



Murrumbidgee Valley Food and Fibre Association

MVFFA represents business owners in the Murrumbidgee Valley. Many of our members are directly engaged in irrigated agriculture, producing a wide range of agricultural commodities. Our membership also includes those engaged in related businesses including processing, marketing and provision of professional services, from towns and cities within the Murrumbidgee Valley. Our focus is on water policy at all levels of government because the ecological, economic and social sustainability of communities like ours is dependent on how water is managed.

MVFFA has been submitting to the NSW Government about water management in the Murrumbidgee Valley and across the NSW Southern Basin for over 10 years.

The Murrumbidgee Valley is a highly productive region and home to two of the most successful, purpose built, irrigation areas in Australia and the world...the Murrumbidgee and Coleambally Irrigation Areas (MIA and CIA) as well as many NSW rural/regional LGAs, towns and cities such as Wagga Wagga, Griffith, Coleambally, Leeton, Whitton, Gundagai, Darlington Point, Collingullie, Yanco, Yenda, Narrandera, Carrathool, Balranald and Hay.

The latest round of Regional Water Strategy (RWS) presentations have created widespread concerns that many of the assumptions and options are based on long proven flaws in the WSPs, incomplete and unrealistic data in the modelling and an overly conservative or 100% risk averse approach to allocating water resources. Most particularly we're concerned that the relevant state departments have chosen to use the driest models and then proposed to always base allocations on the 'worst case scenario' every year, regardless of seasonal conditions. As recent, post millennium drought conditions clearly demonstrate, above average flows are also common in our highly variable climate and the system needs to be managed practically and adaptively with fast feedback loops rather than using wired in, unrealistic, outdated lowest inflow sequence data. Water management is a practical discipline and our highly variable climate and riverine environments need to be managed accordingly. While we fully understand that there are always risks associated with trying to manage high variability the answer is not to manage via a "doomsday" mindset. The known risks need to be accepted, managed and equitably shared by all, including the State Government.

It has become clear to us that overly conservative or 100% risk averse management based on using the lowest inflow sequences has jammed up the storage and regulatory systems at the start of each season, effectively shorting the market and thus unrealistically driving up water prices even in average to above average seasons. While this may be advantageous for short term temporary water trading, it is clearly at the expense of long term production, particularly, but not only, broad acre seasonal cropping such as rice, corn, wheat, oats, barley, hay, pastures, fruit and vegetables & etc.

General Security water licence holders, who make up the majority of the bulk water access licences in NSW, have incrementally and progressively worn the risks of changes to access and reliability for approximately 20 years to the point that proven, significant system underuse is occurring in both major valleys (Murrumbidgee and Murray valleys). Amongst much other research, including work by the MDBA, please refer to the November 2019 RMCG report; *“Recognising Underuse in the Southern Basin”*

“Adaptive Management” is an underlying core principle clearly enshrined in both the NSW and Federal water management acts yet the proposals in the NSW Murrumbidgee RWS are focusing on management based only on the driest models. This management mindset is not productive across all aspects of the triple bottom line and will further exacerbate already identified issues.

MVFFA opposes negative alterations to reliability and we note that many other organisations in our valley concur. We oppose all options that propose to change NSW Murrumbidgee rules, assumptions and regulations that take water from one user in order to reallocate to another user or to another State or valley.

In general, we are in support of development and upgrading or modernising infrastructure but we are opposed to facilitating development outside of the traditional, gazetted irrigation regions if it’s at the expense of our diverse and productive established irrigation regions, our long term value add industries and their generational support communities.

A major concern for our membership is that meeting the needs of irrigated agriculture in our purpose built irrigation communities is not recognised as an area of concentration. (Murrumbidgee RWS p199 and Murray RWS p 166). We further note that major industry groups and community based organisations were not sufficiently consulted when they should be regarded as major stakeholders and significant paying customers and therefore must be included in decision making around options 33-44 in the Murrumbidgee RWS.

MVFFA has always strongly supported the upgrading of Burrinjuck Dam and the principles behind the Lake Coolah project. We note that several other organisations and councils in our valley also fully support these projects.

While we understand that managing water resources can be complicated, conflicted and often parochial and political, very unfortunately we find ourselves submitting, yet again, that the NSW government via the Murrumbidgee RWS is not paying attention to a water management framework that acknowledges ‘real time’ conditions or proven flaws in the modelling or to what’s needed to service paying customers and their support communities according to production and seasonal cropping.

There is no shortage of information that demonstrates what does and doesn’t work in water management. We all need to focus on what works and facilitate more of that but also recognise what is not delivering across the triple bottom line and immediately cease those practices.

We refer you to all MVFFA’s previous submissions to the State and Federal Governments for further details including our recommendations and views on the CMS, the SDLAMs, infrastructure projects, the 450GL, the ACCC report & etc etc.

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