

File: 5.14.019
PD:SM

13 March 2015

**PETA BRETTIG
NATURAL RESOURCES SA MURRAY-DARLING BASIN
GPO BOX 2834
ADELAIDE SA 5001**

Dear Peta

Re: Submission re Water Allocation Plan for the River Murray Prescribed Watercourse

Thank you for the opportunity to comment on the draft Water Allocation Plan (WAP) for the River Murray Prescribed Watercourse, and in particular, for providing Alexandrina Council with an extension of time within which to make a submission.

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 cognisant of our community's interests as articulated in our *Community Strategic Plan 2014-2023* and have consulted widely with water users and other relevant interest groups across our District. Council also comments in our capacity as water user, being the holder of four licences under the current WAP.

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 along with the nation, highly value the international prominence given to this region by virtue of its recognition under the *Ramsar Convention on Wetlands 1971*.

Alexandrina Council has long been an advocate for the interests of a healthy, working Murray-Darling Basin, as evidenced by our April 2012 submission to the Murray-Darling Basin Authority on the then proposed Basin Plan. Many of the principals and concerns expressed by Council at that time remain relevant to the current consultation process on the draft WAP and for this reason, we have included our Basin Plan submission as an enclosure to this letter.

In assessing the draft WAP, we have considered the extent to which we feel the proposed provisions are likely to contribute to achievement of the Basin Plan's end-of-system objectives and targets.

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 salinity target for Milang (Basin Plan, Section 9.14). Alexandrina Council was a strong advocate for these end-of-system targets being included in

the Basin Plan and we submit that the South Australian government must now, through the WAP, commit itself to playing a proactive role in the achievement of these targets.

Our submission focuses on a few key aspects of the draft WAP which are of the strongest interest to Council and our community:

River Murray Prescribed Watercourse – Victorian Border to the Murray Mouth

A number of community members have communicated their concern to Council about the River Murray Prescribed Watercourse being described as extending from the Victorian border to the barrages. The River Murray system does not end at the Barrages but requires regular freshwater flows through the Murray Mouth in order to ensure, amongst other things, adequate flushing of salt into the Southern Ocean. The requirement for sufficient flows through the Mouth is recognised in the Basin Plan and indeed on page 62 of the draft WAP. We request that page 10 of the draft WAP be amended to include reference to the Murray Mouth.

2.4 Climate Change Impacts

We note the adaptive management approach to climate change contained in the draft WAP and Basin Plan as well as the uncertainties involved in assessing the likely impact of climate change on water availability. Nonetheless, we strongly support a continued focus on the investigation of climate change impacts on water resource availability across the Basin. Of great interest to our region and of relevance to the proposed dry allocation framework, is how often and for how long South Australia can expect to receive less than Entitlement Flow i.e. the frequency, duration and extent of low flow events.

We suggest this section of the draft WAP should also acknowledge the potential impact of sea level rise on future water allocation decisions below Lock 1. The *Climate Change Adaptation Plan for the South Australian Murray-Darling Basin (2014)* identifies potential failure of the barrages as a real risk associated with expected sea level rise. The concern for water allocation planning in the CLLMM region is the impact such barrage failures will have on water quality and ultimately, the ecological health of the Ramsar site.

We respectfully submit that the draft WAP should make mention of the need for detailed modelling of the impact of varying amounts of sea level rise on the frequency, duration and extent of saltwater incursions through the barrages, as envisaged by the Regional Adaptation Plan. The most recent climate change projections released by CSIRO predict (with very high confidence) higher levels of sea level rise than those referenced in the Regional Adaptation Plan, increasing the level of urgency for this modelling to commence.

2.5 Areas of Indigenous Cultural Significance

Alexandrina Council acknowledges the Ngarrindjeri people as the traditional custodians of the lands and waters of our Council district. Through our KNYA Agreement signed in 2002, Alexandrina Council and the Ngarrindjeri Nation have made a joint commitment to seek ways of working together to uphold Ngarrindjeri rights and advance Ngarrindjeri interests when decisions are being made about their traditional country, lands and waters.

We note and support the commitment in Section 2.5 of the draft WAP that the Board will continue to work with Traditional Owners to ensure that future WAPs: (1) have regard for Aboriginal values and

uses of water, and (2) identify and provide for Aboriginal people's desired objectives and outcomes with respect to the management of prescribed water resources.

5.3.1 Allocating during dry conditions

Council along with many members of our community is deeply concerned about the dry allocation hierarchy proposed in Section 5.3.1 of the draft WAP.

