

The Goulburn Valley Environment Group Inc.

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Murray – Darling Basin Authority Canberra ACT 2600

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Submission -Proposed Basin Plan Amendments Northern Basin

The Goulburn Valley Environment Group (GVEG) has been actively involved at all stages of the development of the Basin Plan and the Plans implementation to date, both individually and as a member of the Lifeblood Alliance.

Critics of the Basin Plan would have us believe the plan is all about flows to the Lower Lakes in SA. The Basin Plan is not, and has never been, all about the Lower Lakes in SA as some would have us believe. The Plan is all about setting and achieving sustainable environmental health, delivering vital ecosystem services for the benefit of all industries and communities.

GVEG is extremely concerned with the Northern Basin review process, many of its assumptions and recommended actions to "offset" a recommended 70 GL. reduction of essential flows.

The introduction of a "toolkit" of Complimentary Measures as a substitute for these flows is in direct conflict with the intent and integrity of the Plan. Many of these toolkit measures should in time take place, but as genuine complimentary projects, not as a substitution for critical flows identified during the plans development.

Any reduction of environmental water held in the Macquarie and the Gwydir Rivers will have a significant impact on the future of the internationally recognised Macquarie Marshes and Gwydir Wetlands. These wetlands are listed nationally and internationally as important bird areas that support a diverse range of waterbird species and protection should not be reduced.

The 390 GL for the environment was a compromised agreed figure based on scientific analysis and evidence that would improve the "likelihood" of a sustainable working river system with-in the Northern Murray Darling catchment. The 390 GL doesn't ensure Australia meets its obligations under international treaties and arguably should be higher.

Most Scio-economics studies funded by industry stakeholders are based on "business as usual' assumptions and fail to take into account changing industries, technologies and irrigation practices. GVEG believe the Northern Basin Review has been influenced by biased regional interests in addition to not fully recognising the economic benefits of floodplain grazing, recreational fishing and tourism and the wellbeing of downstream Northern Basin communities together with completely undervaluing the value of the ecosystems services of environment flows.

The risk of water quality degradation across the Basin as a result of the proposed 70GL reduction is real, and potential impacts will not only be restricted to the Northern Basin.

The proposal to reduce the shared environmental flows to Menindee Lakes by over 100 GL has the capacity to impact on available water through to South Australia and the Murray Mouth .A further reduction of 70GL will add to this degradation.

GVEG support the current sustainable diversion limits for all ground water sources as agreed to in the Basin Plan and are therefore not in favour of the proposal to increase available groundwater for mining and gas extraction in the Eastern Porous Rock Groundwater area by 14.9 GL per year, or the 109.4 GL per year proposed for the Western Porous Rock Groundwater area.

The Basin Plan identified the need to support those communities most affected and wisely Federal transitional funds were provided to Basin States. We question how these funds have been spent by the States, where they were directed and their effectiveness. It seems to simply return and recommend a reduction to the Plan ignores clearly identified implementation stresses, and recommended transitional assistance to communities and industries.

Given the challenges Climate Change already being experienced across the Basin, now is not the time to weaken our resolve to implement the Basin Plan as agreed, by Federal and State governments and take the "easy" way out and reduce environmental flows.

Any reduction in environmental flows will only exacerbate the problems we now face with the health and sustainability of Murray Darling river system.

Terry Court **GVEG Vice President**

Protecting the environment for generations to come