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Dear Mr Swan

Please find below WWF's second submission to the 2002 Assessment. This supplementary submission relates to the implementation by Queensland of the COAG Water Resources Policy, specifically relating to the Condamine-Balonne catchment.

WWF appreciates the opportunity to provide this supplementary submission for your consideration. WWF is concerned that there has been no significant progress being made by Queensland since our last submission on this matter for the Third Tranche Assessment. Therefore the matters raised previously are still pertinent to the 2002 Assessment and associated competition payments.

As the NCC stated that the 2002 NCP assessment will expect an appropriate final water resource plan to be in place it is considered valuable to revisit some matters raised in our last submission and provide a brief update.

WWF supports the conclusions of the Third Tranche Assessments relating to the Condamine-Balonne:

- that the Condamine-Balonne is a stressed river system and establishment of water allocations is overdue
- that all three of the options in the draft plan for water allocation in the Condamine-Balonne are inadequate to meet the environmental needs of the Lower Balonne and the internationally listed Narran Lakes
- that implementing any of the three options in the draft would result in a substantial reduction in Queensland's NCP payments in the 2002 assessment.

To our knowledge no events or information have come to light to change these conclusions. However, some matters are worth some brief supplementary comments.

ARMCANZ Principle 2 – provision of water for ecosystems should be on the basis of the best available information on the water regimes necessary to sustain the ecological values of water dependent ecosystems

Irrigator groups have been disingenuously attempting to discredit the scientific basis of allocation decisions. As recognised by Technical Assessment Panel in page 2 of the Environmental Flows Technical Report - there is not quantitative information which can describe relationships between environmental flows and ecosystem responses. Therefore, expert opinion is used as the best available information.



Some irrigators in the catchment have called for decisions to be put off due to imperfect information. These are the same irrigators who were happy to have allocations assigned to them without any scientific information. However decisions need to be made without perfect science. Expert opinion must be used as the best available information, and the precautionary principle applied.

ARMCANZ Principle 5 – where environmental water requirements cannot be met due to the existing uses, action (including reallocation) should be taken to meet environmental needs.

As you will no doubt be aware, it appears the findings and recommendations of the last Tranche Assessment (primarily the likely of loss of competition payments), has led to the Queensland Government reassessing its position regarding water allocation outcomes and arrangements.

The sufficiency of any solution to deliver water to sustain the ecological values of the aquatic ecosystems will need to be assessed once details are accessible. Narran Lakes has received significant attention in the debate over water allocation in the Condamine-Balonne, due to its status as a Ramsar listed wetland. However, it is only one of the ecological values in a catchment with many high value wetlands.

In the Draft WAMP the Queensland Government raised the possibility of providing an engineering solution to the lack of flows going to Narran Lake through diversion of flows from other channels into Narran River. WWF would not consider any solution sufficient if it focused only on delivering water to Narran Lakes, omitting or even at the expense of, the provision of sufficient water to other parts of the aquatic ecosystem.

Until the Queensland Government provides further details on proposed environmental flow regimes and means to achieve these, WWF is unable to provide any further comment to our submission for the Third Tranche Assessment. The conclusions of our previous submission were:

Conclusion on NCC Assessment and Queensland water

The submission has focused on the draft Condamine-Balonne WAMP and how it fails to meet with the NCC Third Tranche Assessment Framework. The inadequacies of this water plan point to general flaws in Queensland's response to the COAG water reform agenda. The key concerns are:

- *The Plan does not comply with the Queensland Government's own legislation, and therefore the measures to achieve sustainable water use will not be delivered on the ground.*
- *The Condamine-Balonne has become overallocated only recently. This has been subsequent to intergovernmental agreements committing to sustainable water resource use, including the COAG Water Resource Policy.*
- *The scenarios under the draft Plan will not result in a sustainable balance between environment and consumptive uses.*



- *The Queensland Government commissioned expert scientific advice on environmental requirements but has ignored it in Plan scenarios with no sound justification.*
- *The Queensland Government is consciously planning to cause significant environmental damage.*
- *Little attempt has been made to develop strategies and mechanisms to meet recommended environmental flows (* it now appears that strategies are being developed but no formal communication has occurred on the content of such).*
- *The Queensland Government has not yet completed its study into economic impacts to justify its position that meeting the environmental flows would cause too much economic impact. Further, the work that is being done may be significantly flawed and not provide a sound basis for decision making (the study has now been completed but not released publicly).*
- *The Queensland Government is willing to receive competition payments but not willing to invest sufficiently to achieve the reform agenda with acceptable social impacts.*
- *Monitoring and review mechanisms are insufficient to ensure that allocations are adequate and responsive to new information or changed circumstances.*

Competition payments should be withheld from Queensland until they commit to the achievement of sustainable levels of extraction in the Condamine-Balonne, including meaningful and adequately funded mechanisms to achieve these sustainable levels. The delays in the Condamine-Balonne Plan and water allocation being in conflict with NCC requirements, have been brought to the attention of the Queensland Government a number of times. It would appear that a reduction in competition payments may be the only way to ensure changes in the Queensland water allocation process.

WWF maintains that if the NCC's expectation, stated in the Third Tranche Assessment, that Queensland have in place an appropriate water resource plan for the 2002 assessment, is not fulfilled, competition payments should be withheld. Any proposal put forward should undergo close scrutiny to ensure its compliance with the COAG Water Resources Policy.

Please contact Sean Hoobin, Queensland Murray-Darling Officer, on 3839 4527 for further information.

Yours sincerely

Maria van der Gragt
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