

**Submission of the River, Lakes and Coorong Action Group Inc.  
Re: The Guide to the Murray-Darling Basin Authority Plan**

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## 2. Executive Summary

The River, Lakes and Coorong Action Group Inc (RLCAG) is an independent community-based, action-oriented organisation with expertise in river ecology and a track record of engaging with MDB matters via submissions, symposia, meetings and campaigns.

The health of the 'Great Southern Lakes' (Lakes Alexandrina and Albert), the Coorong and Murray Mouth is central to achieving the objects of the *Water Act 2007* and in a number of submissions re EPBC matters RLCAG has argued that maintaining connectivity in the 'Great Southern Lakes' (GSL) is central to achieving a healthy, resilient river system.

RLCAG has engaged with the Murray-Darling Basin Authority pre and post the release of the Guide and has engaged with a wide range of people through their community-based actions. RLCAG has modelled engagement and identified key issues through the Fresh Water Embassy, the Water Election Team Questionnaires, the People's Forum on Water. The Forum, an exercise in deliberative democracy, explored topics including the environment, SDLs, buy-backs and infrastructure efficiencies, consultation, socio-economic modelling, family farms, corporate farming, managed investment schemes (MIS), critical human needs, sustainability and negotiating the plan.

There is a clear continuity in the identification of key issues by the wider community that is summarised in this submission as a SWOT analyses – strengths, weaknesses, opportunities, threats.

RLCAG advocates modelling the full range of SDLs based on open, transparent and peer-reviewed science and submits that the 3-4,000 GL return to the river will not meet the requirements of the *Water Act 2007*.

RLCAG offers a critique of the way in which communities have been engaged and notes that it has been our experience that citizens are ahead of the politicians when it comes to water-related issues. Our fellow citizens are waiting to be engaged in a respectful, meaningful and rigorous manner.

RLCAG identifies the persistent problems with the plan and process, the silences and the omissions. In particular we ask: where is the vision for the post-plan society; who are the stakeholders; who are the experts?

We are at a critical moment in our history as a nation. Let us leave a legacy for future generations of which we can be proud.

Further details regarding RLCAG campaigns and analyses are available on [www.hurrysavetheMurray.com](http://www.hurrysavetheMurray.com)

### 3. River, Lakes and Coorong Action Group Inc. (RLCAG)

**3.1 Who are we?** Membership of RLCAG includes scientists, artists, writers, irrigators, dairy and cattle farmers, olive-growers, tourist operators, bureaucrats, community workers, health experts, students and retirees. We come from local communities around the 'Great Southern Lakes' (i.e. Lakes Alexandrina and Albert) and the Coorong. We come from communities along the River Murray from upstream to the Murray Mouth. We come from all the Basin States. We are united in our work for a healthy Murray-Darling Basin for all Australians, now, and for future generations.

RLCAG was established in January 2007

- *to protect, conserve and enhance the biodiversity of the River Murray, Lakes and Coorong;*
- *to liaise with appropriate bodies over the management of the River Murray, Lakes Alexandrina and Albert and the Coorong, and their immediate surrounds; and*
- *to educate the Community in River Ecology.*

**3.2 Our work:** As an independent community-based, action-oriented organisation, RLCAG identified the proposal to build a weir across the River Murray below Wellington (SA) and over-allocation as significant threats to the Murray-Darling Basin eco-system. Our work on these matters has required that we are familiar with matters at a number of levels, as well as across disciplines and jurisdictions: local (NRM Boards), state (DEH, DENR, DWLBC, DfW), national level (DEH, DEWPAC). We have formed alliances with communities along the river and with experts facing similar crises in other countries.

RLCAG has provided commentary and critique on policies that impact on the health of the MDB; conducted seminars; presented papers, published proceedings and the *Lakes News*; organised and participated in a range of events; given evidence to Parliamentary Committees at state and federal levels; maintained various websites; campaigned for environmental water and bioremediation; undertaken research on specialist matters; worked with the EDO and much more.

