



Wildlife Queensland

YOUR VOICE FOR YOUR WILDLIFE

The Co-ordinator General
Project Manager
SEQ Infrastructure (Water)-Traveston Crossing Dam
PO Box 15009
City East, Queensland 4002

Dear Sir,

Re: Traveston Crossing Dam Environmental Impact Statement

I have been directed by the State Council of the Wildlife Preservation Society of Queensland (WPSQ) to forward comments on the above Environmental Impact Statement. 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 takes the opportunity to make comment on the document. The fact that WPSQ has availed itself of this opportunity does not infer support for this project. WPSQ remains totally opposed to the proposed construction of this dam. The Environmental Impact Statement does nothing to allay WPSQ concerns. There is insufficient consideration of climate change impacts. In addition the treatment of known endangered species is inadequate, there appears to be inaccuracies in the terrestrial vegetation and its status and as for the Environmental Management Plan (EMP), the detail is not presented to be evaluated. Words such as "will develop", "to be developed", "would" "should", "could" and "may" do not provide comfort or certainty but are scattered throughout the alleged EMP. Cost of implementing the EMP when developed is not evident. Early variations in the cost of the project and obvious omissions such as cost of pumping to Brisbane, value of environmental services downstream, detailed decommissioning costs cast doubt on the accuracy of the economic data provided.

It is suggested that the current level of water extraction on the Mary River has already affected estuarine ecology significantly through impacts on the flow regime at the mouth of the Mary. Contrary to what is stated in the EIS, that maintaining 85% of mean average annual flows, under particular circumstances the proposed dam will exacerbate this existing situation and the Great Sandy Marine Park will suffer. There is insufficient evidence

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presented to ensure the protection of these wetlands has been adequately addressed. WPSQ has no doubts that this proposed dam will impact or already has impacted on a range of social, economic, cultural and environmental aspects. There are other organizations more qualified to comment on the social, economic and cultural issues and on certain environmental components. WPSQ will focus on issues that include sustainability, alternative water sources, terrestrial environments, aquatic environments and compliance with national agreements and protocols.

The EIS fails to adequately address principles of ecological sustainable development as required by the terms of reference. ESD as defined in the Commonwealth Environmental Protection and Biodiversity Conservation Act 1999 stipulates five principles namely:

- Decision-making processes should effectively integrate both long term and short term economic, environmental, social and equitable considerations
- If there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation
- The principle of inter-generational equity- that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations
- The conservation of biological diversity and ecological integrity should be a fundamental consideration in decision making
- Improved valuation, pricing and incentive mechanisms should be promoted

All the above principles have equal standing. One principle does not have a higher priority than any other. It appears that appropriate consideration of alternatives to satisfy these principles have not been adequately addressed. On this measure alone the EIS fails to satisfy the terms of reference. It is recommended that all feasible alternatives be re-examined and evaluated against satisfying the basic principles that comprise ESD as defined above paying particular attention to the whole of life realistic cost estimates and not the selective economic data provided.

The section on alternatives is deficient. There is need to re-examine alternatives using realistic climatic and economic data in a clear transparent and accountable fashion. The impact of climate change has to be built into the equations. There is a high probability of a 10% decrease in rainfall over south east Queensland (CSIRO data) Such a decrease is likely to result in a 31% decline in the streamflow. Even over the last ten years the streamflow in the Mary has declined. Such observations are not unique to the Mary River system but have been observed in the Wivenhoe/Somerset catchments. Climate change will impact on streamflows and that has been clearly established but not adequately addressed in the EIS. Inaccuracies in the streamflow throw further doubt on the already dubious economics underpinning this project. Should the figures presented be accepted then the difference between desalination and the Traveston Crossing dam is relatively insignificant taken over the whole of life cost estimates. In the face of climate change, desalination using renewable energy sources and located to disperse of the brine discharge, is reliable and more than likely creates less environmental harm overall. Should a staged desalination option be seriously considered then the dam would even be less favourable. What about rainwater tanks, stormwater harvesting and localized recycling and the final cost to the consumer being fully explored prior to putting at risk three endangered species, the Mary River and downstream benefactors of its waters. It is recommended that consideration to various alternatives be re-examined prior to this project commencing. Such a re-evaluation should hold no fears if the decision is correct and would provide clarity, transparency and accountability sadly lacking in the EIS as presented.

