

File: 5.3.001  
PD:SM

23 September 2015

**Mr Mark Fitt**  
**Committee Secretariat**  
**Senate Select Committee on the Murray-Darling Basin Plan**  
**PO BOX 6100**  
**CANBERRA ACT 2600**

Dear Mr Fitt

**Re: Submission of Alexandrina Council**

Thank you for the opportunity to make a submission on this very important issue of Basin Plan implementation.

By taking the opportunity to provide a submission, Council is acting in accordance with section 6(d) of the *Local Government Act 1999* (SA) which provides that a council is established to, amongst other things, "represent the interests of its community to the wider community". In making a submission we are also cognisant of our community's interests as articulated in the *Alexandrina Council Community Strategic Plan 2014-2023* which places an emphasis on respecting and protecting the integrity of the Coorong, Lower Lakes & Murray Mouth (CLLMM) region as an integral component of a healthy, working Murray-Darling Basin.

Alexandrina Council covers 1800 square kilometres at the very end of the Murray-Darling Basin system and we are home to over 25,000 people. The River Murray, Coorong and Lower Lakes form the cultural, economic, social and environmental fabric of the Alexandrina community. There is a direct link between the ecological health of the CLLMM region and the economic, social and cultural wellbeing of our people. We are extremely proud and privileged to live in this iconic area of South Australia and highly value the international prominence given to this region by virtue of its recognition under the *Ramsar Convention on Wetlands 1971*.

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. Whilst we have sought to address each of the Terms of Reference below, the process of implementing (and analysing implementation of) the Basin Plan across such a large geographical area is extremely complex. As such, our submission is necessarily focused upon those aspects of the Basin Plan which are of most interest to our region.

**(a) implementation of the Basin Plan including its progress, costs, effects on agricultural industries, local businesses and community wellbeing and evidence of environmental changes to date.**

We strongly welcome the Federal Government's ongoing commitment to delivering the Basin Plan in full and on time. Continued multi-partisan support for full Basin Plan implementation is a critical first step towards providing certainty for both the community and the environment.

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 the economic, social, cultural and environmental wellbeing of our community.

The impacts of the Millennium Drought on our region are well documented elsewhere<sup>1</sup> but included low water levels, elevated salinity, vast exposure of acid sulphate soils and localised acidification of surface waters. As a 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. The cost of not implementing the Basin Plan would be the return of a very uncertain future for our local businesses and agricultural industry which have not yet fully recovered to pre-drought levels of productivity.

The final Basin Plan outcome, which provides a framework for recovering the equivalent of 3200GL of environmental water, is based on best available peer-reviewed science and is a historic opportunity to put the use of Basin water resources on an equitable and sustainable footing for the long-term benefit of communities across the whole Basin.

Achieving the end-of-system environmental objectives and targets contained in the Basin Plan is of critical importance to our community. These include 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).

With respect to progress to date, we support the Federal Government's emphasis on recovering water via infrastructure investment and our previous concerns about the potential impacts of a legislative 1500GL cap on water buy-backs have largely been allayed by the recent publication of the SDL Adjustment Stocktake Report.

With respect to environmental changes to date, already there are positive signs of environmental recovery within our region as a result of improved environmental flows and the outputs of the CLLMM Recovery Project. The process of ecological recovery is however variable and still continuing. Whilst water quality has generally returned to pre-drought levels in Lake Alexandrina and the Goolwa Channel, this is not the case for Lake Albert where salinity levels remain significantly higher than the pre-drought average. Many key species (frogs, fish, water birds, *Ruppia tuberosa*) have also not recovered in terms of abundance and distribution recorded prior to the Millennium Drought. Monitoring results indicate that continued recovery is highly dependent on future freshwater flows and a

---

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

management approach which allows for seasonal water level changes in the lakes and additional barrage flows into the Coorong over spring and summer.<sup>2</sup> We strongly encourage the Committee to actively engage with the South Australian Government (DEWNR, PIRSA, SARDI, EPA), relevant research institutions including CSIRO and the Goyder Institute, local irrigators and other community members with respect to the outcomes and implications of ongoing ecological monitoring efforts in this regard.

**(b) the effectiveness and appropriateness of the plan's Constraints Management Strategy.**

Alexandrina Council acknowledges the concerns of upstream landowners with respect to the potential flooding impacts of easing constraints to allow for the release of higher environmental flows. The process of relaxing constraints is a very complex issue and one which we here at Alexandrina Council do not have the necessary expertise to comment upon in any detail. We encourage the Murray Darling Basin Authority (MDBA) to continue to identify, evaluate and address system constraints in a way that minimises adverse social and economic impacts and maximises the achievement of environmental outcomes.

**(c) the management of the Coorong, Lower Lakes & Murray Mouth, including the environmental impact of the locks, weirs and barrages of the Murray River.**

Full and timely implementation of the Basin Plan is critical to securing a healthy fresh-water future for the industries, communities and environment of the CLLMM region.

We are concerned that some interests will seek to use this inquiry to reopen the debate about a freshwater vs seawater solution for Lakes Alexandrina and Albert. We respectfully submit there is little value in reopening this debate given the extensive body of research which demonstrates that the consequences of removing the barrages and re-introducing seawater on a long-term basis would be the creation of an increasingly degraded, hyper-saline ecosystem rather than a healthy, estuarine environment.<sup>3</sup>

In the absence of natural upstream river flows, both the barrages and sufficient freshwater flows are essential for maintaining the environmental values of the CLLMM region as well as an appropriate supply of "fit for purpose" water to existing users between Lock 1 and the barrages. Here "fit for purpose" means water of sufficient quality and quantity to be suitable for urban water supply, irrigation industries, tourism and other community uses such as the irrigation of public space. As identified in the MDBA's Drought Emergency Framework for Lakes Alexandrina and Albert, the introduction of seawater would not only result in the collapse of existing ecosystems, it would also compromise major urban, irrigation and riparian stock and domestic supplies below Lock 1.<sup>4</sup>

Situated as we are at the end of the river system, our community is particularly vulnerable to the vagaries of upstream water resource management. In this regard, we would like to see the Committee recommend that recovery of the 450GL of Special Account Water continue to be prioritised. This additional water recovery can only occur through voluntary participation in projects that have no adverse social or economic outcomes and we submit that the benefits of an additional \$1.7 billion being invested into regional communities as a result should not be overlooked. As with any significant

---

<sup>2</sup> DEWNR (2014) *Ecological Monitoring Summary: Coorong and Lakes Alexandrina and Albert, July 2013 to June 2014*.

<sup>3</sup> See for example Muller K.L. (2011). *Ecological consequences of managing water levels to prevent acidification in Lakes Alexandrina and Albert: Technical Report*. Prepared for Department for Environment and Natural Resources, Adelaide, South Australia.

<sup>4</sup> Murray Darling Basin Authority (June 2014). *Drought Emergency Framework for Lakes Alexandrina and Albert*, p. 10.

infrastructure spending of this type, there will be significant flow-on benefits for private landowners and local economies where the money is spent.

Rather than re-examining the premise on which the Basin Plan was developed, we urge the Committee to instead focus on the practical steps that can be taken between now and 2024 to improve Basin Plan implementation so as to meet key environmental outcomes, whilst helping regional communities and the industries that support them to adapt and thrive.

Alexandrina Council looks forward to the Committee's careful consideration of our feedback and would welcome the opportunity to appear before the Committee at the public hearing in Goolwa scheduled for 8 December 2015.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Dinning', with a large circular flourish at the end.

**Peter Dinning**  
Chief Executive

CC: Hon. Ian Hunter MLC, South Australian Minister for Water and the River Murray