

Name of Organisation	Name of respondent	Email Address	Submission Mechanism	Timestamp	Address	Contact phone number	Are you an individual or representing an organisation?	After reading the material, please indicate how well you understand the role of long-term diversion limit equivalent factors in determining water recovery for the basin plan	Do you believe the method for determining the factors is now more transparent and robust?	Do you feel the changes to factors are appropriate?	Please write your submission below
	Brian Phillip John Stevens	[REDACTED]	Have Your Say	7/16/2018 21	[REDACTED]	[REDACTED]	Individual		2 No	No	<p>Firstly, I was the Secretary of the Darling River Action Group. I am also a member of the Inland Rivers Network, but my submission does not necessarily represent the views of that organisation.</p> <ol style="list-style-type: none"> <li>The invitation for public submission should be re-started from scratch with plain English explanation of what these cap factors mean. The current document has failed miserably in this respect.</li> <li>The reliance on historical usage data is flawed: <ol style="list-style-type: none"> <li>because major users have lied about their usage.</li> <li>because increases in floodplain harvesting are unknown and affect the amount of water used and the runoff into the rivers, i.e. the total volume available for environment and diversion.</li> </ol> </li> <li>I notice there is a proposal for recovery of water from the lower Darling. There is nothing to recover. Or does this figure include the water entitlement already bought back from Tandou? Or is it proposed to take even more water from Menindee Lakes?</li> <li>The Cap Factors are meaningless in the Northern Basin while irrigators are entitled to pump from environmental flows.</li> </ol>