



# **Murrumbidgee**

Private Irrigators Inc

Submission on:

## **Murray-Darling Basin Plan Five-year assessment**

**To:**

Productivity Commission

Via website: [www.pc.gov.au/inquiries/current/basin-plan](http://www.pc.gov.au/inquiries/current/basin-plan)

**From:**

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Murrumbidgee Private Irrigators Incorporated (MPII) welcome the opportunity to provide comment contribute to the Productivity Commission's five year assessment of the Murray Darling Basin Plan (Basin Plan).

MPII is concerned in seeing the Basin Plan implemented while adhering to the triple bottom line aspiration of the Basin Plan with no further negative impacts on Basin communities. This can only be achieved if it is an outcomes based plan rather than a volume focussed one. Just adding water will not benefit the environment or regional communities.

### **Background**

MPII represents around 400 irrigators on the full length of the Murrumbidgee River, and Yanco Creek System. Our members live from Batlow to Balranald and from Jerilderie to Moulamein. We also have a number of "operators" amongst our members although volumes of water are vastly smaller than the irrigation corporations. We account for approximately one third of the diversions on the Murrumbidgee system with approximately 400,000 megalitres being made up of High Security and General Security entitlements as well as significant supplementary licence holdings dispersed amongst our members.

### **Information Request**

In this submission MPII will concentrate on a few specific points. As members of both National Irrigators Council (NIC) and NSW Irrigators Council (NSWIC), we are confident that their more comprehensive submissions will fully represent our position.

## **1 Approach to assessing the Basin Plan**

*The Commission welcomes feedback on its approach to assessing the Basin Plan.*

MPII has grave concerns in assessing the success of the Basin Plan based on flow volume measures rather than broader environmental outcomes. Overall river health is reliant on a raft of other non-flow measures such as feral pest species, cold water pollution and native fish habitat to name a few.

## **5 Recovery of water for the environment**

*The Commission is seeking information on:*

- a. *the extent to which the Australian Government's strategy to recover water in areas where gaps remain will be cost effective, align with the Basin Plan's environmental objectives, and be transparent*
- b. *risks to achieving water recovery targets by 1 July 2019 and, where not already addressed under current arrangements, how any shortfalls may be resolved*



- c. *examples of water recovery (both infrastructure projects and purchases) that have been either well implemented or had major deficiencies, including risks to securing contracted but not yet delivered water from water saving infrastructure projects.*

MPII has concerns around the uncertainty associated with Cap Factors and the possibility that they may change in some valleys so increasing the amount of water to be recovered. There is no doubt that the cap factors for Gwydir and Macquarie have been underestimated and need to be altered but we argue cap factors should remain as they are in all other valleys.

## **7 Water Resources Plans**

*The Commission is seeking information on:*

- a. *the main risks to remaining WRPs being finalised and accredited by mid 2019*
- b. *how, and to what extent, recent measures to make the WRP accreditation process more efficient and streamlined have sped up the preparation of WRPs and whether there are opportunities to further streamline the accreditation process for WRPs*
- c. *other ways WRPs or associated planning processes (e.g. consultation, modelling inputs) could be changed to better meet the objectives of the Basin Plan*
- d. *how effective Basin States have been in consulting with all relevant stakeholders*
- e. *the main risks to planning assumption work being finalised on time.*

MPII have extreme concerns regarding progress on the development of water resource plans (WRPs). The repeated restructuring and staffing issues of the NSW government departments tasked with developing the WRPs is our prime concern.

Through our membership of NSWIC, we are participating in the consultation processes and have offered assistance, but meeting the June 2019 deadline for completion and for them to be processed by MDBA in time remains a grave concern. Recruiting quality staff and working with NSWIC are vital first steps towards allaying our concerns.

