



## WAKOOL RIVER ASSOCIATION

### Submission to the MDBA's Guide to the Proposed Basin Plan

The MDBA's handling of the development and release of the Guide to the Draft of the proposed MDBA Plan has been absolutely appalling. The information sessions started a mere four days after the draft 260 page guide was released, without the supporting technical and scientific report that was not released until weeks later. Rural and regional communities believe that they are being 'railroaded' without their involvement or understanding of the perceived problems, as their confidence for the future is shattered and their social fabric being torn apart. The trust and confidence that the Basin communities had in the MDBA has been destroyed. The manipulation and presentation of much of the data raises the question of how truly independent the MDBA actually is? Much of the guide appears to revolve around biased political views which completely ignore two of the key principles of the National Water Initiative:

1. to identify third party impacts
2. to assess the three main competing interests – social, economic and environmental with a balanced and even weighting which optimises their outcomes.

Other points that we would like to comment on are:

- The fact that the MDBA appears to be hiding behind the 2007 Water Act and using its interpretation to by-pass the Australian Constitution and be driven by foreign international agreements is very concerning that the rights and long term interests of the Australian public are being overridden by international agreements
- The Public and Stakeholder consultation and engagement process has proven to be extremely disappointing and a dismal failure. Even though the Community has shown a strong commitment to become involved in the process and provide real input into the development of the plan, the MDBA have only allowed token involvement. This point is verified by the fact that the guide has been completely rejected by the vast majority of the basin communities involved.
- The MDBA have been very selective in the so-called scientists and experts that have been used to support their recommendations and assumptions. The science used by the MDBA is by its own admission is only of moderate accuracy. It is very selective and has not been scrutinised and subject to proper independent peer review. The plan suggests a flow regime as the only solution to the health of the basin; this is a very simplistic view and has previously been identified as but one of more than twenty solutions to improve River health. We are in the 21<sup>st</sup> century and expect science to be based on factual data and a better understanding of the basin requirements from our government representatives. The authority has neglected to use some of the best information that they have available to them, that being local knowledge from the basin Communities and in particular the Landholders that live in the effected regions. **The science and hydrological**

models used need to be independently peer reviewed by outside scientists and experts that are acceptable by the regional communities that are affected

- The MDBA has not justified in their basin plan the amounts of water required for the environment. Surely the starting point for any plan would be zero and then justify the amounts as it increases. This has not happened. The lack of a watering plan that would identify the requirements of environmental assets in the basin is a clear example of an ambit claim by the authority. The amount of water that is already apportioned to the environment has not been identified and assessed in the plan. Surely in any assessment of environmental needs, the existing environmental flows should be clearly displayed and identified in the basin plan. For example the Living Murray initiative was a program to help restore the health of the river therefore a lot of the icon sites have been addressed yet the authority failed to acknowledge these. The interim report from the parliamentary enquiry back in 2004 for the Living Murray suggested river health was in a far better state than was originally thought and even the 500 gl was not warranted at the time. However politics took over and there was an assessment of 500 gl returned to the environment, surely our science has not changed that much. **There is an immediate need to identify and do a comprehensive transparent audit of all environmental water that is allocated and used within the entire Basin. (eg. The loss and dilution flow of the Murray and the water lost in the lower Lakes and weir pools.)**
- All environmental assets should be assessed on their own merit. It is an obvious omission in the guide that the Lower Lakes and the Coorong have not been assessed on their own merits. The authority keep telling us this plan is not just about a fresh water solution for the Lower Lakes rather it is all part of the water that ends up in the bottom part of the system as a result of satisfying the environmental needs upstream. We all know this is not the case and it is about time the authority addressed this propaganda. Until this has been resolved, looking at minimising the losses in the Lower Lakes will not be addressed. **.If the plan is to be successful no part of the Basin should be above scrutiny. The single biggest loss of water out of the basin ,ie.the Lower Lakes, must be looked at immediately .**
- There is an obvious mis understanding and confusion with regard to the term 'overallocation', that effectively blames extractions for most of the problems of the basin without at least acknowledging the fact that the Basin has just endured the most severe drought in recorded history. A extract from a paper put together by David Grant (ex. CEO of Clyde Agriculture ) clearly explains the issue. | [The two key terms are "Licenses/Entitlements" on the one hand and "Allocations" on the other. They are constantly confused in the current debate.](#)

[State Governments have issued "Licenses/Entitlements" to irrigators, but the usage of these has to be triggered by the granting of "Allocations". Allocations are granted seasonally by Governments in accordance with available water. This is how variability is dealt with. When water is short, allocations are low or non-existent.](#)

[The Governments action in granting, or not granting, allocations is governed by a "water sharing plan" for each irrigation river in the basin. These water sharing plans take account of water availability, environmental, livestock and domestic needs](#)

before irrigation extractions are allowed. Whilst water sharing plans are hotly debated by people pushing the various competitive needs, it is a most sensible and effective approach.

However, of recent times there has simply not been enough water to go around and quite correctly it is irrigation extractions which have been severely constrained. Few realise that if it were not for the headwater storages, the Snowy Scheme diversions and *severe restrictions on irrigation extractions*, the Murray River would have actually stopped flowing altogether, as it has done under very dry conditions several times in recorded history. Through this drought we were able to keep it flowing and to maintain at least some water in the Lower Lakes at the mouth of the river as a result of these factors. A truly independent authority would help clear up the confusion revolving this issue and not actively add to the propaganda as seen and heard in the recent blitz of media advertisements.

While the original intent of the Basin Plan to be above Politics is commendable it has clearly been taken over by other agendas. If we are serious about developing a long term, workable plan that addresses the issues, we believe the following must happen:

1. A balanced assessment of the triple bottom line must be undertaken. ie. The social, economic and environmental outcomes
2. The MDBA need to be restructured to redeem its independence to be able to present objective and realistic reports and recommendations in the future.
3. The ability of an international agreement to override the Australian constitution must be revoked
4. The Basin community must be involved in developing the means to providing the mechanisms for proper community involvement and engagement so they can have ownership of the process.
5. Identify engineering works to boost the efficiency of environmental watering
6. Undertake a complete and transparent audit of all existing water that is used for the environment eg conveyance, dilution and loss.

We appreciate the opportunity to be able to make comment.

John Lolicato

Chairman

12 Dec.2010