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# DRAFT Evaluation Framework – for the Review of Water Sharing Plans

## RGA Submission

October 2022

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Thank you for the opportunity to provide feedback on your DRAFT Evaluation Framework.

We note that the regular review of *Water Sharing Plans* (WSPs) is an important part of effective water management within NSW. We appreciate the efforts of the Natural Resources Commission (NRC) to make this process as transparent as possible; in addition to being open to community feedback to shape the architecture and approach of these important reviews.

We also appreciate the NRC's flexibility in allowing extra time to provide our comments to you.

The RGA supports rice growers in the NSW Murray and Murrumbidgee Valleys. We note the WSP for the Murrumbidgee Regulated River Source is scheduled for review in 2022-23, with the NSW Murray and Lower Darling Regulated Rivers WSP scheduled for 2023-24. We request the opportunity to be directly engaged in the conduct of both of these reviews.

### *The Ricegrowers' Association of Australia (RGA)*

The RGA is the collective voice of rice growers in Australia. Our main objective is to provide members with strong and effective representation on the issues impacting the viability of their businesses, their communities and their industry.

The RGA is made up of eight branches located across the NSW Riverina. Each branch annually elects representatives to form the RGA's Central Executive. The Central Executive determines the RGA's policies and projects.

The RGA is a member of the National Farmers' Federation, National Irrigators' Council and NSW Irrigators' Council.

### *The NSW Rice Industry*

NSW rice production predominantly takes place in the Riverina, with a small industry in the Northern Rivers. We're completely reliant on irrigation, mainly sourced from the Murray and Murrumbidgee regulated systems. When water is available, our rice production is some of the world's most successful, delivering significant yields while leading the way in efficient use.



According to the United Nations Conference on Trade and Development (UNCTAD), Australia is classified as the most efficient producer of rice in the world. The NSW rice industry is also a world leader in water usage at 12 megalitres per hectare, with the world average being 15 – 20 megalitres per hectare, and with some countries using upward of 50 megalitres per hectare.

In a typical year the rice industry produces around eight hundred thousand tonnes of premium paddy rice with a farm gate value of around \$350 million. The total industry value is well over \$1 billion each year. This makes the rice industry a significant contributor to local economies. Griffith, Leeton, Coleambally, Finley, Jerilderie, Deniliquin, Wakool and Moulamein are all highly dependent upon rice production for their social and economic wellbeing.

Reliable access to water, that matches what licence-holders are legally allowed to draw upon under relevant WSPs, will always be fundamental for the ongoing success of our industry.

#### *Overarching Comments*

We understand this particular feedback process is specifically about the architecture of the framework that is used to review WSPs. We support the concept of prioritising the NRC's review efforts – especially in terms of complexity and risks to water sources – and acknowledge that only a relatively short period of time is available for each review.

With this in mind, and in reference to your three feedback questions<sup>1</sup>, we're comfortable that the DRAFT Framework clearly establishes the NRC's role (**question one**), including what is reasonably in and out of scope in giving effect to that role. We're also comfortable (**question two**), that the framework is suitable to support a fair and useful WSP review, recognising the NRC's various role, resourcing and time limitations.

The following comments relate to **question three** – *do you have priority issues you would like to see addressed?* – and are provided in no particular order.

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<sup>1</sup> Previously located here: [WSP reviews - Review approach \(nsw.gov.au\)](https://www.nsw.gov.au/water/wsp-reviews).

1. (p. 3) WSPs “...intend to provide certainty regarding rules for water sharing for water users over the life of the water sharing plan...”

For most consumptive users that we represent, the life of their existing WSP has been one of significant water reform. The consumptive pool has shrunk – as a result of environmental water recovery – and market function and river operations have changed in material ways.

All of this has eroded certainty and trust in the rules that protect water access for these users. Importantly, this change process is not over, and ‘rule’ certainty and security is expected to continue to be impacted.

On this particular issue, it’s important that WSPs take account of the broader water reform context within which relevant plans operate. It would be appropriate for NRC reviews to recommend how users can be assured of rule certainty - within their WSP – in the face of what can appear to be never-ending state and national water reform.

2. (p. 3) “In reviewing Water Sharing Plans, the Commission aims to contribute to improved and more transparent water management...” & (p. 7) – Principles of the Act – (g) “the social and economic benefits to the community should be maximised”

It’s undeniable that the impacts of climate change are very much front-of-mind when considering improvements to water management, especially those aimed at maximising benefits to the community. It would be most useful for the NRC to advise on how WSPs can best maximise the benefits for all users under an increasingly variable climate.

For example, extreme drought will not be the only water outcome year-on-year. Recent above-average flows are also part of future climate variability. In particular, we believe the NRC should pay attention to what’s needed to ensure WSPs are better able to respond to water availability in real-time, which many of them currently don’t do.

3. (p. 8) – Objects of the Act – (d) “to recognise the role of the community, as a partner with government, in resolving issues relating to the management of water sources”

At least in regard to the WSPs of interest to us, more attention needs to be paid in this area – especially in relation to how WSPs give effect to relevant state and federal policy.

To illustrate, *Regional Water Strategies* (RWSs) for the NSW Murray and Murrumbidgee were released earlier this year for public comment. The only user groups that influenced the drafting of these RWSs were local council, water utilities, NSW agencies and Aboriginal communities. The irrigation sector was neglected, despite many of the options contained in the RWSs having the potential to materially impact on access rights under WSPs.

It would be appropriate for the NRC to advise on how water users can help co-design management approaches where their existing access rights are directly affected.

4. (p. 10) – *Key Question 1: To what extent has the plan contributed to the achievement of environmental outcomes? – (6) how drought & climate change are managed; & (7) new or more accurate knowledge of environmental outcomes & e-water requirements.*

In relation to this matter, the RGA notes the current position of its Water Committee, that there are a range of ways to deliver improved environmental outcomes under an increasingly variable climate – and additional water recovery won't always be the best solution.

For example, in RGA's footprint – the Murray-Darling Basin – Carp make up 80-90 % of fish biomass. Arguably, Carp pose the greatest risk and threat to the resilience of native fish within relevant WSP areas; however the problem won't be solved by extra water recovery.

Every WSP should strongly emphasise and drive efficient use across the board, including in delivering held and planned environmental water. It would be useful for the NRC to recommend how this can best be achieved, as well as how any additional e-water recovery can be minimised – including by links to other plans, projects or policies as needed.

5. (p. 11) – *Key Question 4: To what extent has the plan contributed to the achievement of economic outcomes? – (2) the extent to which licence holders had access to water provided for under their accounts.*

Rice industry climate-preparedness is based on the ability to maximise water-use when it's wet, and have transparency, clarity and reliability around access when it's dry. Unfortunately, the current WSP-content is driving individual irrigators to be unnecessarily cautious, which is creating significant system underuse.

Just as we've spent decades reducing the impact of consumptive use on the environment, we also need to make sure that WSPs don't result in an 'over-correction', where consumption is perpetually held below legally accessible volumes.

It would be useful for the NRC to advise on appropriate WSP content that would ensure – where required – that consumptive access is brought up to, and maintained at legal limits.