



# *Shire of Campaspe Submission Guide to the Murray Darling Basin Plan November 2010*



*Lifestyle & Opportunity*

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## EXECUTIVE SUMMARY

The Council and Community of the Shire of Campaspe hold great concern about the Guide to the Murray Darling Basin Plan (the Guide) and the impacts of the subsequent policies and plans. The attempt to establish an holistic approach to managing the resources of the Murray Darling Basin (the Basin) is commendable. However the objective should be to benefit both the natural environment as well as achieve social and economic outcomes for current and future generations of Australians. If the Murray Darling Basin Plan (the Plan) is developed on the basis of the Guide these objectives cannot be achieved. The Murray Darling Basin Authority (the Authority) must act now to change of direction so that a balanced and sustainable Plan is established.

The submission of the Shire of Campaspe (the Council) does not dwell on the technical details of the Guide. It is not the role of the community or of Council to undertake a technical critique of the Guide. This is left to those with the expertise and resources to undertake the difficult task of reviewing this complex document. Notwithstanding this, the Shire of Campaspe has significant concerns about the validity of the data, information and importantly the assumptions within the Guide. Therefore the Shire of Campaspe does not accept the premise of the Guide or its recommendations.

It is anticipated that individuals, businesses and industry groups will make submissions to the Authority. However Council takes seriously its role of also bringing the voice of the community to this process, recognising that the impacts on its community will be felt in both breadth and depth. To this end, Council has hosted five public meetings across the municipality attended by over 200 people with written feedback provided by over 60 people. Through this process the Campaspe Community (the Community) has expressed clearly its views, concerns and feelings about the Guide. The Community wishes the Authority to hear the following key themes:

- The Community is committed to the natural environment. Significant volumes of water have already been made available to the environment through innovation, infrastructure and investment of this community. This sacrifice is not recognised or valued by the Guide.
- The Community is vulnerable after decades of drought. Financial hardship and uncertainty has had significant impact on individuals, families and communities and their resilience is low. While reduction of agricultural output has been minimised during the drought, this has largely been through increased debt. The unbalanced approach of the Guide has been a further blow to a community that is trying to look to the future, but cannot plan or commit when faced by such uncertainty.
- The consequences of the Guide will be felt by all rural and regional communities. This is not just a farming issue; this is a local and regional issue that will be felt throughout families, businesses, communities, schools and service providers for current and future generations, unless balance and consideration for communities is embedded into the process.

The Shire of Campaspe makes the following submission to the Authority for its consideration:

- 1) The Guide does not have credibility as a whole-of-basin plan.
  - a) The Guide does not adequately plan for an holistic approach to basin management because it is too narrowly focussed on the natural environment.
  - b) Local expertise and skills of natural resource managers, catchment management authorities and local communities is needed if a credible whole-of-basin approach is to be established.

- c) The Guide has not demonstrated sufficient understanding of the integrated basin systems or the role of the agricultural landscape in the natural environment.
- 2) The claims made on behalf of the environment are not substantiated.
    - a) The premise that water flow is the paramount factor in environmental health has not been demonstrated and communities should not be asked to accept this at face value.
    - b) The application of the precautionary principle in the Guide to calculate the demands of the environment, instead of more detailed and rigorous assessment of environmental needs, is unreasonable and should be modified.
    - c) Environmental infrastructure opportunities and innovative approaches should be investigated, and commitment made to their implementation, before reductions in water diversions are calculated.
  - 3) The approach needs to be balanced.
    - a) Consideration of the Basin's environment must include consideration of the Basin's communities.
    - b) The economic and employment impacts under the Guide must be more rigorously assessed and considered at local, regional and basin-wide levels.
    - c) The Plan should provide an environment that creates investor confidence in our communities, businesses and communities.
    - d) The Authority should advocate to the Commonwealth Government that buy-back be restrained until a strategic framework is established.
    - e) The impact on food security for domestic and international consumption has not been adequately considered in the Plan.
  - 4) The need for community buy-in and support for the plan.
    - a) The front-line environmental managers found within the Basin communities should be engaged to bring their skills and knowledge base to the benefit of the development of the Plan and its future implementation.
    - b) Water savings and environmental flow contributions made to date should be acknowledged, and the baseline for both diversion limits and environmental flows must be clearly documented and communicated.
    - c) There is a critical need to re-establish the Community's faith in the process before the Plan is developed in detail.
  - 5) Time must be available to establish a workable solution.
    - a) The intent of Parliament to consider the Plan is clear, but so is the recognition that more time is needed to get the right solution.