Our engagement with MDB related matters at the federal level includes submissions re:

- Guidelines for an EIS for the proposed Pomanda weir (EPBC 2007/3484)
- Draft EIS for the proposed Pomanda weir
- Referral for the Causeway to the Pomanda Island (EPBC 2008/4674)
- Independent Review of the EPBC Act
- Referral on Opening the Barrages (EPBC 2008/4618)
- Guidelines for EIS re Opening the Barrages
- Referral for Emergency response for the crisis management of Acid Sulfate Soils in the Goolwa Channel, Finniss River and Currency Creek, South Australia (2009/4833)
- Referral for the Goolwa Channel Water Level Management Project, EPBC 2009/5277
- Guidelines for the EIS 2009/5277
- Senate Committee: Inquiry, Water (Crisis Powers and Floodwater Diversion) Bill 2010

- Request for Reconsideration of Particular Matter Decision – Flow Regulators in the Goolwa Channel and tributaries, and pumping from Lake Alexandrina, South Australia (EPBC 2009/4833)
- Request for reconsideration of decision under Section 78A EPBC Act 1999 re Temporary Flow Regulators in the Goolwa Channel and tributaries, South Australia (EPBC 2009/4833)

In these documents we canvassed a range of matters, offered reasoned and substantiated critiques of meeting procedures and in particular made comment on the nature of ‘consultation’ with local communities. It gives us no joy to have to repeat these commentaries and critiques.

In 2009, RLCAG was the recipient of the prestigious SA Conservation Council Jill Hudson Environment Award, which recognised our accomplishments and the challenges we had faced in our work.



**March 2007:** The newly formed RLCAG marched to Parliament House in Adelaide as they began their campaign against the Wellington Weir that would have cut the River Murray off from ‘Great Southern Lakes’. On 26 October 2010, the SA Government announced the weir would not be built.

#### 4. The 'Great Southern Lakes' (GSL): Icon and indicator

RLCAG argues that ensuring the health of the 'Great Southern Lakes' (Lakes Alexandrina and Albert), the Coorong and Murray Mouth is central to achieving the objects of the *Water Act 2007* and in a number of submissions re EPBC matters has argued that maintaining connectivity in the GSL is central to achieving a healthy, resilient river system.

- the GSL are an early warning system - the 'canary down the mine', re the health of the MDB;
- Rivers die from the bottom up - when the Murray Mouth closed for the first time in 1981, that should have been the sign that we were taking more than the system could sustain;
- the some 2 million tonnes of salt that comes down the River, need to be flushed through the GSL and out to sea through the Murray Mouth;
- flow is critical to life – of our eco-system, our communities, and our economies.

We urge the MDBA to support the science regarding the GSL as a fresh water system not simply as a consequence of having river flows, but because the GSL are both icon and indicator for the MDB ecosystem. The reluctance of government instrumentalities at all levels and of the MDBA to be explicit and clear regarding the ecology of the GSL has allowed divisions to fester, science, risk analysis and opinion to be conflated and has wasted valuable time, energy and resources. It has been left to the local community to address the misconceptions and deceptions. There have been numerous occasions on which the 'open the barrages and return the lakes to their natural state' could have been refuted on the basis of the science. Instead the assertion that 'they were always salt water systems' so either 'cut them off' or 'flood them with seawater' or both has been repeated over and over in public forum.



**25 July 2010:** The Murray Mouth; closed over 1981 for first time in millennia; dredged 2002-2010; now flowing and flushing the accumulated salts and nutrients out the sea. RLCAG supports an allocation for the Murray Mouth to ensure end of system flow.

## 5. RLCAG 'Engagement' with the MDBA Plan

*To engage*: intransitive verb, to draw into; involve<sup>1</sup>

RLCAG's engagement with the MDBA Planning process has been purposeful, labour-intensive and innovative.

- Pre 8 Oct 2010, RLCAG attended information sessions; met with members of the Authority and the Basin Community Committee BCC; flagged our concerns re the scope and quality of the socio-economic research with the MDBA but were told to wait till the Guide was released; critiqued the modes of consultation.
- Post the Guide release, RLCAG attended meetings organised by the MDBA at Renmark (x 2), Adelaide and Murray Bridge. And meetings organised by the SA Government at Adelaide and Goolwa.

