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SUBMISSION TO THE HOUSE OF REPRESENTATIVES
STANDING COMMITTEE ON REGIONAL AUSTRALIA
ON
THE INQUIRY INTO CERTAIN MATTERS RELATING TO THE
PROPOSED MURRAY-DARLING BASIN PLAN

SUBMISSION DUE BY FRIDAY JUNE 15TH 2012

Prepared by

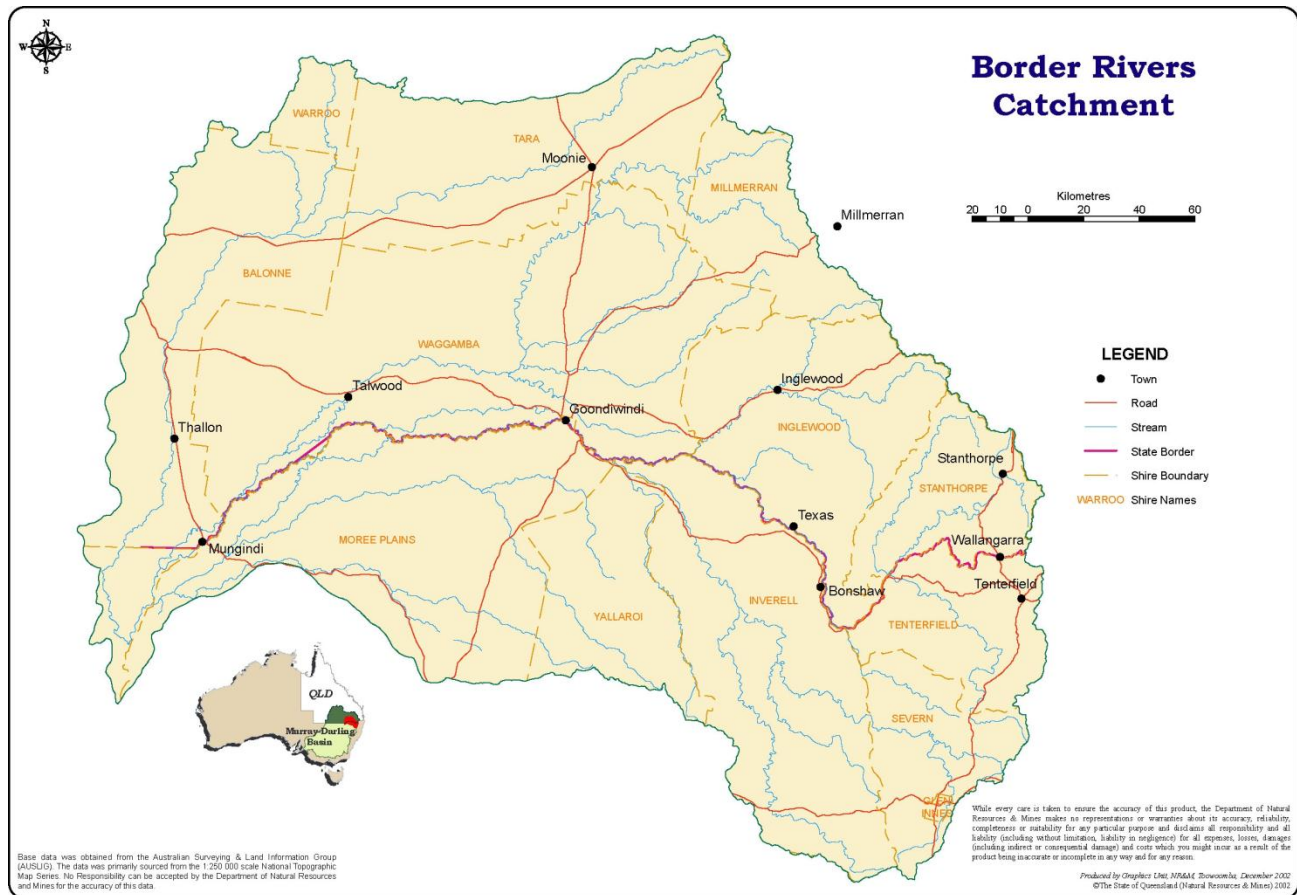
TIM NAPIER

EXECUTIVE OFFICER

AFFILIATES: BOOMI-GNOURA GNOURA WATER USERS ASSOCIATION; DUMARESQ VALLEY IRRIGATORS ASSOCIATION; EASTERN RECHARGE GROUNDWATER USERS ASSOCIATION; LOWER WEIR RIVER WATER USERS ASSOCIATION; MACINTYRE BROOK IRRIGATORS ASSOCIATION; MACINTYRE RIVER BASIN WATER USERS ASSOCIATION; MACINTYRE VALLEY COTTON GROWERS ASSOCIATION; MOLE & SOVEREIGN WATER USERS ASSOCIATION; MUNGINDI WATER USERS & COTTON GROWERS ASSOCIATION; PINDARI WATER USERS ASSOCIATION; UPPER WEIR RIVER & TRIBUTARIES WATER USERS ASSOCIATION

INTRODUCTION

Border Rivers Food and Fibre (BRFF) represents the water users and entitlement-holders of the Border Rivers region of southern Queensland and northern New South Wales. These water-users responsibly utilise the water resources of the Macintyre Brook, the Dumaresq, Macintyre, Severn, Weir and Barwon River systems and the Eastern Recharge Zone of the Great Artesian Basin. Production from irrigated agriculture includes vegetables, herbs, stone-fruit, hay, cereals, coarse grains and cotton. Its contribution to the local economy exceeds \$500 million (farm gate) in average years.



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GENERAL COMMENTS

BRFF submits that there is no justifiable reason for any further water to be removed from productive use in this valley. The claim for any additional water is invalid, and the prior environmental benefits of the current State plans are not taken into account.

The Proposed Basin Plan is a 'blunt instrument' in that it only has a single factor that it controls that impacts on environmental condition and that is water flows.

