



# Response to the Basin-wide environmental watering strategy

By

Victorian Farmers Federation

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## Foreword

The Victorian Farmers Federation is Australia's largest state farmer organisation, and the only recognised, consistent voice on issues affecting rural Victoria.

The VFF consists of an elected Board of Directors, a member representative Policy 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 at many industry and government forums.



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## Executive Summary

The VFF appreciates the opportunity to comment on the Basin-wide environmental watering strategy.

The VFF welcomes the recognition that the Basin-wide environmental strategy is to be developed and delivered in the context of a working river system (p.1). Farmers and communities in the Basin are reliant on water for their livelihoods and domestic needs. It is not realistic or desirable to be aiming to restore the Basin to a natural system. We need a sustainable river system which supports the needs of farmers, communities and the environment.

Recognising that there are many demands on a limited amount of water, the VFF supports the most efficient use of water. Governments and rural water corporations are investing in modernisation works to ensure that the supply of water to the farm gate is efficient. Farmers are investing in modern irrigation technology on farm to make the best use of available water.

The same efficiency principle should be applied to the use of water for environmental purposes. The VFF calls on all agencies involved in the planning and management of environmental water to ensure that it is being used efficiently. The Strategy makes some reference to this concept, but it is not a strong message.

The VFF is concerned about the potential waste of effort and resources amidst the plethora of agencies responsible for planning and managing environmental water. It is the VFF's view that the MDBA should focus on setting the over-arching policy. This then needs to be effectively linked to existing planning and monitoring processes being undertaken at the regional and local levels. It is not the role of the MDBA to become enmeshed in the detail of prescribing how this is achieved.

The VFF has concerns about how the environmental outcomes have been developed and how progress towards them will be monitored. It is not clear whether these outcomes are achievable with current resources and constraints. The lack of a rigorous monitoring framework will make it impossible to assess whether these outcomes are being achieved, and whether they are being achieved efficiently.

The VFF remains concerned about the third party impacts of environmental watering. The use of over-bank flows to achieve environmental outcomes on the floodplain needs to be managed in consultation with local landholders. Further work is required to define what constitutes the acceptability/unacceptability of third party impacts. The VFF's firm view is that environmental water planners and managers are responsible for avoiding, minimising and mitigating third party impacts, including bearing any related costs.

## **1. Coordination and duplication**

The Strategy recognises that there are multiple agencies involved in the planning, management and monitoring of environmental water (Box 9). At the community meeting in Mildura, hosted by the MDBA, it was also acknowledged that the environmental watering space is very crowded.

The VFF is concerned about the waste of resources and confusion which may result from duplicated efforts by these multiple agencies. To avoid this, a process for coordinating needs to be clearly articulated.

It is the VFF's view that the MDBA is responsible for the overall development and monitoring of the Basin-wide environmental watering strategy. The MDBA should focus on setting the over-arching policy, consistent with the requirements of the Basin Plan. This then needs to be effectively linked to existing planning and monitoring processes being undertaken at the regional and local levels. In Victoria detailed planning for environmental water management is undertaken from the ground up. This approach of using local knowledge to develop local priorities is consistent with the Strategy. Catchment Management Authorities coordinate with their working groups to identify local priorities. This work then feeds into the regional processes and through to the Victorian Environmental Water Holder to manage the water resources.

The MDBA should not be seeking to duplicate these processes, nor to constrain the capacity of these existing decision-making processes. The role of the MDBA is to ensure that what is produced is consistent with the Strategy, but not to become enmeshed in the detail of prescribing how this is achieved. The MDBA has oversight, but is not responsible for operations.

## **2. Developing environmental outcomes**

The VFF is concerned at the lack of transparency about what criteria have been considered in the development of the environmental outcomes listed in Table 1. The Strategy does not explain the scientific/technical basis, the volume of environmental water assumed to be available or whether constraints are addressed or not.

There is no information about the baselines being used to measure these outcomes against. The current level of flows, bird and fish populations and the state of existing vegetation need to be understood before being able to establish a level of improvement.

There is a lack of information about how much water would be required to achieve these outcomes. The volume of water needed to deliver a particular environmental outcome needs to be more fully understood before deciding on what can be achieved.

Establishing outcomes in isolation from a baseline and recognition of the current context (current environmental water holdings and existing constraints) risks the creation of outcomes which are unachievable.

If the outcomes are not developed with regard to their achievability this creates the risk of failure. The impact of this failure could mean that the environment will seek to recover more water from farmers. This is not acceptable.

There is a responsibility on environmental water planners and managers to make the best use of environmental water. This means making decisions about priorities given the available resources. It does not mean setting outcomes which are unachievable in the anticipation of being able to use this as a means to legitimise further water recovery.

The VFF does not support environmental outcomes which have been developed without sufficient regard to their achievability.

### **3. Monitoring framework**

The VFF is concerned that the timeframe for achieving these outcomes will be misunderstood. The Basin Plan requires that there is no loss or degradation in environmental outcomes in the period to mid 2019, yet the Strategy acknowledges this in only one place (measuring success, p.66). The improvements in environmental outcomes, as proposed in the Strategy, will only come into play from mid 2019. As the Strategy focuses heavily on the efforts required to achieve these improvements there is a risk that this information about timing will be missed.

The VFF believes that the monitoring framework for environment watering needs to clearly set out what is required to be achieved and by when. Then appropriate efforts and costs can be effectively allocated.

A clear monitoring framework will also support an adaptive management approach. Without regular data collection, collation and analysis it will not be possible to learn from experience and modify future decisions. This will become increasingly important as the impact of environmental works and measures to address constraints need to be taken into account. This needs to be adequately resourced and coordinated.

### **4. Third party impacts**

The VFF welcomes the recognition that the delivery of environmental water will be "...within the context of not creating unacceptable third party impacts or creating additional risks to the reliability of water entitlements."p.38

It is the VFF's view that environmental water planners and managers are responsible for any third party impacts. Delivering environmental water which is likely to flood private property is a very different situation to a natural flood. The former is a managed decision, it can be changed to avoid flooding. It is not appropriate to apply the same expectations about liability and costs as would apply when dealing with a natural flood.

The VFF believes that further work is required to clarify responsibilities and processes for managing third party impacts. It is necessary to define what is considered acceptable and unacceptable third party impacts. In the absence of such a definition decisions are likely to be made on a case by case basis, resulting in inconsistent and potentially unfair outcomes for farmers. This is not acceptable.

Agreed criteria for what is considered acceptable/unacceptable will enable environmental water planners and managers to determine when further action is required. For example, when unacceptable impacts can be addressed through the provision of mitigation works or compensation.

A clear process needs to be developed for working with landholders to understand the third party impacts in a particular situation. This needs to include a process for resolving disputes when the parties fail to reach agreement.

It is the VFF's firm view that landholders should not be burdened with the negative impacts or costs of floods resulting from environmental watering. The VFF's view is that environmental water planners and managers are responsible for avoiding, minimising and mitigating third party impacts, including bearing any related costs. The delivery of environmental water should not be used as an opportunity to shift additional costs onto farmers.