



NORTH QUEENSLAND CONSERVATION
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Tuesday 14 July 2020

To: Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
Via email: epbc.referrals@environment.gov.au

Proposed Actions:

- 2020/8708 - Urannah Dam and Pipelines Project
- 2020/8709 - Collinsville Irrigation Scheme Project

I am writing on behalf of North Queensland Conservation Council, the peak Environmental NGO in the North Queensland Region.

Thank you for the opportunity to comment on whether the proposed action should be assessed under the EPBC Act and what the controlling provisions should be.

The proposed action should be assessed under the EPBC Act as it is likely to have a **significant impact(s)** on the following matters of national environmental significance for the following reasons:

World Heritage Properties and National Heritage Places

- The dam, pipeline and irrigation scheme are likely to impact on the Great Barrier Reef, which is both a World Heritage Area and a National Heritage Place, by increasing the load of nutrients, sediment and pesticide and decreasing other water quality values in the Burdekin River catchment, which discharges to the Great Barrier Reef lagoon.
- In 2017 UNESCO World Heritage Committee identified nine factors affecting the Great Barrier Reef World Heritage Property. Of those, these proposals will affect six. They can be summarised as:
 - Ground and surface water pollution causing changes to oceanic waters
 - Increasing the extent of non-renewable energy facilities which are a source of temperature change and other climate change impacts

Water Quality

- The proponent says that the proposed action will have a significant impact on the values of the Great Barrier Reef World Heritage Area and those impacts should be addressed through an Environmental Impact Statement. Conditions imposed by the Commonwealth on approval of

the Rookwood Weir set a precedent for a proper assessment through an EIS. Those conditions aim to protect the Great Barrier Reef World Heritage Area from declining water quality. We do not agree with the proponent's assessment that the impacts of the proposed action would be insignificant. This should be assessed as part of an EIS.

Reduction in water flows and discharge

- The volume of water to be extracted by the dam (150,000 ML/yr) must be considered in combination with additional proposed water extraction by other proposed users, these include; Hells Gates Dam (452,900 – 580,200 ML/yr) and Big Rocks Weir (10,000 ML) both currently proceeding with independent business cases. These demands together will reduce river the flow at discharge by far more than the 20% maximum as determined by xxxxx. Thus there is an urgent need to examined all proposed demands on the Burdekin in a coordinated way.
- This reduction of water flow, and capture of large sediment particles by the dam is likely to cause erosion of Cape Bowling Green, a Ramsar listed wetlands (see below). Signs of erosion are already evident along the Cape, though to be due to similar effects from the existing Burdekin Falls Dam. Accelerated erosion from the Urranah Dam and potential breaching of Cape Bowling Green will impact on breeding grounds for dugong and marlin, and on coastal communities.

Climate Impacts

- One of the purposes of the dam and pipeline project is to provide water to existing and proposed mines in the Bowen and Galilee Basins and to provide water to the Abbot Point State Development Area. That water will facilitate coal mining and thereby increase the concentration of carbon-dioxide in the atmosphere. Greenhouse gas pollution is the most threatening process affecting the Great Barrier Reef. The role that this dam and pipeline project could play in increasing coal mining activity has not been considered by the proponent. On this ground the referral should be rejected.

Ramsar listed wetlands

- The nearest Ramsar listed wetland is at Bowling Green Bay, which is located about 45 kilometres north of the mouth of the Burdekin River. The Ramsar site is at very high risk from degradation of water quality. The Burdekin Region Water Quality Improvement Plan 2016 (p.45) indicates that during the wet season, the Burdekin River has the greatest influence on water quality in high risk locations in the region. The proponents identify water quality impacts as having a significant effect on the World Heritage Values of the Great Barrier Reef. Similarly, declining water quality is likely to impact the Ramsar listed wetlands at Bowling Green Bay.
- The proponent has not provided any assessment of the impact of the proposed action on Ramsar listed wetlands in the referral. On this ground the referral should be rejected.

Listed species or threatened ecological communities Poplar box woodland on alluvial plains

One of the components of this threatened ecological community, *Eucalyptus populnea* woodland on alluvial plains (RE 11.3.2), is highly likely to occur on any alluvial plains in the area affected by the proposed action. Being a woodland with grassy understory, it is subject to grazing impacts, but this doesn't change the ecologically dominant layer, i.e. the poplar box (*E. populnea*) which determines its remnant status. The proponent discounts this community as degraded and weed infested. It must be assessed properly as part of an EIS.

Black Ironbox (*E. raveretiana*):

This listed species is abundant (and includes some of the largest individual specimens) within the proposed dam impoundment. The proponents propose to retain the riparian vegetation, however, these plants will be inundated below the standing water level of the dam. The impact on this species must be assessed in an EIS.

Northern Gastric Brooding Frog (*Rheobatrachus vitellinus*)

The holotype description says *R. vitellinus* is an aquatic species inhabiting shallow sections of fast flowing creeks in rainforest. It is suggested that the species is confined to areas above approximately 300m AHD where the creeks flow across granitic rocks.

The dam proposal will have a Full Supply Level (FSL) at 290m AHD. The Burdekin Falls Dam has a record holding of more than 218% of its FSL. The referral provides no assessment of the impact that any exceedance of FSL would have on streams that may include habitat of *R. vitellinus*. It is likely that during intense rainfall events that a dam would cause streams to back up and flood that habitat.

A large body of permanent water in close proximity to the frog's habitat may provide conditions for increased populations of pigs and other species. This frog is listed as extinct in the wild federally but has not been considered by the proponents. On this ground the referral should be rejected.

***Elseya irwini* (Irwin's Turtle).**

E. irwini is likely to comprise the bulk of the biomass of the waterways proposed to be dammed. Water infrastructure is the main threatening process to this species. *E. irwini* requires clear, fast flowing and well oxygenated water for its survival. It is thought to nest in sandy stream banks. Those conditions would be detrimentally affected by a dam.

A proposed listing of this species was rejected in 2009 due to a lack of information on its distribution, population size and population structure. Since then, a substantial effort has been made to determine its distribution, with over 400 specimens examined. Further research is being undertaken to determine the extent of its range and population. It is possible that this species could be listed prior to the commencement of construction of this project. The proponents have not included *E. irwini* in the referral document and on this ground the referral should be rejected.

Pumped Hydro Scheme

The proponent has not referred the Bowen Renewable Energy Hub Pumped Hydro-electric Scheme which is an integral part of this series of linked projects. This component is part of the referral to the Queensland Coordinator General's Office. The pumped hydro-electric scheme is likely to have a significant impact on stream flow and other outcomes that affect Matters of National Environmental On this ground the referral should be rejected.

Conclusion

While the action could be assessed using an Environmental Impact Statement there are many significant issues that have not been addressed in the referral. The proposed action has the potential to cause a major decline in the environmental values of the river systems and associated ecosystems

including a Ramsar wetland and a world heritage area. Given the lack of information in the referral, it should be rejected.

Regards

A handwritten signature in black ink, appearing to read 'Simon Cheers', with a large initial 'S' and a cursive 'C'.

Simon Cheers
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