



Department of Regional Development, Manufacturing and Water Chief Executive Water Services Northern Region Attention: Manager Water Planning and Science PO Box 5318 TOWNSVILLE QLD 4810

Email: WPBurdekin@rdmw.qld.gov.au

Date: 5th May 2023

Re: Submission to Preliminary Consultation Notice and Statement of Intent for the review and replacement of the Water Plan (Burdekin Basin) 2007.

Dear Sir or Madam,

As Queensland's peak environment non—government organisation, the Queensland Conservation Council (QCC) welcomes the opportunity to provide the following comments regarding the preliminary consultation notice for the review and replacement of the Water Plan (Burdekin Basin) 2007.

1. Proposal to replace the Water Plan (Burdekin Basin) 2007

Given the array of emerging issues, improved science and the numerous water infrastructure proposals within the Burdekin Basin Water Plan area, QCC fully supports the Minister's decision to commence the review and replacement of the Water Plan (Burdekin Basin) 2007.

2. Water the new water plan applies to

As it will lead to improved outcomes for surface and underground water dependent ecosystems and species, QCC fully supports the inclusion of the Crystal Creek Catchment, Black River underground water area and the Ross River Catchment in the Burdekin Basin Water Plan area.

3. Other matters that must be addressed and considered in the development and implementation of the new water plan

Along with the matters mentioned under s3 of the Public Consultation Notice, other matters that must be addressed and considered in the development of the new water plan are:

- In accordance with s2 (3) (a) of the *Water Act 2000*, implementing water demand management and water conservation measures across the water plan area particularly in the Lower Burdekin Catchment and the Townsville City Council area
- As per s13 (f) (ii) of the 2007 water plan, ensuring the flows required to maintain natural sedimentation processes to support the replenishment of beaches along the Burdekin Haughton floodplain and Cape Bowling Green are provided,
- Specifically assessing the impacts of climate change on the strategic reserves in the 2007 water plan for raising Burdekin Falls Dam and water infrastructure in the Bowen Broken Catchment
- In accordance with s2 (2) (2) (c) of the *Water Act 2000*, ensuring that specific provisions to sustain the health of ecosystems, water quality, water-dependent ecological processes and biological diversity associated with watercourses, lakes, springs, aquifers and to reverse degradation that has occurred from the take and interference of water are included in the new water plan
- Other matters?

4. Consultation and public awareness

Due to the range of emerging issues, competing outcomes and high level of public interest, QCC strongly recommends that an advisory panel consisting of representatives from the community, water users, First Nation peoples, local government, tourism and environment NGOs is established to provide advice on the development of the new water plan. [John, please insert a short paragraph here regarding the public awareness about the water plan that you want the Department to do to better engage the public in the development of the new water plan]

5. Studies and investigations required to inform development of the new water plan

Due to poor quality and paucity of data, a range of studies and investigations need to be undertaken to properly inform the development of the new water plan, which includes:

- Assessing the prevalence of flow dependent species and ecosystems throughout the water plan area, (Peter, please insert comments here about any other biodiversity/environmental studies that you think need to be done to inform the development of the new water plan)
- Calculating the volume of water that can potentially be saved across the water plan area through the introduction of robust on-farm and urban water use efficiency measures,
- Undertaking detailed analysis to determine the potential linkages between sand build up in the lower Burdekin River channel and erosion that's current occurring at

- Cape Bowling Green and, the Lower Burdekin catchment (John, please add any additional comments to this section you think are necessary)
- Assessing the risk of the Burdekin River breeching its current channel during high flow events due to the build-up of sand in the river channel downstream of Burdekin Falls Dam the Lower Burdekin catchment (John, please add any additional comments to this section you think are necessary)

6. Water for First Nation peoples

QCC fully supports providing the regions First Nation peoples with sufficient water under the new water plan to maintain their cultural values and to support their economic aspirations across the water plan area.

7. Lower Burdekin underground water management

Due to the considerable adverse environment and socioeconomic impacts that will occur if the issue isn't resolved, it is absolutely imperative that the new water plan must contain specific measures, provisions and strategies to address the causes of rising ground water levels in the Lower Burdekin catchment. (John, please add any additional comments to this section you think are necessary)

8. Improved monitoring and measurement

To better monitor and measure water take, include specific provisions in the new water plan requiring:

- The Department to develop and implement a comprehensive monitoring program within 2 years of the commencement of the new water plan,
- Water users to install water meters to measure the take of surface and underground water within 2 years of the commencement of the new plan and,
- The Department to develop and implement a framework to measure the take of overland flow within 2 years of the commencement of the new water plan

9. Improved management of Burdekin Falls Dam (BFD)

To better achieve improved outcomes for flow dependent species and ecosystems, include specific provisions in the new water plan requiring Sunwater to operate BFD in a way that:

- Replicates natural high-flow regimes to enable sand to be transported from the Burdekin River channel to the marine environment and,
- Minimises adverse impacts to ephemeral watercourses from releasing water from BFD for irrigation purposes in the lower Burdekin catchment

11. Conclusion

Please do not hesitate to contact any of the undersigned should you need and further information or clarification regarding the matters raised above.

Your sincerely,

Nigel Parratt Water Policy Officer Queensland Conservation Council 1/377 Montague Road West End QLD 4101

Peter McCallum

John Connell and or Crystal