



Better management of environmental water

Submission to the Water Reform Action Plan

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Southern Riverina Irrigators

SRI is a peak organisation providing advocacy for our membership comprised of five landholder associations representing irrigators operating within the footprint of Murray Irrigation Limited in the southern Riverina of NSW.

Formed in the 1960s, SRI now represents over 1,600 water users committed to producing food and fibre through environmentally and economically sustainable practices.

Our key principles are:

- We recognise the property rights of water entitlements
- Water reform must deliver against the “triple bottom line”.

Key industries

Our region is highly productive utilising water sourced from the NSW Murray above the Barmah Choke. Industries have developed to suit the highly variable water product that is predominant in the region. Despite seasonal variabilities, we continue to produce high quality crops sustainably and efficiently contributing significantly to the gross value of irrigated agricultural production.

Industry	2015-16 (\$M) (23% water allocation)	Average 2010-2016 (\$M)
Rice	\$26.5	\$105.3
Cereals	\$72	\$60.8
Other broadacre (inc cotton)	\$10	\$10
Dairy	\$112	\$99
Livestock	\$58	\$56

Source: ABS Gross Value of Irrigated Agricultural Production 2015-16, NSW Murray

Commitment to environment

Our irrigators operate in the environmentally significant Edward-Wakool Rivers region of the NSW Murray valley. The area is home to the three largest River Red-Gum Forests in Australia – the Barmah-Millewa, Koondrook-Perricoota and the Werai. It is also home to a large number of identified wetlands, most of which are located on private properties.

Our members have a long history of proactively working with Governments to identify and implement environmental solutions beginning in the early 1990s with the development of the Barmah-Millewa environmental allocation and installation of regulators within the forest. From 1995 to 2010 the region invested in the land and water management program taking a holistic approach to addressing issues such as rising water tables and soil salinity. Since the turn of the century the private property wetlands watering program has been successfully implemented across the district to improve environmental resilience, support bird breeding events and build native frog numbers including the endangered Southern Bell Frog. This program has now been expanded to include watering of ephemeral creeks and streams across the district. Most recently the Ricegrowers Association in conjunction with Birdlife Australia are working to protect the endangered Australasian Bittern.

Irrigators are committed to ensuring their farms and our region are sustainable into the future. We want to leave our land in better ecological condition for the next generations.

SRI is pleased to provide the following comments on the *Better management of environmental water* consultation paper for the Water Reform Action Plan.

The following comments are based on issues relevant to consumptive water users in the southern regulated Murray River system. While the paper predominantly focusses on the unregulated northern systems, if the policy recommendations are implemented across the State there are implications for other water users.

It is noted that the issues paper refers to held environmental water which is separate to planned environmental water and which is subject to the same rules and conditions as consumptive held water of the same entitlement type or class.

Principles based approach

1. No negative third-party impacts on water availability to a licence holder.

In 2016 the Department of Primary Industries – Water released an overview paper on the development of Water Resource Plans and listed the guiding principles for the process. The first principle was:

There will be no adverse impacts on water available to a water access licence holder.¹

Earlier, in 2013, the MDBA released a guide for the development of Water Resource Plans which including a range of position statements. Position Statement 1H dealt with the issue of potential changes to reliability which specified:

The Basin Plan does not require a change in the reliability of water allocations².

Any proposal to better manage environmental flows must be consistent with the principle to protect the accessibility and reliability of existing entitlements – regardless of ownership.

A key concern with the proposition to protect environmental water throughout the system is the potential impact on consumptive users via the loss of water that used to be re-socialised.

An example of this is the trial of environmental water reuse in the Murray whereby flows returning from the Barmah-Millewa Forest are reused for environmental watering actions downstream³. In the past, any flows exiting the forest were re-socialised into the water resource and could be used to meet downstream demand reducing the need for dam releases to do so. It is unclear what impact this has had on the overall water resource as there is no transparency around the trial or the models or calculations used to ascertain how much of the return flows is environmental as opposed to operational.

¹ Water Resource Plans – Overview, NSW Department of Primary Industries, November 2016.

² https://www.mdba.gov.au/sites/default/files/pubs/WRP-Position-Statement-1H-Changing-reliability_0.pdf

³ Edward-Wakool long term intervention monitoring project report 2015-16, CEWO, 2016, p19

<http://www.environment.gov.au/system/files/resources/51cd99ea-08bb-4b8e-bbcb-e01b4f707094/files/edward-wakool-ltim-annual-report-2015-16.pdf>

2. Environmental water must retain the characteristics of the entitlements acquired and cannot be given priority in terms of channel access or reliability.

A key component of the Basin Plan implementation has been the bi-partisan commitment to “bridging the gap” between baseline diversion limits and sustainable diversion limits. In practice, this has meant the Federal Government committed to acquiring entitlements to reduce water use through either buyback or efficiency measures. Since Basin Plan water recovery commenced in 2008, over 2,100GL worth of various entitlement types has been recovered.

To ensure the principle of no compulsory recovery is maintained, it is vital that the entitlements recovered have the same characteristics of entitlements of the same type/category. To change the rules that apply to the entitlement based on ownership risks undermining the integrity of modelling assumptions that are used to underpin WSPs.

It is therefore not appropriate to apply rules for held environmental water that do not equally apply to entitlements of the same type in the same WSP area. Therefore, a provision to protect flow share for environmental water must be equally applicable to consumptive water of the same entitlement type.

3. Environmental water must be prioritised for use in the region from whence it came.

Much of the consultation paper is based on the presumption that environmental water must be delivered to the end of the system, however, the Basin Plan identified local and shared water recovery targets. In the NSW Murray and Lower Darling the local target is 262GL and across the entire southern NSW system the shared target is a further 458GL. Conversely in the northern basin the unregulated Barwon-Darling has a local recovery target of 6GL while the shared target across the north (Qld and NSW) is 143GL.

SRI believes that reporting on environmental water use must clearly indicate the volume of water used for local targets and that being transferred downstream so the community can have faith that water that was recovered for local outcomes is actually being used locally and that any water being transferred is clearly identified and can be measured.

4. The use of environmental water must be measured to the same standards as consumptive water users or the method of measuring use and loss factors must be publicly available and reported against.

SRI members have had their water use metered in some manner since the Murray Irrigation districts were developed from the 1930s. Over the years, system accountability has been refined such that system losses are calculated, water use is measured, and operation of the irrigation network is reported publicly via the annual compliance report and through the ACCC and the bureau of meteorology.

On the other hand, the Commonwealth Environmental Water Office (CEWO), who are now the largest water holder in the Basin, do not have to deliver their water through an approved or compliant meter, do not have to report losses and do not have to report how much water reached the end of system.

Recently the MDBA and WaterNSW have been trialling return flows through the system (a method to enable environmental water to be quarantined throughout the system rather than re-regulated as with

other types of water)⁴. What is not clear or easily accessible are the calculations or assumptions made for use and losses along the way.

These assumptions must be made public and be reported against annually as is a requirement of all irrigation infrastructure operators to ensure the community can have faith that the water held is being used efficiently and responsibly with no adverse risk to third parties.

Conclusion

SRI is committed to sustainable and efficient farming practices that leave our land and environment in better condition for the next generation. We look forward to a future where our land owners can work with environmental water managers to maximise local outcomes for a triple bottom line.

⁴ <http://www.environment.nsw.gov.au/research-and-publications/publications-search/flow-management-in-the-southern-connected-basin>