The Basin Plan must be a socially and environmentally responsible plan that directs how sustainability will be achieved. For a truly sustainable state of the Basin to be achieved, a far more comprehensive and wide-ranging environmental plan is required, and this does not appear to be the intent of the Basin Plan in its current form. Factors such as flow management for improved distribution of flows, land management practices, and natural resource management projects should all form part of the Basin Plan and not just simplistic water volumes. All these measures are fundamental in holistically managing the environment of the Basin and can influence the health outcomes either in place of or in addition to, simple water volumes owned.

A balanced Basin Plan process has far broader requirements and more enduring impacts than a water and environment plan can effectively provide. Communities expect active management of natural resources to be employed and investments made in works to achieve the best possible outcomes for the environment, but they also expect their social and economic considerations to be taken seriously by government and effectively planned-for and resourced.

We in the Border Rivers have a long history of prudent and conservative management of our water resources. The Sustainable Rivers Audit (2008) found the Border Rivers to be the healthiest working river in the entire basin and yet we are still targeted for water recovery. There is no good reason why our community should be penalised for doing the right thing all the way along. We avoided the extremes of over-allocation seen elsewhere, we have adapted our production systems to suit our variable supply realities, we have been responsible stewards of our natural environmental assets and have been constructive participants in the water reform process for more than 15 years. We have just experienced a substantial cut to our access to water through the state planning processes and we now are faced with an additional cut despite there being no scientific justification provided for it.

There is no good reason to make cuts for our local environmental requirements as they are already sustainable.

There is no reason for us to forgo further water for downstream requirements as there is already more than enough provision for that built into current state plans.

1. Progress to date in water recovery towards bridging the gap by 2019 through both irrigation infrastructure investments and water purchase.

