



S.A.M.I.

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South Australian Murray Irrigators (SAMI)

Submission to the

Australian Government Productivity Commission

**Murray-Darling Basin Plan:
Implementation Review 2023**



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South Australian Murray Irrigators Inc. (SAMI) is a privately funded not-for-profit irrigators group providing a united voice for our South Australian Murray Irrigators from the South Australian boarder to the Coorong Murray Mouth. SAMI members include both private and trust irrigators and represent over a thousand irrigators collectively holding over 94 GL of South Australian River Murray consumptive water. SAMI members irrigate a wide range of food produce including annual crops and perennial crops. We play a vital role in protecting the interests & livelihoods of our irrigators and those in our communities. We actively defend the South Australian Murray Irrigator's right to farm and strongly promote the best practice irrigation techniques and water reform initiatives that our irrigators have implemented.

SAMI Irrigators have been at the forefront of irrigation practices over the decades, tackling hard environmental problems such as salinity. Our members are among the world leaders in the sustainable & equitable management of irrigation water and land management. SAMI is a not-for-profit volunteer organisation that was initiated in 1992 by a collaboration of irrigators. We welcome this review and would like to express the following comments and suggestions for your consideration.

What needs to change to ensure water recovery targets are met and that supply and efficiency measures are delivered?

SAMI believes it is highly important to ensure the delivery of supply and efficiency measures as this and other initiatives make up the heart of the Basin Plan and provides security for all water users. SA Irrigators are early adopters of Water Use Efficiency measures and the qualifying actions defined as efficient and open to us for funding should be broadened to allow farming business to address their individual needs including productive efficiencies and not just water use efficiencies.

People at meetings are not a measure of success if the meeting leads to no action. The people expect more of their professionals and the investment that they have entrusted them with. It has almost become the political normal for communities to receive continuous excuses as to why things can't be done. This is not a measure of success!

The accounting of supply and efficiency projects that are committed or contracted, is a sloppy way of accounting for water returns and politically makes the states and federal bureaucracies appear more successful than they really are. This burdens the communities with further water returns should these contracted projects



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blow out or fail in any way. If projects can't be delivered, then the clock needs to be wound back and a look into the past. What has worked and why. Was it followed up adapted or championed. What did succeed? What did achieve? and what did make us cohesive?

What lessons can be learned from past experiences and are the current arrangements for implementing the Murray Darling basin plan operating effectively? How could the arrangements be improved?

The lessons that can be learned from experience are numerous and span many governments. In time what we have learnt from past initiatives is that you must include the people who can affect a result and not just those who think it's a good idea to try. Many people with firsthand management, experience, particularly farmers are ignored in their opinions if they conflict with mainstream initiatives. This conflicts with active adaptive management principles.

Many initiatives have been commissioned to overcome stagnation in the implementation of the basin plan. This tends to be in the form of further reviews, reports, and studies. Whilst these initiatives are well intended, their failure is in part because they often raise further off-topic questions that diverts resources from real actions and wastes budgets. This at times puts status quo governance structures under threat of losing relevancy and budgets and this creates competitive attitudes instead of collaborative ones.

The systems reliance on the status quo bureaucracy, processes and validation from consultants has meant the opportunity cost of prioritising others' ideas has been at the expense of good ideas that may have worked for less budget. We will never know! Currently the community is willing to try, and cost is no longer an excuse to not try given the long history of wastage and project failure that our communities have had to endure.

Constantly having to defend the 2012 Basin Plan agreements has been unhelpful and all parties have been guilty of this. Governments pandering to these arguments has forced the water reform focus to remain on the figures and not on the reality of resolving real world problems and facilitating a healthy river. It also creates uncertainty in leadership and direction and creates a sense of fear and mistrust.

Other lessons that can be learnt, include what one may argue as the detrimental endorsement of propaganda slogans as MDB policy narratives. This occurs at local government, state and federal level and is at times contradictory to each other and at worst, not based in fact. This creates division in communities and does nothing to reinforce the collaborative goodwill and triple bottom line approach that the authority and



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governments claim to want. This has been going on for decades in water reform and it is not anticipated that this would change going into the future. We expect a higher standard from those who are empowered to unite communities and implement agreed outcomes. The lack of results in water recovery, infrastructure investment and environmental outcomes is not the fault of irrigators but implementation failures of governments, most of which they have already been paid for. This affects irrigators and regional communities to a greater or lesser extent depending on location and the political flavour of your area and state.

