



Partnering for a balanced Basin Plan

Group submission to the Murray Darling Basin Authority

Draft Murray-Darling Basin Plan

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Terminology used in this submission:

<i>The Group; we; our</i>	The Murray River Group of Councils, Greater Shepparton City Council & the Shire of Strathbogie.
<i>The Draft Basin Plan; The Plan</i>	The Draft Murray Darling Basin Plan (2011)
<i>The Guide</i>	The Guide to the Murray Darling Basin Plan (2010)
<i>The Authority; the Basin Authority</i>	The Murray Darling Basin Authority
<i>The Basin</i>	The Murray Darling Basin

Executive Summary

The eight Councils of northern Victoria comprising this partnership seek a healthy Murray Darling Basin as the principal outcome of the major water reforms taking place across the Murray Darling Basin. Implicit in this is a sustained environment, a prosperous economy, and productive, vibrant communities. This Group recognises that the establishment of an overarching plan for the water resources of the Basin is crucial in order to achieve equitable and sustainable water management between the six jurisdictions with interest in the Murray Darling Basin.

However, the balance needed to bring about such an outcome is not presently evident in the Draft Murray Darling Basin Plan. The Plan deals disproportionate burden to the productive rural communities of this region, which along with the diverse economy of northern Victoria will likely experience significant decline over the coming decades should the Plan proceed in its current form. This Group of Councils will be seeking significant modification to the proposals put forward by the Draft Basin Plan before support can be given to further water reforms in the Murray Darling Basin.

Our eight partner Councils represent a diverse rural community. This region is significant in terms of its area, population and contribution to the Victorian and national economies. Agriculture - in particular irrigated agricultural production - drives the local economy through high-value production of food and fibre. This production supports a wide range of processing, manufacturing and servicing businesses in the towns across the region.

The major rivers of northern Victoria – the Murray, the Goulburn, the Campaspe, and the Loddon – flow through this region, providing a focus for recreation and tourism. These rivers along with the tributaries, wetlands and lakes of northern Victoria are fundamental to shaping local identity and sense of place. Maintaining the environmental health of the region's natural resources is recognised as an important issue.

The communities of this region have a vested interest in the outcomes of water reform in the Murray Darling Basin and seek sustained engagement on this issue.

Since the release of the Draft Basin Plan in November 2011 each Council has sought to actively engage with the communities, businesses and stakeholders of the eight municipalities in order to understand local views on the proposal. Discussions revealed deep concerns amongst the community that recommendations

arising from community consultation on the Guide to the Murray Darling Basin Plan in 2010 have not been given due consideration in the intervening period. The Plan continues to propose the diversion of significant volumes of productive irrigation water to the environment without a clear plan for how it will be recovered, how it will be used, and how the impacts to rural communities might be addressed. Key community concerns with the Draft Basin Plan include:

Community impacts – High level of impact on local communities due to economic dependency on irrigated farming, with limited availability of information on what the final impacts will be.

Water buybacks – Ongoing impacts on communities and businesses due to the permanently reduced capacity for agricultural production and cost burden on remaining system users.

Sustainable Diversion Limits (SDL's) – 2,750GL of water represents considerable cuts to irrigation entitlements with significant repercussions for the farming sector and local economy.

Infrastructure and efficiency – Recognition that investment in infrastructure will realise universally beneficial outcomes for the environment and irrigation communities.

971GL Southern Basin shared allocation reduction - To not apportion volumes to individual systems will fuel uncertainty. There is no clarity around how much water will be drawn from each region.

The management of environmental water, food security, and mitigation options for affected towns and communities also featured as common issues of concern.

The Group's assessment of the Plan has revealed similar issues to those identified above. Discussion around these issues has been conducted through five key themes, under which positions have been formed around the central proposals of the Draft Basin Plan. The Group holds that:

- The Plan lacks sufficient information to enable a proper assessment of its impacts, let alone to implement.
- The Plan lacks detail on how the water will be recovered, with the method of water recovery critical to influencing regional outcomes.
- The Plan lacks sufficient detail on how recovered water will be used.

- The Plan has the potential to bring about unacceptable impacts on local communities and the nation's capacity for food production.
- Ongoing water reform efforts must be collaborative and provide certainty for communities.

The element of uncertainty remains a critical issue with the Plan and acts to constrain business confidence and investment. This uncertainty is exacerbated through specific Basin Plan proposals such as the 'shared-reduction' and the 2015 review, the eventual outcomes of which could only be speculated at this point. Confidence must be enabled through ensuring sufficient information is available to facilitate long term business decisions.

This submission makes specific recommendations for change that will assist with positive water reform for all stakeholders. Key recommendations are set out below.

Recommendations

- 1. Complete all dependent work prior to Parliament's consideration of the Plan. This includes the preparation of:**
 - **An agreed water recovery strategy;**
 - **Impact assessments and mitigation options at the local community level.**
- 2. Require the preparation of a water recovery strategy that seeks to establish how, when and where environmental water is to be recovered. Such a strategy must be prepared with community, local government and key stakeholder involvement.**
- 3. Provide more certainty to shared-reduction outcomes by re-apportioning water recovery targets (at a minimum) along State boundaries.**
- 4. Seek commitment to investment in irrigation, on-farm and environmental infrastructure as the principal means of water recovery, with a delay in buybacks until all options for system efficiency are exhausted.**
- 5. The process for EWP preparation should be affirmed with the States utilising local networks such as Catchment Management Authorities.**

6. **Complete impact assessments and mitigation options at the local community level where it is identified that water recovery will cause unreasonable impact. This should include a substantive and strategic consideration of potential responses supported by Commonwealth funding with seed money for implementation.**
7. **Seek government commitment to investment in irrigation, on-farm and environmental infrastructure as the principal means of water recovery in order to retain water in productive use.**
8. **Explore the option of an adaptive SDL framework accommodating of ongoing water efficiencies and new knowledge, built on an equation-based or alternative expression of SDL's that allows for progressive recognition of realised water savings.**
9. **Continue to emphasise a collaborative process between the Basin States. Additionally, instil community confidence through a commitment to investment in works and measures across all Basin States in return for collective water gains.**

The social consequences across the Basin arising from the proposed cuts to irrigation water allocations are significant, including considerable impacts on Australia's capacity for food and fibre production. It must be recognised that these types of outcomes are avoidable. An opportunity is presented for positive water reform in the Murray Darling Basin that will realise benefits for all water users. Proactive and considered water policy that seeks tangible gains for the environment, communities and the national economy is the only option that ought to be pursued.

In this regard, works and measures that realise water efficiencies must be exhausted prior to discussions about removal of water from productive use. Doing so would realise long-term material gains to the environment while at the same time ensuring that Basin communities can maintain local economies centred on food and fibre production. At the same time, it is critical that substantive and strategic assessment of impacts to communities be undertaken prior to implementation of significant changes.

The eight partner Councils of northern Victoria and this region's communities remain engaged and eager to have input into water reform in the Murray Darling Basin, and seek a genuine commitment to meaningful and sustained dialogue on the issue. Further discussions with government and government departments, including the Murray Darling Basin Authority, will be sought as part of a collaborative process to find a positive future for the environment and communities of the Basin.