We firmly believe that the Commonwealth is buying the wrong type of water for its purposes in the northern basin and the Border Rivers in particular. To date, the Commonwealth has targeted regulated, General Security-type water entitlements, that is, water that is held in a dam and released on demand for delivery downstream. While this scenario is practical for the highly regulated southern connected system, the reality in the northern basin is very different. Firstly, the comparatively small size of headwater storages limits the amount that can be stored and more importantly, the release capacities for these storages is also very small. Of the two dams in the Border Rivers system, Pindari and Glenlyon dams, their combined release capacity is approximately 5GL/day and 2GL/day respectively. The system operators work on average 50% loss factor for deliveries to the bottom of the system, on a wet river, so only half of the water released will make it to the end of the regulated system. This leaves little for any further beneficial environmental use downstream in the Barwon Darling. Given the price paid for regulated entitlement to date (\$2276/ML) this makes it an extremely expensive exercise with little of value that can be achieved with 3.5GL/day flows in the Barwon-Darling system.

BRFF submits that the Commonwealth will be far better off, in practical terms, to own **unregulated** entitlements and to leave their additional water in the river when it runs, as the physical capacity does not exist to adequately manage releases to service environmental requirements with regulated water. In terms of environmental outcomes achieved per dollar paid for water, the cost-benefit equation will be inefficient in the extreme. Even with shepherding provisions in place, this will be an extremely poor use of government resources given the outcomes apparently being sought.

The option of temporary water for environmental use has yet to be adequately canvassed as a realistic option, as it shows promise especially in terms of outcomes achieved for dollars spent.

2. The potential role that new environmental works and measures projects could play in partially offsetting SDL reductions under the Basin Plan, focussing particularly on prospective project proposals identified by state governments and community interests.

The big works and measures projects must be completed before more water is taken out of productive use. In the northern Basin the standout project is Menindee Lakes Storages. The long-standing profligate management of these storages is an indictment on all governments who have allowed this situation to continue unchanged for so long. This has the potential to make massive water savings that must be shared between northern and southern systems in order to reduce the overall water recovery requirement. It would be richly symbolic if governments could make good

on their old promises of addressing the institutionalised inefficiencies BEFORE severely impacting regional communities by requiring further water recovery to take place.

There are additional smaller projects that can be utilised for smaller gains, such as

There remains the ability for the water recovery to be done in such a way that it minimises the social and economic damage that will occur with the permanent removal of productive capacity in a region. This must occur if a triple-bottom-line outcome is to be achieved in any real sense. It would appear to be illogical if any government were to not try and minimise the collateral damage caused by the environmental intentions of the Basin Plan and Water Act.

If any efficiencies can be made in the results that can be achieved with the stated volumes then an off-set must be credited to reduce the recovery volume. But to view this as purely an exercise in off-setting SDL's is to miss the point of the Basin Plan. Environmental outcomes must be achieved and the numbers are largely irrelevant, especially in the northern basin, as the volumes will vary hugely depending on seasonal conditions. The Basin Plan must reflect outcomes, not numbers.

See Appendix 1 – Works and Measures

3. The groundwater sustainable diversion limits (SDLs) for Basin in the revised proposed Basin Plan

Not Applicable to BRFF.

