



The Goulburn Valley Environment Group Inc.

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Senate Inquiry into Multi-Jurisdictional Management and Execution of the Murray Darling Basin Plan

The Goulburn Valley Environment Group (GVEG) is one of the peak environmental organisations in northern Victoria and has been actively involved protecting and enhancing our natural environment, flora and fauna for over 25 years in what is one of the most highly cleared and modified regions in Australia. It is in this context, our engagement in the development of the Murray Darling Basin Plan and member's expertise in the irrigation water industry that we offer the following Submission.

The implementation of the Basin Plan as intended and as agreed to by the States is floundering in parochial State politics and is being undermined by industry and vested interests.

The SDL adjustment mechanism was not based on science and is a risk as implementation of supply projects fail to meet Basin Plan deadlines.

Constraints measures used in the calculating of supply measures have not been implemented.

Victorian and NSW State governments have actively conspired to make the removal of constraints almost impossible. The intention has clearly been to make the delivery of the 450GL of "up-water" impossible to deliver. The failure to remove constraints is seriously restricting the effectiveness of existing E water held by CEWH and State EWH's.

The failure of NSW to deliver **Water Resource Plans** for accreditation or to meet agreements on SDL management as of June 2019 is a serious breach of the Basin Plan. NSW has increased flood plain harvesting since the implementation of the Basin Plan and is showing no signs of managing this resource responsibly.

Metering all water extraction is critical. This metering must reflect all use plus losses incurred in the harvesting and delivery of the resource. The resource is clearly too valuable to be evaporating away in shallow floodplain harvesting storages. Full cost accounting principles, including the "lost opportunity" impacts of these losses downstream should be accounted for.

NSW has failed to **protect water recovered for the environment** from irrigators as environmental flows occur. Unfortunately there appears to be no recognition of the legitimacy of these flows in sectors of the irrigation industry. Confidence with-in the community and industry has been in decline since the demise of the National Water Commission as the independent oversight body for national water reform.

This confidence must be restored by an **independent Federal Basin Plan Regulator** to deal with enforcement of water resource plans, and be underpinned by a **National Integrity Commission**.

There is an immediate requirement for a full **independent audit of environmental water** recovery to date, including water availability for provision of environmental flows.

The Audit should also measure river flows against Basin Plan targets, as an essential element of restoring transparency and community confidence that the Basin Plan is being delivered as intended.

State governments in administering water reforms have not protected against **third party impacts that are damaging the environment, communities, irrigation entitlements and the integrity of water trading**. This is a market failure and clearly not the sustainable management required to ensure the ongoing health and productivity of the Murray Darling Basin.

GVEG remains available for further information or interrogation if required.

Yours sincerely,

John Pettigrew GVEG President

Protecting the environment for generations to come