1.2 We are Victoria's Food Bowl

The contribution that this region makes to the nation's food and fibre production is significant. This region is commonly referred to as 'Victoria's Food Bowl', and has a strong association in the general mindset of being the heartland of the state's orchard, vegetable and dairy industries. Key agricultural industries across the region include pome fruits, stone fruits, and citrus production, primarily in the districts centred around Shepparton, Cobram, Mildura and Swan Hill. The north-west region is also the focus of Australia's table grape industry, with wine production a well established sector across all eight Council areas. Vegetable production occurs throughout the region following the irrigation system, with significant olive groves and tomato production other examples of the area's diversity.

Dairy farming is the region's principal animal-based industry, generally occupying an arc from Moira/Shepparton west through Campaspe, Gannawarra and Loddon Shires, with dairy processing facilities providing significant employment in many towns across the region including Rochester, Cobram, and Stanhope. Beef and sheep (meat and fibre) remain staple animal industries, with continued growth also seen in intensive animal industries. Cropping is a major sector, tending towards the less populated areas of the region where more expansive areas of land are in supply.

1.3 Water brings us together

Water is at the front and centre of the region's success as a producer of diverse foods and fibres. The region wholly contains the Goulburn Murray Irrigation District, which is the largest area of irrigated farming in Australia. This combines with irrigation areas in Mildura and Swan Hill and groundwater supplies across the region to form an expansive area of production, producing an array of commodities not always suited to other climates in Australia. Irrigation-based production supports a broad array of interrelated industries in the towns of our region, including refining, processing, servicing and transportation. Together, agricultural production and its associated processing and servicing industry remain the largest area of economic output and source of local jobs. Some key statistics include:

- Agriculture directly provides approximately 22% of all employment.
- A manufacturing sector principally associated with the processing of agricultural products and provision of agriculture-related services provides a further 12% of employment.

- Irrigated production in this region comprises 51% of the value of all agricultural production.²
- This region generates almost 60% of Victoria's irrigated production, valued at approximately \$1,886m out of a State total of \$3,253m.

The rivers of the region hold a special role in the formation of local identity, with almost all of the region's principal towns being located on a waterway. Recreation in the form of boating, fishing or swimming on the local rivers is an integral part of the region's lifestyle, with tourism - including ecotourism - being a key contributor to the local economy. For this reason there is a strong recognition amongst the communities of northern Victoria for the need for healthy rivers sustained by good water management, which sits alongside the desire for continued economic prosperity through irrigated production. In this light, the Murray Darling Basin Plan is of utmost interest and concern to the communities of our region.

1.4 We are constructive and valuable to talk to

The Group has established a reputation based on respectful and constructive dialogue. Throughout this 20-week process we have sought to engage with government, government agencies and key stakeholders in order to both learn and impart information on the Basin Plan and its implications for our region. We have also participated in a number of successful meetings with the Murray Darling Basin Authority including round- table discussions in Mildura, Swan Hill, Kerang, Echuca and Cobram, public meetings in Shepparton and Mildura and a productive working session in Canberra with key MDBA staff.

We represent the communities most directly affected by the Draft Basin Plan, and in this regard our eight partner Councils must be recognised as fundamental in shaping the future competitiveness of the northern Victorian economy.

1.5 We represent the communities of northern Victoria

Our Councils have united to represent the communities of our nationally important region with a commitment to seek balance in the Draft Murray Darling Basin Plan. In recognition of the role as representatives of the broader community, our partner Councils have each sought to actively engage with the people of the eight municipalities to understand the key areas of concern and interest on the Draft Basin Plan. Each Council has engaged with its community in a variety of ways, such as through targeted stakeholder discussions,

² ABS: 4610055008DO003_200001200910 Gross Value of Irrigated Agricultural Production, 2000-01 to 2009-10 – Commonwealth of Australia

open community consultation sessions and requests for written feedback and commentary. Our Councils' dialogue with local communities has revealed common threads and collective points of concern across the regional footprint in relation to the proposals being put forward by the Plan, which will be discussed through the course of this submission.

This submission will seek to bring forth a summary of the views of the people of this region alongside a broad analysis of the key features of the Basin Plan. The Councils comprising this partnership will also each lodge separate submissions to the Murray Darling Basin Authority to emphasise the particular characteristics and issues within each municipality and the challenges posed to their local communities. We recommend that the individual Council submissions be read alongside this broader submission in order to obtain a collective understanding of the issues being encountered in this region through water reform initiatives in the Murray Darling Basin.

2. Retrospective

The Group provided a submission to the Murray Darling Basin Authority on the Guide to the Murray Darling Basin Plan in November 2010. Reflection on the key points from that submission reveals notable similarity in the issues considered relevant to those raised by our communities on the present Draft Basin Plan.

The Group's submission in 2010 was broadly critical of the Guide, in the main due to its narrow focus on achieving environmental outcomes without due consideration to the resultant impacts on the communities of the Basin and their future livelihoods. The key concerns raised in the group submission can be categorised as:

- *Environmental issues being placed ahead of people;*
- *The 'Guide to the Murray-Darling Basin Plan' placing little consideration on the effects of proposed cuts to water allocations on communities;*
- *The social and economic impact assessments being based on large scale, unrealistic models, not on small rural communities;*
- *Water savings already achieved through improved infrastructure, innovation and sustainable farming practices not being adequately recognised;*
- *Little appreciation of the stress placed on communities already vulnerable from years of drought;*

In response, the Group put forward the following recommendations to the Murray Darling Basin Authority:

- *That the Authority acknowledge the impact the Plan will have on communities;*
- *That social and economic impacts on the community relating to the proposed Sustainable Diversion Limits (SDLs) be clearly identified and included in the proposed draft Murray Darling Basin Plan;*
- *That water savings already achieved through improved infrastructure, innovation and sustainable farming practices be recognised as contributing to improved environmental flows and included in the calculation of any sustainable diversion limits;*
- *That innovative infrastructure and practices be used to manage environmental assets and deliver environmental flows, aimed at achieving the required outcomes for the environment with the least amount of water necessary thus minimising the need for water recovery through buybacks;*

- *That the Authority recommend to Government that water buyback schemes be strategically planned and conducted so as not to disadvantage remaining farmers;*
- *That the Authority commit to establishing a consultation process that rebuilds community involvement and ownership of the outcomes through the process; and*
- *That a process affirming the science be established, to involve State Government departments and Catchment Management Authorities in particular.*

Reflecting on the above, we observe that the key criticisms of the Guide are very similar to those that will be presented through this current submission on the Draft Basin Plan. The Group is concerned that despite general opposition to the proposals put forward by the Guide, the intervening modifications have realised little if any material benefit for the communities of the region.

In observing the points above, the Group continues to remain concerned about the majority of the key issues raised in its submission to the Authority in 2010, including:

- The lack of recognition of economic impacts on regional towns and communities as a core issue. Impact assessments for communities undertaken at the local level have still not been performed; rather, broad impact assessments have been written in abstract terms due to the uncertainties around future water recovery.
- The relative lack of rigour applied to efficiencies around the use of environmental water as compared to water for food and fibre production.
- The continuing need for a course of action that rebuilds community participation in the process, coupled with a genuine commitment to social, economic and environmental gains.

