



**Conservation Council
of South Australia Inc**

**EPBC Referral 2008/4618
SA DEH / NRM
Lake Alexandrina and the Coorong
Opening the barrage network
separating the lakes.**

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The **Conservation Council of South Australia Inc (CCSA)** is the peak conservation body for South Australia, representing over 55 of the State's environment and conservation organisations.

CCSA is an independent non-profit, non party-political, community based organisation which provides resources, advice and representation for the SA environment movement, and which leads many of the key conservation campaigns in SA.

CCSA is known for its success in developing long term community development, education, and on-ground environmental restoration programs.

CCSA regularly liaises with Local, State and Federal Governments, Government agencies, media, educational institutions, NGOs, unions, industry, business and other groups on matters relating to the environment and social justice.

As a community organization, much of what CCSA achieves is through a large network of skilled volunteers from all walks of life – for its office, on-ground, governance and campaign activities.

CCSA Is committed to a healthy environment for South Australia.

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Introduction

The Conservation Council of South Australia (CCSA) welcomes the opportunity to comment on the proposal by the **South Australian Department for Environment and Heritage (DEH)** to flood the Lower Lakes (Lakes Alexandrina and Albert) with seawater via opening the barrage network.

CCSA however notes with some disappointment the very short timeframe allowed for public consultation on this proposal, especially given its monumental significance. Meaningful community consultation on such a vital issue requires a longer timeframe, particularly in the lead-up to the festive season.

This proposal highlights the dire condition of the Ramsar-listed Coorong and Lower Lakes, and the River Murray as a whole due to historic over-allocation and poor management. The recent drought conditions have brought forward this component of what was an inevitable whole-of-Basin crisis.

The aim of this proposal is to attempt to minimise the impact of acid-sulphate soils, the potential for which has been increased by management of the Lakes as permanently submerged water bodies for the last 40 years. The lack of freshwater flow to the Lakes causes acid sulphate soils as the soil profile dries and oxidises, potentially having significant negative impacts on the already severely stressed lacustrine ecology.

CCSA understands the necessity to respond to this threat, and the other imminent environmental consequences of the lack of environmental water being secured across the Murray-Darling Basin. The treatment of water-related environmental impacts is a test of the functionality of the relationship between the now separate Federal portfolios of Water and Environment.

The Proposal

A meaningful response to the threat requires an adequate understanding of both its nature and magnitude.

It is apparent from the submission that neither a full investigation of the ecological consequences of the threat, nor comprehensive consideration of the full range of management options and associated ramifications, have occurred.

The proponent states in section 2.1, page 10 *'The strategy aims to avoid acidification of both lakes by maintaining the lakes above alkalinity and water level management triggers. The strategy is not aimed at refilling the Lower Lakes or addressing other social, economic, cultural and ecological needs.'*

The fact that the purpose of the project is serving a very narrow (though critical) component of lake maintenance does not justify the paucity of ecological consideration given in the referral. A project is assessed under relevant legislation according to that which the legislation requires.

Despite this lack of detail describing the full nature and magnitude of the impacts, significant negative impacts are predicted for matters of both national and international significance. These include Ramsar-protected areas and migratory species, including those protected under the China-Australia Migratory Bird Agreement (CAMBA) and Japan-Australia Migratory Bird Agreement (JAMBA), and matters of national significance including threatened species, threatened ecological communities and migratory species.

RECOMMENDATION:

CCSA asks the Federal Minister for the Environment, Heritage and the Arts to exercise the power provided under S74B(1)(a) of the EPBC Act for an immediate refusal of the proposed development due to unacceptable environmental risk and an absence of adequate investigation to warrant such action.

Failing that, we are asking the Minister to direct the Government of South Australia to subject the development to the appropriate level of environmental impact assessment, that being an Environmental Impact Statement (S87(1)(d)). Without this, an informed, reliable and comprehensive decision-making process cannot occur.

EIS requirements

If an EIA process is initiated, there are a number of key discrepancies in the referral which must be addressed. These include, but are not restricted to:

- A full investigation of the specific environmental impact of acid sulfate soils on the environment in the both the short and long term, and the likely impacts on all the potentially affected species and communities, groundwater resources, soil chemistry and other abiotic processes.
- A full understanding of what impact the inundation with seawater will have on the environment, in both the short and long term, and the likely impacts on all potentially affected species and communities, groundwater resources, soil chemistry and other abiotic processes.
- A full understanding of the impact of other actions such those detailed in Fitzpatrick *et al.* (2008) including application of lime and bioremediation.
- Recognition and assessment of the project as part of a larger action

Larger action:

Failure to provide adequate water to run through the river presently or in the near future, has caused the State Government of South Australia, in conjunction with actions deemed acceptable through the Murray-Darling Ministerial Council, to formulate an emergency response package. This involves building a weir at Pomanda Island (currently undergoing EIS, EPBC Referral 2007/3484), this proposal to flood the Lakes with seawater via opening the barrages, and the refuge project referred to in this proposal, which would most likely require another regulating structure (weir/barrage) at the mouth of the Finniss River.

The projects are not isolated, and in fact each precipitates the other.

The weir at Pomanda Island will cause the *'freshwater inflows reaching Lake Alexandrina [to] be diminished, increasing risks associated with exposure of acid sulfate soils...'* (section 1.12 page 3) increasing the magnitude of the current threat, and requiring action even more urgently.

If this proposal to flood the Lakes is fulfilled, the weir will be necessary to *'prevent[ing] saline water moving back up the river channel'* (section 1.12 page 3).

If the weir is built and then the Lakes are flooded or *vice versa*, the requirement for a refuge for sensitive Lake species that will not

withstand seawater, will be necessary and inarguable. A definite refuge proposal is not made in this referral, although a number of possibilities are listed (section 2.1, page 11).

- If the actions are not recognised as being part of a larger action, they must in the very least be considered as indirect impacts associated with each other within the EIA process.

CCSA recognises the situation for the entire MDB is critical.

Regardless, CCSA maintains that proper process and investigation of the extent and magnitude of impacts and the level of environmental risk, particularly for such an important area of biodiversity, must not be subordinated to perceptions of urgency. At this crucial instance, the deterioration of the system must not be hastened.

For further information or clarification please contact CCSA at the listed address.

Please note CCSA will be closed from 19/12/08 till 5/1/09.