## 6. Modelling Engagement and Identifying Key Issues

RLCAG has engaged with a wide range of people through their community-based actions. There is a clear continuity in the identification of key issues by the wider community.

**6.1 The Fresh Water Embassy:** In June 2009, RLCAG established the Fresh Water Embassy (FWE) at Clayton Bay and entered into diplomatic relations with other like-minded groups. The FWE advocated:

- keeping Lakes Alexandrina and Albert as fresh water systems and therefore not flooding the lakes with seawater by opening the barrages;
- restoring fresh water flows by addressing over-allocation and through buy backs;
- establishing a whole of basin approach with reference to management, economic, social, cultural, spiritual, climate change and ecological factors;
- maintaining connectivity for the eco-system by pursuing low intervention strategies which would preclude weirs/dam/regulators at Pomanda Island (the Wellington weir), Clayton Bay, Currency Creek and Finniss River and the bund at Lake Albert;
- encouraging regrowth and employing biomediation strategies as part of the management of exposed shores and potentially acid sulphate soils.

RLCAG argued that there was water in the system and what was needed was the political will to establish the health of the River system as a priority and to develop policies accordingly. The floods of December 2009 - January 2010 highlighted the need to have a policy that allowed these waters to flow through the system.

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<sup>1</sup> <http://www.yourdictionary.com/engage> en·gage (ĕn-gāj'); verb **engaged** en·gaged, **engaging** en·gag·ing, **en·gag·es**; verb, transitive: (4) To attract and hold the attention of; engross: a hobby that engaged her for hours at a time. (6) To draw into; involve: engage a shy person in conversation.

RLCAG argued that:

- rivers die from the bottom up;
- the health of the river upstream relied on salts and nutrients being flushed out to sea through the Murray Mouth and not accumulating in stagnant pools;
- flood waters were an historic opportunity to 'reset' the system.



**28 June 2009:** Clayton Bay, SA: Ceremony to launch the Fresh Water Embassy

The Embassy kept a peaceful vigil at Clayton Bay every day of the eight weeks of construction of the regulator from Clayton Bay to Hindmarsh Island. Some 60 visitors a day sought information about the construction of the regulators and the local ecology. We had many lively and robust discussions. The Embassy took the message to the steps of Parliament House in Adelaide, December 2009 to March 2010. In that time we distributed some 10,000 flyers.

In July 2010, the Fresh Water Embassy accepted the invitation of the Save Our Gulfs Embassy to work on 'big picture' issues, especially those that connect the MDB to the desalination plants (under construction and being planned) for South Australia.

Through these activities and interactions RLCAG has become increasingly aware that the general public is hungry for accurate and in depth materials and analysis. The public understands the issues are complex, many are angered by the inaction of state and federal governments, the spin, 'blame game', and lack of vision and leadership. They want to be engaged not power-pointed to death.

RLCAG has challenged a number of government reports and has been frustrated in gaining access to documents on which decisions have been based. The lack of serious, timely, open and respectful consultation has been raised in many fora and on many occasions by many people.

**6.2 The Water Election Team:** The Water Election Team (WET), an initiative of RLCAG, engaged politicians and voters in the SA election of 20 March 2010 and the federal election of 21 August 2010 on issues concerning the MDB and water policies.

**6.2.1 20 March 2010 South Australian Election:** In the state election, WET identified ten problem areas, distributed the 76 question document to candidates and voters as hard copy through the Embassy, visits to party offices, in shops, libraries, mail boxes, at meetings and received valuable feedback. In all we distributed 10,000 to voters and 500 of the candidate version. The questionnaire was emailed and available online.

All parties, except the Nationals responded. There was across the board support from the candidates for

- a healthy river, environmental flows and water as a human right;
- keeping Lake Alexandrina and Albert as fresh water systems;
- not opening the barrages to allow sea water into the lakes;
- managing the system as a whole;
- upholding our international obligations;
- open and transparent governance and respectful consultation ;
- a commitment to a fresh water future and the environment;
- maintaining connectivity in the GSL.

Candidates expressed ambivalence re the privatisation of water and questioned the sustainability of increased populations in economic models driven by growth.