We observe that the perception of similarity between the two documents has regrettably cultured a sentiment of scepticism amongst our communities regarding the genuineness of the Basin Authority's commitment to collaborative consultation, as so little of the feedback received on the Guide has been addressed.

The Group reiterates our request to the Murray Darling Basin Authority for deep and sustained reflection on the issues and concerns being voiced across Basin communities, with a commitment to a genuine 'triple bottom line' – economic, environmental and social outcomes – to achieve a greater balance than that evident in the current Draft Basin Plan.

3. Community Reaction

As the key representative of the communities of our region, our Councils sought to engage with the businesses, communities and key stakeholders of the eight municipalities to understand prevailing views on the proposals advanced by the Draft Basin Plan. This included open discussions through a series of community consultation sessions across the region, a range of written feedback, and dialogue with a range of key stakeholders.

The Group's conversations with the people of the region revealed great depth of consideration for the range of issues involved in water reform, with communities expressing a continued desire for balance in the distribution of water use in the Basin. Overwhelmingly, however, the response received towards the Plan was one of negativity and frustration, with many concerns identical or similar to those heard in reply to the propositions put forward by the Guide to the Murray Darling Basin Plan in 2010. What was notable was a high level of consistency on issues across our eight partner municipalities, with common themes and shared concerns around the proposals being put forward by the Draft Basin Plan.

That community views on the Plan have not been very different from the release of the Guide in 2010 is perhaps due to the fact that not a lot is perceived to have changed between the two documents. There is a strong sense of the current draft Plan being a *fait accompli*, exacerbated by an expressed keenness from government to have the Basin Plan put before Parliament in 2012 despite consistent messages from all sides that it is premature. This sentiment of despair has been manifest in the lower attendance at all community meetings on the issue as well as in the depth of media coverage. We observe that farming communities and local businesses are in the process of 'picking themselves up' after officially the longest and most severe drought known to modern Australia³, with little time or energy left to continue the endeavour for equal footing in the Basin Plan. It is vital that the Basin Authority does not misinterpret sentiments of community resignation and fatigue as tacit approval of the Plan.

The following table (Table 1) provides a broad summary of the main issues being discussed by our communities, as heard through the forums conducted across our region by our partner Councils as well as through written feedback.

³ Longest, hottest drought on record, says Bureau of Meteorology, The Australian, 11 October 2008

Table 1: Summary of key community feedback

Theme	Issues
Community impacts	<ul style="list-style-type: none"> High level of impact on local communities – most towns in region are economically dependent on irrigated farming to some degree. Limited availability of information on what final impacts will be.
Water buybacks	<ul style="list-style-type: none"> Buybacks should cease (or be a measure of 'last resort'). Buybacks damage communities due to permanent exit of water and burden on few remaining ('Swiss-cheese' effect) Claimed preference by MDBA for reduced buybacks however there are no guarantees that this will happen. Most sellers of water are not 'willing', but do so as a last resort.
Environmental water and Environmental Watering Plans (EWP's)	<ul style="list-style-type: none"> The way in which environmental water is to be used should be clarified up front – concern as to absence of EWP's. Supply before Demand – the Plan is determining the volume of water required for the environment without knowing its end use. Delivery constraints are not adequately clarified.
Sustainable Diversion Limits (SDL's)	<ul style="list-style-type: none"> Too much water being taken from irrigation – impacts on farming sector and local communities. SDL's are not dissimilar to those proposed under the <i>Guide</i>. Insufficient recognition of water savings achieved to date.
971GL Southern Basin shared allocation reduction	<ul style="list-style-type: none"> To not apportion volumes to individual systems will feed uncertainty – market impacts. Competition to retain water - State v State, catchment v catchment. No clear cap on how much can be drawn from each region.
Infrastructure and efficiency	<ul style="list-style-type: none"> Strong preference for water savings via infrastructure upgrades, on-farm efficiencies and environmental works and measures. Investment in infrastructure will realise 'win-win' for environment and irrigation communities. Use of environmental water must be as efficient and accountable as irrigation water.
Mitigation for affected communities	<ul style="list-style-type: none"> Limited discussion around what will happen to areas where irrigation is reduced or ceased – what will be the trade off? Towns must be assisted to transition with effective, strategic planning – long term commitment needed.
Food production and food security	<ul style="list-style-type: none"> Australia has international obligations to feed a growing population. The Plan will strongly impact upon ability to produce food. Future national security issue. Economic opportunities through trade will be lost.
2015 SDL review	<ul style="list-style-type: none"> The 2015 Review adds to general uncertainty about end outcomes. No security that SDL's will increase – they may decrease further.
Impact of other States	<ul style="list-style-type: none"> Entrenched water rules in each state will limit ability to achieve consistency across Basin. Plan is premised on appeasing South Australia's concerns about the lower lakes.
Timeframes for implementation	<ul style="list-style-type: none"> Communities will not be able to restructure to cope with less water by 2019 without significant government assistance. 2012 is too soon to commence Plan – too many questions unanswered, the Plan is being 'hurried through.'

3.1 Community and Business Survey

Most Councils in our regional partnership participated in a survey of community and local business in order to more firmly gauge common opinion on a range of issues around the Draft Basin Plan. The survey questions were standardised across the Councils to ensure consistency.

As identified earlier, the survey revealed considerable uniformity across our region on key issues relating to the Plan and to water reform options for the Murray Darling Basin. Some of the most indicative and compelling aspects of the findings include the following:

- The priority areas of concern are the volume of water proposed for recovery (the SDL's), the potential for more Commonwealth water buybacks and the lack of an Environmental Watering Plan.
- A strong view emerged that the Plan will create uncertainty, in particular through proposed mechanisms such as the shared-reduction in the Southern Basin and the 2015 review.
- There is significant opposition to further Commonwealth water buybacks, with a corresponding level of support for water recovery through infrastructure upgrades, on-farm and environmental efficiencies.
- There was some doubt over the additional environmental benefits to be achieved by the volumes of water proposed to be returned to the environment coupled with a strong level of disbelief that healthy communities are a natural by-product of having healthy rivers alone.
- The Plan is seen as discouraging of continued food production in the Basin and discouraging of business investment, in particular through the perceived level of uncertainty generated by the Plan.

Please refer to **Appendix 1** for a more detailed summary of the results of the survey.

It is important to note that a considerable proportion of respondents were farming businesses. Such negativity towards the plan is concerning from a business investment perspective. Notwithstanding how the Basin Authority chooses to reflect on the concerns raised about the Plan, it is critical that the Authority recognise that farming businesses are typically at the centre of the investment needed to drive the region's growth and productivity. As such, in its response to the key issues arising from the public consultation process the Authority must be cognisant of the need to re-establish the confidence of the business community in order that long term investment can proceed.

4. The Group's analysis of the Draft Basin Plan

The structure of the Draft Basin Plan and the omissions in crucial information place our group of Councils in a quandary in terms of how to adequately respond to the Plan on behalf of the region's communities.

