



11 April 2023

EIS Project Manager, Project Evaluation and Facilitation,
Office of the Coordinator-General
mtrawdon@coordinatorgeneral.qld.gov.au

Re: Queensland Resources Industry Development Plan

Bundaberg Ag-Food & Fibre Alliance (BAFFA) aims to identify, research, consult and solve challenges facing the Bundaberg primary production sector.

Our vision is a united food, fibre, renewable fuel, fishing, forestry and foliage sectors in the Bundaberg Regional Council Area.

The Bundaberg Regional Council area is predominantly rural, land is used largely for intensive irrigated agriculture and horticulture, notably macadamias, sugar cane, fruit and vegetable growing, and some cattle grazing.

This reliance on agribusiness means that any negative impact on our farmers' ability to generate and market the crops and products they produce has a much greater impact on our community than in other areas.

BAFFA welcomes the opportunity to provide comment on the Mt Rawdon Pumped Hydro Project.

We provide this submission without prejudice to any additional submission/s from our members or individual farmers and are primarily focused on potential yield implications on Paradise Dam and negative impacts on Medium Priority allocation holders in the Bundaberg Irrigation area and the potential for increases in mineral salt loads in downstream areas should there be a discharge.

We note that in the proposed construction phase:

3.5.1 Water required during construction and operations is likely to be sourced from within the mine's existing water entitlements from Perry Weir and Paradise Dam. Water to replace evaporative or other losses during the operational phase will be sourced either from within the mine's existing entitlements or through the acquisition of new entitlements (most likely out of Paradise Dam or Perry Weir). A new (temporary) water entitlement will be required to undertake the initial filling of the Generation Facility at the end of the construction phase. The Proponent's current intention is to seek access to water available through the strategic reserve or strategic water infrastructure reserve under the Water Plan (Burnett Basin) 2015, which is available to coordinated projects. The Proponent has been advised by government that approximately 16GL per year is available, with this volume reflecting the reduced volumes being held in Paradise Dam due to Paradise Dam's structural issues. The volumes of water available dictate whether the first fill can be completed in a single year or over two or more years and will depend upon factors including works on Paradise Dam, demand from other users and projects and seasonal factors (please see further discussion in section 6.6.2).

It is our understanding that the Unallocated Water Volumes reserves that are referred to are 15,295 ML in the Burnett River in the Bundaberg Water Supply Scheme and 6,300 ML in the Upper Burnett Water Supply Scheme. We are aware that the proponents have an existing High Priority allocation of 500 ML.

From our rudimentary understanding of the modelling of the system it is highly unlikely that the 24,000 ML could be accessed without impacting medium priority allocation holders (Irrigators) in the Bundaberg Regional Council Area given the current interim full supply level of Paradise Dam.

We request that detailed modelling on potential yield and impacts on announced allocation be undertaken and provided to existing Medium Priority holders in the Burnett segments of the Bundaberg Irrigation area. In that modelling we also request the maximum 24 hour flow rate that can be achieved with the planned infrastructure and the calculated evaporation losses on a daily basis to be identified and documented.

5.1 Alternatives

The connection point to the electricity transmission network was identified through consultation with Powerlink, the network operator. The study area for the Transmission Line component of the Project was identified through a desktop constraints analysis, the objective of which was to identify engineering, environmental and social constraints between the Mt Rawdon mine site and the proposed Morganville substation.

The selection of the study area addressed the key environmental and social risks that have potential to constrain transmission line routing, including:

- Biodiversity sensitivity: significant and irreversible impacts to protected areas and broad flora and habitat.*
- Social sensitivity: number of land parcels, dwellings, existing land use, heritage, visual impact and rural infrastructure.*
- Ground conditions: steep or rocky terrain, problematic soils, waterways and areas prone to inundation.*

The resulting study area primarily comprises areas of Category X (unregulated) vegetation and avoids the Good Night Scrub National Park to the south and areas of remnant vegetation to the north. The study area will be further refined through engineering input and consultation with landholders and other stakeholders to seek to minimise impacts on farm infrastructure, visual amenity and aerial mustering areas.

We are pleased to see that the Co-ordinator General's ToR for the EIS does include consideration of agricultural values as per the guidance ([Queensland Government's Department of Agriculture, Fisheries and Forestry \(DAFF\) Environmental Impact Assessment Companion Guide](#)).

However, the ToR EIS for the Mt Rawdon project do not specifically cover all aspects of the DAFF guidance document.

The main omission is the impact of the proposed transmission line on agricultural values, operations and productivity .

We request that this impact be assessed and communicated to all landholders likely to be impacted.

6.1.5 Surface and Groundwater

Studies undertaken by Northern Resource Consultants (NRC, 2015) for the existing mine indicate that groundwater aquifers at the existing mine site are believed to be highly localised and discontinuous, with depth to groundwater varying widely. The open pit is currently the main discharge area for groundwater within the mine site, owing to a steep hydraulic gradient and can require dewatering following rain events. The EIS/IAR will comprehensively model the potential impacts on groundwater.

We request that the proposed modelling for groundwater and rainfall include the potential for meeting evaporation and other operational losses with the aim of reducing or eliminating imports from either the Perry Weir or Paradise Dam.

6.2.3 Aquatic Environment

The Project is located in a lattice of riverine wetland ecosystem watercourses (DNRME, 2021) that connect the Perry River and the Burnett River (Figure 6.6)8. No wetlands occur within the Transmission Line study area;

We request that detailed modelling be undertaken to identify potential conductivity levels in the water being cycled to create energy as well as any other contaminants and levels and the potential for offsite releases both intentional and unintentional.

Our members lift water from the Burnett system to irrigate a range of crops, some of which are extremely sensitive to mineral salts and we would like the potential for this to be identified and communicated to BAFFA.

Should you require further explanation or clarification please do not hesitate to contact me.

Yours faithfully

Dale Holliss
Executive Director