



Wakool Landholders Association

Submission to the House Standing Committee on Regional Australia.

Inquiry into the impact of the Murray Darling Basin Plan in Regional Australia.

The Wakool Landholders Association represent 350 Landholders in southern NSW . The Landholders in the Wakool District are predominantly irrigators, and water is supplied from Murray Irrigation Limited and the Wakool, Niemur and Edward Rivers.

It is worth noting our irrigation system is a complete gravity system starting from Hume Dam. Murray Irrigation Limited operate a most efficient gravity irrigation scheme that has delivery efficiencies that exceed 87% . Murray Irrigation delivery efficiencies are at the highest end of all irrigation systems in Australia and other irrigation providers aspire to be at a similar level in the future

The Water Entitlements owned by our Landholders are General Security Entitlements. The security of our entitlements is at the lower end of reliability therefore towns, the environment and other transmission flows are provided before we get any allocations. The NSW Murray Allocation process is reflective of the varying climate conditions that exist in Australia. That is, when the water resources are in the dams we get an allocation after all other higher priority areas are accounted for in the basin. For example our general security allocations ranged from zero in 2006/2007 to 60% this current year. In this period of zero allocation the critical human needs and transmission flows were maintained to supply water the length of the Murray River. Normally the river would of run dry in these extreme times of drought. This allocation process has the support from environmental groups and is not acknowledged and understood by the MDBA.

We would like to comment on numerous parts of the guide to the draft of the Murray Darling Basin Plan for your inquiry to consider;

- As far as our association is concerned the MDBA has lost all credibility in our community. To rectify this situation the MDBA must engage and consult with the basin communities at a local level. We need confidence that the Authority retains its non-political status and has impartial views that don't reflect the attitudes of various environmental groups. This unbiased approach is fundamental to restoring respect from all Australians.
- The Water Act 2007 is the foundation stone of the MDBA Basin Plan. The Act focuses on the environment at the expense of the social and economic sectors in the basin. The Basin Plan will never get the support from local communities if the balance isn't restored. Regional Australia has just survived the worst drought on record and is therefore very vulnerable; therefore it is completely irresponsible to treat regional communities in this fashion. The MDBA has hidden behind the limitations of the Act all through this process. If the MDBA is to restore any credibility they must publicly acknowledge the Basin Planning process is hamstrung by the Act and demand the parliament amend the Act to enable a balanced basin outcome. Mr Taylor is obviously of this view.

- The Guide to the Basin Plan fails to articulate the need for change. During some years of the drought our farmers have been on zero allocation because of limited resource. Whereas the Murray River has been running water at high levels to South Australia. The MDBA has no comprehension of what this does to people in these extreme times. To add salt to the wound the MDBA keep telling us we are over allocated. How can you be over allocated when you are on zero per cent allocation? Some of our Landholders were paying in excess of \$200,000 per annum for fixed charges without getting one megalitre of water. Obviously the MDBA are still to comprehend the allocation process in the NSW Murray system.
- The Authority has created an enormous amount of uncertainty and lack of confidence. The mental anguish has taken its toll on our landholders and in some cases has had profound repercussions. The sensitivity that has been shown by the MDBA in these difficult times is non-existent and our Landholders deserve far more than this. Care, support, security and community are the main considerations when people decide to live in regional areas. If any of these attributes are threatened the others will collapse also, resulting in major restructuring and a high dependence on welfare. As we are recovering from drought, it is critical that we gain support from our Governments to rebuild our communities. This plan does the exact opposite.
- The engagement process has been non-existent. The process the MDBA undertook to develop this guide has alienated everyone; you have done a great job getting everyone off side. It isn't a clever option to develop a plan without true engagement from all sectors, especially the people that are going to be adversely affected. The recent reactions at the community meetings were expected considering the lack of true feedback from the BCC and alike. The authority treated our landholders with contempt, how on earth do you expect communities to accept a basin plan if they have had no involvement in the development. The damage has now been done, to progress this process the authority must resort to genuine engagement for every part of the plan and must reach every part of the basin. The current Basin Community Committee is not the conduit for engagement, it would be better to have a committee that is representative of the communities. The benefits of this tack are twofold, these representatives would convey the views of the communities to the authority and also the new committee members will have the responsibility to report back to their constituents. A great example of this process is The Land and Water Management Plans that were so successful and well accepted by all. Although this plans cost our landholder's considerable amounts of money, they were well received because everyone was brought along with the process. To follow a similar process would be highly recommended.
- MDBA have grossly underestimated the economic impact of taking water from the basin. They have made no attempt to calculate and understand the real flow on effects from irrigated agriculture. In the guide it was suggested by taking 3,000 gigalitres out of the basin, this would only result in the loss of 800 jobs and only 800,000 million dollars in gross production value, this is treating irrigated communities with contempt and illustrates how ill-informed the authority is. For example, in my farming enterprise (broad scale irrigated agriculture) during the drought my turnover went from 3.5 million to 1 million, if you multiply that out in our own local area the figures would far exceed the ones you suggest. The way your impacts were calculated on a basin wide basis was completely misleading and doesn't acknowledge the local and community impacts. If you were serious about assessing the impacts of the plan, we recommend you undertake socio economic surveys on a more

