Submission to the
Senate Standing Committee on Rural Affairs and Transport
The Murray-Darling Basin
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Guide to the Draft of the Proposed Murray-Darling Basin Plan

The environmental health of the basin is fundamental to life and production. Any potential water savings made by the procurement of water entitlements requires a balanced approach to protect the environment whilst maintaining agricultural production. These actions and decisions must not be taken lightly using a flawed Plan.

Comments

1. The objectives of the National Water Initiative agreed to by the Basin States in 2004 has not flowed through to the Commonwealth Water Act (CWA) and that the triple bottom line of optimizing social, economic and environmental outcomes will clearly not be achieved.

2. Need an Environmental Water Management Plan first.
Key Environmental assets need to be determined and justified prior to any suggested purchase of consumptive water for an environment that may not need it. It is idiocy to announce proposed SDL's without having any clear and tranparent validation of watering requirements of the identified assets by an Environmental Water Management Plan. This should have been done to allow cross examination of the environmental watering requirements and provide a robust environmental watering account encompassing engineering solutions for the environmental sites with state of the art works and measures to ensure every gigalitre is in fact required.
The Commonwealth Water Holder currently has in excess of 500GL of Environmental water which, embarrassingly, it has nowhere to use. How then can it be justified that more water is needed? Note that prior to man made regulation of the system the proposed environmental watering requirements did not occur. The systems natural environment was accustomed to extended dry periods followed by floods which are being experienced this year.

3. Water account balance to include ALL environmental water.
A transparent and comprehensive Environmental Water Account needs to be established that includes ALL water available for environmental purposes, both State and Federal, within the Basin. The commonwealth Water Holder currently has in excess of 500GL, The Living Murray 400GL, with all water held by the States such as 32GL Murray Environmental water together with NSW Riverbank. This then needs to correlated with where it is to be used and a set of clearly defined triggers for frequency and volumes of use in the EWMP.
When this was raised at Deniliquin there was confusion around whether or not the proposed SDL's were in addition to the volumes that have already been taken from consumptive use or were starting from a baseline of zero available for the environment.

4. There is no recognition of the "duality" of water.
Within the plan water has been "earmarked" for specific purposes such as transmission, critical human need etc, without any apparent understanding that for as long as water is in the system, no matter what it is there for, it is in fact providing environmental function and service.

4. Translocation of population to the coast looking for employment.
The lack of a comprehensive socio-economic analysis of the potential impacts is inexcusable. Equally concerning is the lack of consideration of the third party regional communities. We have seen with the prolonged drought some shift in population, while many chose to remain in the area waiting for "the drought to break". If water is removed from consumptive use permanently it will create a permanent drought and substantial numbers of families will be forced to relocate to coastal areas for employment. This will have a twofold impact: implosion of locate regional communities as well as creating additional population pressures on infrastructure that is already inadequate to demand.

5. No consideration was given to engineering solutions and substantial infrastructure development such as new dams and additional in system storages to capture available water in extreme years for use when needed. This obsessive "buy-back" as the only option demonstrates a severe lack of vision for the future, particularly with forecast population trends into the future.

6. The "best available science" has not been used.
Basing a plan on only the worst recorded drought is not using the "best available science" to develop the SDL's and so the plan has no credibility. The CSIRO reports issued over the past eight years, reflecting the driest ever sequential drought period as the basis for recommendations have very little credibility and reflect poorly on what was once this countries premier scientific research organisation and that their sustainable yields report has been used for the Guides recommendations.
In conjunction with the CSIRO sustainable yields report, the Sustainable Rivers Audit (SRA) has also been accredited by the MDBA. We challenge the MDBA with using the SRA findings that were researched during a record dry period with phrases such as *"best available science"* used.

7. Need to take into account Water Sharing Plans
The NSW WSP's need sufficient time to adjust to water buyback and more normal inflows prior to determining a SDL. *In recognition of the CSIRO sustainable yield report that states that the past dry ten year period is the worst case scenario*.
The MDBA should acknowledge the environmental measures that were built into the Water Sharing Plans (WSP's) which have not had time to be measured and monitored due to the last 10 years of drought. These environmental measures should be considered (post drought) before introducing a new round of SDL's under the Basin Plan.