SUBMISSION TO THE
NEW SOUTH WALES OFFICE OF WATER
ON
ENVIRONMENTAL WORKS AND MEASURES

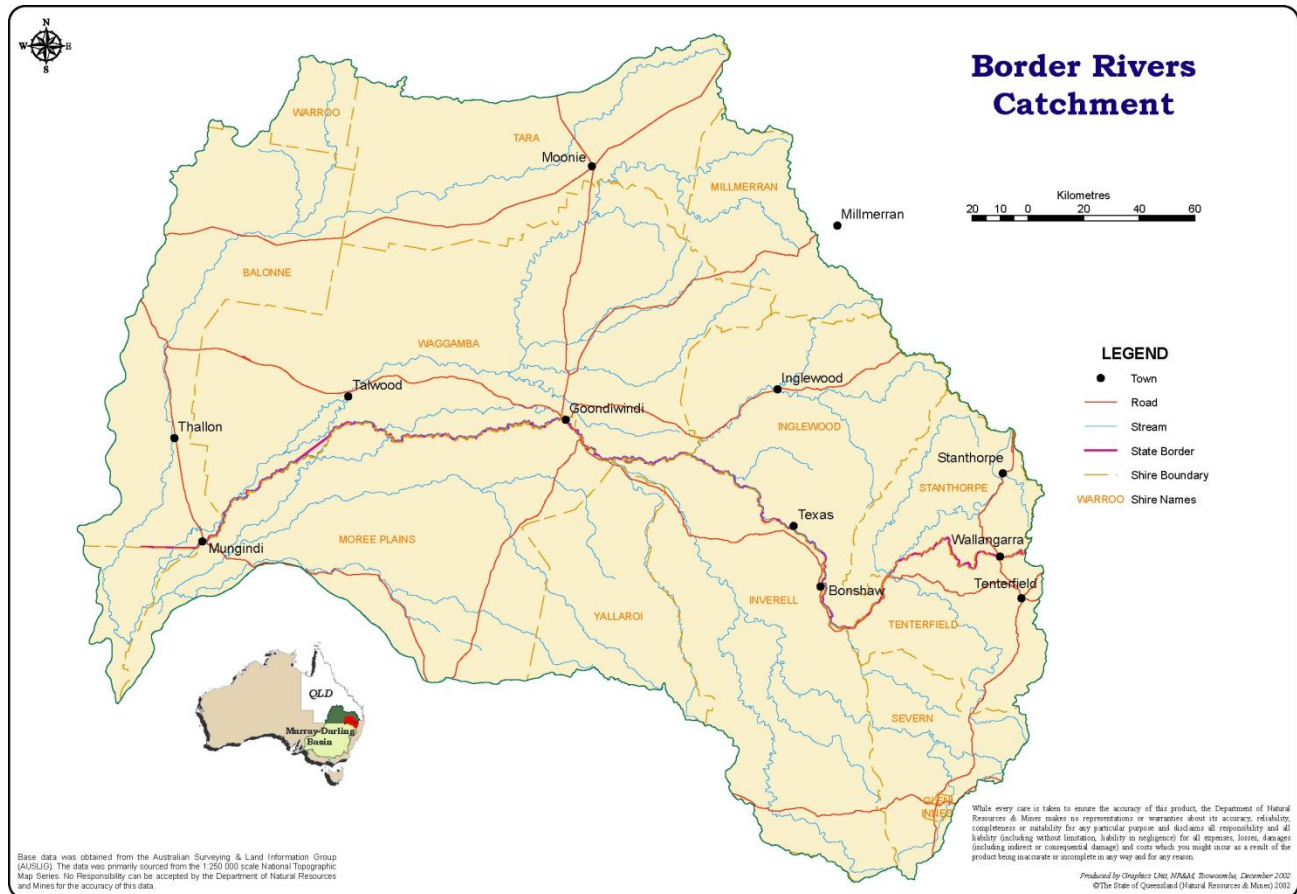
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Border Rivers Food and Fibre was formed in 1995 to coordinate and represent the views of the water-users in the state water reforms that commenced at that time and have been ongoing ever since. The organisation is funded entirely from voluntary subscriptions from its members. It receives no public funding whatsoever.

The organisation is considered a trusted and constructive stakeholder group that is valued by local, state and Federal governments for its input into water, natural resource management and local social and economic issues.

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GENERAL COMMENTS

The works and measures are a greatly under-rated component of potential improvements to water management across the Murray Darling Basin and in the Border Rivers in particular. Indeed, the combination of twenty first century engineering, well integrated operating procedures and intelligent, thoughtful management could completely negate the requirements for water to be recovered from productive use to be reappropriated for exclusive use for the environment. This potentially heads-off the catastrophic downsides of the water recovery process and preserves local rural and regional communities and potentially reinvigorate many of them. If a balanced, triple-bottom-line approach is taken to the planning and implementation of the additional, non-water solutions from the outset, then there is a far greater likelihood of some real win-win outcomes being achieved.

