



The Goulburn Valley Environment Group Inc.

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2 November 2017

MDBA's draft determination under the SDL Adjustment Mechanism in the Basin Plan

On behalf of Goulburn Valley Environment Group (GVEG) I thank you for the opportunity to provide a submission related to the draft determination under the SDL Adjustment Mechanism in the Basin Plan.

GVEG has followed the development and implementation and made numerous submissions and presentations in support of a realistic Murray-Darling Basin Plan (Plan) since 2007.

GVEG is adamant that the Plan should be implemented as agreed on time and in full, with the recovery of the full volume of environmental water, that is 3,200 GL by 2024.

However, water recovery is currently stalled at 2,047 GL, just under two thirds of the total, which is itself the minimum required to restore Australia's greatest rivers to health. The draft determination to increase the overall SDL by 605 GL will prevent any further water recovery and halt the Plan in its tracks. We are deeply concerned that this determination will cause the Plan to fail to meet its objectives for the environment and for water-dependent communities.

The SDL adjustment process was intended to provide a suite of supply, efficiency and constraints measures that would provide enhanced environmental outcomes.

The reality has turned out to be very different. The MDBA has failed to provide sufficient detail about the supply projects with little publically available information on their operation, likelihood of success or environmental outcomes. The notified constraints projects are lacking in support from their proponents and the efficiency measures lack basic details and the anticipated environmental outcomes have not been articulated.

GVEG has real concerns that the 37 measures contained in package will never be fully realised. This view is reinforced by the failure of the MDBA to fully implement the

Koondrook-Perricoota Flood Enhancement Project where \$80m was spent and the project has never been used and any environment gain never realised.

Also, some of the measures include the efficient delivery of environment water and GVEG considers these measures dubious as these projects are essentially industry best practise and should not be consider as the adjustment mechanism.

The projects proposed involving engineered delivery of environmental water to dispersed wetlands and floodplain aim to improve the health of specific sites. However, many of these projects fail to achieve genuine connectivity with the floodplain. The maintenance of the carbon cycle is critical to the long term health of flora and fauna dependant on these rivers. This can only be achieve by connecting river channels to the floodplain allowing the return of floodwaters.

Without doubt environmental outcomes can be maximised when environmental water is used to achieve frequent and timely out of bank flows. It is extremely unfortunate that Victorian Government “New Goulburn Constraints Project” doesn’t sanction the use of environmental water to achieve or contribute to an overbank flood. This position, reached because of the threat of legal action by a small number of vocal landowners (some not even directly impacted), is severely restricting the VEWH and waterway managers to achieve their mission.

This means we are never going to be able to get the best possible gains from the use of environmental water.

It is obvious that insufficient time has been allocated for genuine consultation and processing of concerns raised and for the MDBA to present a defensible determination to the federal Water Minister on 15 December 2017 and accordingly this deadline should be modified.

Yours sincerely



Terry Court

Vice President, GVEG

Protecting the environment for generations to come