



Save the Mary River Coordinating Group

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The Director

Legislation Policy Section

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Department of the Environment, Water, Heritage and the Arts

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19 June 2009

Dear Sir/Madam,

Re: Submission on the draft assessment bilateral agreement between the federal government and the Qld state government concerning the assessment of projects under the federal Environmental Protection and Biodiversity Conservation (EPBC) act.

The Save the Mary River Coordinating Group Inc (STMRCG) is a community based group formed two days after the Queensland Government's surprise announcement that it intended to dam the Mary River at Traveston Crossing. It has a committee comprising of landholders in the region of the dam footprint; a membership of over 170 members and demonstrated very substantial community support for its legitimacy and its actions. It has members from a wide range of professional backgrounds including expertise relevant to the issues required to be addressed submission on the existing bilateral agreement.

STMRCG strongly recommends "that the draft assessment bilateral agreement be amended to ensure that major state-owned projects are subject to an EPBC assessment procedure which is wholly independent of the proponent" for the following 4 reasons:

1. Conflict of interest and lack of independent environmental assessment:

A major concern with the existing bilateral agreement arises where the proponent is a wholly-owned State corporation, or a private/public partnership set up for a specific project by the State Government. This effectively creates the situation where the state government proponent gets to write the environment impact statement for the project as well as assess it on behalf of the Federal government.

This concern has been raised in many public submissions to the senate inquiry into the Traveston Crossing proposal, during the existing assessment procedure for the Traveston proposal and in the

senate and independent inquiries into the operation of the EPBC Act.

Here we have a lack of confidence in the bilateral agreement being an appropriate assessment method when the State is trying to undertake an independent environmental assessment on the Traveston Crossing dam project. We were advised in 2006 by Queensland Water Infrastructure (QWI) that “Queensland Water Infrastructure Pty Ltd is a Corporations Law entity wholly owned by the Government, with a single share held in trust by the Premier of Queensland”, and found five of the six Directors were Queensland Government employees. The proponent, QWI, and the Queensland State Government are effectively one and the same. In effect, this is the State Government referring its own proposal to itself for assessment, akin to allowing a person charged with a serious crime to be a juror at their own trial. Further, QWI has been granted State Government powers to progress the proposal and is therefore not an independent company.

Similarly we have seen how the proposed Traveston Crossing Dam has been written into state legislation, land purchased and a destruction of a community even before it has any approvals through the state or federal EPBC Act approval processes.

Due to the way the Queensland Government had approached all aspects of the Traveston Crossing dam proposal, the communities represented by the Mary River Council of Mayors (500,000 people from Maroochydore to Hervey Bay) had no confidence in the honesty, integrity and transparency of Queensland Government accredited processes. An independent least cost planning study to evaluate all alternatives to building the dam was sponsored by the Mary River Council of Mayors and found there to be a combination of alternatives that were cheaper, with less social and environmental impacts. The STMRCG requested that the action to build the proposed Traveston Crossing Dam be assessed by an independent inquiry as set out in Part 8 Division 7 of the EPBC Act. This was denied because of the current conditions of the bilateral agreement.

2. Major changes in the planning and assessment laws and procedures:

Major changes that have taken place in Qld's own planning and assessment laws and procedures since the bilateral was originally signed, justifies a rewrite of the bilateral agreement to include conditions for independent assessment for significant projects being proposed by the Queensland Government or any of its agencies/companies.

This is particularly important with respect to 'fast-tracking' major state-owned projects under the Integrated Planning Act(IPA) and Queensland's unique State Development and Public Works Organization Act (SDPWOA). Once a political decision is put into place under these particular pieces of legislation, Queenslanders have very little recourse to a review of these decisions or of their impacts. Queensland has drastically changed the SDPWOA in the last 3 years and is set to completely change the IPA to The *Sustainable Planning Bill 2009* soon. (<http://www.propertyoz.com.au/qld/Article/NewsDetail.aspx?p=16&id=1471>).

The concern about these changes is the reduction in the amount of assessment, reduced or eliminated opportunity for public comment and reduction or removal of most of the legal avenues for review of decisions.

Queensland's political system is unique in having no upper house to review decisions made in the

lower house, and by making extensive use of its powerful State Development Act. This act is administered by the unelected government position of Coordinator-General (unique to Queensland), a position which has a history of direct political appointments and whose decisions have no judicial review.

