



Comments on Guide to Proposed Basin Plan

I appreciate the opportunity to comment on the Guide to Proposed Basin Plan.

I believe this process towards a Basin Plan should continue and not be substantially delayed or abandoned, as this is a rare opportunity and indeed a necessity to deliver much healthier river systems for all stakeholders. To delay would be very unfair to river communities, who need more certainty to be able to plan ahead. The communities have already been subjected to several years of uncertainty and pressure.

The underlying challenge presently is that Basin rivers and groundwater have been over- allocated. Adjustment to extraction levels is necessary.

We have to try and ensure that irrigators, other water users and the environment are not subjected to the recent high level of damage in future droughts, which may well be more frequent and intense. Action is required.

VISION

It is important to better highlight the vision of the Plan, which is an outcome of healthier rivers for all stakeholders.

Many river communities feel threatened, in part due to what they clearly see as a top down approach to the process so far.

Consultations need to be re-invigorated, it is only by bringing communities along with the process of development of the Plan, that communities will have ownership of it.

The vision must be articulated and consultation must include many more opportunities for dialogue between MDBA and communities. Regional organisations should have some roles in operating new Basin Plans.

RIVERS: FUNCTIONING SYSTEMS

I believe that much greater emphasis in both the consultation process and in the Plan, should be given to the need to reinforce that rivers are a **functioning system**.

To be healthy, rivers need to be functioning streams and in the Basin, this includes sufficient overbank flows at intervals to connect with wetlands to achieve water quality and acceptable biodiversity levels.

A sufficient stream flow regime is also required to maintain the river channel in satisfactory condition. It is important that sediments are not allowed to build up, especially in weir pools.

Rivers do not consist only of the river channel, but to function appropriately, rivers need a regime that at intervals connects to the floodplain.

With the advent of availability of additional environmental water flows, the management of those will need to be supported by sound knowledge and science and with the collaboration of regional and non-government organisations with authority delegated by MDBA.

IRRIGATION Vs ENVIRONMENT

There is also need to further reinforce with the community that there are many links between the needs of water for consumptive use and for the environment. For example, both are dependent on water quality (salinity, blue green algae etc) and in many ways are interdependent.

SHARING THE ADJUSTMENT

The equitability of sharing water adjustments is a fundamental issue.

Irrigators should not be required to bear a disproportionate share of reductions, as is the case in the Guide to the Plan.

I believe the Plan requires much more rigorous provision for sharing, including by more thoroughly addressing the use of water in upper catchment farm dams, floodplain harvesting and indeed stock and domestic in the various catchments.

To achieve proper accountability of all water extractions, metering needs to be completed right across the Basin.

There does not appear to be provision for capping upper catchment farm dam volume to avoid future increases, let alone provision for sharing reductions now.

A major water contribution should definitely be provided from the S. Aust. lower lakes.

Whilst it may be difficult to articulate a lower lakes project at present, the principle of a contribution should be committed to and be included in the Plan now and determination of the type of project and project implementation in the near future.

I realize that state jurisdictional issues are involved, but the Plan should address all material issues and not remain silent just because State issues are involved. The Plan should be all encompassing across the Basin. It is unsatisfactory to not address all major issues in the Plan.

In this issue of sharing the adjustment, MDBA need to show strong leadership. The states will need to take on much greater heavy lifting in effectively dealing with issues such as upper catchment farm dams, if we are to achieve more significant outcomes, including fairer treatment of irrigators.

ENVIRONMENTAL ASPECTS INTEGRATED INTO RIVER OPERATIONS

There would be additional benefits for river health, if ecological requirements were integrated into river operation protocols. There has developed a long standing culture of flood mitigation as the main component in river management regimes. Whilst this is obviously a necessary component, there are also many opportunities to optimise ecological outcomes.

BASIN STAKEHOLDERS

Many world markets for food products are gradually demanding food that is produced in sustainable conditions. Some major retailers in Europe are accrediting their food suppliers, using requirements such as production in sustainable conditions, a trend that will continue.

Our regional tourism is much dependent on a healthy riverine landscape. Attractions for tourism include satisfactory native fish stocks for anglers, healthy waterways for houseboats and healthy riverine landscapes for camping.

Risks include major outbreaks of blue green algae, excessive water weeds that recently in this region, almost covered the width of the river.

I believe that especially for our Sunraysia region, some allocation of water should also be made available for blue green algae dispersal flows.

Additionally, our riverine landscapes are a hugely important amenity for our regional communities for water sports, angling, camping etc.

WATER PURCHASED FROM IRRIGATORS

The present system, allied to current market prices should be abandoned.

An alternative system needs to be adopted that avoids the large fluctuations in market prices that are impacted by a range of circumstances. Water market prices at present are around 40% less

than a couple of years ago, an example of huge differences that can occur.

Growers' water assets are of a capital nature and are linked to their other assets, particularly in irrigated horticulture.

Therefore the Commonwealth Govt. should adopt a different pricing regime that is not impacted by the vagaries of the market.

Irrigators who are selling high security water, which is needed by environmental water holders, **are entitled to receive much more than the present market price**, especially given the much higher price already paid for lower security, much less reliable water already purchased in NSW and Qld for the environment.

There has also been a lack of strategic purchase of water, for example the missed opportunity to purchase Wakool Irrigation District water.

SUNRAYSIA REGION IRRIGATION DISTRICTS

Irrigation districts such as those in the Sunraysia region are in urgent need of special consideration to improve their viability, as irrigators in these districts are impacted by events that do not affect other irrigators. For example with the large volumes of high security water that has been traded out of districts (some close to 50%), remaining irrigators will be bearing highly elevated annual water charges, as many of these are fixed costs.

If the viability of irrigation districts can be improved, this will impact favourably on the respective regional communities.

Unviable commodity prices have had a profound impact on irrigation enterprises, however cyclical price improvements will occur, or alternative crops will be identified.

When this occurs, it must be ensured that high security water traded out of districts may be traded back in later.

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