The Group cannot view the Draft Basin Plan as a fully detailed plan in the usual sense of the word. Rather it is more akin to a framework, which hinges upon a considerable volume of as-yet uncommenced future work with unknown outcomes. In this context it is difficult for us to make an informed assessment of the Plan's effects, as the magnitude of the impact on communities is almost fully dependent upon the outcomes of further work.

We describe the predicament as follows:

- Key components of the Plan that are presently unknown include the methods by which the 2,750GL water will be recovered (infrastructure or 'buybacks') and the nature and extent of further environmental efficiency works that may influence the volume of water required.
- As a result of this, we find it difficult to accept the basis of the 2,750GL as the target volume of reductions, being aware that this will most likely vary as new information becomes available.
- Of this 2,750GL, 971GL in the Southern Basin is unallocated to any particular catchment. The amount of this that will be sourced from our region is unknown and uncapped.
- Through not having adequate information on where, how, and how much water is to be contributed from our region, our Group's capacity to ascertain impacts on our region's communities with certainty is particularly constrained.
- Not being able to adequately determine community impacts hinders our capacity to participate in discussions around mitigation strategies for communities with reduced irrigation water. We note the absence of any detailed discussion in the Basin Plan around risk avoidance and mitigation, presumably due to a lack of relevant information and high level of uncertainty as described above.

Stakeholders should be able to expect that a fully detailed plan seeking to redistribute water across the various users of the Basin would state in clear terms where the subject water was to be sourced and how it would be used, but this is not the case. This lack of information feeds the uncertainty amongst the farming and business community, meaning investment and business decisions cannot reasonably be made in the absence of supporting information. There is already evidence within our communities that investment is being stifled because of this uncertainty.

We wish to affirm the Group's support for a plan for the Murray Darling Basin. It is clear that with 6 separate jurisdictions⁴ seeking to draw on the water resources of the Basin there is an imperative for a long-term sustainable water management plan for the whole of the Basin. However, the plan that has been presented on this occasion is inadequate and likely to result in considerable economic and social consequences for many of the Basin's towns and communities.

Our assessment of each of the key issues arising from the Draft Basin Plan is outlined below. In broad terms this will cover:

- The gaps in the current information required for a complete Plan
- Proposals around water recovery
- Proposals around the use of environmental water
- Potential impacts on the community and local and national economies

The Group has formed positions around many of the key elements of the Draft Basin Plan and these will be highlighted and explained throughout the discussion. Section 5 of this report will provide an overview of the key issues as seen by the Group with recommendations for moving forward.

4.1 The Plan lacks sufficient information to enable a proper assessment of its impacts, let alone to implement.

4.1.1 The Group seeks a Plan with all dependent work completed prior to its consideration in Parliament.

The Group sees that the implementation of the Basin Plan in its current form would be leaving the most fundamental aspects in doubt. The Plan as presented constrains our ability to make a full and confident assessment of the impacts on the local economy and the communities of our regional footprint, as the fundamental information underpinning the Plan is absent. In this regard we regard the Plan as incomplete and necessitating considerable work before it can progress. In particular this relates to the source and method of water recovery, the future use and management of environmental water and risk mitigation for

⁴ Queensland, New South Wales, Victoria, South Australia, the Australian Capital Territory & the Commonwealth of Australia.

affected regions and communities. These aspects of the Plan will be elaborated through the discussion that follows.

The proposed timeframe for delivery of the Basin Plan by the end of 2012 is premature in light of the remaining work required to bring about a comprehensive proposal inclusive of all necessary information for its full consideration. Parliament's consideration of the Basin Plan should only take place after changes are made and there is a level of mutual agreement between stakeholders greater than that evident at present. Contrary to recent statements, dissatisfaction on all sides does not infer that balance has been struck.

4.2 The Plan lacks detail on how the water will be recovered, with the method of water recovery critical to influencing regional outcomes.

4.2.1 The Group can not support the volume of water proposed for recovery in the absence of a detailed water recovery strategy.

While the volume of water proposed for recovery has reduced from the initial 3,500GL of the Guide, the 2,750GL of the current Plan still represents a cut to irrigation equivalent to conditions experienced during the recent drought. This figure represents a further 20% cut to the Basin-wide Baseline Diversion Limit - it is clear that this level of reduction will have drastic implications for the composition and resilience of the local economy.

However, this stated figure is subject to a number of assumptions, with the Basin Plan relatively silent on the range of possible environmental works and measures that could be undertaken to maximise the efficiency of environmental watering. Investment in environmental watering (including improved river operations) would presumably lessen the 2,750GL of water proposed to be returned to the environment, as environmental benchmarks could be met with less water. Further modelling must be undertaken for a variety of scenarios inclusive of environmental works - including downwards of 2,400GL – before any credibility can be given to 2,750GL as the required volume of water.

Options for minimising the impacts of water recovery through such environmental works, infrastructure and other means must be clarified through a detailed strategy. A water recovery strategy has not been developed alongside the Basin Plan nor is it clearly specified that such a strategy is required. For all of the discussion regarding the Plan's bias towards infrastructure over water recovery through buybacks, the

Group does not see this bias evident in the Plan itself with the legislative instrument absent of any such references. In this regard, communities and businesses have little faith in 2,750GL as the 'right' volume of water, nor certainty around how, when and where water will be recovered. This issue will continue to frustrate investment and business decisions until such time as clear strategies are formulated.

4.2.2 *The Group can not support the concept of the shared-reduction in the absence of a detailed water recovery strategy.*

One of the key differences between the Guide and the current Draft Basin Plan is the way in which water allocation reductions have been apportioned between systems. Along with the large volume of water proposed to be diverted away from productive use, we find ourselves particularly concerned with the concept of the shared reduction, totalling 971GL in the Southern Basin. On a pro-rata basis⁵, this would translate approximately to an additional 353GL from the four major catchments influencing our region being the Goulburn, the Murray, the Loddon and the Campaspe. While this is a significant and concerning figure, more worrying is the likelihood that the northern Victorian region will be targeted for an even greater share, for reasons that will be discussed further below.

It is understood that the rationale for the Basin Plan leaving such a significant portion of water unallocated to particular systems is to allow the 'market' to determine from which system the water should derive. Considering that 971GL represents more than two thirds of the remaining water to be recovered in the Southern Basin, the Group expresses an alternative view - that the concept will generate market uncertainty and could lead to perverse outcomes on the ground.

A well-functioning market-based system is dependent on the availability of knowledge and information in order that reasoned business and investment decisions can be made. In this light, we see that leaving the bulk of water reductions unallocated will feed uncertainty in the market, leading to unintended consequences, such as:

- Interstate and inter-catchment competition: Each river catchment effectively has a different capacity to compete for water based on dominant agricultural sectors (eg. pasture-based versus horticulture). An unplanned free-market approach would likely see certain systems less able to compete for water. At a higher level this could also see particular States unfairly burdened.

⁵ Based on Baseline Diversion Limits (BDL's) specified by the Draft Murray Darling Basin Plan Schedule 3

- Progressive system erosion : A ‘Swiss cheese’ patchwork or wholesale routing of certain systems is a likely consequence, arising from panic, self-preserving or misconceived selling behaviour. This would leave prohibitive costs for residual irrigators and render certain systems potentially unviable.

