



## The Goulburn Valley Environment Group Inc.

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### **Murray-Darling Basin Royal Commission**

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 from this context and our close engagement in the development of the Murray Darling Basin Plan that we offer the following comments as requested by the SA Murray-Darling Basin Royal Commission

**SDL Adjustment.** In many ways the implementation of the Basin Plan now relies on the achievement of 3 key elements of Chapter 7, the 605GL adjustment being considered, the 450GL Up-water component and Constraints Management. The 37 projects proposed for SDL adjustment, the 450GL efficiency volume and constraints management are reliant on each other to achieve the equivalent to the original 2750GL and are all equal components of SDL package, negotiated and agreed to by all states.

Unfortunately NSW and Victorian governments have actively opposed both the 450GL and the removal of constraints to delivering Environmental Flows (E- Flows).

The Goulburn Valley Environment Group (GVEG) has concerns with the 37 projects offsetting the 605GL as expressed by the Wentworth Group of Concerned Scientists. Most of these projects lack transparency, consultation, business plans, and appear to be based on “trust us; we will consult as projects are further developed”. As expected, given opposition to other elements of the SDL package this trust is wavering. Recovery of the 450GL Up-water has been challenged by vested interests sponsored socio economic reports including the Basin Plan GMID socio economic impact (Assessment Final Report 13 October 2016) and the Victorian Government’s recently released report Social and Economic impacts of the Basin Plan in Victoria.

GVEG has been highly critical of the quality and assumptions of these reports which fail to include the many beneficial elements of the Basin Plans’ introduction. GVEG position on these reports has effectively been endorsed by the recent EY report on the viability of the 450GL and a Marsden Jacobs report of on-farm efficiency projects in the Murray Irrigation District.

### ***SDL adjustment in the Northern Basin.***

GVEG has serious doubts relating to the Northern Basin Review, the modelling used, base flows allowed for, the unknown take of overland flows by diverters and actions such as the Barwon Darling WSP hurriedly introduced prior to the Basin Plan coming into effect. The replacement of E-flows with “toolkit measures” which simply

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advocate for the NSW government to comply with water reform agreements dating over almost 2 decades and Basin Plan undertakings over the past 6 years should not be contemplated. Many of these toolkit measures are considered best management practice and are therefore part of a social licence to divert resources.

### ***Constraint management strategies***

Constraint Management has, since being handed over to the States by the MDBA, stagnated with little if any progress. The Victorian “New Goulburn Project”, the first put forward by any of the States, fails to even supply out of bank flows, restricts flow level below minor flood level that in many river reaches are allowed for irrigation deliveries. Unfortunately Constraints Management has been politicised by the Victorian and NSW governments in an attempt to also walk away from the 450GL up-water in the Basin P

### ***Water recovery projects.***

GVEG has concerns with some on-farm water efficiency projects, believing that the best results were achieved were those managed by Catchment Management Authorities who had the ability to achieve multiple benefits by including regional socio economic outcomes. The introduction of commodity and commercial interests administering these projects undermined many of these benefits and introduced unacceptable risk of conflicts of interest.

A Marsden Jacobs review of on-farm efficiency projects in the Murrumbidgee Irrigation Area found that economic productivity was enhanced following these water saving programs.

GVEG has advocated, for over decade, for a reduction of the GMID irrigation footprint as a foundation principle of Goulburn Murray Waters’ \$2b Connections Program. GVEG believe the Connection Program has failed spectacularly to optimise the reduction and modernisation of the GMID.

GVEG position has been vindicated by Goulburn-Murray Water Review (Jan 2018) Strategic Advisory Panel that detailed are serious concerns about GMW’s long-term future viability.

This Review detailed that recent analysis of meter usage and channel data showed that 80 per cent of GMW’s channels delivered less than 500 ML during the 2017 irrigation season, and accounted for only 18% of total deliveries. A third of these channels delivered less than 50ML. In contrast, 20 percent of channels delivered 500 ML or more during the season. These 20% of channels accounted for more than 82% of total deliveries in 2017.<sup>1</sup>

In addition to the Connection Programs’ lack of commitment to reducing the irrigation footprint it has had no regard to for the efficient deployment of energy across GMW or customer assets leading to a greater impost on irrigators in the medium to long term. The replacement of gravity irrigation assets with electrical asset in most cases will lead to higher costs and a more vulnerable irrigation system

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## ***Structural Adjustment***

More assistance should have been provided in the Basin Plan to adversely impacted industries and communities. This would have allowed for a smoother transition during the implementation phase and provided a genuine platform for new industries and technologies to be taken up by communities and industries. The lack of assistance has created uncertainty about the future which has in turn created some resentment towards the Basin Plan. It is not too late to address some of these inequities

### ***WRP's***

GVEG is involved in Victoria's Northern WRP. The complexity, the technical nature of documentation and the volumes of information make it very difficult for volunteer community based organisations such as GVEG to be involved.

Provision should be made for National and State peak environmental organisations to be part of this process.

Given past experience with examples such as the 2012 Barwon-Darling WSP highlight issues with the MDBA assessment and accreditation process by the MDBA are a concern for GVEG

## ***Environmental watering planning and delivery***

GVEG plays a role in Northern Victorian annual watering plans through the Goulburn Broken Catchment Management Authority (GBCMA).

It is unlikely that Prerequisite Policy Measures (PPMs) assumed to exist under the Basin Plan will be in place by the target date of 30 June 2019.

Whilst shepherding and accounting of environmental water is in existence in much of the Southern Basin there has little or no progress in the Northern Basin.

It is disappointing that the release of environmental water to complement natural and irrigation flow events appears to be included in the **SDL adjustment Hydro-Cues project**. GVEG believe these 'savings' are no more than Best Management Practices (BMP) and should not be included to reduce the volume of environmental water in the Plan.

GVEG has concerns that complimentary works have been include in the Northern basin 'Toolkit' of measures to offset water delivered to the environment. Many of these measures are BMP's and part of the irrigation industry's social licence to operate.

It has been pleasing to see the MDBA beginning to question and pressure practices like Wake-boarding on the Murray and the CEWH's approach to the Victorian Government's regarding the removal feral horse in the Barmah National Park.

## ***Risks of meeting human needs***

It would appear that human needs have insufficient priority on the Darling River and tributaries.

The definitions of "human needs" should include cultural flows and sufficient flows to ensure the social wellbeing of communities, and not confined the drinking supplies

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## ***Monitoring and compliance***

Compliance is a threat to the creditability of the MDBA and the Basin Plan. Water meters should be a condition of supply. No meter no licence. The MDBA needs to a much stronger role in compliance and enforcement.

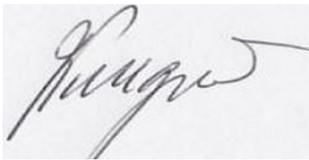
## ***Water trading***

The increased trading of water downstream in the Southern basin is not sustainable. The delivery of these entitlements are putting at risk current delivery standards and damaging upstream rivers with unseasonal high flows. Water trading in the Southern Basin should be reviewed.

## ***MDBA Board***

GVEG has concerns with the balance of the MDBA Board. Over recent year's politically influenced appointments to the Board have favoured irrigation interests at the expense of a balanced ability based Board. MDBA Community Consultation Committee is also heavily irrigator biased with little representation from environmental interests.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Pettigrew', written on a light-colored background.

John Pettigrew  
GVEG President.