Are the arrangements affective for developing accrediting and reporting on water resource plans are the arrangements adequate and affective for water quality delivery.

Most Water Resource Planning in South Australia is advanced, and our water resource plans are accredited by the Authority. We are waiting for this to occur in New South Wales. We have faith this will occur in the foreseeable future. Any further developments should wait for all jurisdictions to be at the same level. There is no incentive to be an innovator in this field we tend to be part penalised.

It is our view that the CEWH now has responsibility for all Ramsar wetlands should we head into a dry sequence and this burden not resting with any one state.

The governments reliance on the big for consultancy firms has been an ongoing frustration throughout many decades of water reform and has at times, stagnated reform. Governments hand problems to consultancy firms who very slowly suggest how we're going to solve it. This usually results in timelines being blown and budgets being in adequate and no results occurring another report with good initiatives that goes nowhere.

Are the arrangements affective for critical human water needs?

In South Australia critical human water needs is prioritised in our water allocation plan. It is recognised that Adelaide has a great reliance on the Murray River, particularly in times of drought and how important it is to sustain this population and manage the river so that production, the environment, and communities can benefit.

Are the arrangements affective for environmental water planning and management?

In South Australia, our water allocation plans, and water resource plans are Authority compliant and written for variable river flows. This assumes that under all climate scenarios the plan has an answer applying



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tier one, two or three management. Triggers and transitions between these three tiers could be communicated clearer, however once they are triggered, action will follow.

Water Resource plans are written for variability, the figures stipulated in the plan of the 3200 equivalents if delivered would achieve what they said they would achieve regardless of climate scenarios as they are being delivered by a managed river, this is again dependent on constraints being addressed.

It cannot be stressed stronger that constraints are the first actions that the government should take through all states to ensure that any water return volumes can be delivered if they can't be delivered then their recovery is pointless and could cause devastation or floods and further cost local councils in infrastructure destruction. Addressing constraints is something that both sides of government have had the chance to implement and both sides of government have put it in the too hard basket and done little except study and review. Real action has not followed and should be a priority going forward.

It is recognised that the delivery of environmental water to environmental assets is a feast or famine scenario in dry times Commonwealth environmental water holder claims to not have enough water to deliver to all the environmental assets in the basin therefore priority assets are determined, and their watering regimes actioned this holds with the do more with less as we are all expected to do.

The Commonwealth environmental water holders use of their carryover has been overly precautionary, and this has hindered water markets in creating demand at un-natural times and competing with irrigators for dam airspace. We support the like with like concept and agree that the CEWH has a right to manage its carryover as it sees fit. However, their carryover decisions seem overly precautionary, and this interferes with the ability to deliver unregulated and surplus flows and create airspace for consumptive users. There can be mutual benefit in this if the concept was willing to be explored. Unregulated and surface flows reduce the pressure on all water users including critical human water needs, irrigator entitlement reliability and environmental water delivery.

Irrigators by nature of the location of their farms are at times, environmental stewards and wetland managers and enjoy this responsibility and take it very seriously and with a sense of pride there are many great fostered relationships between environmental watering personnel and local landholders. This should not be discredited. Irrigators are some of the biggest environmental land managers and water delivery partners achieving environmental outcomes. This should be recognised, celebrated, and rewarded.



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Have the governance and institutional arrangements for the plan, including the arrangements for compliance and monitoring evaluation and reporting proved effective.

Effective governance has occurred in theory, but not in practice due to the lack of substantial action by some groups and not because the governance structures were wrong. The obvious failure is the large number of still incomplete NSW Water Resource Plans. The Basin community's committee at times doesn't reach out to the full community in the breadth that it should. This is evident by the fact that so many organisations produce these submissions to these inquiries and do not supply any meaningful input to their community committee representatives with whom they have little if any relationship.

Minco and National cabinet meetings can change the trajectory of water reform with little to no warning or consultation. This constantly changes the direction of the policy this creates market instability and unclear intentions. The 'no social impact' policy is an example of this where ministers made this policy change in defiance of the fact that many irrigation groups were working at the time to develop mutually beneficial water return initiatives. This made all this work redundant even if the project could prove multi benefits and address Basin Planning objectives.

