



River Lakes and Coorong Action Group Inc

ABN 23 590 559 324

Winner 2009 Jill Hudson Environmental Award

Senator Doug Cameron, Chair, Senate Environment and Communications Committee's Inquiry into the provisions of the Water Amendment (Long Term Average Sustainable Diversion Limit Adjustment) Bill 2012 and the Water Amendment (Water for the Environment Special Account) Bill.

Submission - Proposed Water Amendment (Water for the Environment Special Account) Bill.

I acknowledge the Kurna people on whose land we are meeting, and the Ngarrindjeri Traditional Owners of the land and waters around the lower reaches of the Murray River, the Coorong, Lakes Alexandrina and Albert.

About the River Lakes and Coorong Action Group Incorporated

RLCAG is an independent community-based organisation which formed in 2006 to advocate for the biodiversity of the region and to protect people's livelihoods from over-allocation upstream. The organisation incorporated in January 2007:

- *to protect, conserve and enhance the biodiversity of the River Murray, Lakes and Coorong;*
- *to liaise with appropriate bodies over the management of the River Murray, Lakes Alexandrina and Albert and the Coorong, and their immediate surrounds; and*
- *to educate the community in River Ecology.*

RLCAG has a track record of engaging with Murray-Darling Basin matters through submissions, symposia, meetings and campaigns. This is the group's twentieth submission regarding government inquiries and actions on environmental matters.

The Region's importance in the system

We believe that the River Lakes Alexandrina and Albert and the Coorong form a critical region in the management of the system overall. This is an extraordinary freshwater system that supports an estimated 68,000 people in intensive agricultural, tourism and service industries in a region characterized by relatively rapid growth. The Coorong is recognised as a globally significant wetland with remarkable physical and biological biodiversity. The Australian government has responsibility to maintain the ecological health of the Coorong under the Ramsar convention of 1985.

We have long contended that the River Lakes and Coorong is critical not only because of its environmental social and economic assets but because this is the canary in the mine. Rivers die from the Mouth up. If we're OK, upstream is more likely to be OK. At the same time we are critically concerned with the health of the river system as a whole, with the fair allocation of water for all users and for the environment. We note there are another other 16 Ramsar-listed wetlands in the Murray Darling basin potentially at risk.

Overall, therefore we welcome the creation of a Bill that supports responsive management of the Basin system and at the same time aims to provide funding of the acquisition of an additional 450GL of water. We strongly support quarantining of funds which can only be used for the acquisition of extra water. We welcome the recognition, at 8, of the importance of the key environmental benefits of reducing levels of salinity in the Coorong and Lakes Alexandrina and Lake Albert, maintaining the Murray Mouth and the critical need to flush accumulated salts, increasing barrage flows to the Coorong to support critical fish migrations and the importance of environmental watering of floodplains throughout the whole Basin.

However we are deeply concerned that:

1. In any case 3200 GL may not restore the River Lakes and Coorong, even by 2024, as the best available science shows, and the 450GL is not certain. 450GL needs to be a fixed minimum amount.
2. The timeline may be too long. The arbitrary time-line and amounts of funding do not allow for the changing environmental requirements of the River, which may well need water sooner, and
3. The apparent emphasis of this Bill is on acquiring the additional water primarily through investment in off-farm efficiency projects (at 11) and only then on purchase of water access entitlements, and
4. There does not seem to be a system for how this would be managed - How the fund will be administered is unclear.

3200 GL not enough and 450GL uncertain

There are still too many unknowns. The benchmarks for a healthy river system have not been set, but the return of 3200 GL to the environment with 450 GL over a period of ten years still compares unfavourably with the amounts initially proposed.

We are unaware of any modelling of volume and frequency of higher flows. We note that the MDBA's own hydrologic modelling of the relaxation of operational constraints in the southern connected systems shows that there are areas where ecological flow targets are still not achieved or are only achieved at a high level of risk, including the Coorong, Lakes and Murray Mouth with respect to low flows out the Murray Mouth.

We ask that the Bill be re-written so that the 450GL is mandatory, not because we think that will fix the system but to give some certainty as a starting point to water reform.

We are concerned that the importance of groundwater is still unclear in the whole scheme of things, the Plan and accompanying amendments. In this context we note that we do not support the removal of any groundwater from the system and we are completely opposed to fracking because we believe it has the capacity to undo any good work this Bill may achieve

Arbitrary time-line

The time line may be too long. The system will need increased water allocation in the next drought.

We ask that the Fund should be able to respond seasonally and on a needs-basis to the need for acquisition of water?

If this is not enough water to achieve a healthy river system, there may need to be a process to procure further funding to buy more water?

Focus on infrastructure

The Bill's focus on infrastructure is disappointing. The Bill could be interpreted as an extra \$1,775 million over 10 years for irrigators to improve infrastructure. The proposal that sufficient water could be returned to the environment through irrigation efficiencies, is unproven. The RLCAG is not opposed to irrigation efficiencies, supported by research and best practice, and we acknowledge the efficiency and adaptability of Australian farmers overall, and the efficiency of South Australian irrigators, some of whom are our members.

However the RLCAG would prefer to see a buyback of water entitlements, in perpetuity, as a clear acknowledgement that the Murray Darling Basin system has been compromised by over-allocation.

With regard to irrigation measures, the RLCAG is unequivocally opposed to any further damming of the system. We are still hoping for the complete removal of a regulator, aka dam, that was put in over a fish breeding ground at Clayton Bay and has left a lasting impediment.

Indeed we have long argued that there needs to be a complete moratorium on any further extractions from the system, including of groundwater, while the Plan is being implemented, to reach some certainty about the efficacy of all these proposed measures.

We note Mr Windsor's question and ask if farmers do not volunteer for improvements to infrastructure, what impact will that have on the return of water for the environment?

Will the Fund in fact create liquidity for irrigators to improved efficiencies in some areas and increase extraction at the same time?

Administration of the fund

We feel there are serious questions about how the fund will be administered.

We ask that bulk funding should not be handed over to any government or peak organization to administer because that will diminish the actual amounts through administration.

What conditions will be attached to the provision of monies for infrastructure improvement?

We ask that there should be clear requirements for qualification for irrigation projects and that these should include clear environmental benefits analysis including an Indication of how much water the project will return to the system over a period of ten years (this is after all the purpose of the Bill), ongoing measurement of returns, an undertaking to maintain systems over time, and a consideration of liability in the case of default

Need for review

We feel there is the need for a system of review. How will the success of the provision of 450 GL be determined? There is no system of public consultation built into this Bill, and we recommend that there should be

Elizabeth Tregenza, Secretary