Outcomes for northern Victoria with such an unplanned approach to water recovery would be overwhelmingly damaging. Water in our region would likely be attractive for buyback due to the relative availability of high-reliability water shares, the predominance of pasture-based agricultural industries and the area being downstream of key system delivery constraints.

This element of uncertainty leads back to our earlier comments that the Draft Basin Plan can not be considered a ‘plan’ when key considerations such as where the water will come have not been determined. Again we stress the need for a detailed water recovery strategy to provide more certainty as to how and where environmental water is to be sourced. In the absence of such a plan our capacity to undertake a full and proper assessment of outcomes for our local communities is significantly constrained.

Rather than a shared-reduction the Group would prefer to see assigned reductions, at a minimum apportioned between the States. In saying this, we would seek to ensure that the volumes would be fairly and equitably assigned between States or individual catchments with due regard given to the extent of water recovery already undertaken. The process should also provide State and Local Governments appropriate opportunity for review and input.

4.2.3 *The Group strongly opposes any further Commonwealth water buybacks except where:*

- consistent with an agreed water recovery strategy; and***
- all other opportunities for water recovery are expended.***

As has been previously discussed, many towns and communities of our region have developed around the irrigation system and as such a reduction or removal of water would likely have considerable economic and social implications at the local level. We regard the process of removing water through buyback as a short-term solution, which can have permanent and irreversible consequences for farming districts and small towns through removing the key economic driver. While dryland farming options might remain the value of return per area is significantly less, with opportunities for value-adding through processing or refinement also diminished.

Commonwealth buybacks to date have not been strategically based - rather the influx of government funds onto the open market has distorted the value of water and contributed to the fragmentation of the irrigation system through the indiscriminate de-watering of individual farms. This process has led to higher costs for residual users and can put at question the ongoing viability of some systems. While options to improve this process remain through a more 'targeted' approach, the overall impact on rural communities remains acute and the Basin's capacity for diversified and substantive food and fibre production is weakened. The Group would instead seek to have remaining water recovery fully achieved through a wide range of efficiency measures backed by long-term government commitments to funding.

We note the tendency for governments to make offers of compensation or commitments to post-water mitigation projects in an attempt to assist communities in which irrigation previously supported the local economy. While regional funding is welcomed, in many ways this process can be seen as ironic – the same money could have been used to modernise and shore up irrigation infrastructure in the first place, hence removing the need for unnecessary economic restructure and mitigating responses. We would like to see the priorities reset to focus on investment in works and measures.

It should also be noted that it is unrealistic for Councils to be asked to identify mitigation projects at short notice. Initiatives of this importance and scale are best developed through a substantive and strategic planning exercise in collaboration with local communities.

4.2.4 The Group will strongly support investment in irrigation and environmental infrastructure as the principal means of water recovery.

Much of the irrigation system in place today is a century old. In recognition for the need for significant modernisation of the system, large scale projects such as NVIRP have delivered environmental water through system efficiencies coupled with the maintenance of water for productive use. These are legacy projects, improving Australia's capacity to balance environmental and productive demands into the future. As discussed above, while cheaper short-term options such as buyback might appear attractive to governments the damage caused to rural communities and Australia's productive capacity is ultimately irrecoverable. The towns, businesses and farming communities of this region cannot become the casualties of a desire for expedient, low-cost solutions for water reform in the Basin.

Water recovery principally undertaken through investment in maximising efficiency will resolve much of the angst for our farming sector and small rural communities while continuing to deliver environmental benefits. On-farm efficiency programs, for example, have been typically oversubscribed due to popularity, delivering considerable water savings through efficiencies while modernising irrigation farming techniques. We observe that the Commonwealth has committed to a substantial package (\$4.6 billion over 12 years) to buy back permanent water rights from irrigators⁶. Diversion of this money to infrastructure, on-farm efficiency and environmental works and measures would have absolute benefits for the Murray Darling Basin by:

- achieving the water savings required for the environment;
- retaining equivalent volumes of water for productive use;
- maintaining rural economies and employment;
- providing long-term investment in food and fibre production; and
- boosting local economies and employment through the capital works program.

Efficiency measures must include environmental works and a review of river operations, with this area presenting enormous opportunities for water savings. Investment in works and measures for meeting environmental benchmarks more efficiently will have the additional benefit of avoiding risks to private land – through overbank flows, for example, which is observed as one of the more controversial proposals around environmental watering.

It is essential that water gains achieved through investment in works and measures are credited back to the relevant catchment(s), hence contributing towards achieving reduction targets. This will require a more flexible approach to SDL's, which will be discussed further in this submission. It is also important for the reestablishment of community confidence and unity across the Basin for all States to participate in such projects. This will require State and Federal co-operation for sustained funding for environmental water-saving initiatives.

⁶ http://www.mdba.gov.au/draft-basin-plan/supporting-documents/ewp/ewp_ch4

4.3 The Plan lacks sufficient detail on how recovered water will be used.

4.3.1 The Group expresses conditional support for preparation of EWP's by the States, subject to:

- a framework of strong co-ordination between the States; and**
- a framework committed to stakeholder and community input.**

The Group acknowledges that the lack of an Environmental Watering Plan is an issue of significant concern to its communities. It would be a common expectation that a plan seeking to redistribute the use of water amongst the competing needs of the Murray Darling Basin would be accompanied by a detailed plan explaining how, when and where the water recovered for the environment would be used and managed. In this regard we express disappointment that stakeholders in the Basin Plan are unable to respond to the Plan as a complete plan.

Having said that, the Group also acknowledges that the Commonwealth does not have a strong history of water management due to the States holding responsibility for natural resource management. In this regard, while we express some concern about the relative lack of information available at this stage around the use and application of environmental water, given an option the Group would prefer that long term EWP's be prepared at the State level with maximum opportunity for input of knowledge at the local level.

In this regard one of the Group's key issues is ensuring that the framework for implementation is robust and that stated commitments to localism ensue. While we are not in a position to undertake a full technical assessment of the operations of Chapters 7 and 8 of the legislative instrument, where possible we wish to see strengthening of language around provisions requiring the preparation of long term Environmental Watering Plans and determination of annual watering priorities in consultation with local communities. We also observe that the preparation of long-term watering plans at a State level must necessitate strong co-ordination between the Basin States. This concept of Basin-wide collaboration must be woven into the Basin Plan framework if successful outcomes for the use of environmental water are to be achieved.

4.4 The Plan has the potential to bring about unacceptable impacts on local communities and the nation's capacity for food production.

4.4.1 *The Group will only support proposals and actions that have had the impacts on communities quantified and offsets or mitigating responses agreed to by Local Government.*

The Plan's relative lack of details on community impact is of particular concern. A proposal of this scope should be seeking to achieve a triple bottom line of economic, social and environmental benefits, however the emphasis of the Plan on obtaining environmental outcomes with little regard to the other two components reveals deep flaws in the underlying motives of the Plan. We reiterate that our communities are encouraging of initiatives to reinvigorate the health of the river systems of the Basin, recognising the role of the region's rivers in the formation of local identity and contribution to the local economy through tourism and recreation. However, with the economy of our towns and wider region underwritten by irrigated agricultural production and its associated processing sector, the impact on local businesses and communities of transferring water away from productive use is of principal importance.

