

# WENTWORTH GROUP OF CONCERNED SCIENTISTS

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Mr Peter Cosier, Prof Tim Flannery FAA, Dr Terry Hillman AM, Prof Lesley Hughes,  
Prof David Karoly FAA, Mr David Papps AM, Prof Jamie Pittock, Prof Hugh Possingham FAA,  
Mr Robert Purves AM, Ms Anna Skarbek, Prof Bruce Thom AM, Mr Martijn Wilder AM.

CONTRIBUTING AUTHORS

Dr Terry Hillman AM, Mr David Papps AM, Prof Jamie Pittock, Dr Eytan Rocheta, Prof Bruce Thom AM.

## Submission on the draft Basin-wide environmental watering strategy August 2019

The Wentworth Group of Concerned Scientists welcomes the opportunity to comment on the draft Basin-wide environmental watering strategy 2019. This document sets out the long-term watering plan for the Basin including the expected improvements resulting from environmental water on river flows and connectivity, native vegetation, waterbirds and native fish.

We note with disappointment that the approach to the statutory review of the 2014 Basin-wide Environmental Watering Strategy is to choose to avoid making any material changes in order that the Basin States are not obliged to review their recently finalised (and generally inadequate) long-term watering plans. Indeed, some of those plans are still under preparation. The point of a review of such a fundamental and statutory instrument is plainly to ensure it reflects the best available contemporary knowledge and, in particular, the experience of the last five years so that it can guide environmental watering to deliver optimal environmental outcomes. Instead, the principal driver of this review is avoidance of an administrative burden on the Basin States. Important changes around, for example, dealing with climate change and floodplain connectivity, have been kicked down the road until 2022. It is unfortunate that the Basin Plan's implementation continues to be compromised by the tardy and poor performance of the Basin States in meeting their obligations.

The Wentworth Group strongly endorses the inclusion of text that reinforces the fundamental importance of constraints relaxation, implementation of pre-requisite policy measures, and solving delivery issues aimed at producing optimal environmental outcomes and meeting the Basin Plan's objectives. We note that, in a legal sense, the MDBA has determined that the PPMs are "in effect". Whether this is actually the case in practice can only be determined over the next few years.

We agree with the importance of a "watching brief" over the three issues identified by the MDBA from its review of the states' Water Resource Plans. That scrutiny must be regular, rigorous and published to ensure the states are held accountable. Those three issues pose significant risks to environmental outcomes.

Additionally, there must be comprehensive and open consultation with stakeholders during the MDBA's work on the matters identified for inclusion in the 2022 review. In particular, the commitment to investigate how best possible environmental outcomes from environmental watering can be achieved while pursuing opportunities to "improve social and economic outcomes" must absolutely not compromise the integrity of environmental watering and its principal purpose under both the Water Act and the Basin Plan.

The stakes for the Murray-Darling Basin have never been higher. Over the next few years environmental requirements in the plan including the environmental watering strategy need to deliver environmental improvements to avoid a bleak future for river ecosystems.