Perhaps the most fundamental shortcoming of the Guide has been the failure to demonstrate to the Basin communities that there is a need for change. The Murray Darling Basin Plan and the objectives of the Water Act 2007 will not be achieved without the support of the community. It is therefore critical that the Authority and the Commonwealth Government reassess and reconstruct their engagement and development processes for the Plan to ensure that the community can understand and accept the need for change. Council recommends the following way forward:

Step 1: Re-engage the Basin Communities

Step 2: Build the Case for Change

Step 3: Establish a Balanced Framework

Step 4: Demonstrate Environmental Efficiencies

Step 5: Reassess the Environmental Needs

Step 6: Plan and Implement the Change

The Shire of Campaspe knows that if the productive base of agriculture is diminished, then the standard of living for our communities will also diminish. The irrigated water reductions indicated in the Guide could result in job losses of approximately 10% across the municipality. The Community does not have the resilience or opportunity to recover from this scale of impact. Council doesn't want to talk about buy-back, financial compensation or other compromises until Steps 1 to 6 above are completed. Only then can the true impact on the natural environment and basin communities be understood and the right response be determined.

## **1 BACKGROUND**

The Shire of Campaspe is located in north central Victoria, about 180 kilometres north of Melbourne. The Shire encompasses a total land area of over 4,500 square kilometres. It has an estimated residential population of more than 38,000 people and continues to enjoy a positive population growth.

The Shire of Campaspe is a predominantly rural area, with the majority of our land used for agriculture, particularly dairy farming, cereal and grain growing and sheep. The introduction of the Murray Darling Basin Plan is of significant interest and concern to the Shire of Campaspe. Irrigated agriculture is the foundation of Campaspe's economy and generates 13% of economic output from the municipality, with a further 25% generated by a manufacturing industry that is directly-related to processing of agricultural products. Agriculture is also a major employer providing approximately 16% of jobs in the municipality, with manufacturing providing another 15% of employment. Therefore the immediate and long term impacts of reduced water availability on the Campaspe Community are likely to be significant, particularly with regard to income, employment and population change.

Council recognises its role in bringing the voice of the community to this important discussion as the Guide is released and considered. To foster open discussion with its community, Council held four major public forums across the Shire and a fifth forum in partnership with its neighbouring interstate Council, Murray Shire. These forums have attracted wide attendance and provided an opportunity for community members to give voice to their concerns, and to express their expectations of Council, the Authority and the Commonwealth Government in relation to this important matter. Issues raised at the Council-run forums were reiterated at the Authority's presentation in Echuca in November attended by over 1,600 people.

Like many other basin communities, the Shire of Campaspe has experienced and adapted to severe and prolonged drought. Individuals, businesses, community groups and local government recognise that water availability and water security looks very different in the future compared to what has been experienced over recent decades. Council feels that the resilience and resourcefulness of Campaspe communities has been commendable. However, unless a more balanced and considered approach is established, the consequences of the Murray Darling Basin Plan, as forecast through the Guide, may be beyond the community's ability to adapt.

The Shire of Campaspe is an engaged community that wants and needs to have its voice heard.

## 2 THE COMMUNITY REACTION

Concerns, views and stories have been gathered from the Campaspe Community through Council-hosted public forums, feedback sheets and case study forms. The many personal stories are worthy of an individual recognition that is not possible in this submission. However the stories shared by these individuals reveal common themes across the municipality. Council puts forward the summary below using language and phrases that best reflect the feelings and opinions of the Campaspe communities:

- 1. Further water reductions will impact the viability of small farms and businesses and will have significant negative impacts on small communities. This threatens the delivery and sustainability of services for those left behind when rural communities and the agricultural landscape becomes further fractured.*
- 2. Mental health in rural communities has suffered through years of drought and the resulting bankruptcies, unemployment and financial difficulties. Personal and family breakdowns are experienced in higher proportions than ever before, and a further threat to the economy through water reductions will be a blow that could have grim consequences to families and communities across the Shire.*
- 3. We have improved river health against a whole range of measures in the worst of droughts. Where is the acknowledgement for these efforts? We have been innovative. We have made sacrifices. We have given water back to the environment. Will it count for anything?*
- 4. Environmental improvements have been made by addressing salinity in the Basin. In many of our rivers there is better water clarity, more native fish and more invertebrates as a result of the efforts of local communities who take the environment seriously. If the community is given the time, the chance, the investment and a fair water share, it can do even more to improve the natural environment.*
- 5. We need to retain crop diversity in our agriculture. Those best-placed to survive the impacts of the Basin Plan are the corporate farms who will focus on high-profit broad-acre planted cotton and crops. They will not focus on not food diversity or feeding the world.*
- 6. Research should be completed on water transfer from other parts of Australia into the Basin, and water efficiency capital projects already vetted and costed should now be funded and built.*
- 7. How can a 3,000-7,600 GL/yr reduction in water diversions be justified, instead of starting with zero reductions in diversions? What happened to starting with the status quo and then justifying the need for change?*
- 8. The models used to calculate the net jobs lost across the basin overstate the opportunities for people to move across industries and thus find new employment. This might be valid in larger, urbanised, regional centres, but through their inclusion in these models the job losses in smaller towns and rural communities are being hidden. It is nonsense and an insult to state losses of 800 jobs across the Basin. In regional communities it could be a significantly greater magnitude.*
- 9. Why haven't the 10 most recent years of actual flows and diversions been compared and published? They would challenge the averages used for the development of the Guide and their omission is another indicator that the environmental needs are not being thoroughly calculated.*

10. *Banks are already pulling back from supporting farms and small communities. They have told us that towns under 25,000 people are not a good investment, that their financial risks are too high and that they don't think we are viable. Business proposals are already being taken off the table by developers. We need banks and investors to have confidence in their communities to help us build a future.*
11. *How International treaties be given precedence over our own efficient communities? Overseas farmers will be lining up to take our markets and send their produce to us, but they won't play by the same environmental, safety and quality rules.*
12. *Metropolitan communities are given an incorrect and unfair image of Australian farmers and rural communities. Most don't understand that Australian farming is amongst the most environmentally responsible in the world. Farmers view themselves as custodians of the land and usually have the greatest positive impact on the environment because they are closest to it.*

*All community comments offered at the five Council-run forums have been captured by Council, in addition to over 60 written feedback submissions. A summary of comments made at each of the public meetings across the Shire is available via <http://www.campaspe.vic.gov.au/level3.asp?menuID=16&pageID=112111>.*

### 3 COUNCIL COMMENTS ON THE GUIDE

#### 3.1 Local Expertise is Critical to Establish a Valid Whole of Basin Approach

The Shire of Campaspe recognises the need to find ways to protect our natural environment with secure, clean supplies of water. This needs to be balanced with the needs of regional communities and our role in the Goulburn-Murray Irrigation District (GMID) as one of Victoria's major food bowls.

***The Guide does not adequately plan for an holistic approach to basin management because it is too narrowly focussed on the natural environment.***

The whole-of basin approach will be deficient unless there are partnerships at all levels, but particularly with local natural resource managers and local communities. A basin-wide understanding will be created best through bringing together the Authority's resources with the knowledge and expertise of local catchment management authorities (CMA's) and the skills and experiences of communities who live closest to the environment and care for it day-to-day.

***Local expertise and skills of natural resource managers, catchment management authorities and local communities is needed if a credible whole of basin approach is to be established.***

A practical and effective approach to managing the resources of the Murray Darling Basin and the natural environment requires detailed understanding of the Basin's complex relationships between its catchments. This understanding is best developed through close association with State Government departments responsible for natural resources and by working with the CMA's who are best placed to understand the needs and functions of their relative catchments and communities. In addition, the role of the agricultural landscape in the natural environment is not adequately recognised in the Guide. The natural environment is not constrained to river corridors. The removal of water from the soils, dams and pastures of the agricultural landscape may have detrimental effects on flora and fauna that appear to have been inadequately recognised or considered.

