

Response to Sustainable Diversions Limits issue Paper

The Finnis Catchment Group recognises that the paper is part of a slow process of change and must be commended.

The Finnis Catchment group supports the initiative of the Authority with this paper. However our collective experience with government agencies has been negative. With this in mind, we hope that the Authority can learn from this and make use of people with the necessary skills to communicate and stimulate the stakeholders and then for the Authority to be able to listen and respond. The Authority must make a genuine effort to listen. The Authority should ensure that they have examples of feedback where they have listened. Further, they should make use of experts in working with groups, as well as experts in science. We are concerned that community response via written surveys will be poor and that face-to-face meetings are likely to be much more worthwhile. Recipients need to feel valued and the Authority needs to readily acknowledge this community involvement.

With regard to the Water Act 2007, we think that it should be interpreted should be interpreted to give the highest priority to the environment and, once that has been established, optimising economic and social outcomes can be addressed. Without considering the environmental sustainability, the other issues cannot be resolved. It follows that the litmus test as to how well the health of the River is, is in terms of the flow through the mouth. Low flows simply point to poor health and accumulation of salt and contaminants, whereas flows that allow these contaminants to be expelled to the Southern Ocean are likely to be associated with a river in good health.

The Finnis Catchment Group is concerned that mining industry requirements of the river are not described in the overview. The mining industry has the potential to have a large impact on the health of a river. For example, we look to the Murray Darling Basin Authority as to how much water could be used in the processing of ore. We are also concerned that the mining process could interfere with the underground water body or aquifers. There seems to be little quantification of the volumes of water potentially required and of the potential impact on the resource. Impacts could have the form of lowering the level of water in the aquifer, lowering the quality of water in the aquifer or indeed damaging the aquifer so that water resource is unavailable for future Australians. We would like to see these concerns addressed.

We are concerned that the section 3.1.2, Rainfall and hydrology section suggests that the statistics quoted imply a high degree of understanding in the physical and hydrogeological processes. We feel this is not the case and that the model used to describe the interactions of the system are quite dynamic and complicated. We are concerned that a statistical description given is somewhat one-dimensional. The implied high degree of accuracy of the surface water and extractions do not convey the high degree of connectivity of the resources.

The Finnis Catchment group is confused as to how the concept of “carry over water” fits with the concept of “Sustainable Diversion Limits”. We feel that the volume of water indicated by the SDL should be the volume of water available and that water not able to be used should be made available to the environment. We are unable to see how the concept of “SDL” and “carry over water” sit in the new context.

We feel that the paper is part of a slow process of change and must be commended.

The Finnis Catchment Group welcomes the input box of “Social, cultural and indigenous and other public benefit issues” described in Figure 4 on page 12. We think this issue to be very important and look to the Authority to quantify what volume of water is intended for these purposes. We are keen to know how these quantifications were arrived at.

The Finnis River Catchment Group supports integration of social issues with hydrological management of the river. We support the clear message that environmental flows are necessary for indigenous communities. As a group we can only hope that political interference will not impact on volumes of water needed for environmental flows.

We are pleased that the authority has chosen to link the surface water and the underground water reserves as described on page 15. The resources should not be considered in isolation and applaud the Authority's approach.

We agree with the Authority with its approach to "key environmental assets" on page 16. While we support its choices, we are concerned that information regarding these criteria may be incomplete and feel that these criteria should be set up to allow new information to be considered when assessing these assets.

On page 18, in the section 3.5.3 where water resources are described against potential uses, we would like to know how the base line has been arrived at. For example is there a period in time to be compared with and why is this appropriate? We feel there needs to be more discussion.

We feel that the review Process as described in the third paragraph of 3.5.4 on page 19, needs to consider the "end of the system".

While we agree with the need for all this information to be recorded, we suggest that current vegetation maps be expanded to include vegetation maps at differing times through our history. Inundation is a function of the vegetation and information about the current vegetation must be augmented with the vegetation likely at the time of some historic inundation. It may well be that greater interaction with the indigenous community could expand our understanding and improve our knowledge of these historic events. We welcome the objectives of the water Act described on page 12, but would prefer that in terms of priority, the environment, followed by Indigenous uses are rated above uses such as irrigation. We look to the Authority to provide more information on indigenous input as described in the third paragraph on page 25. We feel this is an important issue and look forward to seeing what the Authority is going to do to address these objectives.

We support the concept of the basin plan aligning with State water planning as described in Section 4.1 on page 26. However the Finnis Catchment group is concerned that the Finnis River itself is an area that we feel requires extra thought. For example the Finnis River, south of the railway bridge – and the extent of the 1956 flood is part of the Murray Darling, yet the rest of the river upstream of the railway bridge is yet to have a water allocation plan set in place. We feel the resource plan and how the Finnis River is described needs further consideration.

We are concerned that the "take" of water, described in section 4.2 on page 27, does not adequately reflect the volumes of water used by the mining industry. We welcome estimates of all forms of usage being published.

The Group found itself unable to understand the second to last paragraph on page 28, where some water may not be part of that limited by SDLs. We seek further explanation to enable us to more clearly understand the issue here.

On page 29, there is description of the impact of "incidental interception" and the example given is due to afforestation. We are concerned that mining is a risk and needs to be addressed and that damage to the system and particularly to the aquifer, needs to be addressed. For example on page 31 where we feel that issues such as afforestation are reasonably well known, but accidents that can occur in a mining operation may impact significantly. We know that the system is dynamic – things

do not happen in isolation and that all processing going on are connected and so we are concerned about an interception where the quality of the water has been changes. We think that this should be further discussed.

On page 36, the variability of the current climate and indeed the likely greater variability of the climate in the future needs to be addressed. SDL will need to carefully incorporate these factors.