These proposed works, measures and management ideas provide for a far more sophisticated and broadly encompassing set of solutions than the crudely simplistic ‘just add water’ approach advocated by the Murray Darling Basin Authority to date. These projects should be viewed for their value in addressing the real-world situation, recognising that existing communities and industries are part of the landscape and cannot be ignored, and hold tremendous value for the region, the state and the country as a whole. These solutions are intended to address all three elements of the problem: environmental, economic and social, not just the individual elements in isolation. There will be trade-offs required between some elements to achieve long-term success, but if these are handled well they can be managed.

We recognise that some of these suggestions may fall outside the strict interpretation of the Guidelines for this submission, but we submit them anyway to inform the broader process and to remain consistent in dealing fully and frankly with government and its agencies.

We submit that individual works and measures will have discreet benefits, but that they must be considered as part of the larger overall range of management options. The combination of a number of these options could achieve greater benefits than the sum of the individual elements, if managed accordingly.

The increase in knowledge about the functions and services of our natural environment will help in achieving win-win solutions so that the improvement in environmental capital does not have to come at the expense of existing social and economic capital, and all three can be achieved.

The Environmental Water Plans that are expected to be drawn up from local groups cooperating with State agencies will come up with new locally targeted ideas that must then be picked up by both the Commonwealth and State governments as needs require it. We consider this submission the first steps in an ongoing series of consultation on these matters.

Storage Works

The building of dams in the headwaters has long been seen as a stimulant to economic growth in regional areas. The wealth that has been created for the regions, the state and the country as a whole has been a cornerstone of regional development for a century or more, and our modern Australian society would not exist without the benefits that the building of such infrastructure has provided. These dams have sometimes come with an environmental cost, which has not been fully appreciated until well after the event. The technology and management capability now exists to offset many of those negative impacts caused by dam construction in the past and expect that any such projects would be done with these broad outcomes in mind.

Regulating Works

These are intended to improve the management capacity and options available to the river operators, for improved efficiencies for both productive and environmental water.

Management

None of the infrastructure investments will be worth a cracker unless they are part of an integrated management plan that is focussed on delivering triple-bottom-line outcomes. The management of the outcomes of the Basin Plan, the implementation of which this submission seeks to inform, will need to constantly have the balance equation in mind. All negative impacts must be identified and avoided at all reasonable cost, or at the very least, effectively mitigated or compensated for. To the greatest extent possible, cost-benefit analyses must be carried out for implementation measures.

Use of Existing Storage Structures

1. What is the catchment and water source where the proposal would be implemented?

All MDB streams

2. What is the objective of the proposal?

Use existing on-farm storage structures for the storage and subsequent release of environmental water. The works requirement is for structures that would enable the discharge of the CEWH water out of the structures and back into the streams. This allows for complimentary use of existing structures, saving on transmission losses involved with headwater storage for downstream use

3. Describe the proposal.

With the sale of productive water to the Commonwealth for exclusively environmental use, this has created a surplus of storage capacity in the downstream reaches of the river. We propose that this storage capacity could be utilised for the storage of CEW water that could be the subject of an agreement struck between the CEWH and the owner of the structure. With the provision of discharge infrastructure, this would increase the capacity of storage and ability to capture unregulated flows for the CEWH, thereby increasing their capacity to service environmental requirements.

Discharge Structures: These structures could take the form of large capacity over-bank syphons or in some installations, the modification of existing pipework and valves to allow for the discharge of water back into the stream. Overbank syphons could be used in multiples on the one structure to enable higher volume release capacity and could be easily moved if required.

4. Could the proposal achieve its objective using current technology?

Yes, overbank syphons have been in common use for a long time.

5. How much water could the proposal potentially save?

The savings lie in the avoiding transmission losses over the several hundred kilometres of river between the dams and lower parts of the catchment. Overall volumes saved would depend on the degree to which the option was used, but the **volumes saved per dollar invested** in this option would be significant.

6. What is the estimated cost of the proposal?

Overbank syphon est. \$20,000 each, depending on specification

Modification existing pipework est. \$40,000 per install

7. Has the viability of the proposal been previously assessed?

This concept was used in the Lower Balonne in the floods of 2010(?) when water was purchased from an irrigator who was already storing it in his on farm structure. The water was released from the storage back into the river after an agreement was struck between the CEWH and the storage owner, for use in extending the flooding of a downstream wetland, which in turn allowed for a successful completion of a breeding event of waterbirds, which would otherwise have failed.

