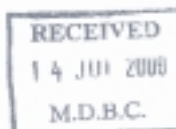


MURRAY LOWER DARLING COMMUNITY REFERENCE COMMITTEE

Independent Chairman: Paul Trevelyan, "Dunoon", RMB 4030 HOWLONG NSW 2943, Phone: (03) 8026 5276, Fax: (03) 8028 5177
 Contact: Digby Jacobs, Executive Officer, C/- Dept of Land and Water Conservation, PO Box 205, DENLINGER NSW 2710,
 Phone: (03) 5881 2122, Fax: (03) 5881 3465, Mobile: 0419 265 283, Email: djacobs@dlwc.nsw.gov.au

Dr Tony McLeod
 Project Manager
 Murray Darling Basin Commission
 GPO Box 409
 CANBERRA ACT 2601



10 July 2000

Dear Dr McLeod 

Comment on the Draft Overview Report of the Cap Project Board

At its meeting of the 14th of June 2000 the Murray Lower Darling Community Reference Committee (MLDCRC) resolved to comment on the Draft Overview Report of the Cap Project Board with particular reference to the measurement of all water diversions and the proposed rewording of Schedule F.

The MLDCRC feels that, whilst end of system (valley) flows in either regulated or unregulated rivers do not necessarily describe nor guarantee environmental outcomes for riverine ecologies, they are important in terms of base flow to the receiving river system. More particularly, we believe that ultimately all water diverted from the natural Murray - Lower Darling river system should be measured.

The MLDCRC agrees with the Independent Audit Group that metering diversions on regulated systems is a reasonably reliable measure of extraction. We believe that reliably measuring and metering other water diversions is difficult but not impossible. To ignore unregulated, floodplain and diffuse harvesting practices disregards the potential that large volumes of water will be exploited without the control that measurement would bring.

The Murray - Lower Darling river system is dependent on flows from progressively more exploited floodplain catchments and increasingly utilised regulated and unregulated tributary water. We also believe that the use of water under stock and domestic (riparian) arrangements is already being abused and has the potential to become a more significant issue if not addressed.

Whilst it may not currently be practical to measure all overland flows and the diversion of those flows, it should be an aim to pursue a measurement methodology along side a requirement that all diversions for consumptive use are metered.

In light of this, the MLDCRC suggests that the deletion from Schedule F of the definition that, "in unregulated rivers this Cap may be expressed as an end - of - valley flow regime" is replaced by the principle that all States should aim to measure and control all extraction from waterways and floodplains so to manage a meaningful Cap on extractions.

.../2

Members of the MLDCRC approved of that part of the report dealing with environmental matters but were disappointed with the section on socio – economic issues. Whilst many of the conclusions may become true at some time in the future, some of the statements are unsubstantiated. This is particularly so in the Murray Valley where resource constraint has been a more significant factor than the influence of the Cap in limiting water for consumptive use.

Yours sincerely



Paul Trevethan
Independent Chair