**6.2.2 21 August 2010 Federal Election:** In this survey, WET asked candidates 43 questions. All parties responded. Candidates stated a commitment to

- water as a human right
- the River Murray as a living system
- the *Water Act 2007*
- an adjustment plan for communities
- an independent authority to manage the system as a whole
- open and transparent government
- upholding international obligations

Significant policy differences emerged:

- The Greens and Democrats challenged overseas ownership and corporate farming; opposed a weir at Wellington and opening the barrages; would stop the desalination plant at Port Stanvac.
- ALP and Coalition embraced market forces: the ALP to continue buy-backs until the health of the River is restored; the Coalition to buy temporary water for the Coorong.

**6.3 The People's Forum on Water, 18 October 2010, Hawke Centre, UniSA<sup>2</sup>** was organised by RLCAG to

- acknowledge the Guide to the Basin Plan;
- model exemplary consultation practices;
- bring together a range of interests, knowledges and political positions;
- distil the issues;
- prepare the ground for analysis and ongoing discussion and debate;
- start feeding back to the Authority, government and our various communities.

The Forum was an exercise in deliberative democracy. Some 80 concerned community members, artists, lawyers, Indigenous Peoples, scientists, politicians and bureaucrats worked together to prepare a response to the 'Guidelines'. We were fortunate to partner with the Hawke Centre at UniSA and to have access to the Bradley Room which is designed for these exercises. Members of the MDBA and SA government were invited and attended.

The Forum was open and engaging, the discussion intensive, the follow-up informative. The format for the Forum is one RLCAG has used on other occasions but this was the first time we have had proper facilities for such an exercise and the resources to train facilitators. Our working group was able to draw on our solid database of concerns and issues from consultations at the Fresh Water Embassy and through the Water Election Team analyses. Through the Hawke Centre we had assistance with registration and thus were able to reach beyond our immediate networks<sup>3</sup>.

#### **6.3.1 Forum format:**

- eight specialists – three minutes each – addressed key issues for considerations – ecology, law, media, anthropology, Indigenous conceptualisations, arts/science, MDBA.
- nine facilitators, one per table, then worked through the issues our working group had identified and circulated
- nine note takers recorded the deliberations at each table
- each table reported back to the Forum with further Q and A
- a rapporteur summed up the issues identified by the facilitators
- the following day the RLCAG working group met for a debrief
- the notes were transcribed and circulated for comment to all participants
- RLCAG has continued to analyse and engage with the issues identified.

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<sup>2</sup> Documentation of the Forum is on line – [www.hurrysavetheMurray.com](http://www.hurrysavetheMurray.com). The notes of the deliberations are a rich record of citizens concerns.

<sup>3</sup> The Bradley Forum was limited to 80 people and we could have registered twice that number – registration was full within 48 hours of going on line. As an index of 'engagement' we would compare this involvement with attendance at the well-publicised and resourced meetings organised by the SA Government for Goolwa (less than 10 people) and Adelaide (approx 30). The MDBA meeting were well attended but the interests represented were narrow and the mood oppositional.

**6.3.2 Forum deliberations:** The handouts and questions arising for each table were as follows:

*Table One. Environment:*

- a story of how you are related to the MDB
- what aspirations/vision do you have for the MDB? 3,000GL-7,600GL?
- how might we inspire the people living in the MDB to meet the indicators?
- what can we do to restore the MDB's health in addition to the suggestions in the plan?
- what are the economic benefits of a healthy river?

Group One's question: How can we mobilise Industry groups, i.e. Farmers Federation, to understand that the laws of economy and ecology use the same rules: if you use more money than you have in the bank you are in debt; if you use more water than there is then you are in ecological debt.

*Table Two. Consultation:*

- what do you/we want to know? how do you/we want to be consulted?
- what does the MDBA claim to have done re consultation and what do they say they will do?
- how to manage appropriation?
- can we design a process that reflects our knowledge and experience?
- MDBA plans visits Adelaide, Murray Bridge and Renmark but not Meningie, Milang or Clayton?

Groups Two's question: How do we tell the story? How do we get the good news out about improvements in the river, tourism and new industries?

