

Southern Riverina Irrigators represent 1800 generational farming families in the Riverina. Supporting a \$7billion agricultural industry while underpinning our region and the country economically and socially, through the use of dual purpose irrigation water to grow staple food and support biodiversity on farm.

SUBMISSION

Natural Resources Commission review of the NSW Murray and Lower Darling Regulated Rivers Water Sharing Plan.

BACKGROUND

It is our understanding this review of the 2016 Murray Lower Darling Water Sharing Plan is largely centred around the Lower Darling WSP component. The WSP has already been comprehensively revised and sent to the MDBA for assessment, however as this is a joint WSP there are still some areas of concern worth flagging and opportunity for improvement across both systems. It is worth acknowledging both these systems are significantly impacted by inflows from other parts of the basin, a point which must be written into each plan by recognising end of system flows for connectivity.

WSP

The vision for this plan is to provide the following:

- health and enhancement of water sources and their water-dependent ecosystems
- continuing productive extraction of surface water for economic benefit
- the spiritual, social, customary and economic benefits of surface water to Aboriginal communities
- social and cultural benefits to urban and rural communities dependent on surface water

Irrigated agriculture is a key driver of economic wealth for our nation.

Here in the Riverina, irrigation underpins the success of our rural communities, our towns and local business, along with creating environmental opportunity through dual purpose water and we have grave concerns for a sustainable future without access.

The concern we have with the WSP in its current form, is the primary focus on environmental and cultural objectives while compromising outcomes for the productive sector.

There have been countless submissions, including a substantial one from MRSG a few years ago where the many issues of the WSP were clearly outlined but as with most of these processes, the feedback from impacted communities has largely been ignored.

There are opportunities for change that have the potential to benefit both Murray and the Lower Darling.

- a trigger to cease both supplementary access and FPH in the northern basin once the top two Menindee Lakes (Wetherall and Panamaroo) volumes in storage drops below the 18 month supply level

ACTION: Include a trigger volume in storage to cease access to Supplementary Water and Flood Plain Harvesting.

ACTION: Establishment of a sustainable, end of system flow target that is not reset by minimal rainfall events.

- operational water should be deliverable down the Darling anabranch, currently an unregulated system from Lake Cawndilla, with a maximum 1,500ML/day capacity before it breaks out. The 80GL of water that was Tandou's is now held by the Commonwealth Environmental water holder and it is our understanding it is coming from the top two lakes into the Lower Darling as Cawndilla currently doesn't access the Lower Darling. **This is an 80GL impact on other water users.** Note # previously Tandou used to transfer their Murrumbidgee supplementary water when the lake was full and could pump up to 200GL.
- Lake Cawndilla can connect to the Lower Darling via the Penelco Channel which has a capacity of 3000ML/day. It has a level floor so water can run either way. If it was refurbished it could be used to get otherwise inaccessible water in Lake Cawndilla delivered into the Lower Darling rather than drawing from the top two lakes.

ACTION: Investigate as a possible SIDLAM project to reduce impact of buybacks on our communities.

MENINDEE SOLUTION

Outcomes from MINCO in August 2023 are yet to be released to the public, however it is understood there is information about shepherding of environmental water through the Menindee Lakes. Under current rules, **all** water which hits the Menindee Lakes reverts back to NSW and Victoria, any shepherding of water will therefore directly impact BOTH NSW AND VIC irrigators, and yet there has been no transparency or communication around this issue. We understand:

- 1,721GL is the metered, long term average annual inflow to the Menindee Lakes on the Darling River
- if Basin Plan modelling is correct – which we are assured it is – the Menindee Lakes should deliver at least 721GL on average each year to the Murray River

- Menindee water should be swapped with the 696GL dilution flows, which flow to South Australia as part of the Murray Darling Basin Agreement
- this would keep water for the productive sector in upper Murray storages, alleviate constraints and shortfall delivery risks.

ACTION: Look into the viability of the Menindee Solution as a genuine opportunity to reduce constraints and shortfall delivery risk.

OPPORTUNITY TO REDUCE BANK EROSION AND DELIVERY CONSTRAINTS

Transfer by environmental water-held above the choke zone 10- to below choke (ie. effectively reclassifying it as zone 11) is in breach of the *Murray-Darling Basin Agreement (Schedule D - Permissible Transfers between Trading Zones) Protocol 2010* and creates inequity because it increases overall losses in the system (and likely increases the “unexplained losses/discrepancy” volume in MDBA figures) It also results in environmental degradation of river banks below the choke, additional mobilisation of sediment and creates the issue of delivery constraints on other water users.

