



Submission to MDBA

On

The Proposed Amendments to the Basin Plan

from the Northern Basin Review

From

Northern NSW Valleys Irrigators

Submission Due February 24th 2017

Jon-Maree Baker
Executive Officer
Namoi Water

Zara Lowien
Executive Officer
GVIA

Michael Murray
General Manager
Cotton Australia

Tim Napier
Executive Officer
BRFF

Grant Buckley
Executive Officer
MRFF

Ian Cole
Executive Officer
Barwon-Darling Water



Our collective groups from Northern NSW valleys, including Macquarie River Food and Fibre, Namoi Water, Gwydir Valley Irrigators Association, Barwon Darling Water, Border Rivers Food and Fibre and Cotton Australia make the following key recommendations:

- “Enough is enough” Water recovery must cease at the current level of 278GL until all alternative means of achieving the desired environmental outcomes, such as complementary non-flow measures and the ‘Toolkit’ measures, have been fully implemented and thoroughly assessed.
- “Just add water” has now been clearly identified as a flawed concept in terms of delivering triple-bottom-line outcomes with the Basin Plan.
- We welcome the work done by MDBA on assessing social and economic impacts as a result of the water recovery process to date as it clearly demonstrates the impacts have occurred, as we have been saying consistently for many years.
- The destructive ‘no-regrets’ buyback process must be acknowledged for causing some severe socio-economic impacts in vulnerable communities and ruled-out of any future recovery requirements.
- To be successful going forward, the focus of Commonwealth bodies must shift from delivering water volumes to delivering real and enduring outcomes in environmental, social, and economic terms.
- Funds which are currently allocated to water recovery should be redirected to the complementary non-flow Toolkit measures that do not result in perverse third party impacts or a change to the characteristics of water licences.
- Complementary measures that achieve environmental outcomes should have an environmental water equivalency attached as do other infrastructure measures.
- Where over-recovery has occurred, the Commonwealth must commit to re-balancing their portfolio accordingly in close consultation with industry.
- Clear public recognition from the MDBA that the Northern Basin is significantly limited by physical and operational constraints, and there are more effective ways to achieve desired environmental outcomes, than simply relying on decreased SDLs.



One of the fundamental flaws in the Commonwealth's water recovery process has been the assumption that water buybacks would be impact-neutral on regional communities and that on-farm modernisation programmes would be impact-positive. The original intent of the National Plan for Water Security was to have a mix of the two options which would recover water from a wide area and over a long period of time to avoid any shocks to local irrigation-dependent communities. The rhetoric of the time was that irrigated agriculture would benefit from the modernisation of their infrastructure and the rivers would benefit from the recovered volumes – a win-win for all concerned.

In reality, the 'no-regrets' buyback policy recovered large volumes of water from small geographic areas in a short period of time, creating the devastating social and economic impacts which have greatly upset rural communities ever since, some because of damage caused directly to their communities and others because they observed the results on communities nearby. People are upset because the Commonwealth assured us it wouldn't happen. Then, when it happened, the Commonwealth denied that it was anything significant and only after several years of sustained pressure did they relent and agree to do a detailed assessment of socio-economic impacts. It would seem that the results have surprised many in the government, the MDBA and the Federal Departments of Agriculture and Water, and Environment.

About the same time as the results of the socio-economic studies were emerging, the Commonwealth was instructed by COAG to consider what other measures could be taken to avoid the socio-economic damage, a point that this group and many others have been making since the 2010 Guide to the Basin Plan was released.



THE FOLLOWING SECTIONS ADDRESS THE EIGHT PROPOSED AMENDMENTS RECOMMENDATION BY THE MDBA:

- 1. The Authority recommends the water recovery target for northern Basin catchments be amended to 320 GL on the basis that the Australian, Queensland and New South Wales governments agree to implement a number of so-called 'toolkit measures' designed to improve water management.**

We submit that reduction in recovery target from 390GL to '320 + Toolkit' is a positive step, but that recovery should cease at the current level of '278GL + Toolkit'.

The 'toolkit' measures are not just intended to improve water management, but to achieve environmental outcomes without the unwarranted collateral damage being inflicted on already vulnerable communities. Genuine implementation of 'toolkit' measures that do not result in perverse third party impacts or a change to the characteristics of water licences, will achieve outcomes far greater and more durable than possible with the 'just add water' approach.

- 2. The Authority recommends the targeted recovery of water, both in terms of geographic location and the class of entitlement, to improve environmental benefits.**

The Commonwealth should only hold water that is most valuable to it in terms of the outcomes it is trying to achieve. We submit that the 'no-regrets' water recovery process, in some cases, recovered water that is not the 'most fit for purpose' for the Commonwealth Environmental Water Holder to use.

We expect that the water portfolio will require 're-balancing' in the future.

As previously stated, no further water recovery should take place beyond the 278GL.

- 3. The Authority recommends improvements to state water management arrangements to safeguard low flows across the north (particularly in the Condamine-Balonne and Barwon-Darling).**

We oppose any changes to state water management arrangements that create an inequity between different owners of the same water entitlements. We feel that the Commonwealth was well aware of the existing rules when it chose to buy those water entitlements and that is intolerable that they now seek to change those rules to suit only themselves, especially if there is a risk of disadvantaging other existing water-users.



4. The Authority recommends the proposed infrastructure measure at the Gwydir wetlands be implemented.

We support the principles of achieving better environmental outcomes with less water however the benefits and costs to such project must be fully assessed. As such we support the submission of the GVIA on this point.

5. The Authority recommends works to promote native fish health through improving their ability to move through the river system and access habitat in the northern Basin.

We support any practical measures that will offset the recovery of productive water and achieve enhancements in environmental outcomes, such as the improvement of fish passage, re-snagging of stream beds, addressing cold-water pollution and reduction of the infestation of alien species. These measures must be implemented and maintained at the Commonwealth's cost and not paid for by productive water-users or local communities.

6. The Authority recommends there be a preference for water recovery based on irrigation infrastructure improvements rather than through water entitlement purchasing.

We strongly support the principle of prioritising infrastructure improvements, either on farm or supply measures, over buyback, purely because it avoids some of the impact of removing productive capacity from a community. We reiterate though, that no further recovery should be done beyond the existing level of 278GL.

7. The Authority recommends that governments consider support for the following measures, to address the concerns of Aboriginal people in the northern Basin:

- ensuring Aboriginal access to waterways
- replacing or refurbishing weir pools at certain locations, such as Wilcannia and Cunnamulla
- continuing to improve the capacity of Aboriginal people to engage in water planning and decision-making, in order to factor in their social and cultural imperatives.

We acknowledge the cultural and social importance of the river for Aboriginal people.



All communities should have appropriate water-supply infrastructure, especially remote river communities like Wilcannia and Cunnamulla.

While it is the government's role to ensure all stakeholders are appropriately consulted, we welcome the constructive involvement of Aboriginal people in the water planning and decision-making process and support capacity building to enable that to occur.

8. The Authority recommends that governments consider further support, particularly for Dirranbandi and Warren.

We support the principle that it is the Commonwealth's responsibility to support any communities that are negatively impacted by its water recovery process.