.8. Basin Rivers in "robust" health despite 10 years of drought
We as riparian landholders know that the evidence found by independent scientists such as marine microbiologist Dr. Jennifer Marohassy and other is that the condition of the Basin Rivers is in a "robust" category considering the past ten

years of dry climate conditions. Even though the MDB has experienced the driest period in 100 years, continued population growth, interception for farm dams and tree plantations, the system has still maintained water flowing from top to bottom with marginal irrigation allocations and reduced turbidity. Salinity levels at Morgan are at low levels and anecdotal evidence is that fish stocks are rapidly improving with the European Carp not seen in the proportions that they were ten years ago.

We wish to stress that all Murray Darling Basin residents will be socially and economically decimated if this proposed plan were to be implemented. The impacts will be reflected not only by declining basin communities, but by the corresponding increase in population pressure along the coastal fringe.

Responses to Terms of Reference:

a) the implications of agriculture and food production and the environment
MPII have been frustrated and dismayed with the lack of investigation of implications. Any investigations, models used, or surveys have been rushed or clouded by the lack of evidence or incorrect use of models.

b) the social and economic impacts of changes proposed in the Basin
This issue has been covered already in this submission.

c) the impact on sustainable productivity and on the viability of the Basin
MPII believe that analysis performed on economic sustainability to this point has been far too narrow. By this we refer to the “tipping point” where the decline in volumes of production will not support processing plants etc.

d) the opportunities for a national reconfiguration of rural and regional Australia and its agricultural resources against the background of the Basin Plan and the science of the future
No comment at this point in time.

e) the extent to which options for more efficient water use can be found and the implications of more efficient water use, mining and gas extraction on the aquifer and its contribution to run off and water flow
Please refer to comment in the NSWIC submission

f) the opportunities for producing more food by using less water with smarter farming and plant technology
It goes without saying that irrigators in this country aspire to use less water with state of the art farming and plant technologies. The top percentage of irrigators who have access to funding are already setting an example in this regard.

g) the national implications of foreign ownership, including:
1. Corporate and sovereign takeover of agriculture land and water and
2. Water speculators;
Land and Water should not be owned by anyone other than Australian primary producers.
Please refer to comments in the NSWIC submission

h) means to achieve sustainable diversion limits in a way that recognized production efficiency
The Senate Committee and Ministerial Committee exhaust the potential of savings via works and measures within the environmental watering requirements.

i) options for all water savings including use of alternative basins; and
ii) any other related matters.
We support further extensive examination and the potential of acquisitions of water from other sources and the possibility of increasing the volume of our storages.

Environmental Works and Measures

The narrow focus on water purchase as the only option demonstrates absolutely no vision for the future. Water is life. With projections on population growth in Australia into the future, more water storage for human need will be necessary irrespective of environmental considerations.

It is astounding that the MDBA would not have made further consideration to the possibility of works and measures on environmental sites. Protection of the key environmental sites with minimal over bank flows would reduce the required volumes predicted by the MDBA and ease the level of the proposed SDL.

Engineering options should not be limited to watering sites, but also additional capture and storage of water, both in system and at the headwaters.

Legal interpretation of the Act

The legal advice provided to the Minister should be made publicly available in total.

Mike Taylor, ex chairman, MDBA, has continually stated that the legal interpretation of the Act has influenced their findings favouring the environment, whilst on the contrary our political leaders are vowing that a triple bottom line can be achieved within the constraints of the Act. This dilemma has added to the anxiety of our constituents and exacerbated their frustrations with the recent resignation of Mike Taylor. It is imperative that this issue is resolved as soon as possible so that all stakeholders involved in the Murray Darling Basin Plan can move forward collectively and achieve a triple bottom line outcome without any further conflicting interpretation of the Act.

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