



# Wildlife Queensland

YOUR VOICE FOR YOUR WILDLIFE

Ms Jeanette Radcliffe  
Committee Secretary  
Senate and Regional Affairs and Transport Committee  
Department of the Senate  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Ms Radcliffe

## **Re: A submission on Additional Water Supplies for SEQ – Traveston Crossing Dam Senate Inquiry**

I have been directed by the State Council of the Wildlife Preservation Society of Queensland (WPSQ) to prepare, collate and forward comments to the Senate Committee for their consideration on the above topic.

The Wildlife Preservation Society of Queensland (WPSQ) is one of the longest established and most respected wildlife-focused conservation groups in Queensland. With over 3500 supporters spread across 19 branches throughout the State, WPSQ is a strong voice for our wildlife and its habitat.

WPSQ is apolitical. Our aims include;

- **Preserve** the flora and fauna of Australia by all lawful means
- **Educate** the community in an understanding of the principles of conservation and preservation of the natural environment
- **Discourage** by all legal means, the possible destruction, exploitation and unnecessary development of any part of the natural environment.
- **Encourage** rational land use and proper land planning of existing and future development, and the use of the natural environment and its management.

WPSQ welcomes the opportunity to make comment on this topic.

WPSQ appreciates and recognizes a water crisis is currently facing the people of south-east Queensland and the Queensland Government. There is a need to provide a broad range of options to provide water resources for the ever-increasing population of south-east Queensland, primary and secondary industries, flora, fauna and ecological processes. Dams are currently part of the solution and will continue to be. However WPSQ has major concerns about the proposed Traveston Crossing Dam being an appropriate component of the solution. WPSQ appreciates that the Traveston Crossing Dam cannot be a component of the solution to address the immediate water crisis and the Queensland Government would even acknowledge that. However the Queensland Government has this infrastructure development as a major plank in its long-term solution to providing water resources for south-east Queensland.

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WPSQ prefers governments and other significant decision-making bodies to use clear, transparent and accountable processes when arriving at decisions that impact on the community and the environment. Obviously public consultation is a major phase of any acceptable process. On occasions the Queensland Government uses such processes. This is not one of those occasions. Limited technical data have been made available. Comprehensive environmental studies are not readily available to organizations such as WPSQ to evaluate Government claims and to justify that no environmental harm will eventuate. From the data available in the public arena the only conclusion that can be drawn is that environmental harm will occur. There is insufficient information available to justify that the Traveston Crossing Dam option is the best fit for that component of the long-term water strategy. Similar statements apply to the data and information available to justify the raising of the Borumba Dam.

WPSQ strongly supports the Senate Inquiry. This presents an opportunity for a tabling of relevant data and the chance for arguments from both supporters and those opposing the development to present their views. WPSQ is aware that the Senate Committee does not have the power or authority to stop the development or defer the commencement of the project. However it would be a very unwise not to give serious consideration to and take necessary actions arising from the findings of such an inquiry.

WPSQ will limit its comments to issues of major concern. These include Protocols and Policies that should guide the Queensland Government's actions, impacts on fauna, site location and economics to a lesser degree. WPSQ acknowledges there are significant social and cultural issues but there are other organizations far more qualified to comment on those particular issues.

### **Protocols and Policies**

There are a number of protocols and signed bilateral agreements as well as Commonwealth legislation, such as the *Environment Protection and Biodiversity Act* (EPBC Act), that should guide the Queensland Government's actions.

The proposed Traveston Crossing Dam project has become a controlled action under the EPBC Act. WPSQ implores that the Minister for the Environment and Water Resources exercises the powers available to him under the legislation wisely. An appropriate consideration of the science available and the environmental harm that will eventuate should leave him with very few alternatives but to reject the current proposal or at least call for hard scientific data to justify its continuation. Unfortunately WPSQ places little reliance on a favourable decision based on past decisions by previous Ministers, and their apparent reluctance to prevent environmental harm. Since the experience with inappropriate decisions, the EPBC Act has been weakened by amendment. It is WPSQ's opinion that there needs to be close scrutiny of compliance by the Queensland Government with the EPBC Act, namely Chapter 2 subdivision C and to ensure the intent or object of Division 1 of Chapter 3 Bilateral agreements are satisfied.

The Queensland Government is a signatory to several bilateral agreements and protocols with the Commonwealth. The Intergovernment Agreement on the Environment commits the Queensland Government to care of the environment. It also advocates ecological sustainable development and the use of the Precautionary Principle when necessary. There is little evidence readily to hand that due and appropriate consideration has been given to this situation by the Queensland Government in this situation under inquiry. Other agreements such as the National

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Action Plan for Salinity and Water Quality, the National Biodiversity and Climate Action Plans and the National Water Initiative all should be considered. The Mary River and its catchment have been identified as a high salinity risk area. It appears that should the dam proceed that salinity may increase and water quality is likely to further decline. When low flows occur, the Mary River has above-recommended levels as given by the Queensland water guidelines for electrical conductivity and falls below recommended guidelines for dissolved oxygen levels. The presence of the dam would only exacerbate the situation with more fresh water removed from the system reducing environmental flows so essential for a healthy river system. These outcomes that would arise from construction of the dam appear to conflict with the purpose and objectives of the National Action Plan for Salinity and Water Quality.

