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17 February 2022

Ms Toni Power,
The Coordinator-General
Department of State Development, Infrastructure, Local Government and Planning
toni.power@coordinatorgeneral.qld.gov.au
sdainfo@coordinatorgeneral.qld.gov.au

Re: Concerns on EIS processes for Burdekin Falls Dam Raising

Dear Ms. Power,

We very much appreciate you arranging the meeting for NQCC with OCG Townsville based staff, Mr Paul Holden and colleagues (07 Nov 2021). There remain however specific concerns with the preparation of the Detailed Business Case (DBC) and Environmental Impact Statement (EIS) for Burdekin Falls Dam Raising (BFDR). These are detailed in the attached note. These were also raised them with the Queensland Gateway Review team in their interview with me on 26 Oct 2021.

To ensure that the DBC and EIS processes proceed with minimal disruption and suitable rigour, we would request that your Office:

- Appraise us of dates for submission of the DBC and EIS, and when they will be made available for peer review
- Ensure that the EIS for BFDR (and other dam projects on the Burdekin) include the effects of “reasonably foreseeable projects” on the Burdekin in their assessment of “Cumulative Impacts” (Sections 15.179 – 15.206 of the Tor for the EIS). These would include the Hells Gates Dam and Burdekin Bowen Pipeline projects
- Review the processes being used for stakeholder consultation in all projects, and advise the proponents where necessary, particularly regarding the need to include environmental advocacy groups

- Ensure that Sunwater assess alternatives to BFDR in a thorough and substantial manner, in particular the development of a water-efficient Modern Irrigation Precinct in the Lower Burdekin.

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Signed

A handwritten signature in purple ink, appearing to read 'J G Connell', is positioned above the printed name.

John G. Connell
Head: Burdekin Basin sub-committee
North Queensland Conservation Council

cc. Scott Stewart (Minister for Resources)
Paul Holden (Executive Director, Office of Coordinator General)
Chris Pam (President NQCC)
Crystal Falknau (Coordinator NQCC)

Attachment:

**CONCERNS WITH PROCESSES FOR THE ONGOING BUSINESS CASE STUDY AND
ENVIRONMENTAL IMPACT STATEMENT FOR SUNWATER'S PROPOSAL FOR BURDEKIN
FALLS DAM RAISING.
NQCC 17/02/2022.**

#1 Environmental Impact Studies

Cumulative Impacts: Mr John Connell is the head of NQCC's Burdekin Basin sub-committee, and is a member of Sunwater's Community Reference Group for the Burdekin Falls Dam Raising. In the last meeting of that group (26 Nov. 2021), in answer to a query he had raised in a previous meeting, he was informed that OCG did not require Sunwater to take into account Hells Gates Dam in assessing "cumulative impacts" for the EIS.

This is would appear to contradict the requirement as stated in the ToR, which states in the introduction for Cumulative Impacts:

(a) avoid, minimise and/or mitigate potential adverse impacts arising from the combined effects of past, present and reasonably foreseeable projects on the environmental, social, economic, and cultural values of the Burdekin Basin and the Great Barrier Reef.

Given that Townsville Enterprise Limited (TEL) has been awarded \$24M to conduct a Detailed Business Case for the Hells Gates Dam, this must be considered a project that is "reasonably foreseeable". Thus, whether the HGD is a coordinated project or not, Sunwater under the terms of the ToR must consider HGD in assessing cumulative impacts. This is especially so as the HGD project alone would have greater impacts than all other projects combined.

It should be noted that the Bowen Pipeline Company has been awarded \$5 Million to conduct a Detailed Business Case for the Burdekin Bowen Pipeline Project (BBPP) which would extract 100,000 ML of water from the Burdekin. This must also be considered a "reasonably foreseeable project", and as such be included in assessing Cumulative Impacts.

This requirement to include the HGD and the BBPP in the assessment of "cumulative impacts" would similarly apply to the EIS of the other two coordinated projects (Urannah Dam and Big Rock's Weir).

Community Reference Groups: Sunwater has been diligent and effective in forming a Community Reference Group (CRG). This has brought together a genuine set of stakeholders with very valid sets of interests. We believe this will make a genuine contribution to the consideration of this project as it moves forward in its various stages of assessment.

Under Section 14 of the ToR, projects are not specifically required to form CRGs, but are required to consult directly with relevant stakeholders. This we understand includes environmental advocacy groups. The Big Rocks Weir and Urannah Dam projects are at a

similar stage of preparing their Detailed Business Cases and EIS's, but no such consultation has been conducted. The Big Rocks Weir is within the mandated area for NQCC, and as such we would expect to be part of the consultation processes there. The Urannah Dam lies within the area of the Mackay Conservation Group (MCG) which also has had no consultation with the proponents.

#2 Detailed Business Case (DBC)

Sunwater noted in the 26 Nov. meeting of the CRG that they expect to submit their DBC early in 2022. In that meeting Mr. John Connell flagged the requirement that Sunwater under the EIS (section #12 "Project rationale and alternatives") must examine both the need for the project, and other options that might achieve the same or similar results. This was particularly in light of the very weak economic justification Sunwater provided for the BFDR project in its "Initial Advice Statement for Burdekin Falls Dam Raising (June 2020, p23).

In the meeting Mr John Connell noted that a substantial alternative does exist; development of a water-efficient **Modern Irrigation Precinct** in the Lower Burdekin. This would make available a similar volume of water (> 100,000 ML/yr) to that from raising BFD by 2m. It would be achieved through: improved channel architecture; installation of tensiometers to measure soil moisture; and automated farm irrigation-management. Rough costing of this could be expected to be in the range of \$300-500 M, a figure comparable to that proposed for raising BFD by 2m. This is based on studies by research agronomists in Sugar Research Australia (see attached discussion paper).

Establishment of a Modern Irrigation Precinct in the Lower Burdekin would have profound economic and environmental benefits that would not be gained by adding 2m to the existing dam wall. These include;

- a) cost savings to farmers (reduced electricity and fertilizer cost) which would confer to the region; greater competitiveness and flexibility in land-use;
- b) mitigate, at the causal level, the rise in water table in the Lower Burdekin;
- c) restore the Ramsar wetland areas, and (d) reduce flow of nutrients out into the GBR lagoon.

Sunwater did refer to such an option in its Initial Advice Statement but dismissed it in a cursory manner. Thus, this alternative is not outside of their thinking.

Such a project is supported at strategic levels:

- it would be regarded as a substantive effort by Australia to address a key issue that affects the sustainability of the Great Barrier Reef. This is supported by an economic assessment of options to improve water quality in the Great Barrier Reef commissioned by the Great Barrier Reef Foundation from "Effective and Efficient Pathways for Investment in the Improved Water Quality in the Great Barrier Reef (Alluvium, June 2019)".
- Such an innovative approach would be aligned with the need for Australia to move from investing in "water storage infrastructure", to investing in "water efficiency", as expressed by National Productivity Commission's "National Water Reform 2020", and Queensland's "State Infrastructure Strategy".