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24 February 2017

Murray-Darling Basin Authority
GPO Box 2256
Canberra ACT 2601

Basin Plan Amendment Submission – Northern Basin Review

Thank you for the opportunity to make a submission on the proposed Northern Basin amendments. On 19 December 2016 Council resolved to make a submission to the Murray Darling Basin Authority (MDBA) with respect to the outcomes of the Northern Basin Review with such submission to focus on the need to ensure that any reduction in Northern Basin water recovery not have an adverse impact upon the achievement of end-of-system environmental objectives and targets contained in the Basin Plan. At that meeting Council also resolved to reaffirm its support for full and timely implementation of the Basin Plan. A copy of the relevant resolution is enclosed with this submission.

Background Information

Alexandrina Council covers 1800 square kilometres at the very end of the Murray-Darling Basin system. We are home to over 25,000 people and the river, Lower Lakes and Coorong are central to our way of life. We are extremely proud and privileged to have stewardship of this iconic area of South Australia. We see ourselves as stewards because there is a direct link between the ecological health of the CLLMM region and the economic, social and cultural wellbeing of our people. If the river suffers, we suffer.

Against this backdrop, Alexandrina Council has been a long-term advocate for the interests of a healthy, working Murray-Darling Basin and we are committed to advancing the national interest and working for the good of all industries, communities and environments that depend on a healthy and resilient River Murray.

We have also strived over many years to ensure that our own approach to water use and conservation reflects our role as an ambassador for the CLLMM region. Council's initiatives have included effluent and storm water reuse, water sensitive urban design, community education programs and events, water saving initiatives in Council buildings and open space irrigation policies.

Prior to adoption of the Basin Plan, the unsustainable use and management of Basin water resources (combined with severe drought) had a devastating impact on our community. The impacts of the Millennium Drought on our region are well documented elsewhere¹ but included low water levels, elevated salinity, vast exposure of acid sulphate soils and localised acidification of surface waters. As a

¹ See for example DEH (2010) *Securing the Future, Long Term Plan for the Coorong, Lower Lakes and Murray Mouth*.

result, what lake water there was became either inaccessible or unusable for irrigation, whilst low water levels had a significant impact on tourism and related industries, with associated drops in property values and sales.

Following the return of higher flows in 2010, Council worked side by side with our community in seeking to ensure that the Basin Plan would prioritise return of sufficient water to the system so as to avoid as far as possible a repeat of what we experienced during the Millennium Drought. To this end, we advocated strongly for the inclusion of end-of-system locality-specific targets in the Basin Plan and it is of critical importance to our community that these targets now be achieved.²

Our farms, our businesses and our community are strong supporters of the Basin Plan but we also recognise that the current 2750GL recovery target is a compromise position – we know that even the higher 3200GL target is not enough to guarantee a healthy river. Nonetheless, the Basin Plan as it stands is the best chance we have to return the Basin to a more sustainable level of take and to provide much needed certainty and security for all users of Basin water resources.

Given the historic nature of the intergovernmental agreements which have made it possible, any undermining of the Basin Plan is seen as a significant risk with real potential for resultant harm to our business sector (particularly agriculture & tourism), to our environment and to the wellbeing and health of our community members.

Northern Basin Review

We understand the MDBA is recommending that the environmental water recovery target for the Northern Basin be reduced by 70GL, from 390GL to 320GL taking the Basin-wide target from 2750GL to 2680GL (subject to the outcomes of the SDL adjustment mechanism). The Authority is also recommending that the Australian, Queensland and New South Wales governments agree to implement a suite of complementary 'toolkit' measures designed to improve water management and minimise any consequent reduction in environmental outcomes.

In response, Alexandrina Council submits that the MDBA should not endorse any amendments which might put at further risk achievement of the end-of-system environmental targets, objectives and outcomes already embedded in the Basin Plan (as compared to the benchmark). We submit the amendments should only proceed if there is sufficient evidence that the changes will have no negative impacts on triple bottom line outcomes in the Southern Basin.

The Northern Basin Review Report (p.31) indicates that reducing the Northern Basin water recovery target down to 320GL will result in a 10-15GL/y reduction to the average inflows reaching Medindee Lakes and a 5-10GL/y reduction in the average flows to South Australia as compared to current Basin Plan settings. We understand this translates to a 3GL reduction in average yearly flows over the barrages. The MDBA has concluded that this impact will not have a material effect on achieving Basin Plan outcomes.

² i.e. the environmental watering objectives regarding the ecological character of Ramsar wetlands, minimum lake levels and flows through the Murray Mouth (Basin Plan, Chapter 8, Part 2), the salt export objective (Basin Plan, Section 9.09), and the salinity target for Milang (Basin Plan, Section 9.14).

As these changes in flows are average values, we understand the effect on flows to South Australia (and thus over the barrages) will vary from year to year, and is in fact likely to be significantly greater in some years. This is of concern, particularly in dry years, when the CLLMM region will already be under ecological stress. We submit that the impacts of this variation in flows (including multi-year impacts) on the health and resilience of the river and floodplain in South Australia should be taken into account in assessing the environmental, economic and social impacts of the proposed changes. It is not clear to us that this analysis has been undertaken.

The MBBA acknowledges that as a result of the proposed amendments, environmental outcomes in the Northern Basin will be "slightly reduced" as compared with current settings. The "toolkit" measures are designed to ameliorate these impacts by improving environmental outcomes with less water, however these measures are outside the remit of the MDBA and cannot be implemented without commitments from the Australian, Queensland and New South Wales governments. We submit that these commitments must be made (in an enforceable manner) prior to any reduction in the Northern Basin water recovery target being implemented.