The section on terrestrial environments again highlights apparent shortfalls in the data. Local information suggests that the flora list is deficient and there are species known to

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occur in the area not recorded. It appears that ground surveys were inadequate. In addition some plants need a combination of factors and or seasonal conditions to establish and prevailing seasons may be inhibiting the presence of these species. Vegetation mapping should be undertaken at an appropriate scale. While mapping at 1:100000 may be considered appropriate at a regional ecosystem approach state wide a scale of 1: 5000 would allay some of the concerns. Also there seems to be some errors in the treatment of the status of the regional ecosystems recorded. This only adds to the apparent lack of accuracy that prevails. Also the application of the Government policy on vegetation offsets to address the clearing of vegetation is confusing and is only satisfied by impacting outside the stage 1 and stage 2 areas. It is recommended that further vegetation surveys be undertaken and mapping of regional ecosystems be re-examined. Unfortunately the treatment of the fauna is worse than the flora. Very limited surveys have been undertaken and only one dry season included. Also the intensity of the trapping effort needs to be questioned. The destruction of habitat will be significant and the minimalist approach adopted is questioned. While spotting and relocating is to be commended there is insufficient detail provided to determine how successful such an operation will be. Fauna should not be relocated to suitable type habitat if that habitat is already supporting maximum population. In addition if an appropriate habitat is located and that will be a challenge as many habitats in SEQ are already fully occupied then on going surveillance will be required to ensure the health of the translocated animals. It is recommended that additional fauna surveys be undertaken, trapping intensity increased and more data be provided on the spotting and relocating techniques to be used.

Similarly the section on aquatic environments is deficient. Sampling was undertaken during an extended dry period and findings may not reflect the true diversity exhibited over a range of seasons. Certainly the baseline data does not address seasonal and yearly variation. Mitigation against weed problems may be addressed in the EMPs but insufficient data are provided to evaluate such an assumption. The EIS defines the well known species at risk namely the lung fish, the Mary River turtle and the Mary River Cod. WPSQ remains totally amazed that the Queensland Government is persisting with this project that poses such risks to these species. A \$35 Million research centre is not the answer. Such a venture gives no guarantee to providing a solution for their long term survival. Leave the species in situ with no further human intervention is the preferred option. The EIS does not adequately address the risk of extinction of these species. It does not adequately provide evidence that these species will breed in the impounded waters. How the loss of the various types of habitat required, connectivity and fragmentation will disrupt the present live cycle of these species is not adequately addressed. What is more disturbing is that some of the measures proposed to assist the survival of these species are either untried or grave concerns have been expressed about their effectiveness in other dams. WPSQ is referring to the fish lock, the turtle ramp and the catch and carry approach. What is clear from the EIS is that a substantial amount of the "riffle, run and glide habitats", essential for lung fish spawning, will be lost. Also the impact of the dam on downstream fauna and also flora appears to be a desk top exercise with no downstream ground truth surveys for conformation. The dam will impact on the freshwater flows and will affect those species that rely on freshwater for parts of their life cycle. It is also suggested that fauna that inhabit the Great Sandy Strait may be affected. More discussion is required on these aspects.

There are a number of protocols and signed bilateral agreements as well as Commonwealth legislation, 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. It is WPSQ's opinion that there needs to be close scrutiny of compliance by the Queensland Government of 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 EIS does not adequately address these aspects.

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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 in the EIS as discussed earlier. Other agreements such as the National 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. Adequate explanations of how the EIS satisfies these objectives are not provided.

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. 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. 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. Again the EIS fails to adequately suggest how the various intents of these plans are satisfied.

Conclusion

WPSQ has outlined its major concerns with the EIS as presented. As indicated, WPSQ concentrated on only issues relevant to its primary focus. WPSQ also supports rational land use and responsible future planning. This Traveston Crossing Dam project fails to satisfy rational land use and responsible future planning but these aspects appear to be outside the EIS. The EIS and its lack of transparency, failure to address issues of concern adequately and the lack of detail in the EMP provided did not convince WPSQ to change its position. WPSQ remains opposed to the proposed Traveston Crossing Dam.

Thank you for the opportunity to voice our views.

Yours sincerely

Des Boyland, Policies & Campaigns Manager on behalf of State Council
14 January 2008