ACTION: Do not allow Zone 10 recovered E water to be transferred below choke beyond the volume of upstream traded water.

OPPORTUNITY TO ADDRESS UNDER USE and ACCESS SUPPLEMENTARY WATER

Underuse has been identified as a significant lost economic opportunity for NSW MGS. During the period 1997-2020, 2727.14GL of water remained unused under the SDL – an average figure of approximately 200GL per year or a 10 per cent allocation equivalent.

- We know from discussions with DPIE the Murray Valley now tracks at an under use of more than 20 per cent below the SDL
- Because the SDL is based upon a long term average of use, this under-use each year means the long-term average continues to erode (and will continue to decrease)

The MDBA reported in 2020 that there was an underuse of 375GL annually across the 4 southern basin valleys. This doesn't align with what DPIE is reporting about the Murray Valley alone and we believe the MDBA is conveniently using long term averages to offset over-use in some valleys, with the under-use in the Murray Valley.

For example, if the over-use in the other valleys was collectively 125GL and the underuse in the Murray Valley was 500GL, this creates a net figure of 375GL. This impacts on both allocation and supplementary allocation.

Our fear has always been under use will be absorbed and classified as a “water recovery” without adequate compensation.

We are concerned under the current interpretation additional extraction via supplementary water will be reduced permanently. During the 2023-24 season supplementary allocations for Wakool irrigators were cut off when flows down the Edward historically would have resulted in continued supp access.

ACTION: The WSP must ensure underuse and overuse remain attributed to each specific valley, figures must not be combined in any shape or form to dilute numerical outcomes.

WAKOOL SYSTEM ALLOWANCE

A conveyance volume of 70GL is used to operate the system and provide both fish and riparian habitat, and should be recognised as Planned Environmental Water and contribute to the 2750GL.

ACTION: This volume must be officially recognised and written into the plan

RIVER MURRAY INCREASED FLOWS (RMIF)

This volume must be reclassified as Held Environmental Water and treated in the same manner. This water was recovered and held in General Security Licences and should maintain all general security characteristics. It must be excluded from annual extraction calculations because in its current form, it has the ability to negatively impact and reduce allocations.

ACTION: Remove RMIF from annual extraction calculations

The Riverina has been at the coal face of impacts from water reform since the inception of the basin plan. Water sharing plans are not protecting the community socially, environmentally or economically.

We remain concerned the Regulated Murray and Lower Darling WSP are focused on environmental water to the detriment of our communities socially, environmentally and economically.

Underuse is emerging as a major issue, significantly impacting on the economic outcome of our region through productivity reductions, which in turn reduces water put through our Irrigation Infrastructure Operators, increasing delivery costs and threatening the viability of regional Australia.

There is some talk of co-design moving forward with resource management but this will only be successful if there is a true willingness to listen and implement meaningful change, outside of the political narrative. Co-design has been trialled previously with Reconnecting Rivers, Western Murray Land Management and MRSG but the facilitation was unsuccessful due to an unwillingness of the government agency to allow unbiased stakeholder engagement.

There have been countless reports commissioned on the impacts of current water reform and because they don't suit the narrative, they have largely been ignored.

No-one would argue the importance of a balanced WSP that encompasses a sustainable irrigation industry, a healthy environment, protection of cultural assets and thriving communities, but the balance is currently not there.

It is imperative we get that right.

To what extent do you think the plan has contributed to environmental outcomes?



As you can see, increasing volumes of water and unseasonal flows to send water down the Murray system to South Australia, is impacting on the health of the Murray River upstream with bank erosion and damage to the Barmah choke increasing significantly.

To what extent do you think the plan has contributed to economic outcomes?



To what extent do you think the plan has contributed to social outcomes?



Riverina communities know the importance of productive water. They know it underpins the success of their community and their business, and once it leaves the area jobs are lost and business start to close. People move away to look for jobs and schools start to close, health services are reduced and we find ourselves in a hell of a mess.

Uncertainty around water reform is creating angst amongst our rural towns and nobody wants to talk about consequent issues including mental health impacts and suicide.