

18 February 2022

Townsville City Council
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**Re: Ross River Dam to Douglas Water Treatment Plant Pipeline Renewal Project
EPBC: 2021/9002**

To whom it concerns,

I am writing on behalf of North Queensland Conservation Council – the voice for the environment in North Queensland. We appreciate the opportunity to comment on Council’s EPBC documentation for the Ross River Dam to Douglas Water Treatment Plant Pipeline Renewal Project (EPBC: 2021/9002).

Our concern relates to the impact on Black-throated finch (southern) habitat and Council’s commitment to rehabilitate only 30% of the disturbance footprint. **Given the conservation status of the Black-throated finch (southern) and its restricted range, we are calling for a commitment of no net habitat loss resulting from this project.**

The Black-throated finch (southern) is listed as Endangered under the EPBC Act, with its range having contracted by an estimated 80% in recent decades. This contraction is attributed mainly to the clearing, fragmentation, or modification of its habitat ([Birdlife Australia](#)). According to the [Black-throated Finch Recovery Team](#), the area of habitat should be large enough that birds can find all they need, and a large area is required to support a viable, genetically diverse population.

Council’s EPBC documentation recognises that “a net loss of nesting trees within 1km of a permanent water source... will occur as a result of the Project, which is an adverse impact to habitat critical to the survival of the species.” We support Council’s recommendation that the project is referred to DAWE for potential impacts to Black-throated finch and request a commitment that no net loss of habitat for this species occurs as a result of the project as a minimum. We would expect Council to seek a greater area of habitat for the Black-throated finch (southern) in order to compensate for the continuing reduction in habitat piece by piece, as development in Townsville continues.

NQCC would **only** support local or adjacent environmental offsets that included the rehabilitation of suitable habitat of the same size (as a minimum) or larger than that lost as a result of the project. NQCC would not support offsets in another area or region.

NQCC believes the timing of habitat rehabilitation/offset is critical and we would expect that rehabilitated/offset habitat would be available while the destruction of the habitat along the pipeline occurred.

Council’s EPBC documentation states that “Council intends to undertake a procurement process... [which] will seek tender responses from suitably qualified entities to undertake a program relating to a benefit and conservation gain for the Black-throated finch.” NQCC would support an environmental offset that included the rehabilitation of suitable habitat nearby, to ensure that the population that depends on this area suffers no net loss to its suitable habitat as a result of the project.



North Queensland Conservation Council

... the voice for the environment in North Queensland

Please do not hesitate to contact me if you have any questions regarding this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Crystal Falknau', written in a cursive style.

Crystal Falknau – Coordinator
North Queensland Conservation Council