

The Goulburn Valley Environment Group Inc.

Po Box 2073 Shepparton Vic 3632 Ph. 0418620377 e-mail: gveg.enviro@gmail.com

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Productivity Commission

Murray-Darling Basin Plan Implementation review 2023

Goulburn Valley Environment Group (GVEG) is one of the peak environmental groups in northern Victoria and our members have advocated for improved protection and management of the natural environment in the Goulburn Valley and Goulburn-Broken catchment since our formation in 1990. This has included involvement in the development and implementation of the Basin Plan.

Our comments to the Inquiry are set out below, using the terms of reference as a guide.

What issues are important to you in implementing the Basin Plan?

The Basin Plan simply came into being to address the over allocation of water resources across the Basin. The completion of the return of 3200GL is very important to GVEG, as is the removal of constraints to enable the utilisation of water recovered for the environment.

What lessons should be learned from programs aimed at helping communities adjust to the Plan?

Many of the programs were poorly targeted and did not leave impacted committees with lasting assets that would both assist transition and contribute to the ongoing resilience of communities. Structural adjustment should include consultation with communities and not simply assume irrigation infrastructure and the retention of rural jobs is the desired outcome.

How well is the Plan addressing the interests of the Aboriginal people?

The simple answer is "not very well', Traditional Owners do not have sufficient input into decision making in Federal or State jurisdictions regarding the Basin Plan. The term "have regard to" is vague and offers little confidence that Indigenous knowledge and interests are being genuinely considered. Compounding this issue is a recent history of Government promises relating to finance, cultural water and representation not being honoured.

How could Basin Plan water recovery be done better?

There is a strong argument that a simple percentage from all water entitlements, fully compensated, would have been a more equitable solution and would have delivered by now. Given this was not the case, GVEG has always supported targeted buybacks to both obtain the required water and to reduce the footprint of irrigation areas. This reduces

capital tied up in infrastructure and reduces ongoing costs to irrigators. Climate change must be considered as the environment is most at risk of flow reductions under the current Basin Plan.

What needs to change to deliver infrastructure and efficiency projects under the plan?

Unrealistic socio-economic criteria instigated by NSW and Victoria has effectively precluded landholder participation in on farm water-use efficiency programs.

This action, (set of criteria) flies in the face of all productivity principles, causes landholders to miss out on opportunities to rationalise irrigation systems and denies communities opportunities to transition to a drying environment.

We strongly suggest these criteria be abolished/modified and assessment of projects include neighbouring districts and the regional central hubs, projects to be targeted at districts and industries and where possible projects be encouraged to incorporate modern and emerging technologies.

How is environmental water improving the health of the Basin?

GVEG has for many years been an active partner in the GBCMA's committees advising and overseeing the delivery of environmental water in our Goulburn River Catchment. Despite deliveries being confined to small in bank flows, monitoring has clearly shown improvements to in channel vegetation, fish breeding events and water quality. We are confident of environmental improvement, but disappointed this has been limited by the Victorian government of flows to "in channel" and denying fully utilising recovered water to maximise the improvements to the health of wetlands and low-lying vegetation.

What more could be done to support a healthy working Basin?

The federal government must take a more central role in both the recovery of the 3200GL and the delivery of constraint management.

Agreement with the States, including clear milestones and penalties need to be established. Given our experience of undermining and obstruction over the past decade, without Federal intervention we have no confidence that implementation of the Basin Plan will be achieved. We are very wary of "toolkit" like solutions that reduce water recovery requirements but do not address the simple over allocation of water in the Basin.

GVEG thanks the Commission meeting with us in Shepparton and this opportunity to comment on the Basin Plan.

.John Pettigrew, GVEG Water Resource Spokesperson