

Central Murray Environmental Floodplains Group Inc

Feedback and Submission on Interim Report to the

Australian Government Productivity Commission

Murray Darling Basin Plan Implementation Review 2023

Feedback Submission.

Our Group was extremely disappointed with the findings of the Interim Report and recommendations made.

We felt that the recommendations lacked the quality and direction made by the Commission 5 years ago.

At the Echuca Hearing on (7th June 2023) your Commissioners stated “when making a submission we need evidence with added comprehensive data to form a pathway forward which is really important. The commissioners then went on to say, one of the things we are interested in hearing about is the evidence around what people figure has led to the adverse current consequences there’s one thing to say there is a problem there and that’s the first step in thinking about what to do and the second step is what should be done about it.

You heard at the Hearings but obviously haven’t read or taken note of evidence submitted of the current adverse consequences that the Plan and water buybacks have caused to those that are living in that environment. Now those same people have offered numerous solutions to what should be done, which you have been totally ignored in your recommendations.

Again, this is disrespectful and shows total disregard to those who live in river communities. Look at our address on this Submission “Cohuna” and where do you live and work “Canberra”! Do you understand what gumboots a shovel and torch are used for?

The Commission Interim Report has taken a very soft touch position like a puppy rolling on its back for a tummy rub, the toothless tiger approach that has little direction to either help the population or address the inadequacies of the current Murray Darling Basin Plan.

From the hearing we thought the Commission was finally going to make some strong recommendations that would benefit those who have been severely affected by the Plans implementation and its Water Buyback process providing we produced the evidence.

Our major Submission No 57 of 153 pages of collected hard factual data and evidence supported by 84, individual, organisations and documented accounts, amounting to hours of voluntary unpaid research and compiling was totally overlooked in the Interim Report. Like how a poorly managed and run resource WATER which is needed for critical human needs is presently operated causing mass destruction of the environment and river communities.

Yet a few brief comments made by me the Group’s Chair at the Echuca hearing and placed on a single page No 6 were. Interim Report Pages 83 & 213. Regarding Page 83 you categorize floodplain landholders as a small problematic group instead of recognizing them as essential producers of the nation’s food supplies. The floodplain extends some 2500kms the length and breadth of the Murray River in this case.

In Key Points you state, “The Murray–Darling Basin Plan (the Basin Plan) is a significant reform that aims to deliver a healthy, working Basin to benefit the environment, Basin communities, and current and future generations”.

There has been no flexibility to change what is now seen to be wrong or consideration made for technological advancement adaptation to be built into this Plan that is now over 12 years old. This is creating massive problems trying to balance now ill-fated fragile environmental ecosystems now being destroyed and the livelihoods and future of river communities.

Regarding Page 213, of the Interim Report, I quote “Participants were also frustrated with a lack of scientific information about the outcomes achieved using water that has been recovered for the environment Central Murray Environmental Floodplains Group sub.6, Northern Victorian Irrigators, sub.7

It should read,

Participants were also frustrated with a lack of **accurate** scientific **evidence** about the outcomes achieved using water that has been recovered for the environment.

The data currently provided is often contradictory, contrary to measurable observations or misleading.

This includes:

1. Environmental Water

The volumes of environmental water used are outlined in the following table:

Water Use (ML) 2021-22		
	MDBA <i>(Gunbower Forest Report Card 2021-22)</i>	VEWH <i>(Dr Sarina Loo – VEWB email: Sept 12, 2022)</i>
Total water delivered	20,000	20,512.5
Associated return flows	0	10,119.0
Total Water Used	20,000	10,393.5
Variance	9,606.5 ML or 92% more than VEWB	

There is wide variation in the data provided by MDBA and VEWB. In both cases there is no actual measuring mechanism to gather accurate data.

2. Birds

There are regular discrepancies between the birds and nest numbers, which implies misleading inaccuracies in the data.

(North Central CMA, Community Update, Gannawarra Times, 23rd May 2023)

“Monitoring during spring 2022 to autumn this year recorded more than 1,000 juvenile waterbirds at Gunbower Forest alone including little pied cormorants, nankeen night herons, Australian darters, ducks, swans, herons, grebes, and sea eagles.

Overall, 15,000 birds were recorded during 69 surveys, including 41 species of waterbirds, 17 of which are rare or endangered. 21 of the wetland bird species were observed breeding”

The published data rarely matches the evidence collected by CMEFG.

