



Department of Regional Development, Manufacturing and Water

Email: regionalwaterassessments@rdmw.qld.gov.au

Date: 14 December 2023

Re: Submission to draft Southern and Darling Downs Regional Water Assessment

Dear Sir or Madam,

As the states peak environment non-government organisation, the Queensland Conservation Council (QCC) welcomes the opportunity to provide the following comments and recommendations to the Draft Southern and Darling Downs Regional Water Assessment (SDDRWA).

1. Comments and recommendations

1.1 Options that QCC supports

As they are unlikely to cause any significant adverse environmental impacts and will ensure that existing available water is utilised more efficiently, proposed options for meeting the region's future water demand in the draft SDDRWA that QCC does support includes:

- Development of an on-farm dam evaporation saving initiative for the Granite Belt region,
- Collaborating with the New South Wales Government on ways to optimise water availability in the Border Rivers and,
- Supporting local governments to expand non-potable recycled water networks across the region, including the:
 - Chinchilla Recycled Water Scheme
 - Inglewood Recycled Water Scheme
 - Warwick Recycled Water Scheme and,
 - Wetalla Water Reclamation Facility

Recommendation

- Progress abovementioned projects mentioned to next stage

1.2 Options that QCC *may* support

Subject to them being economically viable and resulting environmental impacts can be successfully mitigated, QCC may support the following proposed options in the draft SDDRWA:

- Warwick to Stanthorpe Pipeline,
- Texas Off-stream Storage Project and,
- Glebe Weir Off-stream Storage and pipeline project, subject to it being compliant with the Fitzroy Basin Water Plan

Recommendation:

- Undertake preliminary Business Cases for the abovementioned projects

1.2 Options that QCC does *not* support

As it will cause adverse impacts to a wide range of environmental values and is unlikely to be economically viable, QCC does not support any further development of the Granite Belt Irrigation Project (GBIP) as is proposed in the draft SDDRWA.

Recommendation:

- Do not progress the GBIP any further

1.3 Improving water use efficiency

According to Figure 1 on page 10 of the draft SDDRWA, a key strategic objective of the RWA program is to *“consider non infrastructure options including improving the efficiency of existing water supply schemes and maximising the benefit from existing water resources and infrastructure.”*

Despite it being a strategic objective of the RWA program, the draft SDDRWA does not include an assessment of the volume of water that can be saved by implementing actions to reduce future water demand and increasing water use efficiency across the region, which could be utilised to support new economic development at a fraction of the economic and environmental costs of building new water supply infrastructure.

As they could potentially deliver a substantial volume of water at a fraction of the economic and environmental cost of building new water supply infrastructure, QCC strongly recommends that a detailed assessment is undertaken as part of the SDDRWA to determine the volume of water that could be provided by implementing robust demand management and improved water use efficiency measures across the region.

Recommendation:

- Undertake a detailed assessment of the volume of water that can be saved by implementing robust demand management and water use efficiency measures across the region

1.4 Alignment with Murray Darling Basin Plan

As the SDDRWA area is within the Queensland part of the Murray Darling Basin, its essential that the final SDDRWA aligns with the Murray Darling Basin Plan (MDBP).

Recommendation:

- Ensure the final SDDRWA aligns with the MDBP

1.5 Economic viability of options

In order to be economically viable, water supply infrastructure and other types of development proposals must have a minimum Benefit Cost Ratio (BCR) of 1. Despite this fundamental economic principle, the draft SDDRWA contains several proposed water supply options that have a BCR of less than 1.

As they are clearly not economically viable with having a BCR of less than 1, QCC strongly recommends that water supply options in the draft SDDRWA with a BCR of less than 1 should not be included in the final SDDRWA.

Recommendation:

- Do not include water supply options in the final SDDRWA with a BCR of less than 1

2. Conclusion

Please do not hesitate to contact me should you require any further information or clarification regarding the matters raised in this submission.

Yours sincerely,



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