



Draft Wimmera Mallee Water Resource Plan

Victorian Farmers' Federation Submission

August 2017

The Victorian Farmers Federation

The Victorian Farmers Federation (VFF), Australia's largest state farmer organisation and only recognised consistent voice on issues affecting rural Victoria, welcomes the opportunity to comment.

Victoria is home to 25 per cent of the nation's farms. They attract neither government export subsidies nor tariff support. Despite farming on only three per cent of Australia's available agricultural land, Victorians produce 30 per cent of the nation's agricultural product. The VFF represents the interests of our State's dairy, livestock, grains, horticulture, flowers, chicken meat, pigs and egg producers.

The VFF consists of a nine person Board of Directors, with seven elected members and two appointed directors, a member representative General Council to set policy and eight commodity groups representing dairy, grains, livestock, horticulture, chicken meat, pigs, flowers and egg industries.

Farmers are elected by their peers to direct each of the commodity groups and are supported by Melbourne-based staff.

Each VFF member is represented locally by one of the 230 VFF branches across the state and through their commodity representatives at local, district, state and national levels. The VFF also represents farmers' views on hundreds of industry and government forums.



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Foreword

The Victorian Farmers Federation (VFF) welcomes the opportunity to comment on Draft Wimmera Mallee Water Resource Plan.

The VFF have been long standing advocates on the Murray Darling Basin Plan and effective implementation of the plan is critical. Balancing the objectives of the economic, environmental and social outcomes is at the core of the Murray Darling Basin Plan and we welcome this resource plan demonstrating how those objectives are being achieved for the Wimmera Mallee region.

Introductory comments

The Wimmera Mallee Water Resource Plan is the first opportunity for Victoria to demonstrate how they are achieving their obligations in their water resource plan areas. The plan has involved a reduction of 23GL from the baseline diversion limit, which was largely achieved through the closure of the Wimmera Irrigation District; yet another demonstration of Victorian agriculture's contribution to delivering environmental outcomes.

The VFF is largely supportive of the Draft Wimmera Mallee Water Resource Plan, however takes this opportunity to highlight some critical policy areas to be considered with views of farmers in the ongoing management of water resources across Victoria.

Interceptions

The VFF welcomes the assessment of water interceptions and monitoring as outlined in section 13.

13.2.1 Runoff dams

The current arrangements regarding farm dams (runoff dams) are important for agriculture. The allowance provided to stock and domestic users in the absence of licensing or fees is pivotal for commercial agriculture sustainability and its affirmation in this resource plan is welcomed.

The VFF believe the current arrangement sufficiently discourages breach of rules and over utilisation of water intended for stock and domestic purposes (i.e. no licence is required if the dam is not located on a waterway and the water is not used for irrigation). However, we acknowledge the long term water security consequences with potential increases to take associated with runoff dams.

“Growth in runoff dams may pose a risk to the water resources of the Wimmera-Mallee WRP area. **However, at this point in time, uncertainties in estimating take mean that it is not possible to reasonably quantify the additional take (and therefore the risk posed) by future growth in runoff dams.**” (Draft Wimmera Mallee Water Resource Plan, p 146).

Clearly, climate variability is increasing and the consequences for water storages will change. Striking the balance for stock and domestic entitlement and the long term sustainability of water sources in the Wimmera Mallee is likely to become more challenging but we must remind ourselves of the basic rights of farmers to operate their businesses.

Whilst the VFF acknowledge the potential risk associated with runoff dams to the reliability of water resources in the Wimmera Mallee, we take this opportunity to highlight three critical points regarding the management of (farm) runoff dams:

Recommendations for Managing Farm (runoff) Dams:

- 1. Decisions regarding the future management of runoff dams should not be made without robust evidence as to the potential implications for their residing system; and**
- 2. Any transitions away from the existing policy must be cost neutral for new and existing runoff dam holders; and**
- 3. Cost free stock and domestic water is a key property right for agricultural businesses, any changes to current policy should further entrench stock and domestic water reliability without adding additional cost.**

As discussed in the resource plan, sustainable water strategies such as the Northern Region Sustainable Water Strategy (NRSWS) (2009) & the Western Region Sustainable Water Strategy (WRSWS) have previously discussed the management of farm dams.

“The impact of domestic and stock use on the environment or existing users comes under little scrutiny because, in most instances, no licence is required.

Estimates of existing domestic and stock use have been made using State-wide assessments, bore construction approvals or works licences and specific case studies. These estimates indicate that for northern Victoria, domestic and stock use from groundwater or surface water accounts for about four and six per cent of total water use respectively” NRSWS (2009), p 57.

The strategy also considered the management options for better management of stock and domestic water (see figure 1).

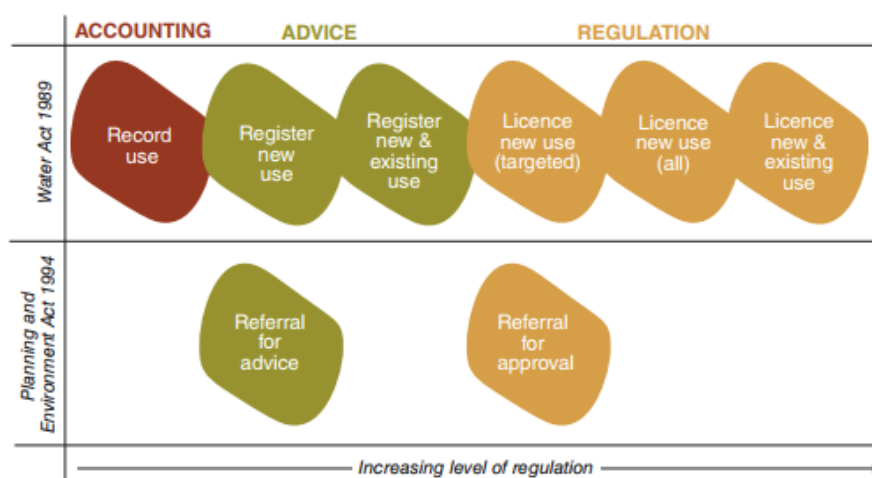


Figure 1: Domestic and Stock management options considered for better management of stock and domestic water (Northern Region Sustainable Water Strategy, 2009, p58).

The VFF recognise the issues identified as part of this strategy. There have been issues in some catchments with a proliferation of farm dams and we recognise this is a risk that requires monitoring. However, again highlight the points above for the continued management of stock and domestic water for commercial users. In particular, we urge recognition of the cost associated with regulation such as those outlined in the Productivity Commission’s report into the ‘Regulation of Australian Agriculture’.

When considering regulatory options for the ongoing management of the resource, commercial agricultural interest must be considered at the forefront and primarily, options ought to focus on monitoring such as the approach outlined in Section 8.3 of *Water for Victoria*; which recognises the significance of water accounting. Largely, the VFF supports the ‘compliance focus’ approach for the management of farm dams in the context of the above recommendations.

Urbanisation

Briefly, the VFF takes this opportunity to recognise the influence of urban developments and their associated diversions onto agricultural land.

In the case of the Wimmera Mallee, the urbanisation anticipated is seemingly limited. However, long term management of water resources across the state deserves further recognition as the role of urbanisation has had considerable impact on the flow of water to agricultural land.

Local government, in granting permits for these developments need to recognise the significance of the runoff they can cause, the management cost and potential loss of production to agricultural businesses over the long term. **Every year the VFF fields a number of inquiries regarding additional water entering their property as a result of ever encroaching urban boundaries. In the current environment of 'beneficiary pays' this additional water often becomes the liability of the agricultural landholders as immediate beneficiary of draining this water.**

The Victorian Government have invested in the development of strategies toward to the management of rural drainage (such as the unreleased Victorian Rural Drainage Strategy). However, strategies such as these do not address the critical issue of management cost to agriculture after urban development permits are granted.

Water for the Environment

Agriculture in the Wimmera Mallee region made a significant contribution to the environmental targets of the Murray Darling Basin Plan with the closure of the Wimmera Irrigation District.

Proper utilisation of environmental water is critical to achieving the Basin Plan's environmental outcomes.

The approach described in this Resource Plan appears consistent with Chapter 8 of the *Basin Plan*. However, in achieving the environmental parameters of the Basin Plan, the collaboration of stakeholders is critical. The ability of the CMAs, MDBA, Water Corporations and irrigators to continually collaborate and engage can mean more effective environmental watering beyond the strict requirements of the Basin Plan.

Whilst existing arrangements see significant collaboration, the VFF see continued engagement as critical to responding to environmental and agricultural challenges in both the long and short term.



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