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Ms Peta Brettig  
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Natural Resources, SA Murray-Darling Basin  
GPO Box 2834  
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February 27, 2015

**Re: Comments on the draft Water Allocation Plan for the River Murray Prescribed Watercourse**

Dear Peta,

The Nature Conservation Society of South Australia (NCSSA) welcomes the opportunity to provide comments on the draft Water Allocation Plan (WAP) for River Murray Prescribed Watercourse. As South Australia's primary nature conservation advocacy organisation, NCSSA has an active interest in the protection and conservation of South Australia's natural resources with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities. NCSSA is a voluntary body with over 200 members drawn from all parts of the State and all walks of life.

NCSSA has been a long term advocate for the protection of the River Murray and allocation of water for environmental needs over the past decade. We commend the South Australian Murray-Darling Basin Natural Resource Management Board for making amendments to the existing WAP that are intended to provide more clarity about water allocations for all users and recognizes environmental water needs as a legitimate use. We strongly support the inclusion of scientific data collected over the past 10 years in relation to wetland and floodplain health along the river system that have increased understanding of the ecology of this vital river system. We also strongly support the intention to implement policy provisions that will protect water dependent ecosystems through ensuring the security of environmental water, particularly during dry times.

Please refer to the following pages for our comments on the proposed amendments to the WAP that are primarily focused on Discussion Papers 7, 8 and 13 that relate to water allocations for the environment. If you would like to clarify or discuss any of the points raised please contact me on (08) 7127 4633 or via email at [nicki.depreu@ncssa.asn.au](mailto:nicki.depreu@ncssa.asn.au)

Yours sincerely,

Nicki de Preu

Conservation Ecologist

## **NCSSA Comments on the draft Water Allocation Plan for the River Murray Prescribed Watercourse**

### **General Comments**

NCSSA considers the draft plan provides an essential framework for future management of the River Murray Prescribed Water Resource and commends the SAMDB NRM Board for recognising the importance of environmental water as a legitimate use to maintain the long-term health of the river system. In particular we acknowledge and support Objective 1 in the draft WAP that aims to “Provide allocations that contribute to the water needs of water dependent ecosystems” and Objective 5 that aims to “Contribute to the prevention of loss of condition, number or extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance.” It is widely recognised that high levels of water allocation and extraction from the rivers, wetlands, and backwaters of the Murray-Darling Basin have resulted in widespread environmental decline and the draft WAP is an important step in addressing this issue for South Australia.

The Policy Discussion Papers relating to key areas and outlining proposed changes to the draft WAP have made relevant information more easily accessible for a range of stakeholders with varied interests in this matter.

### **Policy Discussion Paper 7: Management of water for ecological outcomes**

We strongly support the following proposed amendments to the draft WAP in relation to management of water for ecological outcomes:

- Inclusion of principles regarding wetlands and environmental water that aim to protect water dependent ecosystems that will bring the plan in line with the NRM Act and Basin Plan policies. The SAMDB contains several wetlands of international and national significance in addition to threatened species and ecological communities. The proposed amendments are an important step towards ensuring the water requirements of these wetlands continue to be met, a factor that is critical to maintaining the biodiversity values of these areas and Australia’s international obligations under the Bonn Convention on Conservation of Biodiversity and Ramsar Convention.
- Increased emphasis within the plan surrounding the use of unregulated flows for environmental needs rather than any other consumptive use. We acknowledge that it is still unclear how and when unregulated flows will be allocated and the volume of water involved. We do, however, recommend that further effort is put in to developing a range of modelling scenarios based on these variables to provide further data on which informed decisions can be based.
- Recognition within the plan that managing water for ecological outcomes has broader social, cultural and economic outcomes as well as benefits to the environment.
- Revision to Principle 11.1 that will now require participation in a ‘specified environment improvement program’ that is recognised under the NRM Act rather than a wetland management plan. We strongly recommend that a definition of this term is included in the Glossary at the end of the plan and that further information is provided in the plan about what participation in such a program involves. A short case study might be a useful way to present this information.
- Changes to the way wetlands are referred to under Principle 11.1 from a specific and currently incomplete listing of individual sites to “wetlands within the 1956 flood boundary”. We recommend that a map showing the area contained within the 1956 flood boundary is included in the WAP and that wetlands of international and national significance are clearly shown along with key sites where habitat restoration programs are currently being conducted.
- Specific EWRs for the floodplain, channel and Coorong, Lower Lakes and Murray Mouth environments of the River Murray based on current scientific knowledge and understanding of the ecology of these areas to maintain biodiversity conservation values. There has been a significant investment in wetland management and habitat restoration since the millennium drought and we believe that it is critical to

maintain the ecological benefits from this investment through ongoing allocation of water for the environment.

