

MDBA: Sustainable Diversion Limits Issues Paper.

Response by The Jackson Group

The Jackson Group provides leadership in the north of Victoria by contributing to regional, state and federal debate concerning environmental, resource and sustainability issues.

The group attempts to seek consensus between environmental and development perspectives and assist to direct government policy and community understanding of the need for better land-use and resource management in the future.

Members have diverse backgrounds having occupied positions of leadership in urban and rural water corporations, catchment management authorities, local government, regional development, water engineering and water services committees.

Major rural primary industries are represented with members actively involved in productive agriculture relying on regulated and unregulated water entitlements.

We find the discussion paper very much a high level document lacking in much detail and as such limits community comment you may expect on such a critical development as SDL's.

We fully expect the Proposed Basin Plan will include much of this detail that is required for widespread community consultation across the Murray Darling Basin however our concern is a lack of community input prior to this occurring.

We are concerned that the targeting of Key Environmental Assets could adversely affect the viability of the health of the many non-targeted assets throughout the Basin. The current "Icon" sites do little to secure the future of the Murray Darling river system. If winners and losers are to be identified there needs to be extensive consultation as this happens. We believe all water interception activities should be controlled and included in the SDL's, no exceptions!

Flexibility is in many cases of more value in the use of environmental water reserves than fixed Caps or Flows and this should be top of mind in the development of a Basin Plan.

The SDL's should have the flexibility to adjust to varying climatic scenarios and frequency of flows and as such should be arrived at prior to consideration of social and productive requirements. We need to know what is needed prior to any pragmatic trade offs taking place.

The Environmental Water Reserve should have the ability without disadvantage of utilizing the temporary water market to maximize outcomes both for the environment and productive users.

We believe that an aim of the plan should be to encourage the use of productive water closer to the source unless storage evaporation makes this unviable. Much of the environmental damage to our rivers and streams is brought about by the transporting of water resources for productive use at the times when it is not conducive to the environment.

We briefly address questions on issues in section four of the Issues Paper

4.1 Which Water Resource Plan areas should be used?

We would suggest the use of Catchment boundaries. As an example the Goulburn/ Broken rivers catchment.

4.2 Which forms of 'take' should be limited by the SDLs?

All water used for S&D, and commercial purposes including timber production or stored in dams and tanks. Groundwater and surface water to be treated the same. All interception activities should be included. .

4.2.1 How should interception activities be treated?

Restricted by licensing.

4.3 How should SDL provisions be determined in a way that optimises economic, social and environmental outcomes?

It would be beneficial if the base cases for environmental needs, under the various climate scenarios, were determined first without consideration for the social and productive requirements. This would give us a true starting point and allow everyone to see what environmental sacrifices have to be made to meet the broader objectives.

A transition period is preferable and together with a targeted approach should be adopted based on minimising social and economic impacts and building on these strengths with-in catchments.

We support valley and inter valley sharing of the resource to maximize environmental outcomes.

4.4 How should surface water-groundwater connectivity be dealt with?

Separate SDL's should be prepared for Groundwater and Surface water in catchments. These should then be linked to reflect the actual connectivity occurring.

4.5 How should SDLs be set and expressed?

Modeling that is capable of accepting current and future predictions of resource availability and set in a way of allowing a variable proportionate allocation to be triggered when significant variation occurs.

Flexibility is in many ways a more valuable tool in delivering outcomes than fixed caps and flows.

The environment's needs should also be expressed in terms of the required frequency of various flood flows. In regulated streams the operation of storages needs a major rethink. Instead of dams being operated to minimize flood magnitude (peak flows) and flood frequency the reverse should be the case for the benefit of the environment. Operating rules of dams should be changed to exclude pre-releasing, target filling curves and surcharging on gated storages. This will raise some dam safety issues but they can be overcome with remedial works. The major offenders in this regard are Lake Hume and Lake Eildon.

The Jackson group is appreciative of the opportunity to comment on issues concerning the Murray Darling Basin Authority's Sustainable Diversion Limits Issues Paper and remains available for further contact if required.

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