



Productivity Commission
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Submitted online

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**RE: Submission into the Productivity Commission's
5-year review of the implementation of the Murray-Darling Basin Plan**

Dear Commissioner,

The Conservation Council of South Australia (Conservation SA) welcomes the opportunity to make a submission to the Productivity Commission's 5-year review of the implementation of the Murray-Darling Basin Plan, with reference to the recovery of water for the environment and the achievement of sustainable diversion/extraction levels (SDL) by 2024.

Conservation SA is an independent, non-profit and strictly non-party political peak body organisation representing around 60 of South Australia's environment and conservation organisations. Conservation SA has been a strong advocate for the protection of native vegetation and biodiversity in South Australia since 1971.

Introduction

Conservation SA welcomes many of the Productivity Commission's draft findings and recommendations, specifically its founding premise that the best way to restore community confidence in water management in the Basin is to go back to the basics of good management. These include clarity about roles and responsibilities, effective processes for collaboration, transparency and accountability for decisions and actions, meaningful community engagement including with Traditional Owners, and adequate reporting, monitoring, evaluation and review processes in place.¹

We support the Commission's critique of Basin Governments' lack of commitment to the Basin Plan as a whole. We agree that the 'management of the basin is prone to poor credibility created by decades of States promoting their own interest in negotiations and a recent history of over promise in commitments on the Plan'.²

We endorse the statement that 'the MDB Ministerial Council must set a much clearer tone of firm commitment *to the Basin itself, not just to their own patch*, with unmistakable collective direction for delivering on commitment'³.

We have concerns about some of the recommendations on environmental water planning and management, which fail to take into account the impact of an

¹ MDBP 5-year Report Draft Overview p15

² MDBP 5-year Report Draft Overview p15

³ MDBP 5-year Overview Report Draft Overview p21

adjusted SDL on environmental watering objectives. We reject the recommendation to remove a salt export target and are dismayed by the lack of recommendations for meaningful engagement with Traditional Owners, particularly on WRPs and supply projects. We also question the lack of emphasis on the *benefits* of water recovery to society at large.

Concern about further delays

Ongoing slippage of SDL projects is a real cause for concern as stated in the Report. We welcome the findings about Basin States' lack of commitment to the Plan, the delays in preparing Water Resource Plans and implementation of pre-requisite policy measures (PPMs) to enable the efficient use of environmental water, without which, a water recovery target of more than 4000 GL would be required to achieve the outcomes of the Basin Plan.

450GL through efficiency measures

We cannot overstate the importance of returning the full 3,200 GL to the system, including the 450 GL currently designated through efficiency measures. During the development of the Basin Plan in November 2011 the Wentworth Group of Scientists found that the best publicly available science presented in the 2010 Guide to the draft Plan said that 3,856 - 6,983 GL of water was needed to be recovered from consumptive use to achieve hydrologic and environmental goals. This was later revised to a minimum of 4000 GL.

Recovering water for the environment

It is concerning that only 1995.8 GL has been recovered against a target of 2075 GL (Finding 3.1)⁴. The 2075 GL target does not include the required 62 GL of updaters so sits outside the 5% limit.

Water quality

We hope to draw attention to the importance of the salt export objective and maintaining salinity targets.

The objective for salt export of two million tonnes per year from the Basin into the Southern Ocean, site-specific salinity targets for flow management in the River Murray and the Lower Darling, and end-of-valley salinity targets were reached after considerable community consultation and scientific input in the development of the Plan.

Our members strongly opposes re-specification or abolishment of the salt export objective and site-specific salinity targets because these targets are critical to achieving water quality that is suitable for a range of purposes and is a real measure of the overall working of the Basin Plan. This is not supported by the people who know and work the Lower Murray and Lakes Alexandrina and Albert.

⁴ MDBP 5-year Report Draft Finding and Recommendations p27

Environmental Water Planning and Measurement

It is a concern that PPMs have not been implemented, and that only seven out of 20 long-term watering plans (LTWPs) have been developed and published, with the remaining 13 due to be published by the ACT, New South Wales and Queensland Governments by 30 June 2019. We support guidance to States and maintaining an on-line register of LTWPs including their status (11.2)⁵.

Reporting monitoring and evaluating

We support the Draft recommendations to strengthen intergovernmental agreements (13.1) development of a revised Basin Plan evaluation framework (13.2) and a Basin Plan monitoring and evaluation strategy (13.3)⁶. It is our view that the Murray Darling Basin Authority should lead the states in the development of the strategy to ensure a timely approach.

Institutional governance

We understand the conflict of interest within the Murray Darling Basin Authority (14.2) and wholly support a statutory authority as the regulatory unit, but members are concerned that removing regulatory powers from the MDBA will further weaken its powers and increase its vulnerability⁷.

Thank you for the opportunity to provide a submission into this important review. Please do not hesitate to contact me should you require any further information.

Yours sincerely,

Craig Wilkins

Chief Executive

⁵ MDBP 5-year Report Draft Finding and Recommendations p41

⁶ MDBP 5-year Report Draft Finding and Recommendations p45

⁷ MDBP 5-year Report Draft Finding and Recommendations p48