

Hon. Neil Andrew,
Chair,
Murray-Darling Basin Authority,
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Dear Chair,

RE: Submission to the proposed Basin Plan amendments

Thank you for the opportunity to contribute to the proposed Basin Plan amendments.

I own three properties totalling 500,000 acres on the Lower Darling, approximately 50 km south of the Menindee Lakes. Tolarno Station sits on the Darling River, and all three properties depend on the Darling for livestock and domestic purposes. The properties have a rich history spanning 160 years, and today run merino sheep, cattle and rangeland goats.

I support in principle the vision of the Murray-Darling Basin Authority, which is a healthy, working Basin through management of water resources. The aim of Plan is to:

“... ensure water is shared between all users, including the environment, in a sustainable way. It does this by managing the basin as one system.”(MDBA)

However, unfortunately experience demonstrates that this has not been achieved since the introduction of the Plan.

In 2015-2016, the Lower Darling was dry for a period of 8 months. In white history, it has only been in the last 10 years that on 3 occasions there has not been a permanent water supply. The situation in 2015-2016 was worse than any experienced during the 2000s drought. During this period, there were significant and long-lasting social and economic impacts to the community. On my property alone, I experienced significant loss of land, stock and production totalling approximately \$400,000. 200,000 acres of land was lost to production due to loss of property borders (the river is a natural boundary between properties) and no potable water for stock. The catchment had received average rainfalls over the preceding 12 months, and in our opinion the event was a result of over-diversion upstream of Menindee Lakes in the Northern Basin.

I hope that the environmental, social and economic disaster which occurred will be avoided in the future. The community seeks appropriate, sustainable long-term management of the Lower Darling, and recognise that the MDBP is a cornerstone in achieving this.

The 2015-2016 event did demonstrate the importance of sharing water between all users in a sustainable way, not at the significant detriment to one or more communities. To this extent, the Plan has failed the Lower Darling communities to date.

In my opinion, too much emphasis has been placed on the sustainability of selected individual catchments, and not enough placed on the sustainability of the Murray-Darling Basin as one system.

Dependence of the Lower Darling catchment on the Northern Basin

The Lower Darling catchment has minimal runoff and is entirely dependent on the Northern Basin. The Lower Darling catchment is fed directly by the Barwon-Darling catchment, of which 99% of flows are generated in upstream catchments (MDBA). The Lower Darling is the only connection between the Northern Basin and the Southern Basin. We recognise that the Lower Darling sits within the Southern Basin and is therefore not included in the current review. However, it is our opinion that the Lower Darling should be included in the Northern Basin, and not the Southern Basin.

Concerns with the proposed amendments to the Northern Basin:

- **There will be reduced environmental outcomes possible from the reduction in the water recovery target compared with the Basin Plan.**

The northern basin review states that:

“The environmental outcomes possible from the reduction in the water recovery target will be slightly reduced compared with the Basin Plan.” (page 4)

Given the current instability of sections of the Murray-Darling Basin, in particular the Lower Darling including the Menindee Lakes, it is unclear how the MDBA can propose a reduced recovery target knowing that this will result in reduced environmental outcomes. This appears in opposition to the purpose of the MDBA to provide a sustainable Murray-Darling Basin in the long-term.

- **There will be 10-15GL reduction in flows into the Menindee Lakes**

The northern basin review states that:

“It is estimated that compared to Basin Plan settings this will result in a 10-15 GL reduction to the average inflows to Menindee Lakes ...”(page 31)

As an individual whose livelihood is dependent on the Lower Darling, I strongly oppose any reduction of flows. It is noted that this is an average year, however there is no indication of impact in below-average years.

There does not appear to have been any detailed analysis of the individual year or event based data that would provide confidence in this calculation or allow an assessment of the actual impacts on a year by year basis.

It would be anticipated that during below-average years, reduction in flows into the Menindee Lakes would be significantly greater than 10-15GL. These below-average events are the very times when there should be a focus on the sustainability of the basin as one system.

Over the last 15 years, the Lower Darling has stopped flowing 4 times. This is compared to the previous 60 years, which had not experienced any cease in flows. Since the introduction of the Plan, there has been poor management of flows into and out of Menindee Lakes, which has resulted in disasters such as those seen in 2015-2016.

