



Submission to the Murray-Darling Basin Authority on

The Guide to the proposed Basin Plan

BY

Water Resource Committee Benalla VFF Branch

18 December 2010

The members of the Water Resource Committee of the Benalla VFF Branch thank the Murray Darling Basin Authority for the opportunity to respond to the Guide to the proposed Basin Plan. While we acknowledge and support the concept of MDBA's plan to develop sustainable diversions for the Basin, there are several proposals in the plan that we believe jeopardizes the long-term sustainability of the Broken River Irrigation System. Some of these proposals are also covered in the Victorian Farmers Federation Submission, December 2010.

Background :-

The MDBA's plan to include the Broken catchment for further reductions in diversions comes on top of the Victorian Government's decision to decommission Lake Mokoan, the major storage in the Broken Catchment. The consequences of this decommissioning has meant that :-

- Approximately 60GL of water, from a river with a total annual average flow of 265 GL. has already been removed from the Broken System for the flows of the Snowy, Goulburn and Murray systems (by substitution) as part of the decision to decommission Lake Mokoan.
- Buy-backs along the Broken system have recently reduced irrigators' entitlements from about 25GL down to about 14GL - a 44% reduction.
- Reliability for the Broken System has been reduced to 89% according to figures contained in the Northern Rivers Strategy document 2009.

The water from all tributaries below Lake Nillacootie are clearly not adding to the reliability according to the Victorian DSE design. The historically higher flows that pass from the Holland's and Ryan's creeks are now being lost to the irrigators of the Broken System and flowing out to the Goulburn and Murray Systems, making the previous Victorian Government's commitment to retain the system's reliability of at least 91% unachievable! Reliability on the Broken has therefore been clearly eroded since the very recent decommissioning of Mokoan.

The historical operations of Lake Nillahcootie -which included flood mitigation and consumptive use – has been changed to that of providing all river flows and losses, before any allocation can be released for irrigation entitlements.

These current operation rules have placed Broken irrigators at a severe disadvantage. In other words water for the storage's other commitments must be secure, before releases for irrigation can be made.

- The issue of who now bears the costs of operating the system post decommissioning Mokoan has not yet been resolved with the Victorian Government.

Impact of the MDBA's Proposals :-

Proposed Sustainable Diversion Limits.

The proposed Sustainable Diversion Limits outlined in the plan guide suggests a buyback scheme of 5.6 to 6.3 GL /yr or a further reduction of 40% to 45% of the SDL in the Broken Basin. In real terms the actual reduction in water available for irrigated food production in the Broken is much greater, as the MDBA guide has neglected to include the 'unavailable' water not available for any such buy-back scheme. This includes water for running the river (conveyance water) and water used by our two urban communities.

The V.F.F. estimates the reduction to be some 47% to 53% of the Broken Basins existing diversions. Another potential danger to reducing our SDLs is the expansion of plantation plantings in the higher rain fall areas of the catchment. Plantation interceptions are currently exempted from inclusion in the MDBA's proposed plan.

Clearly the proposed MDBA's SDL's would destroy the Broken system at a huge economic cost to the region.

The current level of interceptions of 43% must be capped so that Broken Basin security and reliability of water entitlement is not further eroded.

Management of the MDBA's Environmental Water Entitlements.

The Broken River is currently experiencing its second moderate to major flood event in three months since the devastating 1993 flood. The community is therefore very apprehensive of any river management strategy that increases the flood risk in the Basin. The "wild river concept" may be embraced for its environment benefits, but the Broken River Basin is shared by farmers and urban communities such as the Rural City of Benalla and the Greater City of Shepparton.

How the Environmental Water Holder manages its Entitlement is very important. The timing of the releases; the volumes of the releases and the effects to riverine soil moisture is all important to valley irrigators. There needs to be an ongoing consultation with all stakeholders as to how this water can best be managed.

Water Allocation Methodology -Proposed Change by the MDBA.

The Authority has cited a proposal to change the water allocation methodology currently used by the States. This in effect will alter the manner in which water allocations are made in years of below average flows. Such a proposal will undermine the reliability of the water available for irrigation and undermine the viability of our farming enterprises.

This proposed change to the way the States' water resource is allocated in the Broken Basin requires a fundamental understanding of its water management to appreciate the impact that such a change would have.

Cost of Operating the Broken Irrigation System.

The small group of irrigators remaining in the Broken system are now very fearful of bearing a much higher cost of operating the system remaining after the MDBA's proposed buyback scheme.

A similar issue with the Victorian Government has not yet been resolved.

Conclusion:-

The members of our V.F.F. Branch acknowledge that the Murray Darling Basin Commission is in urgent need of securing water for the long term sustainability of the Murray Darling Basin, but we believe that the Broken Basin has already contributed to its Murray Darling Basin's environment water bank by providing water for the Snowy, Goulburn and Murray.

Currently some 86% of the Broken flows out of the system to the benefits of the downstream environment.

The members of the Benalla V.F.F. Branch strenuously reject any further changes to the Broken's current Sustainable Diversion Limits on the basis that it has very recently contributed very significantly to the Murray Darling Basin's sustainability through the decommissioning of Lake Mokoan and the consequent reduction in diversions and reduction in irrigators reliability of supply.

The proposed 43% or 6 GL further reduction of the Broken's SDL would effectively destroy what is left of an already very small system at a huge economic cost to the region. (Estimates are included in the VFF Submission December 2010).

The members of our V.F.F. Branch recommend that future contributions to the environment from the Broken Basin should only come from savings won from on farm efficiency programs and possible reductions in interceptions. Such savings would be a win for the thirsty environment and a win for increased food production.

Please do hesitate to contact any one of us if you have any questions.

May we remain,

Yours sincerely,

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Appendix:

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