I am not aware of the specifics of the discharge structures in this example.

8. If the proposal relates to an environmental objective, is this objective consistent with a stated Basin Plan objective?

Increasing the capacity for the Commonwealth to service environmental requirements without having to buy permanent entitlements, instead buying real water when it exists.

Comments

Assuming suitable arrangements could be made with relevant authorities this could provide an additional option for both CEWH and storage owners. It is also an additional opportunity for water-users to bring in some handy cash-flow through the temporary purchase of his water, in a dry time.

This could be part of other solutions involving use of temporary traded water.

REGULATING WORKS

Mid-System Re-Regulating Structures

1. What is the catchment and water source where the proposal would be implemented?

Macintyre and Barwon Rivers

2. What is the objective of the proposal?

Make delivery of water to downstream users, especially environmental requirements, far more efficient by reducing losses associated with long (21 day) delivery times between storage and delivery point. Additional benefit of managing flows to create fresh flows using existing water as well as water owned by the Commonwealth for exclusively environmental use.

3. Describe the proposal.

Installation of re-regulating structures at Boomi and at Mungindi, capable of storing minimum of 10GL that can be used to deliver orders from when required, to save on losses involved with ordering and releasing from Pindari or Glenlyon Dams.

4. Could the proposal achieve its objective using current technology?

Yes

5. How much water could the proposal potentially save?

Significant savings possible with reductions in transmission losses and consequent improvements in delivery efficiencies including for environmental deliveries

6. What is the estimated cost of the proposal?

Unknown (\$10 mill each?)

7. Has the viability of the proposal been previously assessed?

I believe that State Water have done some assessment on this proposal already

8. If the proposal relates to an environmental objective, is this objective consistent with a stated Basin Plan objective?

Makes savings in delivery transmission losses that could then be used for environmental entitlements.

Increase the physical capacity of the system to service environmental requirements.

Comments

It is anticipated that the design would need to incorporate sufficient release capacity to create 'fresh' flows to create and augment the environmental outcomes possible from the passage of all types of water, not just Commonwealth water. These flows have been targeted as the most deficient in the Border Rivers and parts of the Barwon Darling and could be achieved using existing flows, avoiding the need for any buyback of permanent entitlements. They will also assist in increasing the effectiveness of releases of CEWH water.

It is also expected that the design incorporates modern fish-passage elements to aid the translucency of the new infrastructure.

Review of Existing Structures

1. What is the catchment and water source where the proposal would be implemented?

Macintyre and Barwon Rivers and all other MDB streams

2. What is the objective of the proposal?

Utilise, where possible, the existing in-stream structures (weirs) to manage for positive environmental outcomes, or remove those with negative environmental outcomes, where that is not already occurring. This goes beyond simple water regulation and extends into proactive management of the assets associated with given weir structures and pools.

3. Describe the proposal.

Review the status of all existing in-stream structures to ascertain their impact: positive or negative, on current water management requirements, including environmental use. Where found to be no longer appropriate, redundant or of poor design, structures could be re-tasked, modified or even removed to assist with management of water for environmental purposes. Simple modifications will be the incorporation of fish passages, or the removal of redundant infrastructure that has negative environmental impacts.

This should be a broad investigation of all structures in and across streams, including causeways, roads, culverts and stock-watering structures.

4. Could the proposal achieve its objective using current technology?

Yes

5. How much water could the proposal potentially save?

The benefits of these measures are less to save volumes of water and more to improve environmental outcomes for the existing water available.

6. What is the estimated cost of the proposal?

Will vary between cases.

7. Has the viability of the proposal been previously assessed?

Not that we are aware of.

8. If the proposal relates to an environmental objective, is this objective consistent with a stated Basin Plan objective?

The true value in this option is to reduce or avoid altogether the need for water in productive use to be recovered (bought back) to service these environmental requirements. The measure of success of these projects will be in jobs saved as well as environmental assets preserved and improved.