- **There is limited modelling of the impact that reduced recovery targets would have on the environmental outcomes across the Basin**

There should not be a reduction in recovery targets without clear demonstration that equivalent environmental outcomes will be delivered across the Basin, recognising that the basin is one system. This requires an analysis of the source, volume and

duration of flows on at least an annual basis under each of the water recovery scenarios and under high and low rainfall scenarios.

- **Overall reduction in recovery targets for the four major contributors to the Barwon-Darling catchment**

For the four catchments which contribute the greatest flows to the Barwon Darling, the Namoi, Condamine-Balonne, Border Rivers and Macquarie (Hydrologic Modelling for the Northern Basin Review, page 30), it is proposed that there be a reduction in recovery targets. Across the four catchments, the total reduction in recovery targets is 61GL. This equates for almost all of the 70GL reduction in recovery targets proposed. Given that these catchments contribute the greatest flows to the Barwon-Darling, it is illogical to reduce recovery targets for these catchments.

- **Modelling has been undertaken using the assumption of traditional management of flows, which is now not current practice**

The modelling conducted for the Northern Basin review is based on flows over the last 114 years. This requires the assumption that 'traditional' management of flows is applied. However, NSW and Queensland have altered management of flows. In recent years, flows have been managed on a case-by-case scenario. This has not recognised the potential of small flows to make an impact downstream when considered with other small flows. These changes have resulted in withdrawals of water during small flows at the detriment of down-stream users (for both environmental and social purposes).

No modelling has been done which applies current management of flows.

Comments:

- **In-principle support for 'toolkit'**

I support in-principle the 'toolkit', and the dependency of any reduction in recovery targets on the implementation of the 'toolkit'. The full implementation of a 'toolkit' is critical to the delivery of the environmental outcomes outlined in the Plan.

In particular, I support the proposed measures of:

- Protection of environmental flows
- Undertake targeted recovery of water
- Increased coordination and delivery of environmental water

I do not support, without further detail,

- event based mechanisms, particularly store and release. I would propose that instead of store and release options that there be consideration to improve and increase systems of regulation (ie weirs) along the Barwon-Darling and Lower Darling.

There is not adequate detail of the 'toolkit' measures to provide significant comment. Prior to any further agreements, there must be consultation on the detail of the individual measures and the 'toolkit' as a package.

If a reduction in recovery targets does proceed, it must be demonstrated that these measures can and will be implemented. Failure to do so should incur penalties and an increase in recovery targets.

The Southern Basin, including the Lower Darling, should also be ear-marked for protection of environmental flows.

- **Support for recommendation 3**

I support recommendation 3 of the proposed amendments:

“The Authority recommends improvements to state water management arrangements to safeguard low flows across the north (particularly in the Condamine–Balonne and Barwon–Darling).” (page 7)

Recent changes in management of flows, particularly low flow events (as discussed above), has had significant detrimental impacts on the environment down-stream. Low flow event must be safe-guarded for environmental purposes.

- **Comment on recommendation 6**

Recommendation 6 of the proposed amendments states:

“The Authority recommends there be a preference for water recovery based on irrigation infrastructure improvements rather than through water entitlement purchasing.” (page 8)

I support in-principle the preference for water recovery based on infrastructure improvements rather than through water entitlement purchasing. However, this support does not extend to industries that cannot demonstrate long-term environmental sustainability in the Northern Basin of the Murray-Darling Basin. Over the last 20 years, industries which have a significant demand on water have been permitted to develop in the upper reaches of the Northern Basin to the detriment of down-stream communities and industries, and to the basin as one system. I therefore do not support irrigation infrastructure improvements for activities which cannot demonstrate long-term environmental sustainability.

I also believe that there should be government support for industries which have made significant infrastructure improvements without government support at the time. Not recognising previous commitment driven by business places those who were committed to the long-term sustainability of the Basin at detriment in the future.

I would be happy to expand further any of my above comments.

Kind regards,

Robert McBride

Tolarno, Peppora and Wyoming

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