Gunbower Forest Report Card 2021-22

400 juvenile birds

Damien Cook (NCCMA Ecologist)

Monitoring of colonial nesting water birds (rookeries) by Damien Cook of Wetland Revival Trust, a consultant to NCCMA discovered only 60 nests of colonial breeding wetland birds throughout all 5 of the study wetlands within the Gunbower Forest. Almost all had a single clutch of eggs during the 2021 – 2022 season.

Thus, we have another significant discrepancy between two reports.

3. Red Gums and aquatic vegetation

a. Flooding for life. Sustaining a vibrant Gunbower Forest (NCCMA) states that:

“What is a healthy tree? Each year we visit the same sites to quantify the tree’s canopy (it’s top) as a measure of its health.”

b. North Central CMA, Community Update, Gannawarra Times, (2nd June 2022) states that:

*“Iconic stands of river red gum are struggling and the aquatic understorey which makes Gunbower so unique has suffered, waiting for the next flood.
The health of the tree canopy has declined over the past three years since the last flood.”*

b1. Quantifying water requirements of riparian red gums (*Eucalyptus camaldulensis*) in the Murray-Darling basin, Australia – implications for the management of environmental flows. (Doody, CSIRO and others 2015) states that:

“The results show that we cannot tell the health of a tree just by looking at its canopy ...”
Yet VEWH and NCCMA ignore this fact.

b2. NCCMA Facebook post – (05 January, 2023)

The photo used in this Facebook post showing the endangered River Swamp Wallaby Grass (*Amphibromus fluitans*) was actually taken six years ago. A current photo shows nil River Swamp Wallaby Grass present.

4. European Carp

The issue of the immense number of European Carp bred, and then escaping from, Gunbower Forest into Gunbower Creek is not being addressed, and no steps have been taken to prevent the same event being repeated this year.

Gunbower Forest: Environmental Water Management Plan 2011 (MDBA), states that:

“The operating strategy for wetlands aims to replicate the pre-regulation cycle of wetting and drying. More frequent drying phases may be adopted if required to manage carp ...”

No consideration has ever been given to this.

Carp movements on an inundated floodplain – Gunbower Forest case study (2019), states that:

“The NCCMA prepared a Carp Management Strategy to inform future environmental watering in Gunbower Forest and to document complementary management actions that can be used to reduce Carp numbers”.

No such report has ever been prepared.

Reflections 2022-23 (Victorian Environmental Water Holder), states that:

“Some watering actions were stopped to avoid redistributing carp. For example, fishways were closed in protected areas such as Gunbower Creek to prevent more carp moving up from the Murray.”

In reality:

The fish lock at Hipwell Regulator was only closed some 10 days after being notified by members of the Central Murray Environmental Floodplain Group.

The fish ladder at Koondrook Weir was eventually closed after CMEFG (and others) notification.

The carp “moving up from the Murray” actually came from Gunbower Forest into the Lower Gunbower Creek and then moved up to Koondrook Weir “from the **DIRECTION** of the Murray.”

Recognition should also have been made to the following points: -

1. The Lower Lakes in South Australia were always estuarine (P Gell Muddied Waters 2012, K Jury The Better Way 2015)
2. Annual Evaporation off the Lower Lakes is on average 865.2 Gigalitres a year. (Shepherd 1971)
3. No amount of freshwater will ever keep the Murray River Mouth open because The Great Southern Ocean will not allow it.
4. There is only one way to address the Lower Lakes Acid problem that is with seawater not freshwater because it will not work (Paper due to be released by 2 eminent Australian Scientists)
5. Returning the Lower Lakes to estuarine environment would return one of the most important and largest mulloway breeding grounds in the world to Australia waters.
6. Environmental Water must be measured not modelled. You need actual figures to run a successful business. Not a guesstimate that is not accountable or transparent when using public funds.
7. According to the newly released MBDA Take Report, the Environmental Water entitlements currently being held are in excess of 4800 Gigalitres.
8. In the future there should be an Independent Environmental Impact Study done on the overuse of Environmental water and its impact to the environment.

In your own opening principles, you publicly state, “you are driven by concern for the wellbeing of the community as a whole”. Next time there is a suicide in our community we will send you the very graphic evidence for your data collection so you can sweep it under the carpet like the real evidence with solutions we presented in our 153-page submission. For your information the Water Amendment (Restoring Our Rivers) Bill 2023 also proposes the removal of the socio-economic neutrality test.

Yours in Disgust

Geoff Kendell
Chairman