In particular, there is a noticeable lack of detailed assessment of micro-economic and social impacts at the local level, which has proven frustrating in seeking to determine the risk posed by the Basin Plan to local jobs and economic output in each municipality. Social impact assessments that have been undertaken are overly broad and vague and do not bring new information to light directly relevant to the proposals advanced by the Basin Plan. Broad assumptions around population movements from smaller towns and districts to regional centres, for example, mask the on-ground consequences of re-structuring the rural economy. There has been little discussion also around the hidden costs of future social welfare associated with loss of jobs and small-town decline, including mental health and family breakdown. This lack of research has put Councils, businesses and communities in a position of having to source their own information on what the Basin Plan might mean for their future.

As has been noted, our towns and businesses have developed on the premise of irrigation as the underlying economic driver – water is very much the *raison d'être* for many communities, which in reality would not likely exist were it not for the intentions of previous governments to develop this region as the food bowl of Victoria. We believe there is a clear duty of care owed to such communities that have developed through government-established irrigation schemes.

Hence, where proposals are likely to impact on local businesses and communities, detailed risk assessments must be undertaken to assist communities as well as local government to understand the consequences. Further, where maintenance of water is determined not to be an option, offset or mitigation responses must be clearly outlined with a long-term commitment to assisting the evolution towards a new economy. We note that the intricacies of local economies have taken many decades or longer to establish. The implementation of SDL's in 2019 must not be seen as the end point in community transition, but rather the beginning.

4.4.2 The Group favours proposals and actions that will maintain or increase the region's ongoing capacity for sustainable food and fibre production.

At a time of growing national and global population with predictions of sustained food shortfalls in the future, it is worrying to our group of Councils that a proposal would be conceived that openly works towards decreasing Australia's capacity for food production.

The key agricultural industries of our regional footprint – dairy, cropping, viticulture, fruit and vegetable production to name a few - are virtually fully dependent on irrigation water and would not exist were it not for the broad system of irrigation channels interlacing the region. Climactically, many of these agricultural sectors are not suited to other parts of Australia, such that continued removal of water from the Basin would cause retreat or the cessation of production for many of these food types. In the first instance this would compound the continued trend towards the importation of food into Australia and further weaken the capacity of Australian grown products to compete against larger foreign interests. Subsequent to this arises the question of Australia's future food security and the nation's capacity to feed its own population in uncertain times.

More broadly, in a world with a growing population we ask what genuine commitment Australia has to its global humanitarian obligations if a policy of decreased food and fibre production is being pursued. With a medium forecast global population of almost 9 billion by 2050⁷, the challenges presented over the coming decades are significant and must be considered as part of an holistic long-term plan for the use of water in

⁷ United Nations Department of Economic and Social Affairs/Population Division *World Population to 2300*

the Murray Darling Basin. Australia would do well to also treat this as an opportunity, with significant trade and economic benefit to the nation associated with increased global demand for food and fibre.

4.5 Ongoing water reform efforts must be collaborative and provide certainty for communities.

4.5.1 The Group opposes the 2015 review in preference for an adaptive SDL framework accommodating of ongoing water efficiencies and new knowledge.

The proposed 2015 review cannot be supported, as it continues to drive the uncertainty for outcomes in our region. The Group's concerns are discussed below in terms of the issues generated by the review while providing commentary on an adaptive SDL framework that would effectively negate the requirement for a review.

i) The rigour of the existing science is put at question.

- The need for further review is questionable if there is adequate confidence in the science informing the SDL's as presently specified. We also observe that the matters at s.6.06 to be taken into account in 2015 would likely be relevant on an ongoing basis right through to 2019. In this regard, a method of expressing the SDL's in a more flexible way that can respond to the dynamic nature of the process would be preferable (discussed further below.)

ii) The element of uncertainty surrounding final outcomes is perpetuated and exacerbated.

- The need for certainty to instil confidence in business and investment decision making has been discussed at length in this submission. A concern expressed by our communities during discussions on the Draft Basin Plan is that the continued uncertainty regarding end outcomes for SDL's is a considerable disincentive to farm and business investment. Coupled with the insecurity cultured by the shared reduction, the potential for the SDL's to shift again is a highly unattractive proposition.

iii) **The processes required for alteration of the SDL's lend doubt to successful outcomes.**

- The Murray Darling Basin Authority has expressed the notion that the 2015 review is an opportunity to lower the volume of water being reallocated away from productive use. We express some concern about the articulation of such sentiments, being aware that opposing interests are unlikely to readily accept such an outcome. The provisions of s.6.06 and 6.07 as the guiding provisions for the 2015 re-assessment of SDL's can work as equally in favour of a further decrease in SDL's as an increase in SDL's. In this regard we express concern in the Authority attempting to obtain community acquiescence on an unsubstantiated premise.
- It is also noted that there is no requirement specified for further community consultation on this key issue. Neither side of the debate is likely to accept changes to SDL's without an opportunity for input, considering that 'the volume' is one of the core Basin Plan issues. In their current state as volumetric expressions, changes to the SDL's would need to obtain Parliamentary assent. We express considerable doubt that this would be a straight-forward process in light of the high level of interest that this topic holds politically.

In line with the Plan's claimed preference for an adaptive management framework, the Group would like to see the Basin Authority explore alternative options for expression of the SDL's, which is expressly provided for in the Commonwealth Water Act⁸. We are attracted to alternatives such as an equation-based or other adaptive expression of SDL's that could continue to account for ongoing water savings through efficiencies gained via channel, on-farm and environmental works and measures. This method could also act as an incentive for governments and authorities to invest in measures that will reduce the impact on local communities while continuing to deliver water back to the environment.

4.5.2 The Group supports the ongoing reform of water management across Basin States where mutually beneficial outcomes are realised.

In recognising the Basin States as five separate jurisdictions, a particular concern raised by the communities across the region was the impact of water management in other Basin States and the influence this has on outcomes for Victorian water users. Key examples cited included the lower lakes of South Australia and the

⁸ Water Act 2007 section 23(2)

Coorong barrages, and a perception of imbalanced apportioning of water allocation reductions between the Northern and Southern Basin as part of the Draft Basin Plan.

The Group is not in a position to provide substantiated commentary on many of the scientific issues around water use in other parts of the Basin – however, we do observe that supplementary information provided by the Basin Authority has to some degree lessened concerns regarding the status of the lower lakes in South Australia. The Group would like to ensure the continuous review of water management in the lower lakes to ensure the most efficient use of water possible, supported by continued investment in environmental works and measures so as to minimise allocation reductions for upstream catchments.

We see that the continued review of rules around water trading and operations are additionally important to resolving many State-based issues around water management. A system of water management operating under a variety of State-based frameworks creates obstacles to achieving best-practice in the efficient use and delivery of water.