## **8 Environmental Water management**

*The Commission is seeking information on:*

- a. *how environmental water planning under the Environmental Management Framework is, or is not, facilitating achievement of the Basin Plan's environmental objectives within legislated timeframes, and what improvements should be made.*
- b. *how effective and efficient the delivery of environmental water is — including through coordination among owners of held environmental water, managers of planned environmental water and other stakeholders — and how any barriers could be reduced*
- c. *whether Australian and State Government objectives for the delivery of environmental water align, any examples of where this has not been the case, and how differences are resolved through the Environmental Management Framework*
- d. *the extent to which the Prerequisite Policy Measures (PPMs) assumed to exist under the Basin Plan will be in place by the target date of 30 June 2019, so that the Plan's environmental objectives can be achieved under the SDLs agreed by governments, and how any identified concerns should be addressed*
- e. *any opportunities to better integrate environmental water planning and management with natural resource management programs and complementary works to facilitate achievement of the Basin Plan's environmental objectives.*



Environmental Water Management needs to be addressed holistically, and the sooner the use of complementary measures such as carp control through the release of the Carp Herpes virus, management of cold water pollution, restoration of native fish habitat and installation of fishways are incorporated the better our rivers will be.

## 12 Compliance

*The Commission is seeking information on:*

- a. risks to the MDBA's ability to monitor and enforce compliance with the Basin Plan and WRPs from July 2019, and what, if any changes should be made to address these risks*
- b. the extent to which non compliance with the Basin Plan will be addressed by recent changes to compliance and enforcement announced by governments*
- c. any further changes that should be introduced to increase water take compliance across the Basin.*

Resource management is dependent on effective data capture to inform operational decisions. This should be the fundamental reason for improved metering, which will in turn lead to improved compliance within systems.

The Matthew's Report recommending a 'no meter, no pump' approach, but it is acknowledged that to meter every single works approval in the Basin would be cost prohibitive. The target must be to meter a sufficient volume in each system to realise operational efficiencies as well as provide a level of confidence to the public that water use is adequately monitored and managed. In the Southern Valleys the target was to meter at least 95% of licenced water take.

The National Metering Framework for non-urban water use (2009) determined that by 2020 a consistent level of metering would be undertaken for licenced entitlements.

The NSW Metering Project Business Case (2010) determined that efficient metering would:

- Improve water sharing;
- Improve river operations;
- Improve detection of illegal water extraction;
- Enable accurate accounting of water extraction.

MPII Supports all of these goals, however, the reality of the Southern Valley Metering Project – which is what became of the 2010 Metering Project – has been vastly different.

Metering is not standard across the Murray-Darling Basin. Telemetry is not universally applied and the uptake of the online customer portal in NSW, IWAS, has been sporadic at best.

This means the full benefits of efficient and modern metering is not being realised.

MPII maintains the goal to be achieved through improved metering must be improved river operations and improved water sharing, consistent with the 2010 NSW Metering Project Business Case.



If these goals are to be achieved, metering must be rolled out valley by valley to ensure the river operation improvements can be realised in a meaningful manner. Priority may be applied to at-risk systems; however, the whole system must be addressed in the same project to capitalise on the system improvements as soon as possible.

Any rollout program must consider the following issues:

- Access to appropriate pattern approved meters;
- Availability of registered meter installers;
- Any transition or grandfathering process;
- System readiness – when WaterNSW systems will be ready to “talk” to new meters.

MPII has no preference to ownership, suffice to say that there needs to be clear and concise information available to irrigators as to what meters are compliant and pattern approved, how to access an accredited meter installer, and clear information regarding meter requirements.

The issue of ownership should be determined as soon as possible. Irrigators support measurement and metering protocols and are ready to meet the requirements needed, however, they do not want to invest in private infrastructure if the Government is then going to determine that State ownership of infrastructure is the preferred option.

The Southern Valley Metering Project was not perfect, however, the lessons learned though that project must be incorporated into any future metering plan.

Any metering strategy must include an ongoing monitoring and maintenance program including calibration and revalidation of meters. This program should be publicly reported to improve public confidence in the systems.

The main objective of improved metering must be improved resource management which requires telemetry and live data feeds to the river operators. This in turn will lead to improved compliance outcomes.