Council agrees that Dilution & Loss plus Critical Human Water Needs (CHWN) should be given the highest priority during periods of low flow, however along with other interest groups within our District, Council is concerned that the proposed 4-tier hierarchy which prioritises "productive" water use over environmental water will have negative consequences for the social, economic and environmental health of the CLLMM region.

As stated above, there is a direct link between the ecological health of the CLLMM region and the economic, social and cultural wellbeing of our people. Part 3 of our Basin Plan submission (enclosed) details some of the social and economic impacts felt by our community during the drawdown of 2006-2010. We are concerned that by putting unallocated environmental water last, the dry allocation framework proposed in the draft WAP will increase the risk of lake levels dropping below acceptable levels (i.e. above 0.4AHD 95% of the time and above 0.0AHD all of the time) which in turn will have serious flow-on effects for the overall wellbeing of our community.

From an ecological perspective, consideration also needs to be given to the fact that the CLLMM region has not yet recovered from the devastating effects of the Millennium Drought. The draft WAP acknowledges that South Australia's entitlement flow alone is not sufficient to meet the State's environmental water requirements. This means that water dependent ecosystems below Lock 1 will already be under significant stress whenever flows across the border drop below 1850GL. The dry allocation framework as proposed will exacerbate these already difficult conditions by failing to properly account for the inevitable evaporative losses associated with the unlicensed portion of the Wetland Consumptive Pool and by effectively reducing unallocated environmental water to zero before any impact is felt by consumptive users.

Council would instead support a 3-tier framework which properly accounts for the evaporative losses of the Wetland Consumptive Pool, gives unallocated environmental water equal footing with irrigation allocations and thereby goes some way towards safeguarding water levels in Lakes Alexandrina and Albert during dry conditions. The dot-points below indicate what such a framework could look like:

- Tier 1: Dilution & Loss
Wetland Consumptive Pool – unlicensed
- Tier 2: CHWN (Pools A-D)
- Tier 3: Pool E
ELMA
Wetland Consumptive Pool – licensed
Unallocated non-consumptive use

We submit that a framework such as this would result in a more equitable sharing of water losses between the environment and consumptive users during dry conditions. It will also mean that the socio-

economic impacts of lower water availability will be borne in a more equitable fashion by the communities both above and below Lock 1.

The reason for suggesting that the unlicensed portion of the Wetland Consumptive Pool be treated in the same way as Dilution & Loss is that this water is essentially unmanageable. As described on page 25 of the draft WAP, this water is automatically "used" by unmanaged wetlands between the SA border and Wellington through evaporative losses. This use has to be accounted for no matter how low the flows coming across the border may be.

Page 91 of the draft WAP indicates that the dry allocation framework is to be the subject of a detailed administrative policy, developed through engagement with River Murray water users. Given the wide-ranging economic, social and environmental implications of water allocation decisions made during dry times, Council requests that a much broader consultation approach be adopted. Local governments and other community interest groups must also be consulted and given the opportunity to provide feedback during development of the detailed administrative policy.

2.3.4 River Level Management & 6.2 Water Resource Works Approvals

We note that the existing prohibition on additional pumps for backwater and anabranches will now also apply to the tributary wetlands of Lake Alexandrina i.e. the lower reaches of the Finnis River, Tookayerta Creek and Currency Creek.

We have considered the likely impact of Principle 52 on the future development of adjacent land and do not consider the impacts to be at significant variance with Council's Development Plan policy. Whilst this change does have the potential to limit the future capacity of adjacent land, on balance we support the new Pump Prohibited Water Extraction Zone given the strong ecological rationale put forward by the Board.

Council acknowledges the importance of introducing water level variability within the CLLMM system to improve wetland health and ecosystem function. The introduction of water level cycling will make a direct contribution to Basin Plan environmental watering objectives, and in particular, objective 8.05(2)(a) which seeks to ensure that declared Ramsar wetlands maintain their ecological character.

I extend my thanks to Natural Resources SA Murray-Darling Basin for taking the time to speak directly with our Elected Member body and for undertaking community consultation sessions in our local area.

Alexandrina Council looks forward to your careful consideration of our feedback and to working together in the continuing process of achieving the sustainable management of River Murray water resources.

Yours sincerely



Peter Dinning
Chief Executive

CC: Hon. Ian Hunter MLC, Minister for Water and the River Murray; Sharon Starick, Presiding Member, SA Murray-Darling Basin NRM Board.
Encl: Submission to the Murray Darling Basin Authority re 'Proposed Basin Plan – a draft for consultation, November 2011 dated 12 April 2012.