The federal EPBC Act could provide Queenslanders with some form of independent review of the environmental and social impact of major state projects. However, the bilateral assessment agreement as it stands effectively robs Queenslanders of this opportunity. On contentious issues like the Traveston Crossing proposal it doesn't seem to streamline the assessment procedure anyway because the public finds a way to agitate for some form of independent review, which the federal government ends up conducting anyway. It would be more 'streamlined' and efficient to recognize this and plan a clearly independent assessment of this projects from the start.

3. Previous failure of SDPWOA EIS process to assess impacts on Matters of National Environmental Significance

We have no confidence in the SDPWOA process because when it was used for the approval of Paradise Dam on the Burnett River under similar rushed political circumstances in 2002, it had serious shortcomings in the scientific standard and process of the environmental impact studies undertaken (see Appendix A for details). It is an inappropriate process because there is a perception of bias when the proponent is a public company set up by the Queensland government that will undertake an assessment process that is run by the Queensland government

Similarly there is concern about the integrity of the EIS process and the level of balance in the commentary and conclusions reached. We understand that misleading and inaccurate statements can be included within an EIS without any legal accountability being available against the proponent or their paid environmental consultants.

The SDPWO Act has no pro-environment (indeed, any) objects or deliberative obligations, so it allows the Coordinator General's EIS assessment reports to preference creating employment and developing the State over protecting the environment.

Most importantly, declaration as a significant project prevents government agencies (including the Environmental Protection Agency) from requiring the project to be refused or imposing conditions inconsistent with those required by the Coordinator General. In short, the Coordinator General's EIS assessment report overrides the detailed requirements of all other environmental laws and gazumps the powers of other government agencies.

The independence and accountability of the development assessment and approval process for significant projects is clearly compromised by the apparent bias of the Coordinator General for development and the lack of environmental objects and criteria in the SDPWO Act. The role of an independent monitor such as the EPA for all development approvals, in particular major projects, is fundamental to an accountable and balanced process, yet it has been relegated to advisor status. Lastly, there are no offence provisions in the SDPWO Act which prohibit false or misleading statements at any stage of the EIS process.

Since the proposed Traveston Crossing dam was announced by the Queensland Government, there

have been many examples of conflicting and changing information and in combined with the inadequacies of the Burnett River process, we consider that the current process will not properly assess impacts of matters of national environmental significance (see Appendix B for details).

4. Monitoring and lack of enforcement of EPBC approval conditions:

Paradise Dam is the last dam built in Queensland, was audited under the EPBC act to be partially compliant for the fishway and showing a number of other shortcomings in meeting EPBC conditions. Auditing delays (over 6 months between auditing date and final report release) and lack of enforcement of EPBC approval conditions is of concern. . Appendix A lists some of the poor environmental performance being exhibited at Paradise Dam that were not adequately assessed in the planning stages. Appendix C lists some of our comments about the lack of rigor in the Audit of Burnett Water Pty Ltd, QLD, Burnett River Dam, EPBC 2001/422 (comments in yellow notes).

In particular there has been **no prosecution by the Federal government** of the Queensland government for its breach of EPBC conditions on the Paradise Dam even though the downstream fishlock and the upstream fishlift has operated insufficient times to gather enough monitoring data to assess its effectiveness. This is now being challenged in the federal court by Wide Bay Conservation Council and costing the community. This would not have been required had the environmental assessment process been carried out properly in the first place and clearly shows shortcomings of the bilateral agreement.

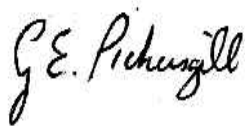
There also has to be suitable habitat on either side of the fishway for the fish to survive, thrive and reproduce... a surface covered in the aquatic weed salvinia in the dam, and lack of suitable spawning grounds (for lungfish) and very little water released downstream could hardly constitute to be suitable habitat. Similarly there has to be suitable water quality. Fish kills in Paradise dam during 2006 and 2007 are evidence that water quality has been a problem that would have put more of the fish population at risk. This monitoring data on fishkills (or fish strandings) is no longer publically accessible on the EPA website further showing lack of transparency in monitoring and shortcomings of the bilateral agreement.

