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Guide to the Proposed Basin Plan – Volume 1

The Kiewa branch of the Victorian Farmers Federation has major concerns over the content within the **Guide to the proposed plan – Volume 1**. We are very disturbed at the apparent lack of understanding relating to the potential social and economic impact to our region if the plan is adopted in any of the 3 proposed scenarios.

- The Guide acknowledges the high flows from the Kiewa River system; however it does not address the massive socio-economic impact of the proposed Sustainable Diversion Limits (SDLs). The Authority doesn't recognize the social and economic impact on Primary Production, dairy manufacturing plants and the wider community by reducing employment opportunities which will affect our schools, sporting clubs and local government's ability to fund our social needs. To put the environment ahead of the social and economic needs in terms of priority only weakens the opportunities available for the environment long term. The environment requires the presence of a robust economy and a strong social system in order to be maintained and improved.
- The Guide also acknowledges the high outflows from the catchment within its tables but fails to recognize the catastrophic impact on the region through the proposals. The large impact would be created due to the proportionally small amount of diversions utilised for irrigation. This would be the only area that reductions can be looked at to meet the proposed SDLs within the Guide. The 4000 GL scenario in the guide states that through a reduction in surface water diversion only, this would bring about a 45% loss of entitlements, given the probability that urban water entitlements wouldn't be available for purchase this figure is more likely to be closer to a 60% reduction in entitlements.
- The models and/or formulas used by "science" fail to provide an equitable outcome when determining SDLs. It appears perverse when you have a healthy river system providing 98% of its flows to the Murray, recommended to have the highest cut to diversions in the entire basin. Licensed irrigation on the Kiewa system is an incredibly small amount in relation to the amount of water provided to the environment, due to the nature of growing feed in rain based agriculture. There is a failure to acknowledge existing efficiencies of irrigators in

regions where agriculture is predominately grown in high rainfall areas. It is much more efficient to use irrigation water closer to its source. Data dating back to 1950 demonstrates the efficiency of our region, the average water use for irrigated pasture in the Kiewa Valley is 4.9 ML/Ha, compared to Kerang 8.6ML/Ha, and Mildura 11.7ML/Ha.

- Our River catchments have in recent years suffered from disastrous bushfires; these events have had serious implications for our communities and water supplies. Pockets of “green” irrigation provide Neighbourhood “safer places” in the event of a wild fire for the community, individual farmers and stock and can help restrict the spread of a fire. The only environmental information in the Guide was a study done in 2006 after the Tawonga Gap fires. From 2002-2007 five considered reports and guides have been presented for the catchment, it appears none of these have been recognized by the basin authority.
- The Kiewa system is primarily unregulated. Operating on trigger levels and flow rates with reductions in extractions based on river flows firstly, then on individual entitlements. The irrigation water that is not used in the Kiewa Valley is passed on to the environment, as there is no storage capacity dedicated for irrigation carryover.
- Sharing the low flows during times of stress is more important to a healthy river environment than having large volumes of water simply provided to the environment. Targeting SDLs does not address when the water should be provided or how it will be managed.
- Our region represents less than 1% of the area of the MDB, but is enormously resourceful in that it provides over 98% of its flows to the environment through outflows to the Murray River. The North East Catchment is 2% of the MDB area and provides 38% of the total flows, it is our concern that the importance of this pristine flow to the Murray River system is not recognized and therefore not valued appropriately.
- The Guide, in its current form, will be a major disincentive for any new development in the valley.
- The history list does not include the increase in the size of the Hume Dam, which involved moving the township of Tallangatta, another example of the lack of local knowledge.
- In the Kiewa system, we have very real concerns over the “voluntary” buy back when a minimum reduction in diversions of 40% is being targeted. The Authority needs to explain how water will be recovered if there are insufficient “willing” sellers?
- We ask that the Authority promotes investment in irrigation infrastructure as the preferred option to secure water for the environment.
- The Guide does not address equity issues. Recommending major reductions to a relatively small number of extractions from a large outflow system is not justified by the guide. This lack of justification is even more poignant given that the Guide at the same time acknowledges the healthy state of the Kiewa system.
- The reliability of our water has been instrumental for our farm businesses to grow and help provide surety of employment as well as ongoing support for our local businesses and communities.
- High interceptions due to the natural topography of the region appear not to be taken into account when developing the SDLs. It appears that all the “grief” will be worn by licenced diversions. The Water security statements made (pages 178,179) within the Guide cannot be accepted and are contradictory to the SDL recommendations when applied to our regions.

- A critical factor that seems to have been ignored is that the irrigation facilities in this valley have been funded entirely by our primary producers. Our farmers have not received 1\$ of the NVIRP to date, this seems ironic, as the water use efficiency in our valley is far greater than the irrigation conducted downstream. The Kiewa Valley should be developed and fostered not retarded, to utilise the minimal losses through evaporation and seepage that the catchment benefits from as a result of being in a high rainfall area.
- People in the Kiewa valley are very environmentally aware, this can be highlighted by the retention of Remnant River Red Gums on the flood plain where primary producers have been working with the North East Catchment Authorities to also fence the rivers and streams and plant thousands of trees, remove willows, studying and spreading a variety of dung beetles and more to ensure we maintain a high quality of water for our valley communities and the environment. The good quality of the water in the Kiewa River is the result of a large outlay of money and effort by the authorities, farmers and individuals.
- The Kiewa valley community understands the importance of sustainability in all the water systems but cannot understand how environment systems along the whole Murray System do not have to manage and measure water use efficiencies in the same way farmers and communities are expected to. There needs to be rules that govern and foster a more efficient use of the water that is allocated to the environment, and the environment must pay its way with respect to infrastructure costs. The authority must take early action to scope a program of works and measures to achieve innovative solutions to reduce the volume of water required to achieve environmental benefits/outcomes.
- We feel the former Authority Chair Michael Taylor; together with the other members of the MDBA have been restricted by their initial advice on the interpretation of the legislation in the Commonwealth Water Act 2007. It is now the responsibility of governments, both Federal and State to review the legislation to ensure all rural stakeholders and communities are recognised and the environment is only one of the future needs of our society.
- It is wrong for the authority to suggest that a reduction in current diversions at the 3000-4000GL/year may result in dairy actually expanding from current levels of production compared with recent droughts.
- If there is no water in the system due to severe drought, buying or acquiring 3000 - 4000 GL of water entitlement will not produce any water, this is what appears to have happened over the last few years.
- We consider that the “environment” should be a much more embracing term than only the **quantity** of water that reaches the extremities of the Murray River, we therefore come to the conclusion that for the purpose of the plan, that appears to be the highest, or only priority.
- The Guide concentrates more on end flow outcomes for the Murray Darling Basin (MDB) without consideration for what the catchments are already providing to the overall system.
- Figure 6.1 Floodplain map shows no inundation for the Kiewa River, despite the fact that it has been constantly on the news for the last few months as one of the few rivers with minor to major flooding.
- Are Sleeper and Dozer entitlements being counted in the plan as watercourse diversions?
- The Guide reminds us of our obligations under international law to protect the 16 Ramsar listed wetlands. Does the Commonwealth government need to be reminded of its

obligations to protect the people and communities of the basin, by maintaining a robust economy and to place a high value on the 40% of National agricultural production that is generated within the MDB?

Yours faithfully

Donald Crosthwaite

President

Supporting Signatures:
