

16th August 1999

Project Manager – Brigalow to Tarong Rail Project
Project Development and Facilitation Division
Department of State Development
PO Box 168
BRISBANE ALBERT STREET QLD 4002.

To Whom It May Concern,

RE: BRIGALOW TO TARONG RAIL PROJECT DRAFT IMPACT ASSESSMENT STUDY

The Condamine Catchment Management Association Inc. (CCMA) would like to make the following submission re: the Brigalow to Tarong Rail Project Draft Impact Assessment Study.

Our submission has been structured to highlight particular issues which the CCMA feels have not been adequately addressed in your Draft Impact Assessment Study. A number of general points are outlined below which are followed by a series of points related to the Condamine Catchment Strategic Plan.

General Points

- The actual need for this project has not been clearly identified or justified. What is the real future demand for coal generated electricity given some of the alternatives mechanisms which are currently being investigated and progressed.
- The reasoning behind the chosen proposed location through the Brigalow floodplains has not been substantiated (particularly pending the impact on good quality agricultural land). Effective floodplain management is of great importance to both the Brigalow community and the Condamine Catchment as a whole. Significant resources have been directed towards addressing this complex issue on the Brigalow floodplains over recent years and the benefits of this should not be compromised. The expenditure of these resources has resulted in a floodplain management plan that ensures that overland flow is used to yield maximum benefit. We believe that the proposed rail line will change the current drainage patterns which has the potential to increase erosion and force the redevelopment of many properties. We are of the opinion that the rail line could be better located within existing rail easements, which have already been incorporated into property development and use patterns.

- There is a need for the proponents of large scale development projects to adequately consult with local community groups, particularly those who have developed and are implementing strategic plans focusing on natural resource management issues. By adequate consultation, I refer to not just acknowledging that such plans exist but actually personally contacting the groups, informing them of the proposal and seeking their collective views. These plans then need to be reviewed on the basis that they exist and that local landholders are committed to their implementation.
- The overall assessment of socio-economic impacts could be more comprehensive. Greater detail of information is required to adequately assess potential impacts on farm viability due to changes in property access and property displacement.
- Acknowledging that this IAS is specifically focussed on the rail link, more information needs to be provided on the actual operations of mine itself, the transportation of the coal to the loading facility and the potential associated environmental cumulative impacts. The issue of transportation / slurry pipe from the coal mine to the loading facility has the potential to significantly impact on local road networks, biodiversity values, and overland flow patterns. Detailed assessment of this issue will be required.

Condamine Catchment Strategic Plan

The CCMA is committed to sustainable natural resource management. An expression of our commitment to sustainable natural resource management has been the ongoing development and implementation of the Condamine Catchment Management Strategy that covers the whole Condamine Catchment. This Strategic plan was originally developed in 1996 by the Committee in conjunction with the Condamine catchment community and has been endorsed by the state. We are currently in the process of reviewing this document and the current draft version has been enclosed for your consideration.

Our strategic plan outlines a number of key issue areas, strategies and actions to ensure that sustainable management may be achieved. The following key issue areas are particularly relevant for consideration in your study. The goal for each issue area has also been listed to provide an indication of what we would like to see as outcomes. The table below also outlines some key considerations which you might find useful when reviewing the Draft Impact Assessment Study.

Issue Area	Goal	Considerations
Water Access, Use and Management	To have a balance between consumptive and environmental use of water within the catchment, based on fair and equitable distribution of the resource.	<ul style="list-style-type: none"> • The potential risk for contamination of groundwater must be minimised and if possible avoided. • The access of water (ground/surface) during the construction phase should not have a negative impact on surrounding landholders (who may rely on that water for their use).

Issue Area	Goal	Considerations
Land Use and Management	To maintain and improve the balance between economic viability and ecologically sustainable use of the land resources throughout the catchment.	<ul style="list-style-type: none"> • The erosion risk on the floodplain must not be significant as a result of changes in overland flow. • All possible locations of the rail line need to be thoroughly reviewed so that land viability and the environment is not adversely affected. • Current remnant vegetation stands are extremely significant within the Condamine Catchment. Any required clearing must be negotiated with all interested parties to ensure that biodiversity values are not compromised.
Water Quality	<ul style="list-style-type: none"> • To maintain and where possible improve the water quality in the catchment. • To identify and protect water quality for agricultural, urban, industrial and environmental uses, including protection of ecosystems. • To establish a balance between land uses within the catchment and maintaining water quality. 	<ul style="list-style-type: none"> • The potential impact of construction should not result in changes that will adversely affect instream and riparian biota (eg changes in habitat, additional silt loads resulting from erosion etc). • Consideration of all potential impacts (immediate and off-site) must be fully explored eg salinity so that a decline in water quality is avoided.
Pest Animals and Weeds	To manage weeds and pest animals on a catchment scale, to minimise their impact on natural ecosystems and agricultural production.	<ul style="list-style-type: none"> • That any new corridors that are developed for the rail project must have weed management plans developed and adhered to. These weed management plans need to be developed in conjunction with the neighbouring landowner.
Riparian Zone Management	To enhance the ecological values (physical and biological) and the condition of in-stream and riparian zones within the catchment.	<ul style="list-style-type: none"> • The potential impact of construction should not result in changes that will adversely affect instream and riparian biota (eg changes in habitat, additional silt loads resulting from erosion etc).

Issue Area	Goal	Considerations
Draft Floodplain Management	Healthy, productive floodplains supporting sustainable natural resource use.	<ul style="list-style-type: none"> • That any proposed rail location be discussed in conjunction with all landholders in the area (not just those who may be directly affected to minimise the adverse impact on them). • Current overland flow processes must be adequately reviewed to ensure that any proposed changes avoid significant alteration of drainage, flood flow patterns and retention periods.
Draft Minerals and Energy	To have mineral and energy industries within the catchment recognise and incorporate appropriate environmental codes of practice in their operational plans.	<ul style="list-style-type: none"> • An environmental code of conduct needs to be developed, implemented and monitored for each component of the rail link project (including the mine operations, rail link, transportation and loading facilities).

I hope these comments assist you during your consideration of the Draft IAS for the Brigalow to Tarong Rail project. We would seek your commitment to involve the CCMA in the development of your proposals. We also seek your commitment that any proposal will consider the strategies in our strategic plan and the principles of sustainability. If you require any further information re: this submission, please contact the Catchment Coordinator on phone: 4688 1157 or by email: Catherine.Potter@dnr.qld.gov.au.

We would appreciate your comments on the issues raised above.

Yours sincerely

Catherine Potter
for Michael Spence
Chair – Condamine Catchment Management Association Inc.