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Dear Mr Glyde

Nature Foundation South Australia (NFSA) thanks you for this opportunity to comment on the Northern Basin Review.

Nature Foundation SA is a not-for-profit nature charity that works to Save, Protect and Restore South Australia's natural biodiversity. Since 2008 one of our flagship programs, Water for Nature, has been delivering environmental water to stressed wetlands along the Murray River to help reduce the loss and stress to ecosystems and habitats caused by river regulation and drought.

Our first watering project in 2008-09 used just 7 ML to sustain stressed river red gums with nesting hollows used by the threatened regent parrot, resulting in >40% increase in nesting trees and nests by 2010.

In 2012 Nature Foundation SA was the first non-government organisation to enter into an agreement with the Commonwealth Environmental Water Holder to deliver environmental water in South Australia. Over the last three years, our Water for Nature program has enabled 200 volunteers to deliver 4.56 gigalitres of environmental water to more than 35 wetland and floodplain sites along the Murray River. Our sites are often located on private properties owned by farmers and irrigators. We work in consultation with our State Government as well as with Indigenous groups, local Councils, and volunteer groups like Mens' Shed and SES groups.

Water returned to the environment is achieving specific targets, and we are developing a flexible portfolio of watering options which can quickly adjust to annual flow conditions, whether dry, normal or flood. We work with smaller volumes on local sites to complement larger government projects to meet regional Plan targets.

The positive outcomes for nature, local communities and business here in South Australia and further afield, include examples that communities can adopt in the Northern Basin. Our communities are demonstrating new and diversified economic development including new ecotourism businesses taking advantage of the increased security of environmental water, the improved health of habitats and

floodplain landscapes, and the stories around environmental stewardship that communities are proud of because they inspire visitors to the river region. We have a far brighter future than pre-Basin Plan.

Our scientific monitoring report for 2013-16 found that watering improved the health of mature vegetation to provide reproduction and recruitment opportunities for riparian native vegetation (particularly river red gum, black box, lignum, shrubs and groundcovers). At 24 sites, watering supported and significantly increased vigour and height of black box and red gum juvenile regeneration from the 2010-12 floods. At five sites, flood watering filled temporary wetlands and provided improved habitat and food sources for waterbirds to assist maintenance of their abundance and diversity.

In addition, sites that we have watered since the 2011 flood peak have had a greater growth response to the 2016 high river event. Environmental watering on our floodplains can also deliver benefits to other users of the river, including by reducing the risk of salinity peaks and black-water events when natural high river events inundate floodplains.

Nature Foundation does not support the scaling back of environmental water recovery in the Northern Basin on the basis that there are diverse benefits to be realised by striving for the Basin Plan targets.

Nature Foundation SA believes that:

- More water is required to meet the environmental objectives of the Basin Plan – in essence a healthy working river for this generation and for those coming.
- The Basin Plan approved in 2012 was adopted with compromise by all stakeholders but in the best interests of all stakeholders.
- The Basin Plan does not sufficiently meet the need for cultural flows for Northern Basin Aboriginal communities,
- The downstream impacts on Lower Darling and SA River Murray communities and ecosystems have not been considered.
- The current sustainable diversion limits and environmental flows in the Basin Plan do not take the implications of climate change into account,
- We must meet our commitments under international conventions and law that protect biodiversity, wetlands and migratory birds,
- The environmental costs of reducing water recovery volumes are not being given equal weight to alleged 'unacceptable' economic and social costs,
- More effort is required to quantify the growing body of knowledge about the economic and social benefits of healthy wetlands and floodplains, including eco-tourism, water quality for licensed water users, and the health and wellbeing of local communities.
- We must avoid the very significant costs to future generations of avoidable rehabilitation of a degraded river system.

Our Water for Nature program has demonstrated its capacity to ensure effective use of environmental water to achieve positive benefits in improving floodplain and river ecosystem health, by working collaboratively with river communities and government. Bringing wetlands and floodplains back to life is incredibly important not only for nature, but also for our cultural, economic and community wellbeing.

The Murray Darling Basin Authority is encouraged to explore and promote these opportunities above pressures to promote water-extraction practices and policies which have proved harmful to the environment and weaken the resilience of river communities and society.

Yours Sincerely,

Hugo Hopton

Chief Executive, Nature Foundation SA Inc.