The current purchasing of gap is supported, particularly because this is the oldest bucket remaining to be recovered and is a relatively low volume. This water goes back to the original agreement and the fact it has still not been recovered, compounds the failures of not achieving the adjustment mechanism and penalises those who have complied. This is evident given the discrepancy in water market pricing when the volumes were recovered in each jurisdiction. (I.e., \$1500/ML market price for water recovered before 2014 versus \$8000/ML market price for water recovered now.) This puts early adopters at a competitive disadvantage. We would be loath to advocate for further action until the other jurisdictions have complied to an equal level. (Unless remunerated) It is expected to be expensive to implement the remainder of the agreed policy initiatives given the past time wasting which hasn't taken advantage of water market pricing and has only exacerbated the instability and demand pressure. Inaction and clarity in direction with respect to indigenous water has exacerbated this.

One option could be the allowance of SA water holders being allowed to sell their interstate water holdings to the Commonwealth and have it return to the Valley where they originated. This would have a NIL impact on consumptive water volumes in that valley as the returned water was always used outside that valley and was never available to the local consumptive pool. Therefore, that water return would be net positive to the



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Valley even if it is now controlled by the CEWH. It would also assist in addressing constraints as it would offset downward moving consumptive trades.

SA Class 3 consumptive entitlement has already addressed its constraints in delivery. As a consequence, the transfer of the SA Class 3 entitlement to the CEWH is worthy of a premium as it can be delivered to any part of the system, with minimal impediments. This fact is often disregarded and socialised within the basin plan. Different water products throughout the basin's valleys, are in no two ways alike.

What changes would you recommend,

The unbundling initiative is historic and history in that it is a deviation from common-law with the promise of shared benefits. Benefactors of river resource are not the villains and operate sustainably within the requirements of the licencing system where they reside. Irrigators do take initiatives that have positive social and environmental impacts and are not taxpayer funded and this should be recognised.

There needs to be a cultural change to stop pitching sector against sector and this narrative in a leadership role is lacking.

During the drought many people in regional communities feel isolated and disempowered from action taking to better their circumstance. There was a great reliance on state and federal governments to take large-scale initiatives and policy reforms to benefit the greater good of all of Australia, including the irrigation industry and irrigation water holders. To achieve this collaboration and compromise was needed. The reliance on others to solve our problems should be mitigated and initiatives put in place to empower local communities to plan for their near future and prepare and build economical social and environmental resilience.

This could be in the form of local 'community resilience water trusts' who would devise water return strategies to be returned to the CEWH in medium to wet times and available to irrigators in dry times to alleviate financial market pressures and return a financial return to the CEWH for offset actions. An even-handed local board could be empowered to make these decisions and adapt to local circumstances and maximise the overall average returns. This would take advantage of nature's natural cues and enable wetland drying in a seasonal manner thus encouraging recruitment of many species, who depend on wetting and drying cycles to complete their lifecycles. It would also allow for the recovery and holding of Indigenous water in perpetuity enabling the volumes to enhance environmental triggers and mentor indigenous economic development. Empowering us all with support to solve our own problems. This would address problems that arise for all users at times when they



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need. It would assess the dynamics of water markets, water pricing, indigenous dreaming animals and plants and ecosystems, river delivery requirements and environmental assets within that reach. Utilising local and timely knowledge that facilitates sharing of the waters and retains in in that reach in perpetuity. This should be initiated in local government reaches or water trading zones. which could return some minimums to eat River Reach. Some of this entitlement may need to be ripped up or removed from the water registers, should over entitlement be addressed in what is an over entitled catchment basin and allocation security achieved.

How well is the plan responding to climate change?

Much of the climate science appears to be speculative and sidesteps the variable structure of most Natural Resource Management Plans. Communities need the freedom to adapt to climate change in a circumstantial and individual way. The spark of innovation required may be currently unknown. Innovation is sought and nurtured, and the paradigms shift will occur when the right idea or technology comes along. This should be nurtured and encouraged with the caution to know when not to keep pursuing an idea.

The desalination plant is currently not being fully utilised. This has come at great expense to the taxpayer funded by state and federal governments and will assist the state in dry times.

How should this be improved?

Then we also need to look to a future with less entitlement issued in a capped system, this requires the ripping up and compensation of that entitlement, whilst inconvenient and expensive this would address water security issues for all water users.

