



Dam the Mary River? Save the Mary River!

Response to Terms of Reference for Environmental Impact Statement (EIS)

Save the Mary River Coordinating Group

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WHY SEND A RESPONSE?:

The State Government has to seek approval from the Federal Government under the Environment Protection and Biodiversity Conservation (EPBC) Act. To obtain approval, Queensland Water Infrastructure (ie. the State Government) must be able to prove that matters of National Environmental Significance have been properly identified, investigated and that the impacts can be mitigated against. We believe that a proper investigation will show that the environmental impacts cannot be mitigated against. Your comments will help to ensure that a proper EIS is undertaken.

WHO DO I ADDRESS THE LETTER TO/HOW DO I START THE LETTER?:

PROJECT MANAGER – TRAVESTON CROSSING
DAM PROJECT
SEQ INFRASTRUCTURE (WATER)
THE COORDINATOR-GENERAL
PO BOX 15009
CITY EAST QLD 4002

Dear Sir,

Re: Draft Terms of Reference for Environmental Impact Statement – Proposed Traveston Crossing Dam

Purpose

The purpose of this letter is to provide feedback on the Draft Terms of Reference for an Environmental Impact Statement dated December 2006 regarding the proposed Traveston Crossing Dam.

(Insert the Text of Your Letter)

WHAT DO I SAY IN THE LETTER?:

Simply pick three of four dot points from the list on the following page, put them in your own letter – add your own thoughts if you wish and send to the address above.

POSSIBLE POINTS FOR INCLUSION IN YOUR LETTER:

- The Impact of Climate Change has not been considered in the Draft Terms of Reference (TOR) and should be included as a matter of critical importance. Reference to the National Biodiversity and Climate Change Action Plan should be included in the TOR.
- The Environmentally Sustainable Development (ESD) Charter should be referred to in the TOR, in particular, the need to adopt the “precautionary principle” where the environmental impact of actions is not fully known.
- The Intergovernmental Agreement on the Environment (IGAE) and the National Action Plan for Salinity and Water Quality should be referenced in the TOR. The Mary Basin Catchment is a priority catchment under NAP for salinity and consideration must be given to this in the TOR.
- The TOR should refer to a comprehensive Health Impact Assessment of public health risks associated with the project such as mosquito borne disease, water borne disease, blue green algal toxins, manganese and other heavy metals and the potential impact of the transfer of toxins and pathogens between catchments.
- Only Stage 1 of the proposed Traveston Crossing Dam has been referred to the Federal Minister under the Environment Protection and Biodiversity Conservation Act (EPBC) yet the State Government is proposing to build the dam to full in Stage 1 and acquire all the properties for Stages 1 and 2 in Stage 1. This constitutes a Split referral under Section 78 of the EPBC Act. The State Government should assess the full impact of Traveston Stages 1 and 2 (including pipeline, distribution and water treatment) in the EIS, advise the Federal Minister that the referral was made in error and refer the full proposal for assessment under the EPBC Act.
- The TOR makes no reference to the risk of extinction to rare and threatened species. The onus of proof is on proponent to demonstrate that species will not be affected. This will require a proper population viability analysis and detailed modeling of the base case (no dam) and the disturbance regime (with dam). The impact on threatened species must consider loss of habitat, connectivity and fragmentation.
- The EIS is to be based on a flawed Water Resource Plan with unacceptable low flow Environmental Flow Outcomes. Simply achieving the outcomes listed in the Water Resource Plan will not provide for environmentally sustainable flows at crucial locations in the river. The EIS should be based on the flows which are required to ensure the continued viability of threatened species and habitats.
- The EIS should contain a demonstrated program of implementation of mitigation measures with consequences for non-implementation and fully documented performance criteria. It is evident that this was not put in place for the Paradise Dam and many of the proposed mitigation measures either do not work or have not been implemented.
- The TOR should include an assessment of the proponent on basis of track record of staff, directors and contractors. Key staff, directors and contractors associated with QWI were responsible for the Paradise Dam. The environmental performance of that project should be assessed to determine whether the proponent is capable of performing in a satisfactory manner on this project. Under the EPBC, the Federal Minister can take into account a person's environmental history in determining whether to approve a controlled action.
- The TOR should include an assessment of the locations impacted by the Probable Maximum Flood (PMF) with the proposed dam and without the proposed dam. A similar exercise should be undertaken in relation to the 1% Annual Exceedence Probability (AEP) – ie. the 1:100 year flood, including the hydrodynamic effects in the regions around the inflows to the ponded area.
- Six months is insufficient time for the completion of an appropriately documented and comprehensive EIS for a project with such a large and significant impact. If the public is to have confidence in the process and the Federal Minister is to make an appropriate assessment, then more time is required for the EIS process.
- The section relating to alternatives lacks any substance and could in no way be considered to offer a real assessment of the alternatives. It seems that this section of the report is only being offered “lip service” in that it occupies only one half of a page in a 70 Page Terms of Reference. A great deal more rigor is necessary in regard to the consideration of alternatives.
- The social impact of the proposal requires a lot more emphasis and should be strengthened in the TOR.