

WENTWORTH GROUP

OF CONCERNED SCIENTISTS

Mr Peter Cosier, Dr Richard Davis, Prof Tim Flannery, Dr Ronnie Harding, Prof Lesley Hughes,
Prof David Karoly, Prof Hugh Possingham FAA, Mr Robert Purves AM,
Dr Denis Saunders AM, Prof Bruce Thom AM, Dr John Williams FTSE, Prof Mike Young FASSA.

**ONCE AGAIN THE TAXPAYER PAYS, INDIVIDUALS
BENEFIT AND THE RIVER LOSES.**

Wentworth Group Evaluation of Proposed Basin Plan

August 2012

SUITE 3, 3B MACQUARIE STREET, SYDNEY, AUSTRALIA, 2000

Telephone: +61 2 9251 3811 Contact: Tim Stubbs, Environmental Engineer
Email: information@wentworthgroup.org ACN 128 963 431

This is the third attempt by the Murray-Darling Basin Authority to produce a proposed Basin Plan. This latest version reinforces the fact that if you start with shoddy foundations you will end up with a shoddy house. In the case of the proposed Basin Plan, some things get worse with each iteration.

- This August version of the Plan does not identify how much water must be returned to achieve a healthy working river and comply with the Water Act.
- Yet again no scientific justification has been given for why 2,750 GI is the proposed reduction in water extractions. This number will still not achieve the majority of targets required for a healthy working river.
- The Authority has attempted to justify the 2,750 GI volume through the identification of “constraints” to water delivery. The August edition of the Plan requires the preparation of a constraints management strategy 12 months after the commencement of the Plan. This will be critical information that must be considered by the Parliament before making a decision on the Basin Plan. It will be of little use 12 months after the Parliament makes an uninformed decision.
- Ground water extractions are to increase by over 1,700 GI from current levels. Nowhere is it made clear why this resource should be given away in such huge amounts without a clear and defined need. In its analysis of groundwater sustainability the Authority has neglected important issues and has made indefensible assumptions to the extent that the public, and ultimately Parliament, are being misled about the sustainability of groundwater use in the Basin.
- The August edition of the Plan proposes a new mechanism to allow the taxpayer to further subsidise the irrigation industry within the Basin beyond the \$8.9 billion already allocated. The Plan proposes a mechanism to increase or decrease the Sustainable Diversion Limits as a result of irrigation infrastructure upgrades or environmental works and measures.

Both measures will be paid for by the taxpayer, therefore any water saved should go to the public good (the river) not private benefit. Currently the Plan proposes that water savings from environmental works and measures should go to irrigators even though the taxpayer will foot the bill. The unfairness of this arrangement is amplified because environmental works and measures never deliver equivalent environmental outcomes to the flood events they replace.

As it stands, the Australian Parliament should reject this Plan because unless current scientific consensus is completely wrong, it has no chance of creating a healthy working Murray Darling Basin.

The Water Act requires the Murray-Darling Basin Authority to determine the volume of water that needs to be returned to the river to achieve the objectives of the Act. The Authority must determine this volume and clearly identify and quantify the cost and complexity of addressing any “constraints” within the system.

The Minister and ultimately the Parliament can then make an informed decision on what is the right outcome for the \$8.9 billion of taxpayers money being spent on this reform.

Each of the dot points above are outlined in more detail below.

How much water?

The only analysis undertaken to identify how much water must be returned to the river to achieve the targets set under the Water Act identified a range of between 3,856 GI (high uncertainty of achieving the targets) and 6,983 GI (low uncertainty of achieving the targets). This analysis was in the Authority's original document, the Guide to the proposed Basin Plan released in October 2010. Since the Guide the Authority has failed to model how much water the river actually needs.

Where did the 2,750 GI come from?

As with previous editions the August edition of the Basin Plan provides no scientific justification for why 2,750 GI is the appropriate volume of water to return to the river. Supporting documents for earlier versions of the Plan had emphasized that 2,750 GI was the starting point of an adaptive management process culminating in the 2015 review. The 2015 review and the adaptive management process have all been scrapped however we are still left with the unjustified "starting point".

The CSIRO led review of returning 2,800 GI to the river identified that the sustainable diversion limits associated with this volume "do not achieve the majority of hydrological targets."

Constraints

In supporting documentation for earlier editions of the Basin Plan "constraints" to the delivery of environmental water were given as a justification for the 2,750 GI volume.

CSIRO in its review found that "While operational constraints preclude the meeting of some hydrologic and ecological targets, in other cases the shortfalls against targets appear to be a result of insufficient environmental water, the shortcomings in modelling environmental flow regimes in unregulated rivers or a combination of these factors."

An assessment of these constraints, how significant they are and how they can be addressed under the \$8.9 billion Water for the Future Program will be a critical input into the Parliaments final decision in the Basin Plan.

The August edition of the proposed Basin Plan requires the Authority to prepare a Constraints Management Strategy within 12 months after the commencement of the Basin Plan.

This requirement for the Authority to identify information critical to decision making 12 months after the decision has been made personifies the incompetence of the Authority and the failure of the Basin Plan. This Plan would not pass a science test, a fairness test, a governance test, it would not even pass the laugh test.

Groundwater

The August edition of the proposed Basin Plan increases groundwater extraction by over 1,700 GI on current levels of take. In its analysis of groundwater sustainability in previous editions of the Plan the Authority has neglected important issues and has made

indefensible assumptions to the extent that the public, and ultimately Parliament, are being misled about the sustainability of groundwater use in the Basin.

No additional supporting information has been provided with this edition of the Plan. This edition is worse than the previous edition with a new groundwater unit in Queensland being invented and 100 GI of extraction being permitted where there was previously none.

There are also additional increases of 15 GI in the Goulburn-Murray Deep and Wimmera - Mallee deep groundwater units. Extractions in the Goulburn-Murray sedimentary plain are increased by 4.1 GI and in the Eastern Porous rock plan areas extractions are increased by 4.0 GI. Extractions in the New England Fold Belt are also increased by 1.1 GI. No justification is given for these increases or their sustainability.

Adjustment mechanism

The August Proposed Basin Plan includes an adjustment mechanism for certain additional changes in infrastructure and other measures that occur between the commencement of the Plan and 1 July 2019. This does not include infrastructure or other measures that either were in operation at the time that the Basin Plan commenced or were expected to be in operation by 2019. There are two defined types of infrastructure or other measure:

1. *Supply measure* – if a work or measure results in an increase in the quantity of water in the river systems before take (for example through reduced evaporation in lakes and storage systems) the saved water is allocated to socio-economic use (that is, the adjustment reduces the reduction amount)
2. *Efficiency measure* – if a work or measure results in a saving of water after take for consumptive use (for example more efficient irrigation), the saved water is allocated to environmental use (that is the adjustment increases the reduction amount).

This allocation of savings is wrong. Both efficiency measures and supply measures will be paid for by the taxpayer, therefore any water saved should go to the public good (the river) not private benefit (socio-economic use).

When calculating a *supply adjustment* (the volume saved from environmental works and measures) the calculation is to be done on the basis of “a repeat of historical climate conditions”. This requirement means that what will be likely dubious estimates will become further and further from reality as climate change impacts affect the Basin. This failure to acknowledge the impacts of climate change conflicts with Government Policy on climate change.

On top of this there is the simple fact the environmental works and measures can never deliver all the environmental outcomes of the natural flood events they purport to replace.

Subsequently the culmination of these factors means that the taxpayer is paying for irrigators to get more water and the stated outcomes the taxpayer is supposedly buying will not materialise in reality.