



The Murray and Mallee  
Local Government Association

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16<sup>th</sup> April 2012

Proposed Basin Plan  
Murray Darling Basin Authority  
GPO Box 3001  
CANBERRA CITY ACT 2601

### **RESPONSE TO THE MURRAY DARLING BASIN AUTHORITY DRAFT BASIN PLAN**

This Association represents the common interests of eight Councils, being the Renmark Paringa Council, Berri Barmera Council, District Council of Loxton Waikerie, Mid Murray Council, District Council of Karoonda East Murray Southern Mallee District Council, Rural City of Murray Bridge and the Coorong District Council.

This Region is located in the Murraylands Statistical Region in eastern South Australia and is dissected by the River Murray. It covers a large area in excess of 50,000 km<sup>2</sup> taking in the areas from the Riverland in the north, agriculture areas in the central, west, south and east along the Victorian border, and south westerly to the coast and lakes. Rural based communities throughout the area share a common interest in agriculture/horticulture, with towns primarily servicing the farming and horticultural communities and supporting a growing tourism sector. The Region has a population base of approximately 68,000 (approx. 4.6% of the State population).

There is a diversity of opinions across the region on the proposed Basin Plan, depending on any one person's individual stance. The purpose of this response is not to canvass each and every issue, but to propose a broad response, coupled with an appeal to ensure the Basin's viability, from top to bottom.

The basis of our submission is recognition of the underlying premise of the Federal Government's "heads of power", that being, to protect the environment.

All Councils agree that the River Murray is the lifeblood of the region, environmentally, economically and socially.

Councils also agree and propose that unless a healthy basin exists, none of the above is achievable.

In short, a river is not a river unless it runs, and runs its full natural course.

Our fundamental concern is that the Authority has compromised the future river health to arrive at a politically acceptable solution. There is no doubt that South Australia will lose most if the Basin Plan does not guarantee the health of the Basin in the future.

#### ***Achieving Improvements for the benefit of the Murray Mallee Community***

Berri Barmera Council, Coorong District Council, District Council of Karoonda East Murray, District Council of Loxton Walkerie, Mid Murray Council, Renmark Paringa Council, Rural City of Murray Bridge, Southern Mallee District Council

It is therefore critical that Authority does not lose sight of what is trying to be achieved by developing the Basin Plan – the primary purpose should always remain that there is a need to ensure the long term environmental health of the basin for without the river being restored to good health, there will not be communities along the river.

The environmental health of the river must remain the principal focus and the current over-allocation of water upstream must be urgently and seriously addressed. Any Plan that does not flush the required 2 million tonnes of salt from the river and sustain floodplains and wetlands will fail to deliver what is required. Scientists have informed us that the rivers need extra gigalitres of flow each year to maintain its good health. If the river is permitted to deteriorate further, no one wins – not the irrigators, not the businesses or people in the towns along the rivers system, and certainly not the environment and the ecosystem that it feeds and supports.

While it may be seen to be parochial, South Australia has already played its part in respecting the health of the river by capping the water taken from the river over the last 40 years and investing significantly, at its own costs, in irrigation efficiencies. These historic efforts must be reflected in the final Basin Plan and water recovery strategy.

Our overview of the documents making up the Plan indicate that South Australia appears to be worse off under this Plan than the Guide that was considered last year. It now appears that SA will have less available environmental water and potentially bigger cuts to our irrigators than was originally proposed.

The Plan indicates that the purpose of Water Quality Targets is to measure progress towards achieving the objectives, in part, of the salinity operational targets. However, failure to meet them does not necessarily mean that a person has acted inconsistently with the Water Quality and Salinity Management Plan. Further it says that achieving the objectives should be given priority over meeting the targets. It appears that the outcomes are more important than the process. Trying appears to be more important to the Authority than actually complying with the requirements of the Water Act.

The modelling undertaken for the Environmentally Sustainable Level of Take (ESLT) does not appear to meet the definitions laid down in the Water Act 2007. The Act specifies that ESLT is a level of extraction which would not compromise the key environmental assets, key ecosystem functions, productive base or key environmental outcomes of the resource. It must be calculated using the best available scientific knowledge. But there appears to be an extra factor added by the Authority called “other lines of evidence”. We cannot accept that this is included when the Act clearly requires that the calculation is based on the best available science only.

The Draft Plan pays “lip service” to an adaptive process with review and assessment in 2015. This is a realistic and informing way to verify the environmental requirements by having some reality in place. The concern of our community comes with the lack of strength in the legislative framework surrounding any adjustments to SDL’s and environmental needs. Any adjustments scientifically identified and proven to be necessary in real time need to be enforced and not just become another political football. Otherwise it will NOT be a truly adaptive process. To this end we ask for inclusion of necessary requirements in the Plan to adjust environmental flows and watering requirements accordingly, commensurate with the 2015 review and assessment findings and into the future.

This may mean increases NOT just reductions.

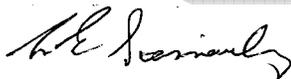
While a Basin wide recovery of 2750GL's for the environment seems inadequate when scientists are calling for 4000GL's, we believe the Draft Plan provides a **solid starting point** for the restoration of the Basin environment and improved long term health of the River System.

However, the Plan should include the following:

- This region as a whole has played its part to conserve water use, operating within defined water resource limits over a long period of time, which must be substantively recognized in the proposed Basin Plan.
- There must be clear evidence that all other opportunities to recover sufficient water for environmental flow have been exhausted, through infrastructure improvements and efficiencies by jurisdictions outside of South Australia.
- There must be appropriate mitigations and transitional support measures to minimize the socio-economic impacts through the flow-on effects of further decreases in horticultural production.
- The Basin Plan must ensure water license security to primary production irrigators.
- The Basin Plan must achieve all seven benchmark indicators at the Murray Mouth to assure the delivery of a healthy river.
- There must be assurance beyond reasonable doubt that the Plan is based on the best available science.
- As part of a cost/benefit assessment the Federal Government must demonstrate the need to build new improved infrastructure in regions, other than utilizing existing highly specialized infrastructure that exists in the Murray Mallee region.

To ensure that discussion about the basin is accurate a full and proper audit of **ALL** aspects of the Basin should be completed before 2015.

Yours faithfully,



Mayor Leon Stasinowsky  
President.