CENTRAL IRRIGATION TRUST

Trustee: Central Irrigation Pty. Ltd. ACN 075 446 810

4 Fowles Street PO Box 34 Barmera SA 5345 Telephone 08 8580 7100 Fax 08 8588 2001



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MDB Plan - Implementation review Productivity Commission 2023 Department for Energy and Mining, GPO Box 320, Adelaide SA 5001. Via online portal

SUBMISSION TO THE INTERIM REPORT - MDB PLAN IMPLEMENTATION REVIEW 2023

Dear Commissioner,

Thank you for the opportunity to comment on the 2023 interim report into Murray-Darling Basin Plan Implementation undertaken by the Productivity Commission.

Central Irrigation Trust (CIT) manages 12 member-owned irrigation networks on the River Murray in SA supplying 1,500 family and corporate farming enterprises, irrigating 14,000 hectares of intensive, predominantly permanent horticulture, as well as supporting water needs for 3,500 homes, industries, and community assets.

We have reviewed the interim report and are pleased it recognises that significant achievements have already occurred. Not only in returning water to the environment and the way that water is managed and used, but that the benefits to the environment are evident. As irrigation communities we live the Basin Plan daily, be it the negative impacts of water recovery, the improved environmental outcomes, or government failure in delivering on their agreements, leaving communities to bear the burden.

The agreed Basin Plan was a compromise to balance the economic, social, environmental, and cultural needs of all. Implementation of the Plan must continue to recognise this compromise and the resultant limitations on how its outcomes can be achieved. This includes that any recovery under the 450 GL target must remain subject to neutral or positive socio-economic outcomes for local communities as this is a fundamental pillar of what was agreed.

The interim report acknowledges that water recovery does not come without risk and that regional communities are impacted with potential for further negative outcomes particularly irrigation networks. Our ongoing concern is that these risks are understated. Our irrigation community and the world in which it operates has changed over the past decade. It may hold true that past water recovery saw funds returned into productive capacity within our districts. However, our current experience, influenced by commodity markets and the demographics of our districts, is that funds returning into productive capacity or being spent in local communities is significantly less likely to occur.

We believe that the Australian and State Governments must focus on the wide range of projects available to achieve environmental outcomes, including those put forward by communities, that limit the need for direct water recovery. These programs achieve the required environmental outcomes and lessen the adjustment support required for regional communities.

The States agreed to deliver supply and efficiency measures that would deliver the water recovery targets of Basin Plan without more water being directly removed from the consumptive pool. We support recommendations for greater accountability and transparency for States to deliver on these commitments.

It is vital that Basin Plan outcomes are achieved as efficiently and effectively as possible. Past performance by government indicates that they have not always been the most effective, flexible, or timely in doing so and therefore in principle, your recommendation to provide an "external" organisation would be supported. That said the setup of such an agency could take some time, and as a result ways need to be found now for proponents of existing or new environmental improvement and non-buy back water recovery projects to be fast tracked to achieve earlier wins. We would not like to see the organisation politized and this would need to be accounted for in its setup. Whilst the proposed organisation may be at slightly greater arm's length from government, it should maintain the general guiding principles of good management or probity. The external organisation should take a holistic view of the total impact in assessing the best way forward e.g., a direct purchase might be cheaper standalone but when coupled with adjustment funding to offset negative impacts an alternative project may have been a better option.

The Basin Plan development and implementation has been a mix of science, models, experience, and compromise. Depending on where you sit in the landscape you will have a view on which of those is the most important and the proportions of each that should take precedence in decision making going forward, including climate change. As a community we need to continue to have all views heard around what we would like a Basin Plan to achieve and how this should occur.

Moving forward the focus must be on delivering the outcomes that were agreed to as part of the Basin Plan negotiations. Collectively we must look for all opportunities to deliver the outcomes of the Plan without the irrigated agriculture sector being disproportionately impacted. It is imperative that all levels of Government continue to look beyond the numbers in the plan and work together to deliver the agreed outcomes in alternative and innovative ways.

Thank you for this opportunity.

Greg McCarron
Chief Executive Officer
Central Irrigation Trust