*Table Three. Socio-economic modelling:*

- how have you responded to the media coverage of lost jobs, foreclosures, etc?
- what is the basis of the MDBA research? quantitative? qualitative? desk top?
- where is the social dimension of their research?
- is there a vision underlying the plan for rural regions? what kind of Australia does this plan portend?
- what ideas can we come up with to create jobs in the areas with the largest water reductions?

Group Three's question: Should the government be prepared to compulsorily purchase water entitlements from large entitlement holders in order to offer some protection to small-scale holders and therefore maintain viability?

*Table Four. Family farms and corporate farming:*

- for whom are we growing food and fibre?
- can the market deliver equity? willing sellers/desperate sellers?
- what about the farmers who are environmentalists?

- where are the agronomists in the report?

Group Four's question: SA knows how much water comes over the border. We can account for our water—whether urban, irrigation or evaporation. As irrigators we are metered from the source. Can the other states justify their water use, evaporation, urban, be it through channels, dams and so on, before metering?

*Table Five. Environmental watering plan:*

- what does the *Water Act* say? where does it place the priority?
- 3-4,000 GL environmental flow is a bare minimum: what happens if this is not enough for the environment?
- the 27-37% is an ambit claim - will it be negotiated back?
- modelling and assumptions in the science - reliability?
- what variation might there be in drought years?

Group Five's questions: How do we disinvest in floodplain irrigation? Why doesn't everyone pipe water?

*Table Six. SDLs/buy backs/infrastructure and efficiencies:*

- how do you/we respond to the reporting of the SDLs?
- the 'cap' was notoriously breached – how will SDLs be policed?
- reducing SDLs and the requirements of the *Water Act*: can it be done?
- what efficiencies can SA achieve?
- What alternatives are there for the environment if SDLs are lowered?

Group Six's questions: Have the states handed over critical and industrial water use responsibilities to the commonwealth? How do we get rid of dams?

*Table Seven. Critical Human Needs:*

- what are critical human needs?
- how are urban/rural needs addressed in the Guide?
- how are plans for desalination plants related to Basin Plan?
- what of recycling, wetlands, a suite of options for Adelaide?
- should Adelaide be dependent on the River Murray?

Group Seven's questions: Can we get clearer definition of critical human needs that is less open to manipulation by the governments? Will the MDBA be clearer and more transparent re what constitutes critical human needs and what constitutes industrial needs?

*Table Eight. Sustainability:*

- how do we define sustainability?
- development/mining - who monitors?
- who accounts for the water?
- population growth and water

Group Eight's questions: Will the MDBA go back to the federal government with recommendations for amending the *Water Act*, so that it ensures sustainability? Will this Guide be able to fulfil the definition for sustainability adopted by COAG in 1992: 'Using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained and the total quality of life, now and in the future, can be increased'?

*Table Nine. Negotiation the Plan:*

- a plan that addresses the environment, but what is the larger vision?
- the irrigators versus ecologist - a false opposition - in whose interests?
- should we call for a moratorium on ALL non-developments including the desalination plant until the MDBA is implemented and there is opportunity to analyse need more accurately?
- how to move beyond the plan?

Groups Nine's questions: How do we reduce the adversarial nature of the public consultation process? How do we create a culture of 'we are all in this together'?

**6.3.3 Big picture issues:** In the Q&A session, the Forum participants returned to big picture issues of social justice; the role of the MDBA and its relationship to government; how we address complexity; the difference between equity of SDLs and equality of allocations; the role of science and experts. In summing up, the rapporteur noted, 'If we have a healthy river it is amazing how quickly we will have health society and happy irrigators, so what are the economics of not providing the water for the environment? It is critical we continue speaking for the river.'

## 7. Have we been consulted?

*To Consult<sup>4</sup>: to have especial respect or beneficial reference to (a person's good, interest, convenience, etc.) in forming plans; to ask advice of, seek counsel from; to have recourse to for instruction, guidance, or professional advice; to seek permission or approval from (a person) for a proposed action (Oxford Dictionary)*

As outlined above, RLCAG has been modelling modes of engagement re MDB matters through a range of innovative actions. It is our observation that the citizenry is ahead of the politicians when it comes to a willingness to make hard decisions about water reform and an understanding that our rivers have been mismanaged.

