

**20/11/2023**

**Productivity Commission**

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**Commissioners**

**Submission to: Murray–Darling Basin Plan: Implementation review 2023 Interim report**

I am responding to the request for feedback on the Draft Implementation review 2023 Interim report.

I am Bob Newman, resident of Port Noarlunga SA and have had a long involvement with the Murray-Darling Basin following a career in engineering with a focus on hydrology, hydrogeology and salinity management in the Basin.

Since the early 1990s I have become increasingly aware of the ecological stresses our history of river management and water allocation have had on the basin's rivers and dependant ecosystems. This was brought about by engaging with many communities along the lower Murray corridor from Swan Hill / Menindee to the Murray Mouth. Those interactions changed my attitude to basin management, as an ivory tower engineer, and taught me of the multiple values of a river system. This life change took me from Adelaide to live within the Basin from 1992 to 2007 before returning to the coast here in Adelaide.

This submission (Attachment A) is a supplement to two other submissions with which I have been engaged; one for the Lifeblood Alliance and another from the Healthy Rivers Lower Murray (a group of Healthy Rivers Ambassadors and ACF River Fellows). I fully concur with the thoughts presented in those submissions.

As I had been travelling during the period that those submissions were being drafted my opportunity for written input was limited. So, on my return yesterday, I have been able to draft these supplementary comments which mainly refer to the drafting and tenor of the draft documents rather than the findings and recommendations.

I would be happy to be contacted in relation to these comments

Yours sincerely,

**Bob Newman, Healthy Rivers Ambassador**

Included attachment A

**Bob Newman - Submission to: Murray–Darling Basin Plan: Implementation review 2023 Interim report****PC Interim Report MDB Implementation review BN comment Nov 2023**

Supplementary comment to other submissions prepared by Lifeblood Alliance and Healthy Rivers Lower Murray

Opportunity for comment – thanks – mostly editorial comments on draft overview document

Well written: - this PC report is an 'easy read', but perhaps relies too much on prior knowledge.

It does provide links to further detail – yes, but it could better contribute to broader water literacy. As a public report, there is another opportunity to set aside some of the mis-conceptions and even mis-information related to the understanding of the issues and their history.

Page 1 - The Basin: Often, the Basin is described in human terms - population, employment productivity; but it is important to explain the unique character of the Basin perhaps compared to other world-wide river basins. The MD-B experiences a level of ephemerality unique in the world. It sources its water mostly from local upland catchments and then delivers it downstream where the river and its connected wetlands and floodplains generate unique and highly valued ecosystems in otherwise arid landscapes. The importance of downstream connectivity is critical.

Page 1 The Plan: Too often, reports related to the implementation of the Basin Plan do not explain the need for the Plan well enough. It is evident that many stakeholders across the Basin are skeptical of the of the scale of intervention required, accordingly it is suggested that the PC take the opportunity of reiterating the actual justification rather than just accepting the 'numbers'. There is no obvious plain English source of justification for the Plan eg the MDBA website skirts around the issues. It's time to reassert the need for the Basin Plan:

This PC report might include text along the lines of;

*The Basin's ecological health has been reported as in severe decline since the 1980s. A benchmark environmental study was published in 1987 following the formation of the MDBC and ultimately the MDBMC, revoking the earlier engineering focused RMC [quote facts in a text box?].*

*Initially the focus was on salinity and action was initiated (1989). Subsequently, issues such as algae, fish, birds, floodplain vegetation each became increasingly recognized and addressed to some extent. Ultimately, over-allocation evidence led to the CAP on diversions (1997) and then the Living Murray 'first step decision' (2003). However, it was during the millennium drought when the ecology was in collapse and the ability to serve human need was in jeopardy, that Prime Minister John Howard declared that the basin's water resources were over-allocated and needed to be reduced (Water Act 2007). At the same time Climate Change was reducing inflows. The Basin Plan response set this aside for the timebeing as the quantitative science remained uncertain.*

Page 1 2750 GL/y? No; the Plan is for 3200GL/y don't infer the 450 is an option!

Page 2 para 3 and 4 SDLs: the current text infers that action starts with the Basin Plan and does not acknowledge the history of over-allocation in older historic State water sharing plans which have increasingly adopted water trading opportunities which have exacerbated the increasing use of historic allocations.

Page 2 LTAAY – need to better explain how this works and the use of CAP factors to convert the multiple classes of water rights to LTAAY

Page 2 para 5 Responsibilities: States are firstly responsible for WSPs to ensure SDL compliance is measured and deliverable before other actions in the Plan.

Page 3 para 4 and context justification for the Plan – accept that the PC has limited role but my earlier comments suggest that PC can help the understanding of the need for action.

Whilst the other monitoring and reporting such as by MDBA is readily available, such reports tend to be set in time and focused on statutory reporting. It would be useful to have a clear overall statement of the health of the basin, its catchments, rivers and critically its floodplains. The acceptance of the need to reinstate the 'Sustainable Rivers Audit' (SRA) is welcomed.

Page 7 Water Recovery Target and Progress: a useful presentation of the state of affairs – thanks

Page 8 benefits from water for environment: need for better acknowledgement of \$ value of WforE within socio-economic analyses – refer to Wheeler et al

Page 8 and 9 Quotes from submissions: - very helpful , but this does tend to over-emphasise the success in locations of action and there is a need to report on the condition of those long lengths of the system including low lying wetlands and floodplains which have not received water similar to predevelopment regimes.

Page 10 para 2 tardy NSW WRPs: ‘step in powers not used’ should such action be mandatory?

Page 10 para 2 Governance and reporting: Engagement / Complexity?– The recent information portals might be useful but are often so detailed as to obscure the broader picture and associated trends. There is need for a more effective policy progress portal MDBA has improved this but more readily available clarity is needed

Page 11 para 1 point 5 supply and Constraints projects progress: “*there are no real consequences for basin states not delivering on supply projects*” does this assume that only federal government is responsible for using buy-backs to cover the shortfall. Why should the States not be responsible not further review of WSPs to ensure SDL compliance?

Page 12 constraints should be separated from supply projects – strongly agree - but need more careful choice of language: “*flood-prone infrastructure*” – constraints relaxation should not be referred to as ‘flood events’ these are just minor beneficial flows that would have occurred under similar climate / flow regimes prior to development.

Page 13 Bridging the Gap: “..... before pursuing the 450 efficiency measures” No - time is running out even with extensions - clarify comment relating to buy backs versus efficiency initiatives

Page 14 water recovery - using an expanded water market could reflect on the contribution of water trade to contribute to the ecologic harm as well as being part of the solution . trade ensures water is used whereas in the past before markets prevailed licensees prided themselves in leaving water in the rivers for the environment, quite common to use only 80% of allocation (at least in SA). [It is unfortunate that at the inception of the original water act and the subsequent plan that the notion of a haircut allocation trim was not discussed (eg 1% per year for 25 years?). Instead a compensation to individual entitlement holders though the water market was preferred. This is at the core of concerns over the plan.

Page 15 box 2 this is a very significant finding and its useful to be stressed

Page 15 para 4 Value of 450? – this is often referred to as ‘water for SA’ and the specific targets over-emphasise the very end of the system without considering the considerable values of delivering such flows all along the system for wetlands and floodplains – this is a flaw in the drafting of the original plan and has been the source of much angst for upstream communities.

Page 21 WRP compliance: the need for 55 individual requirement to be met by each plan is often quoted but these are difficult to discover

*These comments were prepared whilst on a long road trip mostly throughout the Basin and transcribed in limited time after my return, so my apologies for the style and the lack of consistency with the PC request . BN*