

5 December, 2000

Murray-Darling Basin Ministerial Council
GPO Box 409
CANBERRA ACT 2601

Dear Council Members,

**Re: Condamine Catchment Management Association Response to
 Draft "Basin Salinity Management Strategy 2001 – 2015"**

The Condamine Catchment Management Association Inc (CCMA) has considered the above draft strategy and is pleased to provide the following comments in relation to its content.

The Basin Salinity Management Strategy has been described as "the first real test" of the draft Integrated Catchment Management policy statement¹. It is the view of CCMA that the effectiveness of the Strategy will depend largely upon the effective implementation of the ICM policy. CCMA has documented its views regarding the draft ICM policy statement and forwarded them to Council.

CCMA agrees that the management of salinity requires a need for a strategic response on an unprecedented scale, and supports the draft strategy's four objectives:

- to maintain the water quality of shared water resources of the Murray and Darling Rivers;
- to control the rise in salt loads in all tributary rivers;
- to control land degradation and protect important terrestrial ecosystems, productive farm land, cultural heritage and built infrastructure at agreed levels; and
- to maximise net benefits from salinity control across the Basin.

Our members have raised several issues regarding the draft Strategy. These have been documented in the attached response document. CCMA has specific concerns regarding:

- equitable contribution to the attainment of salinity targets;
- roles and responsibilities for target-setting;
- role clarity for catchment management organisations;
- community engagement processes.

On behalf of the Condamine catchment community and fellow CCMA members, I wish the Ministerial Council every success in steering this initiative towards an outcome that will benefit the entire Basin community.

Yours sincerely,

Ms Bobbie Brazil
Chair – Condamine Catchment Management Association Inc.
encl.

¹ "Murray Darling Basin news, September 5,2000 - Federal Minister for Agriculture, Forests and Fisheries and Chairman, Murray-Darling Basin Ministerial Council
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**CCMA RESPONSE TO THE
DRAFT "BASIN SALINITY MANAGEMENT STRATEGY 2000 – 2015"**

CCMA is supportive of initiatives that effectively promote the principles of integrated catchment management. The Condamine Catchment Strategic Plan is based on the fundamental philosophy of integrated catchment management. Our catchment vision is "Our Catchment, Our Community, In Harmony" and CCMA's mission is "to have all levels of government working with the community and industry to develop and implement action plans for the balanced and long-term ecologically sustainable use of the Catchment's natural resources".

1. The Salinity Strategy and ICM

The Basin Salinity Management Strategy has been described as "the first real test" of the draft Integrated Catchment Management policy statement². It is the view of CCMA that the effectiveness of the Strategy will depend largely upon the effective implementation of the ICM policy. CCMA has documented its views regarding the draft ICM policy statement and forwarded them to Council. CCMA has indicated its support for:

- the principles of institutional reform and long-term commitment to integrated catchment management as espoused in the draft Integrated Catchment Management policy statement, and further demonstrated by the draft Basin Salinity Management Strategy; and
- the principle of "catchment groups addressing catchment issues", and suggest that this is the ideal scale to address issues of natural resource management.

2. Commitment by Government

As many benefits of the Salinity strategy may not be fully evident for decades to come, CCMA agrees that long-term commitment by government is vital. The fundamental importance of "sustained commitment" is also identified in the Commonwealth government's National Action Plan for Salinity and Water Quality. CCMA considers that long-term commitment must be a core determinant of institutional reform, thereby ensuring that the Salinity Management process (i.e. the Basin perspective and non-partisan approach) is not thwarted during times of change of government, at a State or Federal level. The integrity of such long-term commitment by government must also be upheld by decision-making that is based on sound knowledge, shared information systems and "good science".

Whilst commitment by the Queensland government has been referred to, CCMA awaits further details of the Queensland government's commitment to ICM and the Salinity Strategy. With reference to the Commonwealth government's "National Action Plan for Salinity and Water Quality", CCMA requires clarification as to the roles, responsibilities and "working relationship" between the Murray-Darling Basin Ministerial Council and the proposed single national Natural Resource Management Council.

