CONSERVATION COUNCIL
ACT REGION

Submission on the proposed Murray Darling Basin Plan

16 April 2012

The Conservation Council ACT region is the peak non-government environment organisation for the Canberra Region, and has been the community's voice for the environment in the Canberra region since 1979.

We represent the interests of community conservation organisations in the region as well as the broader environmental interests of all the citizens of the ACT.

Our mission is to achieve an ecologically sustainable and zero net carbon society through advocacy, education, research and engagement with community, the private sector and with government.

The Conservation Council is active in a number of campaign areas. Our current focus includes biodiversity protection, urban planning and action on climate change.

If you have any queries regarding this submission please contact: Clare Henderson Executive Director on 02 6229 3202 or director@consact.org.au.

Overview

This submission to the Murray–Darling Basin Authority from the Conservation Council ACT Region, arises from a prepared discussion paper, an expert round-table discussion, an open forum and Board discussion.

The Council appreciates the opportunity to make a submission on the Basin Plan. There are three main issues of concern to the Council:

1) The volume of surface water to be recovered
2) The large increase in groundwater use proposed
3) The impact on the ACT water policy of a net SDL.

The volume of water to be recovered for the environment

The proposed recovery of 2,750 GL/yr from consumptive use of surface water appears to be inadequate to meet even the minimum requirements for the maintenance and restoration of the ecology of the Basin. In the Guide to the Basin Plan a range of recoveries were evaluated against the environmental benefits to be achieved. From this it was clear that 7,500 GL/yr was needed to fully restore the degraded environmental assets of the Basin, and 4,000 GL/yr was the minimum that would have sufficient impacts to meet the specified aims of the Water Act. Further estimation of the ecological requirements on a more detailed site basis does not appear to have reduced this minimum figure, as evaluation of the effects of 2,750 GL/yr on the ecology has indicated (for example) that only about one third reduction in blue-green algal blooms in the Murray result, and the Chowilla Floodplain will not receive adequate water for restoration.

Serious consideration should be given to a more adequate recovery of water, especially in the Southern connected system. System constraints are clearly soluble at relatively minor cost, and flood easements have already been obtained in the upper Murray. Low-level bridges flood now, so removal of this constraint by bridge works will be to community advantage.

Recommendation

That the volume of water recovered for the environment is reconsidered, on the basis of meeting a greater proportion of the ecological requirements on the Basin

Groundwater extraction

The considerable increase in groundwater allowed to be ‘taken’ under the Plan has surprised most observers, as it almost cancels out the volume of surface recovery. Since many areas of groundwater are closely connected to surface water, increased groundwater extraction will deplete surface supplies, and it does not appear to have been considered in re-calculating surface SDLs. The potential for trading between surface and groundwater licences or allocation has a multitude of problems and should be prohibited.

Recommendation

That the increased groundwater ‘take’ foreshadowed in the Plan be reconsidered, on the basis of the precautionary principle is to be applied in an area where much still has to be learned.

Impact of the Plan on the ACT

It is apparent that the volume of ‘take’ allowed under the Plan for the ACT will be inadequate at the present as it is based on 2009, and increasingly inadequate for the future. By the commencement of the Plan in 2019, a decade of population growth will have occurred since the BDL calculations.

The population can be expected to increase by 30-40% in the foreseeable future, requiring that proportion of increased supply. While the ACT will be able to obtain the extra volume by purchase, it will be a cost generated by the Plan and passed directly to the urban consumer.

Of greater concern is the use of a net figure for calculating the urban water use. Close to half of the raw water used in the Canberra supply is returned to the river through the sewage plant output, and this volume is proposed to be deducted from the raw water used, generating a net figure. Use of this net figure for determining Canberra's water 'take' under the Plan will have a major negative impact on the ACT policy of using increasing volumes of grey water in households, for sports fields and public park areas, as every litre of grey water not flowing out of the sewage outfall will be deducted from the raw water available. Domestic use of greywater will become a disadvantage, as additional raw water will have to be purchased with the costs passed through to the householder.

This method of water accounting will negatively impact on water saving urban design, water reuse and the overall efficiency of water utilisation in the urban area. As another example, dual-flush toilets will have considerably less value, as the water not used does not go down the drain to be counted.

While it is clear that water re-use is most appropriate for coastal cities where all wastewater otherwise goes into the sea, it still has to be understood that inland urban areas also have a responsibility for wise water use. As long as a net calculation is employed to determine the raw water intake, recycling water is disadvantageous. By contrast, once a gross figure for 'take' is set, then every litre of water recycled becomes a benefit to the community. It is entirely technically feasible to calculate a gross figure for 'take', with no detriment to the capping of urban water use on the basis of an average of actual gross 'take' over recent decades.

The arguments used here apply equally to Albury, Dubbo, Wagga and other urban inland cities. There has been a focus in recent years to not return urban wastewater to the rivers, in order to reduce phosphate and salt pollution, in particular to minimise blue-green algal blooms, and also minimise hormonal steroids that change the breeding capability of fish and other aquatic fauna. The urban wastewater diversions already in place in NSW have beneficial effects on the rivers, as would diversion of Canberra's wastewater onto sports ovals, parks and green areas in the City. Urban wastewater is best kept out of the rivers, if the targets for water quality and salinity are to be met in the future.

Recommendation

That the provision of urban water in Canberra needs urgent reconsideration in the Plan, as use of a net volume is contrary to the ACT government policy of increased wastewater re-use and water sensitive urban design, and disadvantages the community.