Kicking the can down the road and not addressing the core issues has led to the now that is more a more expensive exercise than it otherwise would have been if the issue had been confronted and funded head on. This is not the fault of the public, or the well-intended taxpayer. This is the fault of governments and bureaucracies trying to generate political mileage and avoid expensive responsibilities. It must be noted that this review, whilst well-intentioned and well-structured, it is not a first for many of the people making submissions. As a collective this process has been going on too long and the process could be improved if governments focused on what they agreed to do and stopped trying to renegotiate and change the focus of the original agreement. Doing this diverts resources and doesn't achieve real results.



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How well is the plan addressing the interests of aboriginal people

The current capped Murray-Darling Basin water management system does not include formal indigenous water rights. This is a legacy issue! A 200-year-old inequity that does need to be addressed. However, this should not in anyway, be the expense of current entitlement holders of all persuasions across all jurisdictions, the Australian taxpayer has an obligation to rectify this situation. It is not down to any one sector and will require strong and clear Basin leadership. Due to the diversity of the numerous indigenous nations in the Basin, this should be done at a local level.

How well has community consultation and engagement been conducted how can this be improved what lessons should be learned from programs aimed at helping communities, adjust to the plan?

The consultation processes are multi-jurisdictional and layered. Many community leaders are exhausted by this because of the frustration and lack of substantial achievements towards solving problems. Some are more engaging than others however it is always on governments timelines and tends to align around political cycles. Everything within departments stops in the year proceeding an election and are slow to get moving after elections. Consultation is a word used by governments to just get the job done. It is seen by communities as the tick and flick. Get the right people to tell you what you want to hear and ignore that which they don't agree with.

The MDBA community consultation has been 5 meetings in 8 years encouraged by irrigators to address Basin Planning requirements in favour of wish list environmental projects. We are not against the initiation of these projects however there are needs and wants.

Consultation always reverts to the 'Butcher Paper' questions like 'what is important to you' rather than presenting the Agreed and legislated outcomes and targets as stipulates in the appendices and schedules of the Basin Plan and track out progress towards them. Confusing the issues with new perceived and emotive problems is diverting resources from achieving success towards the known targets. It is perceived that many governments use consultation to reinforce their bias, this is felt by communities who have diverse political views and view consultation as a two-way street. The clarity of information provided to communities has been well-meaning, however sparse, and not even handed. The projects progressed are those that are politically expedient and not



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the most crucial. This is evident where communities have been telling the governments to take more positive action to address constraints and this is acknowledged and studied but never actioned.

Does the implementation of the plan reflect a commitment to the best available scientific knowledge how well is this knowledge communicated?

The Murray-Darling Basin Authority had the world of science open to it when they determined the 3200GL equivalent reduction in the Basins Sustainable Diversion Limit. Most of this science was real and measured. In recent years the 'science' has tended to rely on models for its validation rather than measured evidence and relies on 'could' scenarios which may or may not eventuate. Many of these models have low confidence values and should not have made it through the peer review process and yet it is publicly promoted by governments and senior academics. This is abundant in the science of salt and ecological response to predicted climate scenarios. Wet sequences were not modelled by the CSIRO and yet we just had a 1930s equivalent flood. The second biggest in recorded history. Real and measured science also tells us that these events tend to occur in groups.

The introduction of artificial intelligence and quantum computing has expanded. The issue of data control, farming IP protection and privacy in the modern world is an ever-evolving space and databases of the past, was secured by the naivete of the technology that secured it. Governments need to keep pace with the evolution of technology and make sure that our data and privacy is adequately protected particularly when applied to agricultural machinery and land management tools.

What improvements should be made are there any other issues with the plans implementation that you wish to raise?

The Lower Lakes is managed at Lock 1 at Blanchetown many kilometres to the north. Many say this would assist with the lakes hydrology management however this is polarising to communities in that area who have a fear of being cut off from the river. A cheap and affective alternative is remote controls mechanical opening and closing gates on the Barrages would enable them to respond more efficiently to climatic conditions. Tidal movements and winds push salty water into the lakes a remote-controlled mechanical system could have the barrages closed in minutes or hours as opposed to the current manual system that takes days and weeks. A



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more responsive Barrage system could assist greatly in working with mother nature to improve salinity and nutrient levels in the lakes with very little additional water being used. This responsiveness can also assist in facilitating environmental outcomes.

South Australian Murray Irrigators would like to thank the Commission for their time and efforts in conducting this review.

Yours Sincerely

Caren Martin
Chairperson
South Australian Murray Irrigators