



Save the Mary River Coordinating Group

C/- Kandanga Post Office

Ph: 07 5488 4800

Kandanga Q 4570

Email: savethemaryriver@gmail.com

Website: www.savethemaryriver.com

The Research Director
Environment, Agriculture, Resources and Energy Committee
Parliament House
George Street
BRISBANE QLD 4000
Email: earec@parliament.qld.gov.au

18th August 2011

Dear Sir/Madam,

Re: STMRCG Submission on the Water and Other Legislation Amendment Bill 2011

The Save the Mary River Coordinating Group Inc (STMRCG) is a community based group that continues to protect the health of the Mary River. It has a committee comprising of landholders in the Mary Valley region and demonstrated very substantial community support for its legitimacy and its actions. It has members from a wide range of professional backgrounds including expertise relevant to the issues required to be addressed in this submission.

Please accept these comments and suggestions on aspects of the proposed changes to the Water Act 2000. We would like to offer specific comments on the following four aspects of the Bill:

- Community consultation in the proposed Single Process Framework
- Inconsistencies in water resource plans in providing adequate fresh water flows to the sea.
- Water licences held by the SEQ Water Grid Manager
- The proposed reduction in the requirement for the granting of Riverine Protection Permits for work involving excavating or placing fill in a watercourse.

1. Community consultation:

We are concerned about effective community consultation in the proposed Single Process Framework. From the community experience of lack of community consultation with the Mary Basin Water Resource Plan process where a strategic reserve and the Traveston Crossing Dam were planned without an open and transparent process, we recommend that new legislation **MUST** include a very specific **compulsory** trigger for full public consultation at any time a Water Resource Plan creates a reserve or changes the size of an existing reserve, or at any time that significant new

allocations are granted from a reserve via a Resource Operations Plan.

2. Inconsistencies in water resource plans in providing adequate fresh water flows to the sea.

We are also concerned that the Bill does not address the inconsistencies in water resource plans in providing adequate fresh water flows to the sea.

For example the Mary Basin Water Resource Plan has no specific objectives written into the text of the plan which relate to protecting the health of the estuary. This is in stark contrast to the water resource plans of the neighbouring catchments, the Burnett, Moreton and Logan all of which have specific objectives to protect their estuarine and marine environments.

Schedule E of the National Water Initiative states that environmental flows to estuaries should be part of water planning processes. A mounting body of research also illustrates the importance of freshwater flows to the estuary. Evidence of the change in the Mary River estuary caused by the barrage was noted by the Technical Panel which provided advice to the formulation of the original Mary Basin Water Resource Plan is contained in this extract from the Draft Mary Basin WRP Environmental Flow Assessment Framework and Scenario Implications p 12

"Mary and Tinana Barrages

Freshwater inflows to the Mary River estuary under low flow conditions are substantially reduced by the Mary and Tinana Barrages. The barrages also impede fish passage and have led to hydrodynamic changes arising from the truncation of tidal influence. In addition, there are the very significant physico-chemical changes resulting from the barrages, including deposition of particulate matter and increase in phytoplankton numbers. The Mary and Tinana Barrages have highly significant implications for fish passage, being situated at the lower end of the catchment and at the interface between freshwater and estuarine reaches. Diadromous species move between these environments to complete their life cycle, therefore access is critical for their survival. Fishways are installed on both barrages and both have been upgraded over the past few years. The effectiveness of the fishways, especially on Tinana Barrage, could be improved by modifications to operating arrangements. Small compensation flows would be provided by meeting flow requirements for improved fishway operation. Research outcomes may support a case for larger compensation flow provisions."

We recommend that all Water Resource Plans must have specific objectives which relate to protecting estuaries.

3. Water licenses held by the SEQ Water Grid Manager

The bill proposes that the SEQ Grid Manager will be able to hold allocations that are not linked to a specific location in the catchment.

Most of the Mary River, and most of water allocation holders in the Mary are not in the SEQ region.

In the Mary River Catchment, the purpose of the SEQ Water Grid Manager is to extract water from specific SEQWater owned bulk water assets in the upper Mary catchment, and transport this water out of the catchment via the SEQ Water Grid. Therefore, the operation of the SEQ Grid Manager has a potential to adversely impact on both the environmental values of the Mary River, and the resource security of other water allocation holders in the Mary River downstream of the specific points of extraction of the SEQ water grid in the Mary Catchment (downstream of Baroon Pkt dam, Lake MacDonald and Goomong pumping station).

We recommend that no provisions are written into the Water Act or subordinate legislation and regulation to allow the SEQ Water Grid manager to apply for new water licences without the existing Mary Basin Water Resource Plan and ROP is reviewed, and the full impacts of the proposed level of extraction (tied to specific geographical locations of the points of extraction) has been assessed for impacts on Matters of National Environmental Significance, and on the security of other water users in the Mary River system.

Inter-basin transfer of water resources is an option of last resort, only to be considered after all less risk-prone options have been fully implemented. This is in keeping with current international understanding of ecologically sustainable water development refer to the 2007 International Declaration on Environmental Flows (“the Brisbane Declaration”) and the WWF 2007 paper on Inter Basin transfers in support of this stance.

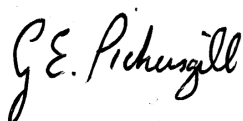
4. Riverine Protection Permits

The Bill proposes a reduction in the requirement for the granting of Riverine Protection Permits for work involving excavating or placing fill in a watercourse.

Due to the high risk if these operations are not carried out correctly, we would recommend that there are no further relaxation of the requirement to obtain a Riverine Protection Permit for excavating or placing fill in a watercourse.

If you wish to discuss any of the issues raised in this submission, please contact me on 07 54843150 mb 0411443589 or email pickerg@bigpond.com.

Yours Sincerely,



Glenda Pickersgill

President, Save the Mary River Coordinating Group Inc.

Ph 07 54843150 mb 0411443589 email: pickerg@bigpond.com