



**AUSTRALIAN  
CONSERVATION  
FOUNDATION**

INCORPORATED ABN 22 007 498 482

FLOOR ONE, 60 LEICESTER STREET CARLTON VIC 3053  
phone ■ 03/ 9345 1111 // facsimile ■ 03/ 9345 1166  
email ■ [acf@acfonline.org.au](mailto:acf@acfonline.org.au) // web ■ [acfonline.org.au](http://acfonline.org.au)

19 February, 2007

Project Manager – Traveston Crossing Dam – Mary River Queensland  
SEQ Infrastructure (Water)  
The Co-ordinator General  
P.O Box 15009  
City East, 4002

To The Project Manager,

Please accept these comments in response to the Draft Terms of Reference for an Environmental Impact Statement into Stage 1 of the Traveston Crossing Dam Project.

ACF is concerned that the approvals process for the proposed Traveston Crossing Dam is flawed, because the proposal should be assessed in its entirety rather than as an artificially split referral. The Terms of Reference should include the full project details and environmental impacts relating to all stages of the proposed dam.

We are also concerned that the Queensland Government is both the project proponent, under the name of Queensland Water Infrastructure Pty Ltd, and the project assessor, under the name of SEQ Infrastructure (Water) – part of the Co-ordinator General's Office. These arrangements may be perceived as a conflict of interest and do not ensure public transparency, accountability and independence in fulfilling the aims of the Environment Protection and Biodiversity Conservation Act. We urge the Queensland Government to request the Federal Government to assess the merits of the proposed Traveston Crossing Dam on this occasion.

The proposed Traveston Crossing Dam will cause serious and irreversible harm to a river of national and international environmental significance, related RAMSAR listed wetlands, World Heritage Areas and endangering 18 species with extinction forever. By its nature, a dam changes the ecological conditions of a river dramatically and irreversibly. Efforts to mitigate such damage have never compensated for the fundamental fact of habitat destruction that unavoidably accompanies a dam. For these reasons, the alternatives to securing water supply in South East Queensland without building the dam should be given much greater consideration in the Terms of Reference.

The environmental, social, and economic costs of this dam should be compared with alternatives and combinations of alternatives such as demand management, rainwater tanks and recycling. To this end, the research conducted by the *Institute for Sustainable Futures* for the *Mary River Council of Mayors*, and the detailed submission provided by the *Save the Mary River Coordinating Group* should be given fair and adequate consideration in determining the environmental and social impacts as well as the alternatives to the proposed dam.

The content of the EIS should also include:

- (section 1.1) An independent analysis of the environmental, social and economic impacts of the Paradise Dam in the evaluation of the project proponent's ability to deliver effective environmental management.
- (section 1.2) A detailed Project Description of all stages of the proposed dam including all aspects of engineering, land use planning, environmental and social impacts, including impacts on towns in the inundation area, the river downstream, and the impact of related infrastructure such as roads and pipelines.
- (section 1.3) The Project Rationale should describe the project in the context of the full range of water security options in South East Queensland.
- (section 1.3.1) The Need for the Project should clearly justify why the proposed dam meets the water security needs of South East Queensland with better environmental, social, and economic outcomes than any other option or combination of options.
- (section 1.3.2) The Costs and Benefits of the project should include a detailed outline of the budget for the proposed project so that capital and related pipeline and road infrastructure works are clearly delineated from the ongoing operational costs.
- This section (1.3.2) should also include environmental externalities such as the costs of abating greenhouse gas emissions from the dam and water distribution infrastructure, the costs to regional fisheries and tourism relying on the health of the Mary River, as well as ongoing operational costs such as the management of aquatic weeds. These costs should not be heavily discounted into the future, but rather, take into account the increasing costs of abating greenhouse gas emissions in a future carbon market.

- (section 1.4) Alternatives to the project should be given a much higher priority in the Terms of Reference for assessing the dam because of the serious and irreversible harm that the dam will cause. This section needs to include the latest research into demand reduction techniques, and the combination of options that could provide water security to SEQ in place of the proposed dam. The assumptions used as the basis for the Queensland Government policy, *A Long Term Solution* have been discredited.
- (section 1.5) The Environmental Impact Assessment Process needs to include adequate baseline research on the ecology of the Mary River, the inundation zone, related downstream and upstream areas, estuarine zones including the RAMSAR listed wetlands, and the ecological communities that are likely to be impacted by related infrastructure such as dams and pipelines. This baseline data needs to be made available for independent scientific and public scrutiny.
- (section 1.5.2) For the Environmental Impact Assessment to be credible, it needs to countenance the possibility that the proposed project may need to be refused on environmental grounds. The burden of proof that environmental impacts *can* be mitigated *at all* needs to be on the project proponent.

We believe that the conflict of interest between the project proponent and the project assessor – in this case, two parts of the Queensland Government, will impair the perceived credibility of the assessment. Further, if the Queensland assessment is seen as not accomplishing the goals of the Environment Protection and Biodiversity Conservation Act, there is a possibility that the project will remain open to legal challenge notwithstanding any federal approval: see *Brown v Forestry Tasmania (No 4)* [2006] FCA 1729 (19 December 2006). For these reasons, we urge the Co-ordinator General to voluntarily refer the decision back to the Federal Government for an independent assessment of the environmental, social and economic merits of all stages of the proposed Traveston Crossing Dam.

We look forward to meeting with you to discuss this matter further. I can be contacted on (03) 9345 1134 or by email [k.noble@acfonline.org.au](mailto:k.noble@acfonline.org.au)

Yours sincerely

Kate Noble  
Australian Conservation Foundation