



Long Term Water Resource Assessment – Southern Victoria

Victorian Farmers Federation Submission

November 2019

VFF Water Council
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The Victorian Farmers Federation

The Victorian Farmers Federation (VFF) is the only recognised consistent voice on issues affecting rural Victoria and we welcome the opportunity to comment on the Long Term Water Resource Assessment.

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 and regionally located staff.

Each VFF member is represented locally by one of the 200 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.

A handwritten signature in black ink, appearing to read "David Jochinke".

David Jochinke

President

Summary of Recommendations:

Recommendation 1: The Victorian Water Act (1989) is amended to ensure the permanent qualification of rights clause as a result of a long term water resource assessment is removed.

Recommendation 2: The Victorian Water Act (1989) is amended to ensure waterway health considers riverbank vegetation, aquatic life and water quality rather than just flows.

Recommendation 3: The Government examine waterway health using its Index of Stream Condition metric rather than simply reviewing flow.

Recommendation 4: The Government review changes in environmental health in wet, dry and average years.

Recommendation 5: The Government review the need to change environmental objectives before recovering more water for the environment.

Introduction:

The Victorian Farmers Federation (VFF) welcomes the opportunity to provide comment on the Long-Term Water Resource Assessment for Southern Victoria.

Water Act:

The *Water Act 1989* requires a long-term water resource assessment every 15 years to assess whether water availability has declined or if waterway health has deteriorated for reasons related to changes in flow.

A long-term water resource assessment considers whether:

- 1) A long term reduction in water availability needs to be shared more equitably between consumptive users and the environment; or
- 2) Water sharing arrangements need to respond to a deterioration in waterway health related to changes in flow.

A draft technical assessment is prepared and made available for public comment, with the Environment Protection Authority (EPA) also providing an assessment.

Following a technical assessment a panel can be established which involves a number of review processes. The Minister then must determine a ‘program of implementation’, which allows for the permanent qualification of rights under Section 33AAB.

The VFF never supported this provision in the Water Act when it was changed in 2005 and the VFF believe this is an outdated piece of legislation that should be removed from the Long Term Water Resource Assessment process.

Victoria has worked tirelessly to establish a strong water market framework, where farmers are able to manage their own risk through carryover and reserve policies. Other water users, including environmental water holders also have the same ability.

The VFF strongly opposes the Minister’s powers to permanently qualify rights because they:

- Undermine the integrity of the market
- Are inconsistent with the approaches taken in the Basin Plan
- Further politicise water management
- Enables the Minister to pick winners and losers.

Recommendation 1: The Victorian Water Act (1989) is amended to ensure the permanent qualification of rights clause as a result of a long term water resource assessment is removed.

The VFF also believes the legislation is too narrow when looking at water way health as it only relates to flow. There are many other elements that relate to waterway health, such as riverbank vegetation, aquatic life and water quality.

Recommendation 2: The Victorian Water Act (1989) is amended to ensure waterway health considers riverbank vegetation, aquatic life and water quality rather than just flows.

Index of Stream Condition:

The Long Term Water Resource Assessment has largely assessed river health in the context of flow. This is too narrow a measure of environmental health to make decisions that will affect farmers livelihoods and regional communities.

The health of waterways must take equal account of riverbank health, vegetation, water quality and aquatic life. An assessment evaluating overall environmental condition should be applied and where conditions have deteriorated, only those measures where benefits are greater than costs should be considered.

The Victorian Government established and has invested heavily in the Index of Stream Condition and sub-indices since 2010. An improved approach would be to assess changes in river health using a broad metric. And where a statistically significant change has been detected then determine the extent to which flow has contributed to the change.

Recommendation 3: The Government examine waterway health using its Index of Stream Condition metric rather than simply reviewing flow.

Modelling Accuracy:

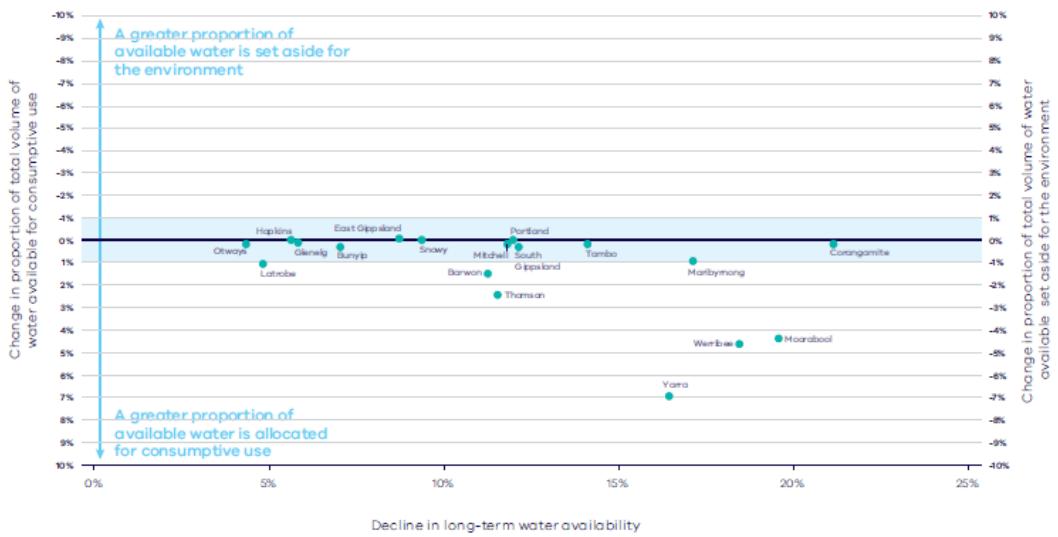


Figure 49: Changes in proportions of water available for the environment and for consumptive uses due to a decline in long-term water availability (step B cf. A), by basin

NOTE: The change in proportion is calculated taking total water availability less not categorised water. Not categorised water is water that cannot be reasonably considered as being for consumptive uses or the environment, typically river losses and evaporation from storages.

The Long-term Water Resource Assessment Overview report on page 110 outlines the above graph. This graph shows changes in the proportion of water available for the environment and consumptive use due to a decline in long term water availability. The figure does not include the error bands for the estimated changes. Assessments for all basins (page 8 of the Basin-by-Basin report) also conclude that *Overall, the findings for waterway health are inconclusive*.

Additional data that shows significant changes in stream condition should be included in the assessment. This would enable the analysis to focus on streams where there has been a statistically significant change in environmental condition and where there has been a statistically significant change in the proportion of water available.

Recommendation 3: The Government acknowledge the potential for modelling error and only focus on streams with statistically significant changes in stream condition and flow proportions.

1975 Datasets:

The report acknowledges that some environmental indicators such as native fish do not have data sets since 1975 and therefore a full evaluation cannot be made.

The VFF believe there is merit in looking at annual differences in wet, average and dry years and this should be factored into future assessments.

If equity issues with sharing arrangements are found to occur in some of these years then perhaps the adjustment should just occur in those years and not all.

Recommendation 4: The Government review changes in environmental health in wet, dry and average years.

Review of environmental objectives:

All completed sustainable water strategies recognised that should it become apparent that environmental objectives can no longer be feasibly met as a result of a long term or permanent or permanent reduction in water availability, the objectives may need to be amended.

Given the long term water resource assessment found that the main cause of declines in surface water availability is drier conditions, the VFF believe that the need to change environmental objectives must be considered before recovering more water for the environment. The long term water resource assessment does not discuss this issue but it should.

Recommendation 5: The Government review the need to change environmental objectives before recovering more water for the environment.