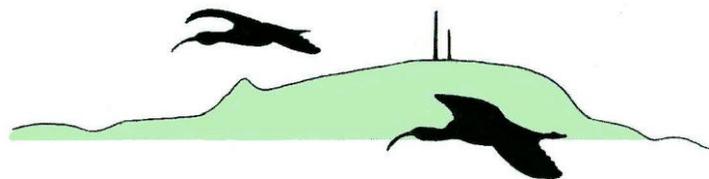


ORANGE FIELD NATURALIST  
& CONSERVATION SOCIETY INC.  
PO Box 369, ORANGE NSW 2800



Proposed Basin Plan  
Murray-Darling Basin Authority  
GPO Box 3001 Canberra City  
ACT 2601

Monday 16th April 2012

[submissions@mdba.gov.au](mailto:submissions@mdba.gov.au)

### **Submission to Proposed Basin Plan**

The Orange Field Naturalist and Conservation Society Inc. (OFNCS) is opposed to the proposed Basin Plan in its current format, although it agrees that a plan is essential for the future health of the river and its dependent communities.

OFNCS was established in 1975, incorporated in 1993 and has about 100 individual and family members. Through its membership the Society has considerable professional expertise in natural history and knowledge of the flora and fauna of the Central Tablelands and the region more generally.

Members of the Society have been involved with the process of preparing this submission by attending meetings such as those held by the MDBA during the preparation of the Guide to the Plan and the Inland Rivers Network in March of this year. The Society welcomes the opportunity to have input into this submission and is particularly keen to draw attention the following points in relation to the Draft Basin Plan.

1. The proposed Sustainable Diversion Limit (SDL) reduction of 2750 GL will not meet the environmental targets set by the MDBA nor the requirements of the Commonwealth Water Act 2007. This was clearly outlined to us by the Environmental Defender's Office at a meeting in March in Dubbo hosted by the Inland Rivers' Network.
2. Of particular concern to this Society is that many smaller wetlands will be lost and even those considered to be of significance will not be adequately compensated for the past degradation - for example the healthy sections of the Macquarie Marshes have shrunk by 90% (Inland Rivers Network 2007)

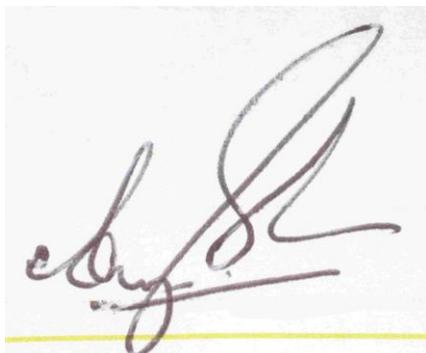
and the environmental allocation will not be sufficient to restore it to a functioning wetland.

3. The needs of flora and fauna, particularly native fish and birds do not appear to have been adequately addressed. This Society has been following keenly the work of Dr. Richard Kingsford who has clearly shown that bird breeding events are dependent on adequate environmental flows, which this Plan will clearly not provide (pers. comm Terry Korn 23/2/2012). For example The Plan has identified that 65 GL of purchased water since 2009 is sufficient to restore the Macquarie Marshes, but we consider this grossly inadequate. This will reduce colonial waterbird breeding events to only 40% of years and the flooding of higher level floodplain vegetation to only 17% of years (MDBA 2012a). In addition, Booligal Wetlands are an important major breeding site for the Glossy Ibis (*Plegadis falcinellus*). It is of concern that the flow indicator associated with colonial bird breeding events at this site is only for 50 consecutive days (MDBA 2012b), which is not adequate time to finish a successful ibis breeding. Under the proposed Basin Plan these indicator flows would only occur in 20% of years (MDBA 2012c).
4. This proposed plan appears to have been drawn up based on political expediency, rather than best science. Indeed, the CSIRO has questioned how the volume was decided on as it would not appear to be anywhere near sufficient to achieve the stated aims.
5. There is a very large proposed increase in groundwater extraction of (2600 GL). This is clearly unsustainable and we would question whether this has more to do with an increase in mining in the basin as it clearly does not appear to meet the requirements of the National Water Initiative requirement to consider connectivity to surface water.
6. The plan does not appear to adequately account for the improved income for the Basin based on a thriving, healthy ecosystem. Industries such as tourism and flood-plain graziers are totally dependent on adequate environmental flows. As a small example, societies like ours regularly visit areas of the MD Basin to observe native flora and fauna and we spend money in these regions.

OFNCS therefore urges the MDBA to revise the environmentally sustainable level of take identified in the proposed Basin Plan to allow for improved environmental flows in the Basin. This mean a return of at least 4000 GL to the environment; additional purchase of water to ensure adequate flows to critical wetlands; and a return to the levels of groundwater extractions outlined in the *Guide to the Plan*.

Finally, we would like to support the submission of the Central West Environment Council.

Thank you for the opportunity to have input into this plan.

A handwritten signature in dark ink, appearing to read 'Tony Smith', is written over a horizontal yellow line. The signature is stylized and cursive.

Tony Smith, Secretary

#### References

- Inland Rivers Network (2007) *Wetland in Crisis*, accessed 13/4/2012, available online at [http://www.irnsw.org.au/pdf/WetlandsInCrisis\\_ReportCard.pdf](http://www.irnsw.org.au/pdf/WetlandsInCrisis_ReportCard.pdf)
- MDBA (2012a) *Assessment of Environmental Requirements of the proposed Basin Plan: Macquarie Marshes*, available online at [https://www.mdba.gov.au/basin\\_plan](https://www.mdba.gov.au/basin_plan)
- MDBA (2012b) *Hydrological modeling to inform the proposed Basin Plan. Methods and Results*, available online at [https://www.mdba.gov.au/basin\\_plan](https://www.mdba.gov.au/basin_plan)
- MDBA (2012c) *Assessment of Environmental Requirements of the proposed Basin Plan: Booligal Wetlands*, available online at [https://www.mdba.gov.au/basin\\_plan](https://www.mdba.gov.au/basin_plan)