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## Dear Sir/Madam

The generic recommendation in the MDBA Guide advocating substantial water cuts across the whole system in spite of the disparate range of issues affecting various catchments suggested a political solution rather than one based on science.

The northern basin has little connect with the southern basin. Extra water released in the northern basin will have very little effect on the south given it takes 9 months for water to move the length of the MDB to the mouth of the Murray and most is lost in evaporation during the journey. Different issues in parts of the basin would suggest different responses are required.

As a Balonne River irrigator I propose the science that suggests the river is in poor health has no credibility. This was the basis of the proposed cuts. The data was generated in a drought cycle and was no different to that generated in western rivers where there is no irrigation! Further research done after the floods will generate a contrasting set of data points showing large variations in ecology are consistent with the cyclical variations in seasonal patterns. A cycle of wet years will at least give scientists a chance to fill in some of the data gaps.

If water cuts are necessary for political reasons, don't propose them under the pretense of science. The admission by minister Tony Burke on 4 Corners that the science does not match the recommendations of the Murray Darling Basin Authority (MDBA) confirms the Guide has a green flavour largely based on the subjective judgements of the Authority. However, the Water Act specifies the outcomes must be based on science.

The ephemeral nature of our river system- one with irregular cycles varying from extreme periods of drought to massive flooding events and everything in between, surely dictates a variable system of water extraction in accordance with seasonal patterns rather than a fixed system based on averages which is the basis of proposed water cuts and modelling. A bit like a variable capacity pump! Larger extraction levels in high flow years and lower in dry years.

The impact of the MDBA proposal will be devastating for irrigators in dryer years, when only part of their allocations are delivered. For example, a 30% cut in water license on top of say a 50% allocation in a dry year actually translates to a 65% overall cut. Compared to a 30% cut in a wet year starting with 100% allocation is only a 30% overall cut.

As the MDBA have acknowledged, in drought years there will be no water for irrigators or the environment. In high flow years such as current, there is ample water for everyone! Surely the water extraction debate needs to focus on the in-between low to medium flow events.

Instead of the huge investment in purchasing permanent licenses, wouldn't it be more prudent for the Federal Government to engage in temporary water buyback in those in between years? Maybe only 5 in 10 years. They are not paying interest on buybacks in the drought or flood years. This would mean they are paying irrigators a fair market price. It would lead to investment in water storages for environmental releases during dryer times. Everyone could be a winner! At least do some economic modeling on the option.

Savings for this scheme could be then be channelled into improving efficiencies of existing water distribution networks by reducing evaporative losses.
Yours faithfully
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