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<sup>4</sup> [www.etymonline.com/index.php?term=consultation](http://www.etymonline.com/index.php?term=consultation) early 15c., from M.Fr. consultation, from L. consultationem (nom. consultatio), from consultat-, pp. stem of consultare 'consult, ask counsel of; reflect, consider maturely,' frequentative of consulere 'to deliberate, consider,' originally probably 'to call together,' as in consulere senatum 'to gather the senate' (to ask for advice), from com- 'with' (see [com-](#)) + \*selere 'take, gather (the Senate) together', from PIE base \*sal- 'to take, seize.'

We note that in our consultations with members and interested parties, we have flagged a number of issues that are now at the core of the MDBA contestations.

- The closing of the Murray Mouth in 1981 was our warning sign that the system was over-allocated but water continued to be allocated. Have we learned the lesson?
- To maintain the health of the MDB, the 2 million tonnes of salt that accumulate each year needs to be flushed through the 'Great Southern Lakes' and the Murray Mouth. Will we ensure an allocation for the Murray Mouth?
- The science on which decisions have been based must be open, transparent and subject to public scrutiny. We have flagged the matter of the ecology of the GSL. Other parties have highlighted their concerns with other sites.

In the past, RLCAG has offered reasoned and substantiated critiques of the processes purporting to be information/consultation/engagement. We have

- been ignored, excluded, patronised or told we are the only ones to have ever raised any dissatisfaction;
- been dismissed as 'negative' rather than understood as offering a critique;
- made notes on butchers' paper or post-it notes which have then disappeared;
- been subjected to power-point presentations with no follow up;
- been assured the next time it would be different but it hasn't been;
- challenged data, reports and been told the material would be released, but it hasn't been;
- had 'solutions' imposed that were not presented as options;
- hoped for innovative meeting practices but seen little change;
- witnessed frustration, anxiety, divisions and ill health generated by meetings.

## **8. The Murray-Daring Basin Authority and Proposed Plan: A SWOT analysis?**

With more time and resources, RLCAG could produce, a more detailed analysis of the materials generated by the People's Forum (see above 6.3). As a quick guide to the critiques, concerns and comments, we have prepared a SWOT analysis of the data.

- Strengths
  - no-borders approach for a no-borders river
  - access to experts, data bases, all levels of government
  - extensive body of existing knowledge
  - mandated consultation, resources available, existing groups participate
  - feedback on earlier 'consultations' available
  - identified across basin needs for environmental water needs
  - *Water Act 2007* – objects require restoration and resilience
  - purports to privilege science over parochialism
  - purports to create an open, transparent market

- Weaknesses
  - lack of vision – for all Australia and the MDB within the Australia
  - reliance on market and economic modelling – water as a ‘commodity’ not rivers as ‘living systems’
  - inability/reluctance/refusal to defend plan; no over-arching narrative of why the Plan is needed
  - no contingency planning for transition
  - lack of professional preparation for engaging the towns; communication within towns/communities/regions; yet to inspire exploration of alternatives ways of making a living
  - conflation of science with advice/modelling and opinion; MDBA should indicate reliability rating of each source on which it relies
  - failure to model upper limits of SDL environmental flows
  - inadequate socio-economic data and research designs - quantitative and qualitative methodologies required; positive and negative impacts should be modelled
  - definition of ‘stakeholders’ limited to economic criteria
  - believe own rhetoric re consultation, science, comprehensivity; claims made re consultation/engagement in the Guide not sustainable
  - deliberations slipped into an adversarial mode
  - exclusions: Great Artesian Basin excluded from MDB Plan; mining extractions excluded; other omissions, coal seam gas
  - silence on Managed Investment Schemes
  - failure to release the full texts of the Legal Opinions re *Water Act 2007*
  - use of long term averages in modelling
  - Government at federal and state levels silent on key issues and big picture issues
  - no end of river flow allocation for the Murray Mouth
  - shifting rationales for Plan and reluctance to own past mismanagement taints future strategies
  - The Guide: The MDBA report needs an index
  - electronic files for the Guide are too big to download for those with limited band width
  