The following link provides additional information and images of Paradise Dam -

<http://picasaweb.google.com.au/glendap5/Paradise?authkey=fcnPkxsYv6Q>

Finally, if any part of this submission is unclear, or for further information please contact the undersigned.

Yours Sincerely,



Glenda Pickersgill

President

Save the Mary River Coordinating Group Inc.

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APPENDIX A: Failure to meet Environmental Impact Assessment process at Paradise Dam

Concerns regarding the assessment process used for Paradise Dam by the State Government:

(PDF) http://www.publish.csiro.au/?act=view_file&file_id=EC122p18.pdf

1. The Environmental Impact Assessment (EIA) process did not achieve its potential as there were no specific Terms of Reference for the project. The Terms of Reference set out generically in the Bundaberg 2000+ project were not sufficiently specific for this major project.
2. The integrity of a process of EIA was diminished as a public decision-making tool when the government commitment to the project was announced before the EIA had commenced.

The process did not give adequate consideration to a sufficient range of alternatives to the dam for meeting water resource needs. It failed to include those identified by other water planning and assessment initiatives in the district. The Least Cost Planning Study commissioned by QLD Government EPA “Using these costed options a Hybrid Option has been developed, which achieves the requirements of the Paradise Dam but with significant additional financial, social and environmental benefits” page v Executive Summary “Burnett Region Least Cost Planning Study” UTS Institute for Sustainable Futures, March 2002

3. The integrity of other planning, especially in this case the Water Resource Planning process, is not maintained when it can be replaced by special project legislation affecting the core area of the Plan.(Details)
4. The public was not informed at any time that the EIA results would be used to amend the Water Resource Plan.
5. The new published framework for assessing the economic viability and ecological sustainability of new water infrastructure was not used in the assessment of Paradise Dam eg (“A Critique of the Economic Viability of the Burnett River Dam Development: Predicted Levels of Future Water Demand According to the Irrigators Ability to Pay for COAG Compliant Water” Dr. John Ward June 2004)
6. The integrity of the EIA process was diminished by the release of new reports and the undertaking of hydrological modelling after the completion of the EIA.
7. The assessment and its evaluation were not independent. The proponent of the project was also the primary evaluation group. There is a potential conflict of interest between the Dept State Development and the proponent given that the Minister was the primary shareholder of Burnett Water.
8. Extensive research and consultation undertaken as part of the WRP process was ignored in the case of Paradise Dam and similarly is being ignored with the Mary River. Major water resource developments should not be conducted in this way.

9. The process did not meet Principle 6 of the COAG agreement which states - "*Further allocation of water for any use should only be on the basis that natural ecological processes and biodiversity are sustained.*"
(Section 4.2 "A Critique of the Economic Viability of the Burnett River Dam Development: Predicted Levels of Future Water Demand According to the Irrigators Ability to Pay for COAG Compliant Water" Dr. John Ward June 2003)
10. All research documents were not released for public comment or considered in the EIA process.
Documents included
- "Ecology and demography of the Queensland lungfish (*Neoceratodus forsteri*) in the Burnett River, Queensland" S.G. Brooks & P.K. Kind Final Report QDPI may 2002.
11. Insufficient time for considering review of the technical information in the IA and related supporting studies. (The period (20 days) for the public to research and respond to the IA documents was inadequate. The period (14 days) for the government agencies to research and respond to the EIA documents was inadequate)
12. All the studies known to be prepared for this, and related projects, were not finalised satisfactorily and accessed in the EIA.
13. Process did not follow open, facilitative procedures: It was not transparent and readily accessible, with a traceable record of assessment decisions and timely opportunities for public involvement and input at key stages.
14. Lack of rigorous follow-up and feedback on explicit measures for checking on compliance with conditions, monitoring effects, managing impacts, and auditing and evaluative performance. In the DNR Annual Report 2004/2006 Burnett River Catchment:
- Section 4.3 ROP/IROL Monitoring**
- The IROL requires SunWater to monitor and report tailwater and headwater quality data at the majority of its storages, including dissolved oxygen, conductivity, pH, temperature, nutrients and blue green algae. During the reporting period there were periods when frequency of monitoring for blue-green algae were not implemented as required by the Blue Green Monitoring Manual. This was reported in SunWater's Annual Report as an oversight.
- Section 4.3.1**
- "Monitoring data transfer and annual reporting from SunWater were completely satisfactory. The appropriate parameters were monitored and reported within reasonable limits. However, the reporting of water movement for the reporting year was in an unsuitable format for NR&M to assess.
15. The Burnett river dam was named by the World Wildlife Fund as one of the 10 worst dams constructed in the last five years. The dam is cited for the lack of transparency in the assessment process, its economic viability and the major threat it poses to Queensland lungfish. "To Dam or Not To Dam: Five years on from The World Commission on Dams" 2006