***The Guide has not demonstrated sufficient understanding of the integrated basin systems, nor the role of the agricultural landscape in the natural environment.***

#### 3.2 Claims made on Behalf of the Environment are not Substantiated

The Guide and the process by which it has been developed have failed to:

- i) Substantiate the claim that increased water flows are critical to the health of the natural environment in a manner that Council and Community can understand and accept, and therefore have failed to establish the need for change;
- ii) Explain how environmental waters will be used in the most efficient and effective manner due to the absence of an Environmental Watering Plan, and therefore industries and communities are concerned that the confiscation of water for the environment might be exceed needs and cause unnecessary detrimental impact;
- iii) Demonstrate that the environmental outcomes are achievable so that rural communities have confidence that water taken from productive use will not be wasted; and

- iv) Establish performance measures to show how environmental outcomes will be demonstrated.

The underlying premise of the Water Act 2007 and the Guide to the Plan is that the natural environment needs increased water flows. And yet the people that live closest to the natural environment, the basin communities themselves, have observed that even in the face of drought:

- Irrigators have achieved a documented decline in salinity levels to well within sustainable levels through changed salinity management approaches; and
- There is strong anecdotal and physical evidence that native fish and invertebrate numbers have improved during this extreme period.

Our community understands that these improvements are not found in all parts of the Basin. Nevertheless, there is sufficient evidence of environmental health improvements to make communities want to challenge the claims made that the Basin health is facing irreversible danger.

There are in the order of 18–22 generally accepted environmental criteria in establishing and measuring environmental health. It is not appropriate for the Guide to adopt one factor, water flow, as the prime contributor to environmental health without demonstrating that this is a valid approach.

***The premise that water flow is the paramount factor in environmental health has not been demonstrated and communities should not be asked to accept this at face value.***

The legislative framework established through the Water Act 2007 was developed at a time of heightened focus on climate change. As a result the precautionary principle was applied to the Water Act 2007 and subsequent Guide to the Plan. More recent weather patterns in our region have seen rainfall amounts returning to levels similar to those of the past. The context of the Water Act 2007 has resulted in an overly conservative approach on behalf of the environment that might not be valid or necessary and this should be reviewed.

***The application of the precautionary principle in the Guide to calculate the demands of the environment, instead of more detailed and rigorous assessment of environmental needs, is unreasonable and should be modified.***

There is a range of significant and viable major infrastructure projects already identified and costed with potential to deliver major efficiency gains in the use of environmental water. The environmental benefits only require funding to be realized. The three examples provided below are not intended to provide an exhaustive list, but to demonstrate the opportunity for significant long-term efficiencies through the type of infrastructure upgrades that are being imposed on irrigation systems and users.

1. Lindsay Island works downstream of Mildura  
(estimated cost \$43 million with calculated water saving of 1,100 GL per flood event)
2. Hattah Lakes System periodic flooding as alternative to daily flows  
(estimated cost \$30 million with calculated water saving of 3,713 GL per flood event)
3. Gunbower Forest diversion flood efficiency management  
(estimated cost \$25 million with calculated water saving 740 GL per flood event)

The flow savings in these examples indicate that significant water savings can be realised at these three sites alone over their relevant flood cycle periods (which typically vary between 2-year and 7-year flood cycles). Opportunities such as these can offer significant steps towards the 3,000 GL/year estimated to be required under the Guide and should be supported over the easy target of irrigation water.

***Environmental infrastructure opportunities and innovative approaches should be investigated and implementation committed, before reductions in water diversions are calculated.***

### 3.3 The Approach needs to be Balanced

The need for a balanced approach is evident to all parties or observers to this process and has been a key theme conveyed to the Authority since 8 October 2010. The Guide, including the key study measures, definitions and supporting science, is too narrow and one-dimensional. The Guide lacks environmental, social, community and economic balance. Of particular concern are the following:

1. The definition of the 'Basin Environment' as exclusive of its 2.5 million inhabitants, their communities and the intrinsic social fabric which underpins them. The Authority's consideration of 'Community Social and Economic' outcomes as secondary to its consideration of 'The Environment' and 'International Treaties' condemns Basin Communities as necessary collateral damage. This is reflected in the Guide by the minimum allocation reduction starting not at zero but rather 3,000 GL/yr ranging up to 7,600 GL/yr. This 'Top Down Methodology' of establishing the non-human environmental water resource requirements first and subsequently allocating the remaining water for agricultural production and community living needs reflects an apparent misunderstanding of the constraints of the legislation.

