

Why a thorough investigation of the Traveston Crossing Dam proposal is a Federal Government responsibility (in addition to its responsibility to administer and enforce the EPBC act).

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In addition to the Federal Government's legal obligation to administer the EPBC Act fully and appropriately with respect to the proposed Traveston Crossing Dam, the proposal falls clearly within the scope of at least 4 other major federal policies under which the Federal and Queensland governments have mutual obligations in the form of signed bilateral agreements.

These joint Federal/State policies are the
National Action Plan for Salinity and Water Quality (**NAPSWQ**)
National Water Initiative (**NWI**)
National Biodiversity and Climate Change Action Plan (**NBCCAP**)
National Agriculture and Climate Change Action Plan (**NACCAP**)

Since the announcement of the proposal in April 2006, even with the limited amount of specific technical information made available to the public, there has been enough information released and enough time for sufficient analysis to support an argument that the proposal can only result in outcomes that are directly opposed to the objectives of these 4 National Plans. This would suggest that a full investigation of the proposal and the likelihood of it producing a set of outcomes in direct opposition to the intent of these plans is warranted on behalf of the federal government. The Queensland Government is effectively the proponent in this project, and therefore has a clear conflict of interest in the administration of its responsibilities under these National Plans.

What follows is a very brief summary supporting this argument, with respect to each National Plan.

NAPSWQ: The Mary River catchment is a Priority Catchment under the NAPSWQ and has already been identified as being at high risk of increased salinity. The intent of this priority listing is to allocate federal funding to projects designed to slow, halt or reverse the trend in increasing salinity and decreasing water quality in the catchment. As such, the NAP identifies community consultation and involvement as a 'cornerstone' of the plan, and ties the catchment into specific provisions under the NBCCAP and the NACCAP to incorporate climate change scenarios into the hydrological modelling and water resource planning in the catchment.

There is compelling scientific evidence that the Traveston Crossing Dam proposal could have no other possible outcome than to increase salinity and drastically reduce overall water quality in the catchment, particularly in the 200km of river downstream of the proposal. In times of low flow, the river already exceeds Queensland water quality guidelines for electrical conductivity, and has dissolved oxygen levels consistently below the guideline standards. Removing a great deal more freshwater from the catchment and drastically reducing the regular minor flushing flows in the river can only make these trends worse.

It is also clear that community consultation with respect to the proposal has been absolutely unsuccessful within the catchment. For example, the entire community reference panel appointed by the State government in developing the draft Water Resource Plan for the catchment formally withdrew all support for the plan following the announcement of the dam proposal, prior to the plan becoming legislation (after being greatly amended with no consultation).

NWI: Some of the stated objectives of the NWI are to "bring about more profitable use of water and more cost-effective and flexible recovery of water to achieve environmental outcomes" and "more sophisticated, transparent and comprehensive water planning that deals with key issues such as the major interception of water, the interaction between surface and groundwater systems, and the provision of water to meet specific environmental outcomes". In Queensland, this is reflected in a commitment to achieving a consistent set of water resource planning outcomes as reflected in the legislated Water Resource Plans produced for catchments throughout the State.

The final result of the Water Resource Planning procedure for the Mary River has been anything but transparent, and has resulted in legislation which does not adequately protect environmental flow outcomes in the 200km of river downstream of the proposal. A comprehensive economic analysis of the Traveston Crossing proposal by Professor Stuart White of the Sydney University of Technology and Cardnos Consultants clearly shows that the proposal is the

least cost-effective means of providing urban water security for SE Qld of all the options they considered, by a large margin. It also pointed out that the water resource planning process has resulted in an outcome where approximately half the strategic reserve identified in nearby catchments in SE Qld (where the urban demand used to justify the project is located) would be preserved, while the entire strategic reserve of the Mary catchment would be utilized and transferred out of the catchment. In fact, analysis of the IQQM modelling used to formulate the Water Resource Plan for the Mary suggests that the total amount of water that would be removed from the Mary catchment by the proposal far exceeds the 150GL/year strategic reserve identified in the WRP.

There is ample data and analysis available to show that the Mary system already struggles with low flows and poor water quality, and if current allocations were fully utilized, it could not meet water security expectations and reasonable environmental flow objectives. The Traveston Crossing Dam proposal can only result in the significant further over-allocation of the system and severe degradation of environmental values within the catchment. When there are significantly more cost-effective means of providing a similar level of water security to SE Qld, this outcome is in direct opposition to the objectives of the NWI.

NBCCAP: In catchments identified in the NAPSWQ, there is an obligation under the NBCCAP to specifically examine the effects of development projects on the ability of species and communities to move and respond to climate change. There is an added obligation to incorporate climate change modelling into the planning of water resource management in these catchments. The principal effect of climate change in the Mary system is likely to be the effect on stream flow regimes. The hydrological modelling used to investigate the impacts of the Traveston Crossing Proposal to date has specifically ignored the impact of climate change on streamflows. The impact of the proposal on biodiversity in the catchment is much greater in a climate change scenario. For example, the yield performance of the dam proposal is doubtful and its impacts on streamflow are far more severe if based on streamflow data from 1997 to 2007, rather than the climatic information over the period from 1890 to 1999 used in the state government modelling to date.

Under this sort of climatic scenario, the impact of the proposal on the complete disruption of riparian and in-stream habitat corridors for extensive lengths along the stream (hundreds of kilometres), both in the proposed inundation area and in the downstream reaches of the river would seem to be in direct opposition to the intent of this National Plan

NACCAP: Most of the proposed inundated area is class one agricultural land, in a favourable climate, with access to irrigation and in close proximity to transport and markets. The soils of the valley floor are extremely deep and fertile. The massive impact of the land use change over such a large area to a periodically inundated swamp is a significant loss of an extremely valuable resource in the context of future societal requirements for a viable agricultural production base under future climate change scenarios.

In addition, the change that this will bring about to the carbon and nitrogen cycling in the ecosystem will potentially have significant greenhouse impacts on a national scale, because of the sheer amount of organic carbon and nitrogen tied up in this massive soil volume and associated surface vegetation. This is a depositional landscape, where soil and associated nutrients in the inflow will be continuously added to a eutrophic, fluctuating anaerobic/aerobic soil/water/biomass system. The greenhouse implications of this gross land use change need to be investigated, as specifically outlined under the NACCAP. This work has not been conducted by the proponent.

Conclusion:

Both the Queensland State Government and the Federal Government are parties to high priority national agreements that are directly relevant to the Traveston Crossing Dam proposal. As the effective proponent in the proposal, the Queensland Government has a clear conflict of interest in the satisfactory execution of its responsibilities under these national agreements. This places the burden of responsibility on the relevant Federal government agencies involved in these agreements to ensure that the objectives of these policies are achieved with respect to the outcomes of the Traveston Crossing proposal. On face value, it appears the proposal can only have outcomes that are in direct opposition to the objectives of these 4 national plans and initiatives.