We thank the Independent Panel for the firm line the report has taken in addressing the distress which communities, particularly the Southern Connected system find themselves in, and the extreme lack of trust that has developed in Government, their departments and agencies.

We would like the opportunity to bring to the Panel’s attention some areas where the report could be strengthened to benefit all communities across the Basin.

There is an overall position within the report that the Basin Plan should continue in its current form and more water recovery, including through water efficiency programs is acceptable. We cannot support any further water recovery under the current regime based on the following –

- Any water recovery in the Southern Connected System will not help the environmental problems in the Darling
- Cannot be delivered without further environmental damage in the Southern Connected System (including and most prominently the Barmah choke)
- Will not solve the problems of the Coorong
- Will support carp breeding in the Lower Lakes and mid Murray wetlands through overwatering
- Will create further economic and social devastation to Southern Basin communities

In particular we would like to highlight

Government Engagement –

- The Basin Plan cannot continue to be implemented in its current form. There is need for vigorous flexibility and adaptation, it should not be rolled out in its current form without change
- Government Departments and agencies need government direction to shift their focus from volumes of water to an outcomes focus
Constraints Management – draft recommendation 2 “The Australian Government should time further water recovery to match the capacity to deliver water to where needed to achieve enhanced environmental, social and working river outcomes. This approach means slowing further recovery in the Basin, and accelerating efforts to relax delivery constraints”.

- We cannot support this recommendation. The system is struggling to deliver the required downstream water commitments without having to try and deliver more – unless it comes down the Darling.
- Totally opposed to accelerating efforts to relax delivery constraints. Relaxing constraints will result in increased flows through the already congested river systems in the Southern Connected System. This will increase inundation on private property causing damage to private property / infrastructure and environmental damage to waterways and crown land
- The relaxation of constraints means agreeing to the increased volumes as proposed by the MDBA and is based on flawed modelling.
- It would also result in further third party impacts including to General Security (or equivalent) licence holders in lost yield through attempting to deliver increased flows (conveyance losses). This will further impact communities reliant on employment which could be generated from this production.

450 GL –

- We do not support the recovery of the 450GL from any region in the Southern Connected System.
  - It cannot be delivered without severe third party impacts
    - Some landholders will be inundated in its delivery
    - Further erosion on reliability of general security water entitlements
    - Environmental damage in its delivery
- Recovering the 450GL from the Nth Basin would help reinstate flows to the Darling and Lower Darling systems, supporting environmental outcomes on the way

Structural Adjustment

- No amount of structural adjustment can replace the wealth that is created economically and socially to communities directly impacted by the removal of productive water from key staple food producing regions.
- Rather than considering Structural Adjustment Packages we need to implement flexible changes to water policy to ensure that water is managed with common sense to
  - Protect our food bowl
  - Protect our regional communities
  - Protect our food security – particularly staple foods
Flawed Assumptions

The report has not addressed the flawed assumptions and poor science which was used to model the Basin Plan – these include, but not limited to (please contact Speak Up directly for reference material)

- The Lower Lakes were once an estuarine system (but the Basin Plan models them on being a fresh water system)
- The southern Coorong was once fed by water from the South East of South Australia, which now flows directly out to sea via the South East drainage systems. This water made its way to Lake Alexandrina and with the combination of tidal flows was crucial in scouring the Murray mouth (the Basin Plan has totally excluded contributions from south eastern SA from its modelling)
- The Darling once provided 39% of entitlement flows to the South Australian border (the Basin Plan models 6%)
- Only 8 out of the 55 wetlands in the southern basin which have undergone sediment sequencing were found to be wetlands prior to the regulation of the river (yet the Basin Plan models on these needing inundation 9/10 years)

Using false modelling on which to base the Basin Plan has resulted in limited environmental benefits to many areas of the MDB and has resulted in environmental degradation across all river systems along with adverse social and economic consequences – including devastation in some areas - across rural communities in the southern connected system.

Food security

The report does not address the nation’s staple food security issues, which have now been highlighted in the wake of panic buying of staple foods.

- Dairy report does not include figures for the past two zero allocation years in the NSW Murray Valley, or the mass exodus from the dairy industry in that time across southern NSW and northern Victoria
- Buying habits over the last 3 weeks have shown that Aussies value milk, pasta and rice - staple foods, all of which we are currently importing (dairy products, wheat and now rice) to meet domestic demands
Recommendations which need to be addressed –

- There are no recommendations for Government, departments or agencies to investigate opportunities to return water to productive use, which could be achieved through
  - Returning flows from the South East South Australia into the Southern Coorong
  - Upgrading and automating the barrages
  - Building Lock 0 at Wellington and piping water to Adelaide and farms established along the Lower Lakes
  - Addressing floodplain harvesting and compliance issues in the Northern Basin to return flows contributed from the Darling to South Australian border flow targets

- Benefits
  - Returning in excess of 1000 gigalitres to productive use
  - Increase confidence and staple food production
  - Reduce impacts on the Barmah choke, river degradation and erosion
  - Return health to the Darling and Lower Darling
  - Reduce dredging in Murray Mouth by allowing tidal flows to enter Lake Alexandrina

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