In seeking to establish consistency around rules and operations it is also crucial that environmental water be treated on similar terms to other water. This includes issues such as:

- Fair apportionment of costs between environmental water holders and irrigators in association with maintenance of the physical delivery system;
- Capacity within the system for temporary trade of environmental water, eg. for emergency watering in the agriculture sector for maintenance of plantings during periods of low allocations.

Issues such as rules around water trade, river operations and levels of consumption in each State can have significant impact on outcomes on the other Basin States. Universal recognition of the important links between the States and the nature of the Basin as a single system will assist in bringing about mutually beneficial outcomes for all Basin users.

5. A way forward

The eight Councils of our regional partnership seek balance in the Basin Plan. As a principle, this means aspiring to achieve across-the-board benefits for all stakeholders in the Murray Darling Basin – this translates to social, economic and environmental gains. The Plan in its current form does not achieve this, rather it is presently perceived to focus on achieving environmental benefits at a risk to the towns and communities of this and other regions dependent upon irrigation water.

Our region has strong binds to water. With the rivers of the region fundamental in the formation of local identity and sense of place, the communities of northern Victoria fully support the proposition of restoring the health of the waterways, but are equally concerned about the considerable economic implications of doing so. The irrigation systems upon which the towns and communities of northern Victoria have developed continue to drive the local economy through food and fibre production, and it remains improbable that there is an alternative source of employment and income of the scale to take its place. We observe that positive environmental outcomes and a sustainable economy and community do not have to be mutually exclusive – rather, that there are a host of options available that would realise benefits for all water resource stakeholders.

We note that many of the issues with the Plan have their genesis in overarching legislation and water management arrangements. This fact cannot constrain our capacity to comment holistically on the broader concerns about ongoing water reform in the Basin. Where issues are beyond the scope of the Murray Darling Basin Authority to remedy, it would be anticipated that the Authority would make recommendations to government to review the relevant constraints in the system as part of a commitment to continuous improvement.

Throughout this submission the Group has discussed its concerns with specific aspects of the Draft Basin Plan and has put forward recommendations. The following table (Table 2) will seek to consolidate the key issues, positions and recommendations for moving forward, with concluding commentary to follow.

Table 2: **Key themes, positions, and recommendations**

Theme	Group's position	Recommendations
Timeframes for implementation	<i>The Group seeks a Plan with all dependent work completed prior to its consideration in Parliament.</i>	<p>Complete all dependent work prior to Parliament's consideration of the Plan</p> <p>This includes the preparation of:</p> <ul style="list-style-type: none"> • An agreed water recovery strategy; • Impact assessments and mitigation options at the local community level.
Sustainable Diversion Limits (SDL's)	<i>The Group can not support the volume of water proposed for recovery in the absence of a detailed water recovery strategy.</i>	Require the preparation of a water recovery strategy that seeks to establish how, where and when water is to be recovered. Such a strategy must be prepared with community, local government and key stakeholder involvement.
971GL Southern Basin shared allocation reduction	<i>The Group can not support the concept of the shared-reduction in the absence of a detailed water recovery strategy.</i>	<p>_____</p> <p>Provide more certainty to shared-reduction outcomes by re-apportioning water recovery targets (at a minimum) along State boundaries.</p> <p>_____</p>
Water buybacks	<p><i>The Group strongly opposes any further Commonwealth water buybacks except where:</i></p> <ul style="list-style-type: none"> - <i>consistent with an agreed water recovery strategy; and</i> - <i>all other opportunities for water recovery are expended</i> 	<p>Seek commitment to investment in irrigation, on-farm and environmental infrastructure as the principal means of water recovery, with a delay in buybacks until all options for system efficiency are exhausted.</p>
Mitigation / infrastructure	<i>The Group will strongly support investment in irrigation and environmental infrastructure as</i>	

	<i>the principal means of water recovery.</i>	
Environmental Watering Plans (EWP's)	<i>The Group expresses conditional support for preparation of EWP's by the States, subject to: - a framework of strong co-ordination between the States; and - a framework committed to stakeholder and community input.</i>	The process for EWP preparation should be affirmed with the States utilising local networks such as Catchment Management Authorities.
Community impact	<i>The Group will only support proposals and actions that have had the impacts on communities quantified and offsets or mitigating responses agreed to by Local Government.</i>	Complete impact assessments and mitigation options at the local community level where it is identified that water recovery will cause unreasonable impact. This should include a substantive and strategic consideration of potential responses supported by Commonwealth funding with seed money for implementation.
Securing food and fibre production	<i>The Group favours proposals and actions that will maintain or increase the region's ongoing capacity for sustainable food and fibre production.</i>	Seek government commitment to investment in irrigation, on-farm and environmental infrastructure as the principal means of water recovery in order to retain water in productive use.
2015 SDL review	<i>The Group opposes the 2015 review in preference for an adaptive SDL framework accommodating of ongoing water efficiencies and new knowledge.</i>	Explore the option of an adaptive SDL framework accommodating of ongoing water efficiencies and new knowledge, built on an equation-based or alternative expression of SDL's that allows for progressive recognition of realised

		water savings.
Basin State relations	<i>The Group supports the ongoing reform of water management across Basin States where mutually beneficial outcomes are realised.</i>	Continue to emphasise a collaborative process between the Basin States. Additionally, instil community confidence through a commitment to investment in works and measures across all Basin States in return for collective water gains.

The eight Councils of this regional partnership are significant stakeholders in the outcomes of the Murray Darling Basin Plan. Our regional footprint occupies one quarter of Victoria, takes in the whole of the Goulburn Murray Irrigation District and produces almost 60% of the State's irrigated agricultural produce. Water is the defining feature of the region's way of life, be it through production, tourism, environment or identity. Our Group can proudly claim represent a broad and diverse community eager to achieve a balanced outcome on this important reform.

Australia has a proud history of nation building through infrastructure initiatives. In accordance with this notion, an opportunity is now available for positive water reform in the Murray Darling Basin that will realise benefits for all water users. Proactive and considered water policy that claims tangible gains for the environment, communities and the economy must be the way forward for the Basin. In this regard, works and measures that realise water efficiencies must be exhausted prior to discussions about removal of water from productive use. This also requires a re-examination of alternative, dynamic expressions of SDL's that can progressively incorporate realised water gains. Doing so would bring about long-term material gains to the environment while at the same time ensuring that Basin communities can maintain local economies centred on food and fibre production.

Consideration of the impacts of any further changes in water availability requires a full and genuine assessment of the social and economic impacts at the local level. This requires substantive and strategic assessment, such as through a multi-decade economic development strategy. Realistically, the capacity of irrigation communities to readily transition to a resilient and equally-prosperous new economy is limited.

However, discussions around mitigation options must only occur once all possible gains from works and measures are exhausted. A substantial commitment to Commonwealth funding for works and measures will be necessary, as will seed funding for economic development initiatives. Commonwealth funding presently set aside for water buybacks must be reassigned to initiatives that achieve tangible benefits for all water users.

Importantly, our Group believes this approach will re-establish the confidence required for Basin communities to move forward with a water reform process aspiring to productive, universally beneficial outcomes.