3. The Role of Catchment Management Organisations

CCMA has specific concerns regarding the role of catchment management organisations with regard to the draft Salinity Management Strategy. Role clarity for catchment management organisations will be vital to the success of ICM at a catchment scale. The draft Strategy proposes the creation of "regional land use planning institutions" – an institutional model not included in the draft ICM policy statement. Because the role of proposed "regional land use planning institutions" would extend beyond salinity-based issues to the broader context of "coordination of natural resources management", clear distinction must be provided between the roles and responsibilities for catchment management organisations and those of other regional organisations.

² "Murray Darling Basin news, September 5, 2000 - Federal Minister for Agriculture, Forests and Fisheries and Chairman, Murray-Darling Basin Ministerial Council

As well as information regarding proposed reforms to institutional arrangements (including catchment management organisations) and resource support/allocations by the State and Commonwealth, CCMA requires clarification of the processes for accreditation of existing approved catchment strategies within catchments and across the Basin. In particular, CCMA requires more information regarding Queensland's "Catchment Natural Resource Management Plans" referred to on page 10 of the draft Strategy.

4. Target Setting – Roles and Responsibilities

CCMA supports, in principle, the aim to achieve "800EC (the upper desirable limit for drinking water) at Morgan for 95% of the time". Our Association supports the setting of 'caps' on salinity levels and salt loads in the rivers in order to protect key values and assets, subject to the application of good science, the use of best available information and equitable outcomes across the Basin. CCMA has concerns regarding inequitable diminishment of assets in some areas of the Basin in order to protect assets in other areas. Queensland's substantial "sacrifice" will have a minimal impact at Morgan.

Because roles and responsibilities for target-setting processes have not been specifically defined in the draft Strategy, CCMA assumes that the roles and responsibilities set down in the draft ICM policy statement also apply to the setting of salinity targets. The ICM document vests the responsibility for target-setting in the Murray Darling Basin Ministerial Council (Basin-wide) and the State/Territory governments (catchment targets) with "involvement" by the Commonwealth and catchment management organisations. Neither "target-setting" nor "involvement" in the target-setting process has been included in the roles and responsibilities for local government, community groups, industry groups and landholders, all of whom are assigned a role/responsibility to "act to achieve agreed outcomes". CCMA believes the proposed assignment of roles and responsibilities in relation to target-setting should specifically encompass legitimate participation by the broader community – an approach consistent with that taken by the Commonwealth government in its "National Action Plan for Salinity and Water Quality", which proposes agreed targets between Commonwealth and State in consultation with the relevant community.

CCMA agrees that targets should "provide a clear view of the health of each catchment, (as well as) implications for the Basin as a whole". CCMA considers that the determination of "a clear view" in Queensland catchments is limited by the current availability of information. Accordingly, the determination of interim targets for Queensland needs to be undertaken in a flexible manner in order to allow for adjustment of targets over time and as additional information becomes available. Targets must apply to all stakeholders and assets in the basin, including those administered by government departments.

In addition, CCMA requires more information regarding target-setting in relation to the:

- process for ensuring compatibility of targets between Basin level and catchment level, and also catchment level to sub-catchment/property level (and the process to be followed where inconsistency is evident);
- responsibility and methodology for undertaking community engagement processes necessary for the effective involvement of all partners;
- manner in which support will be provided to those who will be adversely affected;
- management of target implementation, and the management of targets over time; and
- compliance monitoring, and the consequences for non-compliance.

CCMA recommends that full consideration be given to the range of incentive mechanisms available for investment in beneficial projects (such as tree-planting) whereby tangible short-term benefit can be secured for investors in long-term environmentally-sound projects.

5. Community Engagement Processes

The extent to which Basin strategies will be supported by catchment communities will substantially depend upon the capacity of catchment management organisations and communities (including Landcare networks) to participate in associated processes. Recent experience with the release of the draft Condamine-Balonne WAMP has clearly demonstrated that current community engagement processes have been ineffectual. Community engagement processes need to be:

- legitimate in intent and integrity;
- accessible in terms of participation;
- equitable and representative across industries and geographical sectors;
- appropriately resourced; and
- applied with regard for community restraints re time, knowledge, information & capacity.

This document is a response from the members of the Condamine Catchment Management Association. It has been compiled and edited by Pamela Harris. For further information, contact the CCMA Office (Telephone: 46881157, or Email harr.rp@bigpond.com)