A suitable case study would be a thorough appraisal of the performance of Paradise Dam.

Have the mitigation strategies in the EIS for that project been successfully implemented? Have the economic benefits outlined in the EIS been realized? Has the project complied with the environmental flow outcomes and water security provisions of the Burnett Water Resource Plan? Have the measures outlined in the Environmental Management Plans for the project been properly implemented? Are the stakeholders identified in that project happy with the outcomes? Has there been successful mitigation of adverse impacts on Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) listed species in the Burnett catchment? Did the economic outcomes meet predictions for the dam?

- The comparison between Paradise dam and the proposed Traveston Crossing Dam is directly relevant to the proponent of this project – the two projects share the same Chief Executive Officer, the same consulting firm conducting the EIS, the same corporation doing the hydrological planning and operating the storage as is contracted to do the hydrological planning for the current project.
- There are a number of examples from Paradise Dam where mitigation strategies used in that project have not been effectively carried out. These include:
 - Water manager Sunwater has conceded that the fishway mechanism at Paradise Dam to help fish navigate the dam wall has never worked in both directions. Acting chief executive Peter Boettcher says fish are able to travel upstream but not downstream. *"It's designed to operate at between 57 per cent and 100 per cent capacity and the current level of the dam is at 15 per cent,"* he said. The height of this wall is 25.6m compared to the proposed Traveston Crossing wall height of 45m. There is a high risk that the same problem of insufficient water in the dam will apply to the TCD. This combined with loss of prime breeding habitat for the lungfish has put this species under considerable survival risk.
 - Although Sunwater claims the fish ladder works at water levels over 57% there is no published proof that the fish ladder actually works at any water level. The scientist responsible for monitoring the fish ladder admitted in an email dated 28 June 2006 that *"although the Paradise Dam wall and fishlift was completed late last year the construction of other infrastructure and operational testing continues and for this reason the operation of the fishlift is irregular. As you would appreciate in order to undertake rigorous scientific studies we require regular routine operation so we can perform replicated experiments. All can say for now is that the fishway has been observed passing fish but we are yet to begin replicated studies."*
 - The EPBC Variation of Approval (EPBC 2001/422) required Burnett Water Pty Ltd to, *"adhere to the environmental flow requirements specified in the Water Resource Plan (Burnett Basin) 2000 (WRP) and the Resource Operation Plan (Burnett Basin) 2003 (ROP) and the Burnett River Dam Flow Strategy for Lungfish (dated 22 May 2003)."* The EPBC audit and an admission by Sunwater confirm all requirements have not been met.
 - The Burnett River Dam Flow Strategy for Lungfish has a specific ecological outcome which

is recognized under the WRP, which is:

Water is to be managed and allocated:

- a. To maintain pool habitats, native plants and animals associated with habitats in watercourses;
- b. To maintain long term water quality suitable for riverine and estuarine ecosystems;
- c. To provide flow regimes that favour native plants and animals associated with watercourses and riparian zones;
- d. To provide wet season flow to benefit native plants and animals, including for example fish and prawns in estuaries;
- e. To improve stream flow conditions to assist the movement of fish along watercourses.

