



Standing Committee on Environment and Public Affairs

Response to Petition No 123

The proposed Southern Forests Irrigation Scheme (SFIS) is flawed in a number of crucial respects.

The business plan for the SFIS which was presented to the Federal Government as part of an Infrastructure funding application would have been formulated prior to June 2018 and is therefore no longer reflective of costings in 2019. Estimates of the cost of the scheme range from \$80 million to \$100 million. Furthermore, the business plan, which is in the hands of the Minister for Agriculture and is not for public scrutiny until federal funding is realised, is old and must therefore contain outdated data. This means a new business plan is required.

Water flows are governed by climatic conditions. The Record Brook Dam proposed as part of SFIS would take 9-10GL of "new water" from the Donnelly River per annum. It is claimed this "new water" is run-off from forested areas in the Upper and Middle Donnelly catchments, however this is not possible since in "Western Australia the run-off coefficient (ratio to runoff to rainfall) on forested catchments is less than 10%" (CSIRO 2009 page 47). Currently (23.07.2019) after the wettest June since 2009 there is still no flow from the Upper Donnelly at the Donnelly River Village. Variable take pumping - which only applies in wetter years when there is sufficient flow to meet existing licences - can only be undertaken between 15th June - 15th October each year. This would leave a very short margin to uptake water to RBD. This would mean RBD could not fill its capacity under this licensing agreement (although we have seen no evidence of the actual licence to date).

No figure has been provided for the cost of the pipeline (estimated 253km) which I assume it is included in the total project estimate. By way of comparison however, the Nannup to Manjimup pipeline which was completed in June 2013, cost \$29 million dollars for 49km of pipeline, equating to \$591,836.00 per km (6 years ago). This construction was engineered through power corridors, State forest, very narrow shire roads, rock along the route and requiring traffic management.

(ref. engineersaustralia.org.au) To date, no legal arrangements have been made for the development of infrastructure on private property for the SFIS pipeline corridor, nor has there been adequate consideration of the possible legal ramifications if ownership of SFIS infrastructure falls back to the landowner.

The development footprint of 160 Ha Record Brook Dam and 10 Ha Donnelly River off take and transmission pipeline will mean *clearing 170 Ha native forest, which has environmental significance to the habitat of threatened ecological communities of flora, fauna, birdlife and aquatic species. If the area designated for the pipeline corridor is included, the total amount of land to be cleared is 382.7 Ha.* No studies have been undertaken of the present social or heritage importance of this area. This is despite the existence of heritage railway logging bridges in the area and the significance of the Bibbulmun Track which is listed on National Geographic's Epic Trails.

The Donnelly River is approximately 151km long, passing through predominantly forested areas and it is believed to be one of the best quality rivers in south western Australia. Riverine health has declined state wide due to a number of factors, *primarily resulting from human disturbance.* The Donnelly catchment also contains *Lake Jasper* and associated *Gingilup Wetlands*, as well as several regionally and locally significant *wetland*

systems that link into the Donnelly River system. In fact, the Lower Donnelly is a drawcard of award winning tourism ventures.

The proposed area has no roads or access routes, which means substantial engineering will be required to enable entry. The construction of a concrete weir across the Donnelly River which will reduce the flow of water downstream, risking increased *salinity* levels and "pooling" of water upstream. This will expose native fish species to territory gaining predators such as Redfin Perch and Rainbow Trout.

Around 68-70 purchasers are currently signed up to the SFIS, although the precise number has not been confirmed. There is some speculation that a number are opting out due to their initial misunderstanding of the proposal. The Federal Water Infrastructure funding is currently under increased public scrutiny and should be further investigated for allegations of corruption and misuse of Australians ownership of water rights. The Shire of Manjimup endorsed the SFIS application for funding without prior notice at a meeting in Walpole 138 km from the affected area.

Two Documents - "Donnelly River Allocation Statement" released December 2018 by DWER and the "Offer Document for Water Sales to Members of SFIS Co-operative" contradict each other in their scientific data for hydrological monitoring. The SFIS data is drawn from the Lower Donnelly Strickland station, while DWER claim they have set up stations at Chappells Bridge and Storry Road to assess streamflows. This data has not been made available to the public and appears to have been collected in 2017 - 2018, when water licensing was suspended in the Middle Donnelly. The amalgamation of Record Brook subarea into Middle Donnelly to gain a "new" allocation licence of 15Gl is a farce and claims that "no water will be taken from Manjimup Brook" are not based on scientific evidence. There are no gauging stations on tributaries to the Donnelly River, although visual evidence shows that this is runoff from farmland in the Yanmah and Dixvale farmlands. The effects of the fully allocated water licences since 2010 are not evident even after the moratorium was imposed in 2017. "Variable take" licences were given to SFIS directors after this date. More scientific data is required over a 10 year period of streamflow records. All tributaries into the Donnelly River should have specific gauging stations. The monitoring stations will record collection from cleared farmland versus forested woodlands. This data should be made available to the public.

I respectfully request the Legislative Council to apply due process and address all concerns raised by the petitioners.

Brian Vallentine



24-7-19

References:

CSIRO 2009- Surface water yields in the south west Western Australia

DWER -Donnelly River Allocation Statement 2018

SFIS - Offer Document for Water Sales to Members of SFIS Co-operative - version 4.2

Donnelly River Action Plan 2006

Water Yield Response to Land Use change in south-west Western Australia 2003

Southern Forests Irrigation Scheme - EPA Referral Supporting Document 2019