***Consideration of the Basin Environment must include consideration of Basin Communities.***

2. The socio-economic assessment to date has not been adequately conducted or considered. The impacts on economies and employment forecast in the Guide have been publicly acknowledged by the Authority itself as one of weakest elements in the Guide preparation. In 2009 Judith Stubbs & Associates conducted a case study into the potential impacts faced by the Shire of Campaspe in the face of reduced water. The study, which investigated community resilience in relation to irrigated agriculture, stated that:

*The primary effect will be a loss of employment, ranging from at least a 2.2% loss (339 jobs) predicted from a 10% reduction in water availability, 5.4% loss (847 jobs) predicted from a 25% reduction in water availability, to a 10.9% loss (1694 jobs) predicted from a 50% reduction in water availability, including direct and indirect employment in agriculture and multipliers. Given the job loss experienced during the recent drought (prior to 2005/2006) and the fact that irrigated agriculture is anecdotally stated to have higher multipliers than the average for agriculture, and the likelihood that some agricultural jobs have not been identified in our analysis, this is almost certainly an underestimate. Subsequent population loss is estimated as at least a 2.6% loss (949 people) predicted from a 10% reduction in water availability, a 6.6% loss (2,372 people) predicted from a 25% reduction in water availability, to at least a 13.1% loss (4,744 people) predicted from a 50% reduction in water availability.*

If this is the situation faced by the Shire of Campaspe it is reasonable to anticipate similar impacts across many of the basin communities. It also makes the forecast of 800 jobs across the Basin appear absurd.

***The economic and employment impacts under the Guide must be more rigorously assessed and considered at local, regional and basin-wide levels.***

3. Investor and community confidence is undermined by uncertainty. The focus of the Guide on the Basin's natural environment at the potential cost of communities and economies creates uncertainty for internal and external investment in our communities, businesses, industries and indeed in much of regional Australia. The Guide in its current form, and the uncertainty it has created, is therefore a threat to our community and economy both immediately and in the long-term. At this time, the State and Commonwealth Governments are part-way through their \$2 billion investment in modernisation works across the Goulburn-Murray Irrigation District (GMID). The proposed water reduction and associated uncertainty poses a risk that the opportunity to realise significant benefits from this government investment might not be achieved.

***The Plan should provide an environment that creates investor confidence in our communities, businesses and communities.***

The situation is exacerbated by the Commonwealth Government's continued push for water buy-back without a strategic framework, leaving behind a fragmented agricultural landscape which places increased stress and hardship on remaining farmers and rural communities.

There must be co-ordination between local government planning schemes (through strategic land use planning), infrastructure investments and buyback locations. This inclusion is vital to avoid inconsistencies that result in fragmented land and stranded assets.

***The Authority should advocate to the Commonwealth Government that buy-back be restrained until a strategic framework is established.***

4. The food production capacity of the GMID and the Murray Darling Basin overall has been a foundation for both domestic and international food supply. The export performance of the region has been a long-standing success for Australia and becomes more critical as we face growing populations domestically and globally. If there is not a more balanced approach to the Plan than proposed in the current Guide, this will be seriously threatened. The consequences of this have not been adequately considered to date, and the Guide creates questions about the Commonwealth Government's position on local and global food production. Australians are more aware and more concerned than ever before about the source of the food they consume. The Government claims to be planning for a growing population and yet food security has not been adequately considered in the Guide. Reduced productivity in reliable food bowls such as the GMID will drive prices up such that healthy and safe locally-produced food will not be available to all Australians.

***The impact on food security for domestic and international consumption has not been adequately considered in the Plan.***

### 3.4 The Need for Community Buy-In and Support for the Plan

The frugality, environmental responsibility and water management skills of primary producers and the broader community have been evidenced during Australia's longest and most severe drought on record. Their achievements have credibility and should be given appropriate respect and recognition. It is this front-line dedication and understanding that will be essential to the success of the Plan regardless of the detail and frameworks that are still to be developed.

***The front-line environmental managers found within the Basin Communities should be engaged to bring their skills and knowledge base to the benefit of the development of the Plan and its future implementation.***

Victorians are proud of what they have achieved through innovative practices and their contributions to the Living Murray and other programs are deserving of recognition. Their sacrifices and achievements have not been valued or recognised by the Guide. Environmental benefits have not been demonstrated from the water already made available to the environment. Further sacrifice is being asked from these communities while they are still vulnerable from years of drought and before benefits from previous savings have been demonstrated.