In particular, for the Burnett River Basin and Burnett River the WRP states:

1. Water in the Burnett River is to be managed and allocated to provide for lungfish habitat in the river particularly habitat downstream of Gayndah at AMTD 200KM;
2. *“Operational water release from the dam must occur in a manner that enables the Environmental Flow Objectives and Indicators specified in the WRP to be achieved. As a result, the operation of the dam will promote the proposed ecological outcomes targeted by the WRP, including for lungfish habitat.”¹*

○ *Published evidence that Sunwater has failed includes:*

1. The Queensland Environmental Protection Agency (EPA) has noted in its *“Final Report: Operation of the Ned Churchward Weir between 1998-2005”* that the report has been prepared in response to a request from Sunwater (the operator who subsumed Burnett Water Pty Ltd), for confirmation that they have fulfilled the monitoring requirements as part of the agreement between the Commonwealth and State governments. The report focuses on the review of the Storage Operations Management Plan (SOMP).²
3. The report indicates that, “a **major** (not minor) omission in the SOMP process has been the failure to update the SOMP in light of new scientific data, particularly in relation to lungfish and macrophyte management. This has meant that while Sunwater may have complied with the SOMP monitoring requirements, compliance itself was not achieving the biological goals for some of the SOMP elements, namely, to date there has been no successful spawning of lungfish with the Ned Churchward Weir”.²

¹ Burnett River Dam Flow Strategy for Lungfish
Burnett Water Pty Ltd May 2003 , Introduction , pp 1

² QEPA 2007 *Final Report: Operation of the Ned Churchward Weir between 1998-2005, Executive Summary* , pp2 .

4. The importance of providing suitable habitat for lungfish spawning and recruitment was recognized right at the inception of the Weir Project, with the Administrative Arrangements requiring that investigations were to be undertaken to establish requirements for the maintenance of lungfish breeding habitat and juvenile recruitment so that these could be incorporated into the operational rules for the weir (specifically to stabilize water levels). There was an understanding then that operation of the weir would be based on the results of studies subsequent to the construction of the weir and that rules would be changed to accommodate those results.
5. While the spawning habitat requirements of lungfish have been established through subsequent studies (Brooks and Kind, 2002), the reason behind complete failure of macrophytes to establish and provide habitat within the weir have not been addressed. As a priority the operating requirements to establish macrophyte beds need to be agreed by Sunwater with macrophyte experts. Until appropriate spawning habitat can be established in the Weir and suitable stable water levels are maintained during spawning, incubation and hatching, lungfish populations in the weir will either fail to reproduce or will need to travel to suitable spawning habitat in unimpounded waters.
6. The ability for Lungfish to successfully travel upstream to unimpounded waters is compounded by the operators' admission that the Burnett Dam Fishway can only operate during times of high flow and greater than 57% storage. The Burnett River Dam has only ever achieved 31 % ³ capacity since commencement of operation. The following issues have not been resolved over the life of the SOMP, nor will they be resolved under current arrangements within the ROP:

No lungfish spawning or recruitment within the Ned Churchward Weir to date due to:

- a. Insufficient establishment of suitable macrophyte beds for lungfish spawning and recruitment;
- b. Lack of suitable substrate;
- c. Egg mortality if spawning did occur⁴

This report gives a reasonable insight into the inability of the resource operator (Sunwater) to implement the *Burnett River Dam Flow Strategy for Lungfish May 2003* with particular reference to special ecological outcomes of the WRP (a) –(e) and (1):

- The failure on behalf of the operator (Sunwater) to implement agreed water level stability management is a demonstration of non-compliance with the policy intent of the Lungfish Flow Strategy and it can successfully be argued as a non compliance of the EPBC Variation of Approval (EPBC 2001/422) to ,
“*adhere to the environmental flow requirements specified in the Water Resource Plan (Burnett Basin) 2000, the Resource Operation Plan (Burnett Basin) 2003 and the Burnett River Dam Flow Strategy for Lungfish dated 22 May 2003.*”

³ www.sunwater.com.au/storage/summary/

⁴ *Final Report: Operation of the Ned Churchward Weir between 1998-2005, PP 32.*

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7. Turtles in dams are dying due to starvation (loss of food supplies), crushing in fish ladders and locks, being smashed going over dam walls, loss of sheltering sites, physical barriers impeding movement, reproductive output declined due to loss of habitat and injury (EPA report - Hamann et al., 2007).
8. There has been no publicly available documents demonstrating that the \$1.1 m turtle hatchery has ever produced hatchlings, except from eggs collected in the wild. Additionally, these are not Mary River Turtles. The Queensland Government has not successfully bred Mary River Turtles.
9. Planting of 100 000 trees for environmental offsets not successful due to dry conditions.
10. Removal of vegetation before inundation not completed and this has contributed to rotting of vegetation and poor water quality. In April 2006, a 17 km fish kill occurred at Paradise Dam – Sunwater’s comment was, “We started to collect the dead fish, but stopped after a while – there were just too many.”

