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### **Preliminary Preferred Option for the Clyde River Irrigation Scheme**

Thank you for the opportunity to provide comments on the Preliminary Preferred Option for the Clyde River Irrigation Scheme (the Clyde Scheme). From the documents available on the Department of Primary Industries and Water (DPIW) web site it is clear that this scheme is at an early stage of development and as such the TCT will only provide brief comments in this submission. We will make a fuller submission when public comment is sought on the final preferred option.

#### **Water Management Plans**

The TCT has received correspondence from the Minister for Primary Industries and Water David Llewellyn (dated 18 May 2009) confirming that while water is proposed to be sourced from the Shannon and Ouse rivers for the Clyde Scheme “preparation of statutory WMPs for these catchments has not yet commenced”.

WMPs are the best available means of ensuring a scientifically rigorous and publicly transparent process for decisions regarding water allocations and environmental flows for rivers. We urge the TIDB and Minister Llewellyn to commit to preparation of statutory WMPs for all catchments where Drought-proofing Tasmania projects are proposed and that these plans be completed prior to approvals being sought.

The information provided regarding the Clyde Scheme includes statements about the likely environmental benefits of the Clyde Scheme, and on the surface there appears to be advantages over the current situation, however these claims of environmental benefit should be evaluated within the rigorous and transparent WMP process.

In answer to the question “Will the Scheme provide environmental flows in the River Clyde?”, the *Clyde Scheme Questions and Answers brochure 3* states that “The scheme will not provide environmental flows. Allocations for environmental flows are already in place in the River Clyde and Lake Crescent and Sorell Water Management Plan”.

The Lake Crescent and Sorell WMP is currently under review (as Minister Llewellyn confirmed in writing to the TCT) and the Clyde River has a separate albeit integrated WMP that is still in force. The TCT urges the TIDB to correct the errors in the *Clyde*

*Scheme Questions and Answers brochure 3* and extend the public comment period for the Clyde Scheme to allow the public to comment on this revised information.

While the previous Lake Crescent and Sorell WMP stated that water from the lakes would not generally provide environmental flows to the Clyde River there may be instances when this would be done (Preface, page vi). We do not know the outcome of the Lake Crescent and Sorell WMP review and it is possible, with the pressure over the last year or so to release more water from these lakes for irrigation, that environmental allocations into the Clyde River may be reduced. If this is the outcome there may need to be consideration of increasing environmental flows through to the Clyde River via the Clyde Scheme. This is another reason why WMPs should be completed before approvals are sought for major irrigations projects.

### **Threatened galaxiids**

The Clyde Scheme proposes taking water from the Great Lake and we are concerned that no assessment appears to have been made of the likely impacts on the Great Lake paragalaxias (*Paragalaxias eleotroides*) and Shannon galaxias (*Paragalaxias dissimilis*). If an assessment has been made no information is available on the DPIW web site. Both species are EPBC and State listed as vulnerable and both are restricted to Great Lake, Shannon Lagoon and Penstock Lagoon according to the *Tasmanian Galaxiidae Recovery Plan 2006-2010*. The plan states that Great Lake is probably critical to the survival of both species.

We seek your assurance to correct this omission. The TIDB should provide on the DPIW web site information regarding:

- the conservation requires of these species;
- current conservation actions and commitments;
- the likely effect of the Clyde Scheme on both species and the current conservation efforts; and
- the management responses proposed as part of the Clyde Scheme.

The TCT urges the TIDB to extend the public comment period for the Clyde Scheme to allow the public to comment on this new information.

### **Water Surety and the Sustainable Yields Research**

The *Clyde Scheme Questions and Answers brochure 3* states that “All water development projects are planned to have greater than 95% surety” however there is no reference at all to the Tasmanian Sustainable Yields Research. The TCT urges the TIDB and the Minister to wait for the results of the Sustainable Yields Research before seeking approvals for the Clyde Scheme and commit to reassessing the proposed scheme after fully assessing the results.

### **Property Management Plans / on-farm environmental impacts**

It appears that every property level environmental issue which is raised – such as salinity, clearance of native vegetation and indirect degradation of native vegetation or streams – will be addressed by a ‘on-farm or property management plan’. The TCT is concerned that the DPIW have made the preparation of property management plans a prerequisite for land owners making applications to purchase licences for water, without any generally accepted and defined standards and rules for such plans. For example, what components require land owners to consult experts and who is

accepted as an expert? The assessment and approval process is non-statutory and as yet undefined, but will probably be done by the Assessment Committee for Dam Construction, which is clearly not independent.

In our submission on the Midlands Water Scheme in October 2008 we made suggestions regarding the need for a strategic planning framework and sustainability criteria for determining properties that would be eligible for water licences but our suggestions appear to have been totally ignored. We are still happy to provide further information in this regard.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter McGlone', written in a cursive style.

Peter McGlone  
Acting Director