The Secretary
Senate Rural and Regional Affairs and Transport
Parliament House
Canberra ACT 2600
18th March 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 further information for the Senate Inquiry.

I refer to the Northern Pipeline Interconnector (NPI) which is part of the Queensland State Water Grid proposed to supply water for South East Queensland by taking up to 65.000 ML/year out of the Mary River Catchment at the end of 2008. This is the same pipeline proposed to take water from the Traveston Crossing Dam.

The proposed NPI Stage 1 pipeline would allow water extraction from current level to the 'full allocation' level of extraction from Obi Obi Creek in the Mary River Catchment (Figure 1), and could extract additional water from the 'strategic reserve' via Baroon Pocket Dam. The proposed NPI Stage 2 would allow water extraction from the Mary River Catchment from Lake Macdonald (on the Six Mile Creek), and could extract additional water from Borumba Dam or water allocations from government purchased property in the Traveston Crossing Dam area via the existing Coles Crossing to Lake Macdonald pipeline. The "allocation" is not scientifically based and already there are water quality problems in the Obi Obi creek from existing extraction and management of Baroon Pocket Dam.

Baroon Pkt dam where the "unallocated" water is planned to be extracted from is part of the Obi Obi Creek that drains 202 km2 in the south of the Mary catchment and has a mean annual discharge of 156 000 ML (Queensland Water Resources 1993). This represents 2.1% of the Mary River catchment area and 6.1% of the total discharge volume of the Mary River. Dairy farming and some agricultural production dominate the lower Obi Obi valley. The area between these downstream floodplains and Baroon Pocket Dam (AMTD 26.4 km) is steep, rugged country with limited access, and includes Obi Obi Gorge National Park.

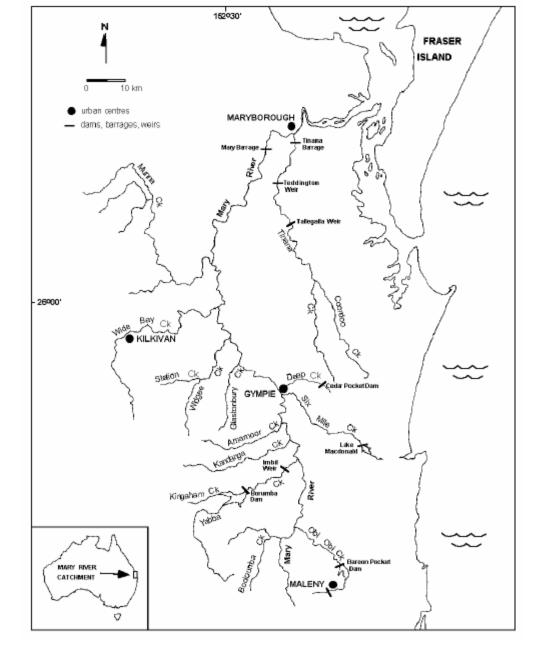


Figure 1 Mary River System, South-east Qld (Simpson and Jackson 1996)

The major environmental impact of stage one of the pipeline proposal will be to allow the level of water extraction from Baroon Pocket Dam on Obi Obi Creek to go from its current level of about 18500ML/annum to its full level of about 36000ML within the time frame of about 18 months. The severe environmental implications of going to this level of extraction were well documented in the studies undertaken by the Technical Advisory Panel(TAP) for the Mary Basin WRP (Mary Basin Technical Advisory Panel 2005.) with major impacts on the flow regime, riparian and in-stream habitats of that stream.

Stage 2 will allow additional extraction from Six Mile Creek and from the Mary River at Coles Crossing (accessing water from Borumba Dam). All of these areas are significant habitat for a number of important EPBC listed species, particularly the Mary River Cod, the Mary River Turtle, the Australian Lungfish and several threatened stream frog species. The most severe risk is to the endangered Mary River Cod, and the importance of Obi Obi and Six Mile Creeks to the survival of the species is highlighted in the Mary Cod Recovery Plan prepared by the State Government and registered with the Federal DEW (Simpson and Jackson 1996).

The Minister for Environment and Water is currently reconsidering the NPI project Stage 1. Neither the Terms Of Reference for the Environmental Impact Statement, the Impact Assessment Statement or the referral under the Environmental Protection and Biodiversity Conservation (EPBC) Act to the federal Department of Environment & Water mentioned the implications for matters of National Environmental Significance in the Mary River catchment, due to impacts of increased extraction from Obi Obi Creek

The current Mary Basin Water Resource Plan needs to be reworked to provide adequate, scientifically based environmental flows to critical downstream locations in the Obi Obi creek and the Six Mile Creek (important breeding grounds for the Mary River Cod), at Dagun Pocket (an important breeding ground for the Australian Lungfish and Mary River Tortoise), and at the Mary River and Tinana barrages to protect the Ramsar wetlands. It currently allows for accessing a "strategic reserve" anywhere in the Mary River catchment and provides no environmental protection for matters of National Environmental Significance.