APPENDIX 1

Summary of Community & Business Survey

Total responses: 102

Status of respondents:

Individual	70
Business	31
No response	1
<i>TOTAL</i>	<i>102</i>

Usual occupation, business or interest:

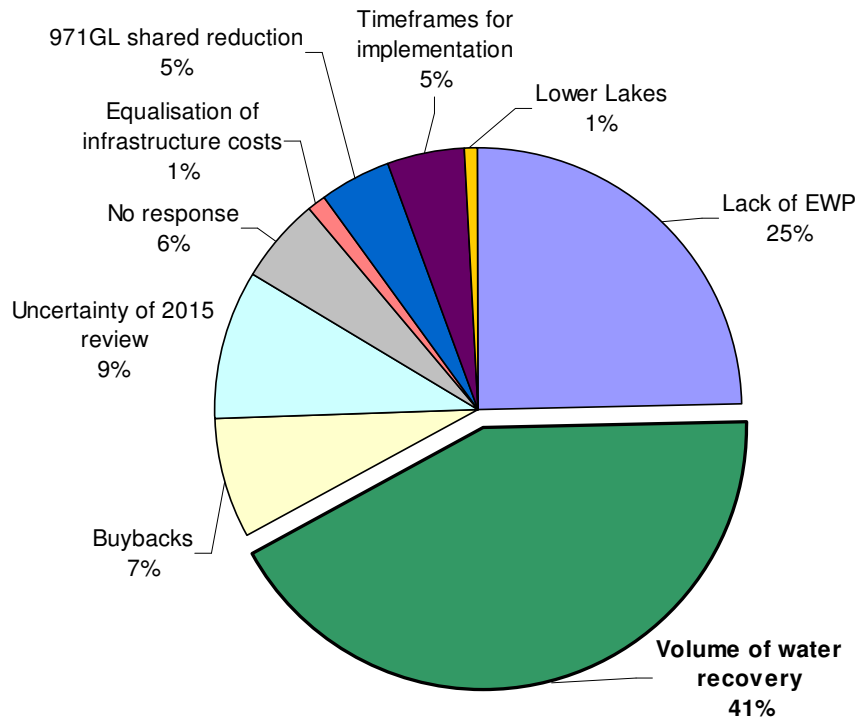
Agricultural production	50
Agriculture-related industry	11
Tourism and recreation	3
Community interests	9
Other	20
No response	9
<i>TOTAL</i>	<i>102</i>

Connection to irrigation water:

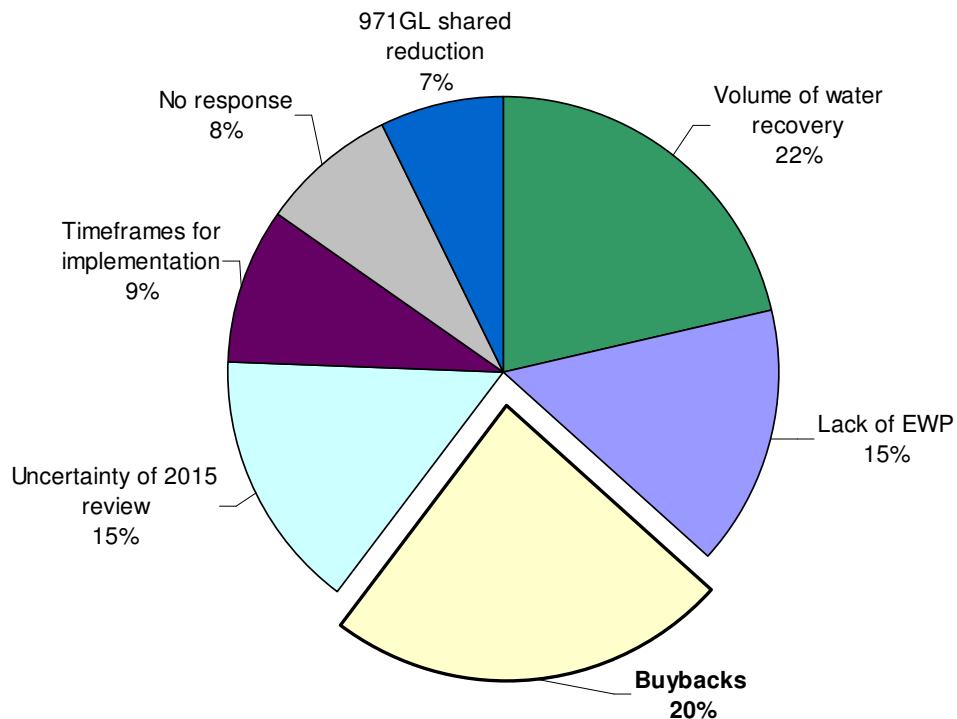
Directly dependent (user of irrigation water)	45
Indirectly dependent (clients/suppliers dependent on irrigation water)	15
Live in an irrigation-dependent community	31
Independent of irrigation water	5
No response	6
<i>TOTAL</i>	<i>102</i>

Priority issues:

Draft Basin Plan: Issue of highest priority



Draft Basin Plan: Issue of second highest priority



Perceptions of outcomes:

Statements posed to participants:

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	No Response
♦ The Plan will bring about positive water reform.	33%	29%	19%	6%	5%	8%
♦ The Plan will create certainty for business investment.	34%	28%	14%	11%	5%	8%
♦ The Plan will foster healthy communities through having healthy rivers.	31%	30%	23%	4%	5%	7%
♦ The Plan will encourage the continuation of food production in the Basin.	38%	28%	16%	8%	3%	7%
♦ The timeframe for implementation of the Sustainable Diversion Limits (2019) will be sufficient to be able to re-structure farms and local businesses.	30%	27%	19%	14%	2%	8%
♦ The volume of water proposed to be returned to the environment will improve river health.	23%	24%	29%	11%	5%	8%
♦ My business or sector will be able to manage with less water.	29%	28%	21%	11%	2%	9%
♦ The 'shared pool' of reductions will achieve the optimal outcome for local systems by letting market forces prevail	29%	30%	19%	8%	0%	14%

Solutions:

Statements posed to participants:

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	No Response
♦ Water should be saved primarily through infrastructure upgrades.	2%	3%	7%	34%	43%	11%
♦ There should be no more water buybacks by the Commonwealth.	4%	9%	18%	28%	33%	8%
♦ Opportunities for limited Commonwealth buybacks should remain.	13%	12%	25%	33%	8%	9%
♦ A detailed Environmental Watering Plan should be developed up front.	2%	0%	8%	33%	47%	10%
♦ Continue to leave the development of Environmental Watering Plans until later.	27%	24%	14%	19%	6%	10%
♦ Keep the proposed 'shared pool' of reductions and let the market determine outcomes.	16%	23%	30%	16%	3%	12%
♦ Replace the 'shared pool' of reductions with prescribed reductions for each system.	9%	23%	24%	21%	11%	12%
♦ Mitigating projects should be outlined for affected towns and regions.	0%	1%	7%	47%	35%	10%
♦ No action or further buybacks until the Sustainable Diversion Limits are reviewed in 2015.	3%	10%	15%	30%	32%	10%