Southern Riverina Irrigators represent 1800 generational farming families across the Riverina, supporting a \$7 billion agricultural industry while underpinning our region and the country socially, economically and environmentally, through the use of dual purpose irrigation water to grow staple food and support biodiversity on farm. We are licensed and metered irrigators according to best practice with every single drop of water entering our farms measured.



NEWLY IRRIGATED PADDOCK

supporting biodiversity.

SUMMARY and GENERAL COMMENTS

It is disappointing to read the National Water Reform 2024 interim report.

There is a distinct lack of acknowledgment of irrigation and its important role in:

- producing staple food
- supporting environmental outcomes
- economic value and job creation.

The National Water Initiative has, like many other publications, been highjacked by ideological environmental outcomes and First Nations water issues and while we agree on the importance of these, they are not the ONLY issues that need addressing. The omission of irrigation and the role it plays in environmental opportunity is glaringly obvious and cause for major concern.

Page 6 states the NWI gives all stakeholders a common language to talk about water reform and while this was the original sentiment, it is certainly not the case in 2024.

How do you propose to feed a projected population growth over the next fifty years of somewhere between 30-45 million (based on your graph) without irrigation to grow staple foods to support this growth?

You cannot ignore the impact a reducing irrigation pool will have on staple food production and future food security for our nation, and yet reform after reform continues to do so.

Our irrigation communities are tired and uncertain about their future.

This uncertainty combined with increasing costs of water delivery (due to sharing system running costs across fewer irrigators) is forcing irrigators to sell water – these are not voluntary sellers but distressed sellers.

We are no longer on an even playing field and the environmental opportunity irrigation brings is ignored time and time again.

Have you taken the time to consider irrigation:

- provides wildlife refuge across a significant footprint of NSW and Victoria particularly during dry times and drought
- irrigation channels provide wildlife refuge for rakali, fish, turtles and birds
- watering a paddock, particularly at the start of every season provides a food source particularly for migratory birds
- supports tree corridors and on farm wetlands
- farming land is an environment, supports biodiversity and is enhanced by irrigation

These opportunities will be lost and former productive irrigation land will become a haven for weeds and vermin. And lets not forget without irrigation we actually need a larger footprint to grow food because yields are lessoned.

Current water reform is stripping away Australia's productive capacity.

The intergovernmental agreement on a NATIONAL WATER INITIATIVE

The original preamble of the NWI acknowledges in point 2 - water is used for a variety of purposes – irrigation, industrial use, mining servicing rural and urban communities or for amenity values and decisions involve BALANCING economic, environmental and other interests. It goes on to say parties agree to implement the NWI in recognition of a continuing national imperative to increase PRODUCTIVITY and efficiency of Australia's water use and provide greater certainty for investment and the environment and deal with change responsibly and fairly.

AND that's just page one.

Points of notice from the Water access entitlements and planning framework

- enhance security and commercial certainty of entitilements (NSWMGS allocation reliability on average (aside from the last three wet years) is 48 per cent with opening allocations reducing year after year.
- adaptive management of surface and groundwater systems (productive use is undermined and costs are increasing as the productive pool decreases and is replaced by environmental water use which doesn't have the same economic potential as irrigation nor does it provide the same level of employment)
- improve investment certainty and minimise costs on water trade (we still don't have a transparent water register)

Assigning risks for changes in allocation

Point 50 states 'Governments are to bear the risks of any reduction or less reliable water allocation that is not previously provided for, arising from changes in government policy (for example new environmental objectives)'.

This statement is the complete opposite to the proposed National Water Reform 2024 section 13.1 Helping communities deal with adjustment pressure which states 'industry assistance and subsidies should be avoided', there is no reference to point 50 for government to bare risks. This completely erodes the concept of property rights enshrined in the original intergovernmental agreement.

This is an acknowledgement of what a disaster a loss of irrigation is for our rural communities and Australia and undermines investment and economic security for irrigated agriculture and severe negative flow on affects to associated industries – government is happy to strip water away but doesn't want to compensate because they know the cost will be high. Community assistance programs do little to replace the wealth generated by irrigation. Public monitoring of assistance will be unnecessary because many of our rural towns will cease to exist because business will close, jobs will be lost, people will move away and education and health opportunities will decline.