Other related feedback

1. Cumulative Impacts

As with many other South Australian stakeholders, our concern for the Basin Plan is 'death by a thousand cuts'. The cumulative impacts of the Northern Basin Review, the SDL adjustment process and political pressure not to deliver the additional 450GL of special account water are likely to have a significant impact on the final amount of environmental water recovered via the Basin Plan and therefore on environmental, economic and social outcomes in the CLLMM region. As stated above, best-available science tells us the benchmark 2750GL recovery target will likely be insufficient to return the CLLMM region to a sustainable level of health and yet we are facing a number of Basin Plan decisions in the coming year which are likely to reduce that figure even further. For this reason, we submit that any decision to reduce environmental water recovery in the Northern Basin needs to take into account the real potential for future policies or decisions to cumulatively undermine fundamental triple-bottom line outcomes at the end of the system.

2. Climate Change

We note that current Basin Plan SDLs are based on an assessment of historic climate variability over the past century and do not take into account the likely impacts of climate change on future water availability. We know that climate change is likely to result in lower average rainfall patterns and more frequent and extreme droughts. There is thus a significant risk that current SDLs will quickly become unsustainable when dryer average conditions come to pass. Given this risk, we query whether the proposed SDL adjustment in the Northern Basin includes an assessment of the future impacts of climate change? It is essential that any future SDL reviews take the likely impacts of future climate change into account. A precautionary approach would seem to dictate the enforcement of more stringent SDLs to ensure the Basin Plan's environmental objectives do not have to be revised ever downwards in the face of reduced inflows into the system.

3. Murray Darling Association Evaluation Project

Alexandrina Council is a member of Murray Darling Association (MDA) Region 6. On 19 December 2016 Council resolved to endorse the move by the MDA to develop the project described below and we encourage the MDBA to actively engage with the MDA to bring the project to fruition. The MDA evaluation project would develop a rigorous and repeatable Basin Plan

evaluation framework and methodology that can distinguish the one-off and short term impacts on communities from the underlying performance and structural impacts of the Plan. This would include production of a consistent set of evaluative data across the twelve Basin regions. Implementation of this evaluation framework would involve capture of the required regional data, interpretation of the data and production of user-friendly reporting designed to improve decision making, to identify problems and to shape regional solutions to mitigate and address impacts being experienced.

4. Recovery of Special Account Water


We urge the MDBA to actively engage with and provide continuing advice to the Australian Government regarding the design of the funding program(s) required to deliver the 450GL of special account water by 2024. The program(s) should be rolled-out across the entire Basin so that participants with the most efficiency gains to be made can self-select for involvement. We note this additional water recovery can only occur through voluntary participation in projects that have no adverse social or economic outcomes but submit that one way to address concerns regarding adverse impacts would be to fund associated programs which support Basin communities to adapt to change and embrace a more diverse range of economic development opportunities. The existing Murray-Darling Basin Regional Diversification Fund is an example of the kind of targeted structural adjustment program that could be considered.

Alexandrina Council looks forward to the Authority's careful consideration of our feedback.

Yours sincerely



Victoria MacKirdy
Interim Chief Executive



Keith Parkes
Mayor

9.3 Murray Darling Basin Plan - Council Policy Position

ACM16480 Moved Cr Featherston seconded Cr Scott:

Cr Davis left the Chambers at 6.32pm

1. That Council reaffirms its support for the Basin Plan and for the following core principles embedded in previous submissions made to the Murray Darling Basin Authority (2012) and the Senate Select Committee on the Murray-Darling Basin Plan (2015):
 - a. Alexandrina Council supports full and timely implementation of the Basin Plan and commits itself to work for the good of all that rely on a healthy, working Murray-Darling Basin.
 - b. Basin Plan implementation must recognise the international importance of the Coorong, Lower Lakes and Murray Mouth (CLLMM) through the achievement of end-of-system environmental objectives, targets and outcomes. Achievement of these targets is critical to the long-term wellbeing of our community.
 - c. The base water recovery target of 2750GL will be inadequate to meet the CLLMM region's environmental watering requirements. Given the direct link between the ecological health of the CLLMM region and the economic, social and cultural wellbeing of our people, it is imperative that the Federal Government continues to proactively prioritise achievement of the 3200GL recovery target.
2. That Council endorses the administration making a submission to the MDBA with respect to the outcomes of the Northern Basin Review, with such submission to focus on the need to ensure that any reduction in Northern Basin water recovery not have an adverse impact upon the achievement of end-of-system environmental objectives and targets contained in the Basin Plan.
3. That Council endorses the administration writing to the Federal Government seeking an assurance that it remains committed to delivering the Basin Plan in full and on time, and in particular, that it remains committed to the proactive administration of a Commonwealth program to deliver up to 450GL of environmental water via the Water for the Environment Special Account by 2024.
4. In its submission, Council will endorse the move by the Murray Darling Association Inc to develop a Project which has two key objectives:
 1. To develop a rigorous and repeatable Basin Plan evaluation framework and methodology that can distinguish the one-off and short term impacts, on communities, from the underlying performance and structural impacts of the Plan. Fundamental to this

objective is the production of a consistent set of evaluative data across the twelve Basin regions.

2. To implement the evaluation framework and methodology developed in 1 above at a regional level:
 - a. to capture the required regional data
 - b. to interpret the data and
 - c. to produce user friendly reporting which provides the information required to improve decision making, to identify problems and to shape regional solutions to mitigate and address impacts being experienced.

CARRIED UNANIMOUSLY