



25th May 2018

Ms Carolyn Lee,
Director,
Murray Darling Basin Royal Commission,
GPO Box 1445,
ADELAIDE NSW 5001

By email to:- mdbroyalcommission@mdbrc.sa.gov.au

Dear Carolyn,

Murray Darling Basin Royal Commission – Issues Paper No.2

Thanks you for your letter of 30th April 2018, drawing attention to the release of Issues Paper No.2 and inviting RAMROC to make a further submission in relation to the matters raised therein.

RAMROC believes that the matters identified in Issues Paper No.2 strongly question the legal validity of determining the Basin Plan's SDL targets. As such, RAMROC in recent weeks was very concerned that those SDL target questions canvassed in the Issues Paper may have provided added argument for the Commonwealth Senate to vote down the 605GL supply measures amendments proposed for the Southern Basin SDL adjustment, in the same way that the 70 GL amendments for the Northern basin had been voted down by the Senate in February 2018.

The repercussions of foregoing those 36 projects making up the 605 GL in supply measures would have been enormously detrimental for the future of food and fibre production, including the impacts on processing, warehousing and transporting industries. As such, those impacts would most likely have resulted in a further downturn in the social and economic wellbeing of agricultural communities throughout the Southern Basin.

As the Royal Commission will be aware, a political agreement was reached between the Coalition and Labor parties, which in turn averted that situation arising in the Senate and which will apparently review the Senate's February decision in relation to the 70 GL adjustment in the Northern Basin. However, the agreement has also reinforced the proposed recovery of the 450 GL for additional environmental watering purposes, through water efficiency projects having neutral or positive social and economic impacts.

As mentioned in RAMROC's first submission (pages 2 and 3) the definition in the Basin Plan of "*neutral or positive social and economic impacts*" is a nebulous one and certainly does not provide an accurate and valid measure of determining the real social and economic impacts on Basin communities brought about by the loss of even more food and fibre production water.

Furthermore in relation to economic and social considerations, RAMROC is very conscious of the political background and compromises that were made in framing the Commonwealth's 2007 Water Act, which resulted in social and economic outcomes being relegated far behind the environmental outcomes required by the relevant international environmental agreements such as RAMSAR. A reference is made to these aspects is made on pages 7 and 8 of RAMROC's submission of 26th April 2018.

The questions that have been validly raised in Issues Paper No.2 surely demonstrate the need and urgency for the Commonwealth Government to amend the provisions of the 2007 Water Act, the Water Amendment Act 2008 and the Murray Darling Basin Plan itself, in order to clarify and enshrine a fair and equal triple bottom line balance between environmental, social and economic considerations and outcomes. The purpose of such amendments would be to remove any further doubts as to the intentions and legal status of the SDL adjustment processes.

Thanks again for giving RAMROC an opportunity to provide further input into the Royal Commission's deliberations.

Yours faithfully,

Ray Stubbs
Executive officer
RAMROC