- Opportunities
  - articulate a new vision for a ‘sustainable Australia’
  - be a world leader in Ramsar ‘wise use’ management
  - draw on international experience and expertise
  - learn from other countries – successes and failures
  - work with local communities and groups – new ways of keeping communities alive
  - include agronomists – another stakeholder
  - transition for communities – planning, imagining, not purely economic
  - model for climate change
  - develop models that integrate ground and surface water
  - integrate state Water Allocation Plans
  - learn from past mistakes

- Threats
  - the MDB goes beyond reclamation
  - reliance on market to deliver equity - water sold to highest bidder, environment cannot compete
  - interpretation of 'balance' skewed to economic users
  - violate Ramsar if SDL below 4,000GL return
  - violate the *Water Act 2007* if Ramsar non-compliant
  - increased salinities, loss of species
  - loss of arable land
  - self-interest, party politics, electoral fortunes and sectional interests driving plan
  - reliance on engineering intervention to delivery 'efficiencies'
  - methodology modelling icon sites fails wetlands
  - no end of river flow allocated
  - Water Allocation Plans (state-based) pre-empt integrated MDB Plan
  - process has been anxiety producing, alienating and deadly

## 9. Persistent Questions, Omission, Silences

Vision: How do we move to a post-plan Australia and what it will look like when we arrive there? What is the relationship between urban and rural sectors? What is regionalism? Where is the research on the future of the regions that are dependent on the MDB? Are we to persist with agrarian socialism or rethink the structure of Australian society? Can we grow our own food? Is there really a 'food security' issue? Who are the stakeholders? Vested interests? Civil society?

RLCAG believes the lack of a vision has created a context in which lobbies have been able to make mischief, manipulate, and misrepresent the impact of the plan on the Australian economy. RLCAG has long noted the lack of discourse about the big picture, a vision for the future, and the transition steps in imagining a different future. The economy has been decoupled from society.

RLCAG has asked: What constitutes independence for experts, governments and the Authority? Who is an expert? Where is the big picture thinking? The process has been captured by specialties and generated adversarial exchanges.

Who speaks for the environment? Who is listening? It is with dismay that we have witnessed the erosion of those bodies that purport to 'speak' for the environment but increasingly preface their statements regarding their responsibility for the environment with the need to balance competing interests.

Market modelling and equity: Where is the public discussion of the water market and privatisation of water (Part 4 of the *Water Act 2007*)? Who owns our water? What is the social value of water? Establishing 'value' via market forces skews 'stakeholders' according to economic interests. See work of Ian Douglas re privatisation and markets: Fair Water Use Australia <http://www.fairwateruse.com.au>

Relationship of ground and surface water - Where is the Water Audit? Where is the research on the relationship between ground and surface water? Mining extractions? The Great Artesian Basin? The Snowy River? Climate change? The exclusion of Great Artesian Basin and Snowy River from the plan skews models of long-term sustainability. See submission of the Snowy River Alliance, SA Conservation Council.

Desalination plants, population growth and the MDB Plan cannot and should not be disconnected from SDLs.

Water Allocation Plans (WAPs) such as that for the Eastern Mount Lofty Ranges (EMLR) must be accurate if the health of the GSL is to be achieved. See the submission of the Finniss Catchment Group.

The return of water to the GSL has masked the quality of the water quality. Saline levels in Lake Albert and the Coorong remain high. 'Emergency' engineering interventions such as bund between Lakes Albert and Alexandrina and the regulators on Currency Creek and at Clayton Bay must be removed completely and the original bathymetry restored. Adaptive management' and the 'precautionary principle' have been deployed as justification for emergency actions that have had 'unforeseen' consequences and have undermined long-term recovery.

## **10. Background Readings**

In preparing this submission, the RLCAG has had the benefit of reading documents prepared by

Alexandrina Council  
Australian Network of Environmental Defender's Offices  
Conservation Council of South Australia  
Darling River Action Group  
Environmental Defenders Office  
Finniss Catchment Group  
Charles Irwin  
Chris Miller  
National Farmers' Federation  
NSW Government  
Jamie Pittock  
SA Government  
Snowy River Alliance  
Liz Yelland