APPENDIX B: Concerns regarding the Traveston Crossing Dam proposal process:

1. Numerous reports and documents were withheld from the community, although some of these reports were still advertised as being freely available on the Queensland Department of Natural Resources, Mines and Water website. Unexplainable delays in getting hydrological modeling data for the draft Mary Basin Water Resource Plan (WRP) Appendix A. Although we did receive the WRP Appendix A in November after 5 months of requesting, we have also asked for and still don't have modeling results for the current flooding from the Traveston Crossing Dam proposal.
2. Fishkill database removed from EPA website and a censored report made available to public relating to a Mingo Crossing fish kill (May 2006) which extended for 17-20km in the Paradise Dam.
3. Dam wall drilling and design suppressed. We haven't been provided with the summary reports for the initial geological drilling, or any reports for subsequent/more recent drilling, or any of the seismology reports. All despite numerous requests, and promises from Government and QWI representatives (eg Peter Beattie in July 2006 Gympie meeting, Scott Smith at Kandanga August 2006 meeting, Anna Bligh at Gympie November meeting).
4. We had to apply under the *Freedom of Information Act* 1992 (Qld) for access to the following documents with limited success:
 - All documents relating to the functioning of the fish ladder on Paradise Dam on the Burnett River, including but not limited to documents addressing:
 - the mechanical operation of the fish ladder;
 - the species and numbers of fish recorded to have successfully negotiated the fish ladder both upstream and downstream of the dam wall; and
 - assessments of the effectiveness of the fish ladder;
 - All documents relating to assessment of the effectiveness of the fish ladder on Walla Weir; and
 - All documents relating to the implementation of the Lungfish Flow Strategy.
5. Incorrect statements from Premier Peter Beattie regarding:
 - Performance of fish ladder at Paradise Dam.
 - Performance of hatchery at Paradise Dam .
6. Inadequate costing and management of aquatic weeds in Paradise Dam (Reference Press Release "Volunteers left to clean up Burnett Catchment")
7. Unfair confusion about volunteer land resumption before project approval. The yield and capacity of the Traveston Dam, and consequently the inundation area, has changed on many occasions during the last 6 months leading to a high degree of uncertainty within the community. Similarly the relocation of roads caused unnecessary uncertainty.

8. Not in compliance with IGA National Water Initiative (Turnbull) for transparency and community consultation.
9. Impacts under EPBC Act cannot be mitigated. Evidence being withheld in Burnett Stage 1 Program of Actions reports not released to the public. Anna Bligh has made a press release regarding the reports are almost finished??.
10. TAP reports for WRP and “A long term solution” discounts hydrological impacts on RAMSAR and world heritage listed areas:
11. Mary Water Resource Plan treated differently to Moreton Water Resource Plan.
12. Current concerns regarding the Mary Basin Water Resource Planning process. Delegates of the MRCCC have been closely involved in the Community Reference Panel (CRP) for the Mary Basin Water Resource Plan (WRP). The formally appointed Community Reference Panel members have advised that they were ‘profoundly deceived’ by the State Government during the formulation of the plan and have publicly withdrawn their support for the process. Subsequent to the CRP involvement, the Queensland Government made significant changes to the WRP between the release of the Draft Plan in November 2005, and when the Final Plan was endorsed by Cabinet in June 2006 to accommodate the Traveston Dam. There report relating to explanation of these changes is months overdue (should be 30 days).
13. Sediment transfer within the catchment has been modelled by Department of Natural Resources using SEDNET. This is data that could be used to predict the effective life of the dam from a sedimentation point of view but there was no willingness to discuss this with the Community.
14. Numerous community consultations with very little feedback on issues raised.
15. Recent announcement of \$75M in the 2009/2010 state budget with no details of environmental mitigation measures being proposed, no community consultation or state or federal approvals. Similarly concerns regarding as of June 2009, over \$500M spent, over 14,000 ha of land purchased and over 100M over budget on purchases of land for stage 1.

APPENDIX C: Appendix C STMRCG comments on Audit of Burnett Water Pty Ltd, QLD (Separate pdf attached).