Stripping water away from rural communities is a no win situation just look at Wakool as a example.

BUYBACKS – a case study Wakool community-profiles-wakool-june2018.pdf (mdba.gov.au)

If ever you needed proof of the negative impact of buybacks look no further than an MDBA case study on Wakool published in October 2016 where 34.5 per cent of the available water was purchased (103.9GL) through buybacks resulting in:

- a reduction in the maximum area irrigated of around 37% to 39%.
- milk production dropped from around 7 million litres to approximately 5.5 million litres (in 2024 there in now no dairy industry whatsoever).
- total employment fell by around 54% between 2001-16.

In 2024 there is no longer a dairy industry, the Barriboi school closed and Wakool Primary School enrolments have dropped from nearly fifty to just eight - most farmers now send their children away to boarding school for education. The local tennis, basketball and football clubs have all closed. The demise of Wakool is directly linked to a loss of productive water. This will be replicated across all irrigation districts and yet this reform does little to acknowledge this critical issue.

This reform lacks an entire section which should be entitled 'helping agriculture and industry deal with adjustment pressure'. It should also adhere to the original premise of the NWI point 50 on page 9.

This section would examine the impacts of loss of irrigation on not only small rural businesses, but also larger manufacturing industries which provide employment and support the wider economy and community across the country.

Dairy and horticulture production is directly related to access to irrigation, milk and fruit and vegetable processing will be threatened along with irrigation infrastructure operators who are already grappling with increased costs after losing water in the first round of buybacks and pushing up water delivery costs to irrigators.

The National Water Reform 2024 could not be any further away from the original NWI

IF YOU WANT SUSTAINABLE RURAL COMMUNITIES AND ENVIRONMENTAL OUTCOMES, IRRIGATION MUST CONTINUE TO PLAY A ROLE IN THE FUTURE.

COMMUNITY IMPACT OF TAKING WATER AWAY

- focusing on stripping high reliability water entitlements away from rural areas, reduces reliability across the consumptive pool, changes the risk profile and reduces overall reliability.
- creates a Swiss cheese affect and makes the cost of water delivery more expensive for those who remain because there are less people using the system.
- upstream bank slumping, erosion and loss of habitat are increasing at an alarming rate while 100 year old river red gums are falling over on the floodplain due to saturation constant forest flooding in the same spots year after year are wiping out regrowth and killing our forests.
- natural river constraints make it physically impossible to deliver additional flows to the SA border, higher flows are destroying the upstream environment.



Picture taken of the Barmah Choke February 2024

Is this considered a positive environmental outcome under basin plan management? Over the last decade the Barmah Choke has lost 25 per cent of its delivery capacity and is now down to around 7000ML/day and river operators continue to push the river outside its natural capabilities.

ADDITIONS to the reform

NWI renewal advice 8.1 Best practice environmental objectives and outcomes.

Inclusion of irrigation channels as an environmental asset as these waterways have created water dependent eco-systems supporting biodiversity.

NWI renewal advice 8.7 Innovative market approaches

Include: in wet flood years, environmental water must be made available to irrigators through the water market via an open and transparent process

NWI renewal advice 11.2 Principles for best practice independent economic regulation

Inclusion: all water users and investors contribute equally to the cost of water delivery and efficient service provision.

CONCLUSION

Rural communities are disappointed and tired of water reform. The constant undermining of irrigation and lack of understanding and dismissal of the role we play economically and environmentally is disheartening. How can this reform guide us into the future when it doesn't even mention irrigation?

There is no protection for staple food production and no acknowledgment of what the real cost to our rural communities is, when the key economic driver is ripped away – community grants will not provide jobs or support business and will not keep people in rural areas. On top of this, we are watching our upstream river environment erode away under increasing delivery pressure to send water downstream to South Australia.

History will not look back kindly on a reform that is ripping the soul out of the country and threatening both the future biosecurity and food security of our nation.

The original preamble of the NWI in point 2 also states;

Governments have a responsibility to ensure water is allocated and used to achieve socially and economically beneficial outcomes in a manner that is environmentally sustainable.

So why is the destruction of our upstream river environment not being taken into account? Why is one section of the basin sacrificed to deliver water to another?



Downstream Torrumbarry Lock

April 2024