Murray Darling Basin Authority submissions@mdba.gov.au



The Joinery Level 1, 111 Franklin Street Adelaide, SA, 5000

(08) 8223 5155

general@conservationsa.org.au www.conservationsa.org.au

ABN: 22 020 026 644

24 February 2017

Proposed Murray Darling Basin Plan Amendments

The Conservation Council of South Australia represents around 60 environment and conservation organisations in our state.

We advocate for the implementation in full of the Murray Darling Basin Plan.

The Basin Plan was a historic achievement that heralded a new era of cooperation between Basin states to restore the Murray Darling river system to health and ensure sustainable levels of water extraction.

Sadly, in the few short years since the Basin Plan was signed, we are seeing considerable undermining and weakening of the Plan, which threatens its ability to meet the objectives of the Water Act 2007.

We object to any reduction in environmental water return, as the Plan itself represented a significant compromise position. Modelling conducted for the development of the Basin Plan showed that 7600 GL would be the ideal volume of water recovery to truly restore the Basin to a resilient state of long term health. The Basin Plan legislated water recovery of less than half this amount, and with these proposed amendments, now even that is under threat.

We therefore strongly oppose the proposed amendments to the Basin Plan.

Northern Basin Review

We don't believe the MDBA has provided sufficient evidence to justify its conclusion that the complementary on ground works ('toolkit' measures) are a reasonable alternative to environmental water. These measures are not enshrined in law, with many falling out of the MDBAs charter. The existing 390GL reduction figure is *already* inadequate to meet many of the hydrological indicators for the Northern Basin, let alone a further reduction by 70GL to 320GL.

The proposed amendments will have a range of other adverse impacts on environmental outcomes in the Basin, and there has not been an adequate connection made between modelling undertaken and the conclusions that have followed.

Socio-economic impacts

The Water Act dictates that the Basin's water resources must be managed in the *national* interest - the interests of individual states must not be given a higher priority than the nation as a whole.

The Water Act also states that meeting the requirements of international agreements takes precedence over optimising social, economic and environmental outcomes. The Basin Plan, as the vehicle for delivering the objects of the Water Act, must not give priority to social or economic outcomes over the requirements of relevant international agreements Australia has signed.

Menindee Lakes

We question the stated impact on Menindee Lakes. Instead, we contend there will be much greater impact on flows in Menindee Lakes, and from there, the available water through to SA and the Lower Lakes and Coorong.

We therefore object to the proposal to reduce by over 100GL the shared environmental flows to Menindee Lakes.

Climate Change

The SDLs in the current Basin Plan do not take into account the impact of climate change. The proposed reduction of water recovered for the environment will therefore further reduce the ability for water dependent ecosystems to respond, and expose them to further risk.

Yours sincerely,

Craig Wilkins
Chief Executive