***Water savings and environmental flow contributions made to date should be acknowledged, and the baseline for both diversion limits and environmental flows must be clearly documented and communicated.***

The Guide has been received with scepticism by our Community not just because of the lack of apparent understanding of local impacts, but because previous policy development processes have left communities feeling that too often requests for engagement and community input is tokenistic and does not influence outcomes.

***There is a critical need to re-establish the Community's faith in the process before the Plan is developed in detail.***

### 3.5 Time must be Available to Establish a Workable Solution

The commitment from the Commonwealth Government is clear. At an address in Adelaide on 11 November 2010 Prime Minister Gillard made two critical statements:

- i. *The Authority has already said that its original timeline, the end of 2011, will be difficult to achieve. If a few extra months mean that we can get a workable solution and restore the river to health, then that is the right way to proceed.*
- ii. *Whether the Plan goes to the Parliament at the end of 2011 or the beginning of 2012, I can absolutely state this. The Plan will go to this Parliament.*

***The intent of Parliament to consider the Plan is clear, but so is the recognition that more time is needed to get the right solution.***

## 4 A RECOMMENDED WAY FORWARD

The Authority has an opportunity and an obligation to establish a sustainable and balanced Murray Darling Basin Plan. In October 2010, the Commonwealth Government Solicitor advised that under the Water Act 2007 legislation “**environmental, economic and social considerations are central to the Water Act and that the Basin Plan can appropriately take these into account**”. These considerations must now be reflected as a priority as the Authority develops the Plan.

Through this submission, the Shire of Campaspe recommends to the Authority and Commonwealth Government that the process for development and introduction of the Murray Darling Basin Plan be reviewed with the intention of:

1. Re-establishing the Community's faith in the process; and
2. Delivering an holistic Plan that considers social, economic and environmental factors in a balanced framework.

The objective must be to satisfy the requirements of the Water Act 2007 in a manner that will deliver benefits to the natural environment and meet the social and economic needs of all Australians for generations to come. To this end the Shire of Campaspe recommends the following steps be undertaken:

### **Step 1 : Re-engage the Basin Communities**

- Both the Parliamentary Inquiry and the Authority's study into Local Community Impacts must be based on engagement at the local community level. Socio-economic theories do not adequately build an understanding of impacts if they have not been ground-truthed.
- The role and value of Local Government and industry groups as vehicles for community engagement should be recognised and incorporated into engagement processes.
- The Regional Development Australia (RDA) committees should be used to leverage regional relationships and understanding and RDA committees should be fully engaged with Local Government to support communities through improved processes.

### **Step 2 : Build the Case for Change**

- Water flow as the key environmental success criterion must be either validated or modified. Additional environment criteria should be considered and a defensible set of criteria should be established.
- Measures should be established that enable communities to recognise and monitor environmental health of rivers and the basin overall for their own understanding of any need for change.
- The Authority must engage with the CMA's to leverage their skills and local expertise as part of an enhanced process to validate scientific conclusions upon which the Guide has been founded.

### **Step 3 : Establish a Balanced Framework**

- The environment needs to be considered in its broader context. The 2.5 million inhabitants of the Basin and need to be recognised.

- Recognise the role of the farming landscape as an integral part of the natural environment, and the environmental risks associated with removing water from this landscape.
- Recognise the economic future of the Basin communities and its critical importance in domestic and global food production and in supporting growing populations.

**Step 4 : Demonstrate Environmental Efficiencies**

- Investigate and exhaust innovative models and infrastructure to environmental water management, demonstrating equal accountability to that expected of irrigated water users.
- Demonstrate environmental outcomes through agreed performance measures that are visible to the community.

**Step 5 : Reassess the Environmental Needs**

- Reassess the environmental health of the Basin.
- Determine if there is still a gap in environmental water needed to sustain the basin to the agreed standard.

**Step 6 : Plan and Implement the Change**

- Work with the Basin Communities on balanced sustainable solutions and incorporate into the Plan.
- Implement the changes needed and monitor their success, challenges and impacts.