

## SUBMISSION ON VICTORIA'S NORTH AND MURRAY WATER RESOURCE PLAN

FROM:

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Victoria's WRP for northern Victoria, according to the MDBA, must show how Victoria will comply with the Basin Plan by showing how they will reduce the consumptive pool and recover water to align with the Sustainable Diversion Limit (SDL).

As the document is extremely large and generalised, it is difficult to make comment pertinent to our area, the Upper Goulburn Catchment, hence the short submission.

I find it very strange that the risk assessments and strategies are written as what will take place in the future when in reality people and communities in the basin are experiencing right now the impacts of reduced water availability and climate change.

Like most of the farming community I have absolutely no confidence, faith or trust in the MDBA having a hand in any of Victoria's water management or compliance framework. They have completely mismanaged the Menindee Lakes, yet refuse to accept that fact. They simply do not understand the reality of farming, irrigation or water management and have never taken on board any advice offered to them by the farming community, so must be kept out of the state's water management.

In vain attempts to make 'water savings', which are proving more and more difficult to justify we are now seeing a similar theory to that enacted at Menindee, of saving water which would only evaporate, being put into practice with Greens Lake. The lake has been used as off-stream storage to supplement the Waranga Western Channel that supplies water to Rochester and Loddon Valley irrigation systems at times of peak demand, and in 2014 was identified as "having highly valued land and water attributes" (Greens Lake Land and On-Water Management Plan 2014)

Apparently Greens Lake is no longer 'highly valued' as GMW states that 8,500ML will be saved that would normally evaporate, so will not be refilled.

The WRP draft document states: "*Victoria's North and Murray Water Resource Plan will have little to no immediate effect on water users in the region.*"

As Victoria's core obligation under the Basin Plan for surface water in Victoria's North and Murray Water Resource Plan is to recover a long-term annual volume of 1,052.3 GL for the environment, it is completely untrue to state that the recovery of this water from Greens Lake will not affect the Loddon Valley and Rochester irrigators. Before completing and submitting this WRP, DELWP should ask these irrigators their opinion and refrain from the action of grabbing this water which will quite obviously impact their water entitlements.

The water in both Menindee Lakes and Greens Lake perform the important natural function of also recharging groundwater, as well as providing ephemeral refuges and breeding grounds, but it seems the all-important 'water-savings' figures take precedence even over the natural environment.

The MDBA wants to recover a further 450GL additional water and a Shorten led opposition has already introduced a private member's bill to remove the 1500GL cap on water buy-backs which means even more water would be removed from Victoria's irrigation areas

The Minister for Water, Lisa Neville *stated Victorians would be forced to find new homes if more water was allocated to the environment, because up to 12 towns would "not survive"*.

*"Townships like Shepparton, Swan Hill and others have already seen job losses in the vicinity of 40 per cent, largely as a result of reducing water availability for production," she said ( ABC News Feb 1<sup>st</sup> 2019)*

As many of the Basin Plan's objectives are simply not attainable, Victoria, as the state supplying the majority(70% so far) of total water recovery in the Basin, should be calling a pause to the Basin Plan until a review, revision and Federal Royal Commission is undertaken. To not do so is placing the Victorian irrigation industry, farmers, basin communities and towns at risk of being destroyed. Therefore I fail to see how DELWP can claim that due to the strength of Victoria's existing water management framework, no immediate changes to how water is managed in the region are required.

DELWP, just like the MDBA, have failed to acknowledge the here and now consequences of climate change and actually show how they will manage the present day reality of vastly reduced surface water availability, not what they might do in the future. The reality is, we all, communities and environment alike, have access to a reduced available volume of water.

The WRP Victoria's North and Murray Water Resource Draft Plan 2019 Page 859 states:

*"Victoria's temperature has steadily increased since the 1970s and overall streamflows have decreased by about 50 per cent or more over the past 20 years."*

This document also says there has been *"a seasonal shift in rain towards less rainfall during the cooler months of April-October, when run-off is greatest..." Climate science predicts this is the new reality.*

Despite this DELWP have failed to update and revise any modelling, but simply followed that of the MDBA which is based purely on historical data(1895-2009).

*"Victoria has not done independent modelling to determine the SDL for the Goulburn-Murray water resource plan area."*

Why would you perpetuate the use of outdated historical data, when the WRP should reflect the current practical hydrologic capacity of Victoria's water systems?

It is time that basin states demanded that the MDBA completely revise their hydrologic modelling of surface water availability, otherwise how on earth can it be assessed whether further water recovery of an additional 450GL needs to be achieved or if the proposed 'enhanced environmental objectives' in the Lower Lakes, Murray Mouth and Coorong are realistically feasible.

Under risk assessment no mention has been made of the fact that landowners in the Upper Goulburn and Hume-Yarrawonga region will not allow, under a relaxed constraints scenario, their private property to be flooded, nor will they negotiate easements. The Victorian Government has acknowledged this by reducing proposed flows in the Goulburn Constraints, but no such action has occurred for the joint ( with NSW) Hume to Yarrawonga Constraints Case.

Despite the Hume -Yarrawonga landowners stating their position at least 3 years ago, the MDBA and basin states continue to forge ahead as if landowners will eventually change their minds.

Nor is there any mention of likelihood of litigation if environmental flows create overbank flooding of private property.

Other risks that have not been identified in the WRP are the impacts on reduced surface water run-off caused by the 2006-2007 High Country fires and 2009 Black Saturday fires which burnt thousands of hectares of upper tributary catchment country. Clearfell logging down to the banks of

some upper catchment tributaries have had a similar effect of reducing stream inflows drastically for the next 100 years .

Nor is there any mention of how delivering water through the Molesworth Choke with a channel capacity of 9,500ML/day will be managed, now that there is increased irrigation demand downstream in the horticultural plantations, a call for more environmental water delivery and the fact that the Goulburn will have to contribute more water for South Australia after the appalling mismanagement of Menindee Lakes.

The main risk that has not been identified, is that modelling data on which success or failure of the Basin Plan rests, is fundamentally flawed in that all hydrologic modelling has been based on historical climate and flows from 1895-2009 whilst completely ignoring CSIRO and other scientific advice to include climate change scenarios of the last 20 years, where we have seen a significant reduction in rainfall and stream inflows.

This WRP appears to see the above risks as something they may have to adapt to in the future, for example classifying climate change as 'high risk', however it is already our current reality and as a result there is huge reduction in surface water availability, particularly in our Upper Goulburn Catchment region, where we are experiencing reduced flows due to the impacts of the aforementioned massive bushfires, clearfell logging to the banks of our tributaries, less rainfall and changed seasonal pattern of rainfall.

The WRP under its strategies to address risk on climate change(p.679) states: "*Improving public reporting on water availability and use*", but nowhere does it mention the urgent need for real-time gauging and improved monitoring of our upper Goulburn Catchment tributaries, as nigh on 50% of the catchment is ungauged, and this is the reason why real surface water availability is just a guesstimate and why basin communities are furious that bureaucrats produce water plans based on 'guesstimates' that are simply not realistic or feasible.

For DELWP to blindly follow the MDBA methodology of using outdated data for water management is to consign Victoria's irrigation industry and reliant businesses, towns and communities to a rapid demise.

I will not include in this submission the many points we made regarding the WRP at a meeting in Yea in February, as I know DWELP took copious notes of this discussion.

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END OF SUBMISSION

JAN BEER