For example: if the flow implications of the operation of stage 1 of the NPI has severe habitat impacts on Obi Obi Creek, and the operation of stage 2 has severe habitat impacts on Six Mile Creek, then this leaves only one remaining large area of suitable habitat identified in the Mary River Cod recovery plan in Tinana Creek, isolated from the remaining population in the main trunk of the river by the Mary River Barrage Barrage and the estuarine area of the Mary River near Maryborough. If the Traveston Crossing proposal proceeds, then this would remove most of the remaining existing breeding habitat in the main trunk of the river as well, and impose a major barrier to migration in response to flow alterations and climate change. It is quite possible that this would ensure the extinction of this species in the wild. Similar concerns apply to other endangered species that rely on continuous connected corridors of suitable riparian and in-stream habitat for their survival.

This impact on the ability of species to migrate in response to flow regime changes is clearly against the intent of bilateral agreements such as the National Biodiversity and Climate Change Action Plan, as well as legislation such as the EPBC Act and the Fisheries Act. The cumulative impacts of the proposed water infrastructure including NPI stage 1, NPI stage 2, Traveston Crossing dam and the existing Mary River Barrage could very easily result in catastrophic changes to the ecology of the entire Mary Catchment, even with the best intents in trying to monitor and manage the impacts to current best practice standards.

The current Mary Basin Water Resource Plan (WRP) intends to minimise the impacts of changes in flow regime through the setting of environmental flow releases. This plan does not adequately protect the river health and is not endorsed by the Community Reference Panel. It also does not account for linkages between runoff, river water and ground water. Choosing 85% of average annual flow at the mouth of a river as an adequate figure to maintain health of a river is flawed. (Burgess and Edwards 2006). The statistic used should be the median annual flow and the scientific basis of the number 85% has no documented empirical basis (Arthington et al 2006.). Environmental flow provisions have not been written into the operating rules for Baroon Pocket Dam, Lake McDonald, Borumba Dam, Mary River barrage or Tinana barrage.

The river is over-allocated already, the water resource plan is flawed and the river's water quality for dissolved oxygen and salinity is outside the Queensland guidelines for Water Quality for a large proportion of the time NOW! before building the Northern Pipeline Interconnector, the Traveston Crossing Dam or raising Borumba Dam.

As further evidence of this over-allocation, Sunwater is indicating it may be unable to provide water for the coming 2007 water year (starting July 1st 2007) for its farming community and will only be supplying urban communities) Appendix 1. This is before attempting to provide additional water for SEQ.

Finally, if any part of this submission is unclear, or if you require further information please contact the undersigned.

References

Arthington Angela H., Stuart E. Bunn, N. Leroy Poff, and Robert J. Naiman (2006). *The Challenge Of Providing Environmental Flow Rules to Sustain River Ecosystems* Ecological Applications, 16(4), 2006, pp. 1311–1318_2006 by the Ecological Society of America

Burgess S.J and Edward, D (2006) Notes on the likely impacts of the proposed Traveston Crossing Dam on the environmental hydrology of the Mary River. Save the Mary River Coordinating Group. Technical note www.savethemaryriver.com

Mary Basin Technical Advisory Panel. 2005. Mary Basin Draft Water Resource Plan – Environmental Flow Assessment Framework and Scenario Implications. Queensland Department of Natural Resources, Brisbane.

Simpson, R and Jackson, P. 1996 The Mary River Cod Research Recovery Plan. Australian nature Conservation Agency Endanger Species Program. Canberra. ACT.

Yours Sincerely,

GE. Pichergill

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Appendix 1: Sunwater letter to Irrigators (medium priority) on the Mary River



Customer Advice

ABN 17 020 276 523

21 May 2007

Dear Irrigator,

Re: Potential Water Allocations in the Mary Valley Water Supply Scheme

Due to the lack of significant rain and inflows to the Borumba Dam system, I wish to advise that the Borumba Dam is currently storing 20,915 ML of water.

Under the rules contained in the Interim Resource Operations License (IROL), when the level reaches 10,500 ML, releases are stopped for medium priority allocation holders. This cut—off arrangement is required to ensure that a minimum level of essential supplies to urban communities is maintained should good rains not occur during coming months.

Given current demands and without significant inflows being received, it is envisaged that this cut off level will be reached towards the end of October early November. Predictions of the storage volume at the end of June indicate that it is likely that medium priority allocations for next water year may be between 0 and 5%.

This situation can improve quickly if rain produces inflows into the system. As soon as any significant inflows occur any announced allocation will be revised.

As in previous periods of low allocations, customers will be able to augment announced allocation with streamflow (credit water) events. SunWater will announce when conditions are met to enable customers to take water during these periods and will work closely with customers to ensure that adequate notice and information is received to ensure that they can take advantage of these events. Details of the arrangements will be sent to customers in the new water year should the system continue to experience these dry conditions.

I remind customers of the rebate that may be available under the Irrigators Fixed Water Charges Rebate Scheme. Full details can be found at www.qraa.qld.gov.au.

If you require any further information with regard to any details in this letter please do not hesitate to contact myself on (07) 4132 6200. I thank you for you co-operation.

Yours sincerely

Danny Green

BUSINESS MANAGER

SUNWATER

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