local and enterprise basis to get a true picture of how this plan will decimate some parts of rural Australia. In the guide it was suggested that any more than the 4,000 gl scenario, the impact would be too severe on the basin communities, what is the criteria and thresholds you have used to assess the “too severe” scenario? Was there any basis behind this suggestion and could you disclose and indicate to the community the jobs lost and economic impacts you considered. Once your criteria have been disclosed, we can then assess the true impacts to rural Australia and maybe identify a lesser quantity of water that would minimise the impacts in the basin.

- The science used by the MDBA is by its own admission is only of moderate accuracy. In the current world we live in where science plays a greater role in our lives and is also open to more scrutiny than it has ever been, due to the environmental movement. The science that has been used by the MDBA has been very selective and has not been scrutinised to the full extent. The plan suggests a flow regime as the only solution to the health of the basin; this is a very simplistic view and has no foundation in the modern era. We are in the 21st century and expect smarter solutions and a better understanding of the basin requirements from our government representatives. The authority has neglected to use some of the best scientist that they have available to them, that being local knowledge from the landholders and other stakeholders. Not once have the authority visited local regions to gain local knowledge from years and years of experience from our local landholders. For example the latest fish kills in the Wakool System, just highlights how computer models cannot predict these devastating events. The MDBA should not be allowed to develop a plan that has such profound impacts to basin communities using moderate science, we expect a far greater degree of accuracy than what has been used.
- All environmental assets should be assessed on their own merit. It is an obvious omission in the guide that the Lower Lakes and the Coorong have not been assessed on their own merits. The authority keep telling us this plan is not about putting water into the Lower Lakes rather it all the water that ends up in the bottom part of the system is a result of satisfying the environmental needs upstream. We all know this is not the case and it is about time the authority addressed this propaganda. Until this has been resolved, looking at minimising the losses in the Lower Lakes cannot be addressed. If our landholders ran their farms in this fashion there would be outrage, we are now some of the most efficient farmers in the world surely we can manage our environment in the same fashion.
- The MDBA has not justified in their basin plan the amounts of water required for the environment. Surely the starting point for any plan would be zero and then justify the amounts as it increases. This has not happened. The lack of a watering plan that would identify the requirements of environmental assets in the basin is a clear example of an ambit claim by the authority. The amount of water that is already apportioned to the environment has not been identified and assessed in the plan. We as an association have had all sorts of trouble trying to identify all these different parcels of water that is credited to the environment. Surely in any assessment of environmental needs, the existing environmental flows should be clearly displayed and identified in the basin plan. For example the Living Murray initiative was a program to help restore the health of the river therefore a lot of the icon sites have been addressed yet the authority failed to acknowledge these. The interim report from the parliamentary enquiry back in 2004 for the Living Murray suggested river health was in a far better state than was originally thought and even the 500 gl was not

warranted at the time. However politics took over and there was an assessment of 500 gl returned to the environment, surely our science has not changed that much.

- Farmers are responsible for 90% of the environment. Environmentalists come and go, trends do change but farmers are here for the long term. If you make it too difficult for farmers to operate in an economic manner, then their ability to undertake environmental initiatives on their farm will be restricted. The recent land and water management plan programs highlighted the relationship between profitability and environmental works. For example protecting native vegetation, watering wetlands. It is about time farmers were given the due credit they deserve.
- The potential flooding risk and delivery of environmental water have been understated in the guide. To get these vast amounts of water down the system that has natural chokes will result in third party impacts. There has been no thought in addressing the potential flood risk from environmental watering initiatives. The Commonwealth Environmental Water Holder will be playing with nature and will run the risk of compensation claims all over the basin. Our landholders have real fears about the deliverability of their entitlements when the natural chokes are running at capacity. What is the protocol for who gets the water in this situation? Would it be fair to say that a lot of environmental assets will be flooded more often than would naturally be the case to achieve these flows. For example Barmah Millewa Forest.
- Monitoring the effectiveness of the environmental initiatives. We need some indication of what environmental health really means. What are the criteria that will be used to assess this? When this has been achieved what is the next step and what will the excess water be used for? These are all questions that need to be undertaken in this process, until these are evaluated the plan will have no relevance.
- Bringing the state's water sharing plans back into uniformity. All states should be treated in a similar fashion throughout this process. To introduce these plans at different times will create an unfair burden on some states and is a recipe for disaster with future state relationships.

In summing up, we need an honest answer to the question; is there really any plan to try and make this area sustainable or has the decision already been made to sacrifice the area now?

Is there really a level of care that supports active and honest consultation, or is this just a process that needs to be ticked off?

Yours faithfully,

David May (Chairman)