Comments

Install fish passages where none exist, remove structures that no longer serve any environmental or regulation purpose.

Some structures could be used to assist in the redirection of water to create artificial overland flows from much lower volumes than required for an overbank flow. They could even be used as pump pools where water is to be pumped out of the river onto the floodplain for environmental use.

Ideally, all structures would become 'smart' where their function (storage and release) could be managed for many purposes, by modifying existing 'dumb' structures which cannot be managed easily.

Management of remnant weir-pools in drought periods to preserve aquatic species and to eliminate pest species, if managed deliberately to achieve long-term improvements.

Temporary Structures

1. What is the catchment and water source where the proposal would be implemented?

All northern Darling streams

2. What is the objective of the proposal?

Create artificial overland flows by utilising temporary structures in-stream. This allows the ability to create 'pulse-flows' or direct volumes of water onto floodplains when flows are at much lower volumes than naturally required for over-bank flows, creating a positive environmental outcome where one would otherwise not be possible.

3. Describe the proposal.

Installation of temporary re-regulating structures at strategic points along the Darling system. These sites may include the existing structures mentioned previously that may require more height in order to direct flows into overland areas for environmental deliveries.

4. Could the proposal achieve its objective using current technology?

Yes

5. How much water could the proposal potentially save?

Rather than volumes saved, significant environmental benefits could be achieved, especially in drought times, from the strategic management of small flows that these temporary structures could provide. The improved environmental outcomes would reduce the need for water to be recovered from productive use to begin with especially in already healthy areas such as the Border Rivers.

6. What is the estimated cost of the proposal?

Unknown, will vary from site to site.

7. Has the viability of the proposal been previously assessed?

Not that we are aware of, though there are anecdotes of temporary structures having been used in trunk-streams previously

8. If the proposal relates to an environmental objective, is this objective consistent with a stated Basin Plan objective?

Increase the physical capacity of the system to service environmental requirements with existing volumes of water. The true value in this option is to reduce or avoid altogether the need for water in productive use to be recovered (bought back) to service these environmental requirements. The measure of success of these projects will be in jobs saved as well as environmental assets preserved and improved.

Comments

These temporary structures will allow for water to be managed to be able to produce small 'fresh' flows, which have been targeted as the most deficient in the Border Rivers and parts of the Barwon Darling, and in some situations creation of artificial overland flows with The theory behind this idea is to store part of normal river flows in the short term for rapid release of large volumes of the stored water. The design would need to incorporate sufficient release capacity to create 'fresh' flows to create and augment the environmental outcomes possible from the passage of all types of water, not just Commonwealth water. Fish passage would not need to be incorporated as structure would be removed and relocated along the river to

Use of Temporary Traded Water

1. What is the catchment and water source where the proposal would be implemented?

All northern MDB streams

2. What is the objective of the proposal?

Achieve far greater value for investment of Commonwealth money by using temporary traded water instead of buying permanent entitlements.

3. Describe the proposal.

Use of this water would be on a project basis, meaning that a strategic purpose would be identified prior to the purchase of the water, so that management of that water would be more closely monitored and managed. Use of temporary traded water would reduce or eliminate the need for permanent entitlements to be purchased from productive users, especially in already healthy areas such as the Border Rivers.

4. Could the proposal achieve its objective using current technology?

Yes, but would need a change in thinking by CEWH.

5. How much water could the proposal potentially save?

Significant savings possible with reductions in transmission losses and consequent improvements in delivery efficiencies including for environmental deliveries

6. What is the estimated cost of the proposal?

The value in owning permanent entitlements with 40% yield at \$2500/ML of entitlement makes very poor economic sense in the northern parts of the basin. Far greater value will be achieved in terms of environmental benefits per dollar spent by purchasing real 'wet' water when it is available, rather than owning lots of 'paper water' in the middle of a drought and having no real water to utilise.

7. Has the viability of the proposal been previously assessed?

Not that we are aware of.

8. If the proposal relates to an environmental objective, is this objective consistent with a stated Basin Plan objective?