With regard to the National Biodiversity and Climate Action Plan there is little evidence that climate change has been adequately addressed in the hydrological modeling used to date. Dated climate data were apparently used for modeling the most recent appears to be 1999. One can not help wondering if that is the most recent data available or did the use of that data provide more acceptable outputs. Regardless of the data, impacts will be severe on riverine and in-stream habitats and the wildlife they house or support. It is estimated that some 500 ha of endangered regional ecosystem would be destroyed. In addition, changes to the environmental flows may have significant impact on the Great Sandy Marine Park and associated wetlands. It is strongly suggested that these more than likely outcomes conflict with the intent of the National Biodiversity and Climate Action Plan.

### **Impact on Fauna**

Only time will tell the total impact on fauna. Biodiversity is valued for many reasons. As pointed out by Graetz in 1995, biodiversity is not just about rare species. It encompasses all species, plants and animals, common and rare. What has to be considered is the decrease or increase in population size of the species and the spread and contraction of its range. Usually intervention by humans has a negative impact on wildlife.

The Traveston Crossing Dam proposal is a massive intervention and will have significant negative impacts. Apart from threats to a number of endangered frog species, there are three species of immediate concern. These include the Mary River cod (*Maccullochella peelii mariensis*), the Mary River turtle (*Elusor macrurus*) and the Queensland lungfish (*Neoceratodus forsten*). The Mary River Cod and the Mary River Turtle are both listed as endangered under the EPBC Act. The Mary River is regarded as the best option for the restoration and protection of the lungfish, a unique creature. It has ancient genetic lineage between prehistoric terrestrial and aquatic animals. Granted undoubtedly management plans for the conservation of these species will be put in place. However species loss is usually gradual and not dramatic. It is also stressed that there is a lag time from loss of and or devastation of habitat to the noticeable impact on species. Management plans will need the test of time to ensure their effectiveness. There is no guarantee that they will protect the long term survival of the species.

### **Location**

By the Queensland Government's own statements, the proposed dam will be a shallow water storage. The proposed site is on a large flood plain. Such a site has a number of inherent problems. It is a well established fact that large shallow storage areas have very high evaporation rates. This is compounded by the depths of sands

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and gravel below the river bed facilitating seepage. Furthermore the alluvial plain which will be inundated also lends itself to seepage. It is WPSQ's understanding the cost of techniques to reduce large volumes of seepage is expensive.

With these obvious limitations it is difficult to understand how this site was chosen. No clear, transparent or accountable arguments have been adequately presented for community consideration.

### **Economics**

While there are other organizations with far more expertise in this area, WPSQ raises the question because of the lack of clarity and transparency. The initial figures for Stage one gave an estimate of \$850 M. It is our understanding that environmental flows had been given no consideration in that costing. Since that initial economic "guesstimate" the current estimates have more than doubled rising to over \$1.7 billion. There is no suggestion that this cost will not continue to escalate.

It is suggested that the yield will be only 70GL per year. On that basis the cost of water appears to be relatively expensive. The cost of water to be produced from the desalination plant to be built on the Queensland Gold Coast allegedly will be significantly cheaper. In addition the desalination plant currently operating in Western Australia to provide water for Perth allegedly produces water significantly more cost effective than that desalination plant to be built on the Gold Coast. Granted water to the householder will be via a controlled water grid that sources water from a broad range of options. However from the economic data available, water from the Traveston Crossing dam will only increase the cost to the consumer. It is difficult to determine if this is a cost effective source of water for the long term supply strategy.

### **Conclusion**

As indicated, the decision making process in selecting the site is not clear or transparent. Information to justify why this site was chosen over other sites is not readily available. What can be guaranteed is there will be a devastating impact on wildlife and vegetation types in the area. It is known that at least some of the species are listed as endangered. Should the dam be built considerable loss of water resources will be achieved through evaporation and seepage. From the questionable economics provided, the water will be expensive. There is a potential for impact on the Great Sandy Marine Park and its associated wetlands. Actions to date have caused considerable disruption to local communities. Actions by the Queensland Government may call into question their compliance with signed protocols.

The Traveston Crossing Dam is not part of the solution to the existing water crisis in south east Queensland. No doubt dams will play a role in delivering water resources in a long term strategy. However based on information made available to the public there is no compelling evidence that the Traveston Crossing Dam is the best option for the future. An examination of other more viable options, not necessarily dams, may prove that the case for the Traveston Crossing dam is not justified.

Thank you for the opportunity to express the views of WPSQ.