentation. The precautionary principle must be employed particularly

in relation to longlived species such as the already endangered lungfish, Mary River turtle and Mary River Cod.

Issue 10: The ToR make reference to the Queensland Government's Water Resource Plan but this plan is flawed, does not have community support and provides no protection for environmental flows downstream of the proposed area. Local area representatives on this panel felt misinformed and deceived by its eventual recommendations.

Recommendation 10: The ToR should require a review of the Government's Water Resource Plan before basing any assessment on it.

Sisters of Mary can be contacted through Dr Rae Norris whose details appear below, or by replying by email to raen@cooloola.net, Glenda Pickersgill at pickerg@tpgi.com.au, Zela Bissett at zela@spiderweb.com.au, Sue Johnson at sandharma@hotmail.com and Joolie Gibbs at Gallery@cooloola.qld.gov.au.

Yours sincerely

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