Achieving a far greater value for money in terms of the environmental outcomes achieved and doing this without having to recover permanent entitlements from productive users. This creates a win-win solution possible instead of the win-lose scenario that happens with the buyback process, where social and economic elements of rural and regional communities are severely impacted, permanently.

Comments

This is a common-sense measure that must be insisted upon by state governments. The precedent for this is the same as the Existing Storages above. By ensuring that water purchases are carried out with a specific and pre-planned environmental purpose in mind, the social and economic impacts are largely avoided and limited to the occasions when they occur, not permanently. It also provides for some handy cash-flow for the seller with that money more likely to be used for local economic purposes instead of the buyback money going purely to retire debt, as has proved the case. This option is particularly well suited to the Border Rivers where base-flow requirements are far less than the southern connected system.

It also works well with the use of existing on-farm storages downstream, achieving specific goals with minimum investment in both water and storage capacity.

The purchase for a specific purpose creates a priority on the water being managed for strategic environmental purposes, instead of just contributing to a 'number' such as the SDL's.

Reticulation Schemes for Stock and Domestic Water

1. What is the catchment and water source where the proposal would be implemented?

Border Rivers and all northern basin streams.

2. What is the objective of the proposal?

To pump and pipe all water for stock and domestic use and exclude all livestock access to rivers and streams.

3. Describe the proposal.

Move stock and domestic water supply from the 18th century to the 21st century by mandating the exclusion of stock access to rivers and streams in the northern basin and requiring that water be reticulated to watering points away from the streams.. **This must apply specifically to all areas where Commonwealth water is applied** for environmental benefit.

4. Could the proposal achieve its objective using current technology?

Yes

5. How much water could the proposal potentially save?

Again the value in this concept is in the improved environmental outcomes from complimentary measures in addition to the reappropriation of productive water.

6. What is the estimated cost of the proposal?

Unknown, scheme specific. Much has already been achieved through the Cap and Pipe scheme applying to bore-drains. This is exactly the same concept, only the resource we are trying to protect is the river rather than an aquifer. Anticipate similar cost-benefit values to apply.

7. Has the viability of the proposal been previously assessed?

Not that we are aware of.

8. If the proposal relates to an environmental objective, is this objective consistent with a stated Basin Plan objective?

Improving environmental outcomes for basin assets. Achieving far greater value for money in terms of the environmental outcomes achieved and doing this without having to recover permanent entitlements from productive users. This creates a win-win solution possible instead of the win-lose scenario that happens with the buyback process, where social and economic elements of rural and regional communities are severely impacted, permanently.

Comments

It is pointless for the Commonwealth to spend many millions of dollars of public money on buying water when stock access is degrading stream banks and wetlands and contaminating water. If there is to be a serious approach to improving environmental health of the basin's environmental assets then this must be a part of the overall management of the rivers.

There a number of examples in the Border Rivers where the reticulation of stock and domestic water could save large volumes of water that is currently run down a dry stream bed, which is a practice which must become a thing of the past.

Roll-out of CARM

1. What is the catchment and water source where the proposal would be implemented?

Border Rivers and all northern basin streams

2. What is the objective of the proposal?

Improve management and delivery efficiencies of regulated water in the Border Rivers.

3. Describe the proposal.

To implement the Computer Aided River Management system across northern basin streams to achieve greater efficiencies in normal river operation.

4. Could the proposal achieve its objective using current technology?

Yes

5. How much water could the proposal potentially save?

Information received to date suggests savings in the order of 5 to 10 of transmission losses.

6. What is the estimated cost of the proposal?

Unknown.

7. Has the viability of the proposal been previously assessed?

I'm sure State Water have run the numbers.

8. If the proposal relates to an environmental objective, is this objective consistent with a stated Basin Plan objective?

Improved management of regulated will accrue benefits to both productive and environmental water, so the Commonwealth's water will be able to be stretched further to achieve more and improved environmental outcomes..

Comments

This is an obvious non-water solution that will be beneficial to all parties concerned and must be rolled out as soon as practical, but especially when the mid-stream re-regulating structures are built.