- The development of a long-term watering plan for the River Murray as a requirement of the Basin Plan 2012 that will specify the ecological objectives and EWRs of priority environmental assets.
- Formal recognition of wetlands and water dependent ecosystems as a legitimate user of water from the system with specific allocation of a volume of 200GL of water for wetland watering purposes and 38GL for Living Murray sites.

#### **Policy Discussion Paper 8 – Upper Pike River Anabran**

NCSSA strongly support the proposed amendments to the WAP that place an initial limit on the volume of water which can be extracted from the Upper Pike River Anabran based on an ecological assessment of the systems requirements. We consider the first management option to be the most equitable way to implement this process to ensure that biodiversity conservation values of this unique area are maintained. We recognise that this option will require further modelling and scientific analysis to determine the actual limit of take by 2019 but do not consider this to be a disadvantage and allows some time for affected parties to adjust or revise their investment plans. We encourage the Board to consider the trial of a financial incentive scheme to reward irrigators that extract less than their entitlement as a means of achieving community by in for the program and to achieve long term environmental benefits for this area.

#### **Policy Discussion Paper 13 – Allocating During Dry Conditions**

NCSSA strongly supports the development of a hierarchy and principles to provide greater clarity and transparency about how allocation of water is prioritised during dry conditions when South Australia receives less than its entitlement of 1,850GL. Although we acknowledge that critical human water needs are the first priority we recommend that further work is required in developing the hierarchy for water allocation in dry conditions and clarification of specific water allocations for environmental needs.

At present, the diagram shows the second 'level' of water allocation is for 'Consumptive Pool E, ELMA Consumptive Pool, Wetland Consumptive Pool held by CEWH'. This level therefore contains water for both irrigation and environmental uses without any explanation of how water will be allocated between these different purposes. We strongly recommend that further work is required to develop this hierarchy so that the Minister will have clearer guidelines for decision making and all users a better understanding of how available water will be allocated between consumptive and non-consumptive uses during dry times. We also strongly recommend that the environment be given further consideration in terms of the hierarchy if the plan is to deliver on its stated objectives.

#### **Comments on specific sections of the draft Water Allocation Plan**

##### **3.9 Achieving Best Ecological Outcomes through implementing the Plan**

As stated in our comments on Policy Discussion Paper 7 we support the requirement for individuals or organisations that are allocated water for environmental use to participate in a 'specified environment improvement program'. We strongly recommend that a definition of this term is provided in the Glossary and further information is provided in the plan about what participation in such a program involves. The current text relating to this is not particularly clear. A short case study might be a useful way to present this information.

### **5.3 Consumptive Pools**

As stated in our comments on Policy Discussion Paper 13 we recommend that further clarification is required of how available water within Consumptive Pool E will be allocated between consumptive and non-consumptive uses during dry times. We also recommend that the diagram and associated footnotes shown in Figure 1 from Policy Discussion Paper 12 are included in the WAP to provide a clear interpretation of the various consumptive pools and how they relate to the previous class categories.

#### **5.4.3 Wetland Water Allocations**

We support the listed principles for water allocations arising from Water Access Entitlements from the Wetland Consumptive Pool that may only be used for wetland management purposes.

### **9 Monitoring and Evaluation**

We support the requirement for accurate monitoring and evaluation of water resources, Water Access Entitlements, water use and water-dependent ecosystems to provide a mechanism for assessing whether the Plan is meeting its objectives and to identify actions that need to be taken to protect the resource. We agree that this information will allow for informed improvements in water management, including changes to the Plan over time through an adaptive management approach.

#### **Table 15: Evaluation and Reporting Table**

*Objective 5: Contribute to the prevention of loss of condition, number or extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance*

We do not consider the current wording of Evaluation Question 7 “Was there the ability to assess the changing condition of the refuge habitats within the PWRA?” will enable an accurate measure of this Objective. We recommend that question is reworded to: “Has there been a decline in the condition, number or extent of refuge habitats and water dependent ecosystems or sites of significance within the PWRA?”