



Victorian  
Farmers  
Federation

**Submission to Restoring our Rivers:  
Delivering the Basin Plan 2012**

*Draft Framework for delivering the 450GL of  
Additional Environmental Water*

Australian Government  
Department of Climate Change, Energy, the Environment and Water

4 March 2024

## Contents

Introduction	3
Discussion	4
I. More Options	
II. More Time	
III. More Accountability	
IV. More Funding	5
V. Delivering the 450GL – Enhanced Environmental outcomes	
VI. Delivering the 450GL – Minimising socio-economic impacts	10
VII. Value for money	14
VIII. Northern Basin Water Recovery	16
IX. Southern Basin Water Recovery	
X. Basin Plan Review	17

## Introduction

The VFF welcomes the opportunity to provide comment on the *Restoring our Rivers: draft Framework for delivering the 450GL of additional environmental water*. The VFF represents the views of farmers across Northern Victoria, which accounts for 12% of the land mass in in the Murray Darling Basin yet produces almost a third of all food output in the Basin. Our ability to feed the nation is the result of the highly secure and reliable water products that exist in Victoria. These secure water products have allowed for the development of diversified agricultural industries particularly in horticulture and dairy and their related manufacturing industries.

Northern Victoria produces:

- 80% of Australia's pears
- 80% Australia's peaches
- 75% Australia's nectarines
- 70% Australia's grapes
- 70% Australia's olives
- 59% of Australia's almonds
- 40% of Australia's cherries
- 35% of Australia's apples
- 20% of Australia's dairy products
- Between 10-12% of Australia's wine, crops, eggs and livestock consumption.

Ensuring a fair outcome for Northern Victoria is critical if the Commonwealth Government wants Northern Victoria to continue to feed the nation.

The draft Framework fails to set out any requirements to document and justify what and where additional environmental outcomes will be achieved by the water purchases. It also fails to set the obligations and processes to be implemented by the Commonwealth to offset the economic damage to rural communities caused reducing irrigation.

The VFF is alarmed at the Commonwealth's wilful destruction of the successful cooperative interjurisdictional management arrangements for the Murray River. The Murray Darling Basin has operated according to 100 years of cooperative management between Basin States. The Commonwealth is destroying these cooperative arrangements by expanding Commonwealth water purchases without the agreement of the Victorian Government.

The draft Framework offers four pillars as areas of focus to deliver the Basin Plan in full, these being:

- 1) More Options;
- 2) More time;
- 3) More accountability;
- 4) More funding.

This submission will address each in turn.

## More Options

The VFF welcome the draft Framework's intention to explore further options for water recovery. We have long argued the restrictive nature of the *Water Act 2007* and *Basin Plan 2012* prevented any flexibility for the Sustainable Diversion Limit Adjustment Mechanism (SDLAM) projects. It is pleasing the legislative reforms and draft Framework acknowledge the need for increased flexibility.

The VFF does not support the new category of water created in the revised legislation that sees the creation of Held Environmental Water (HEW) that allows the government to bypass the socio-economic test that was agreed unanimously in 2018 by Ministerial Council.

## More Time

The VFF welcome the revised times as it has long argued the Basin Plan timelines were unrealistic. This view was also supported by the Productivity Commission in 2018 and again in 2023.

The draft Framework identifies that 31 December 2027 will be the last date to enter contracts to deliver additional HEW that can contribute to the 450GL. 31 December 2026 will be the new reconciliation date, which gives the Commonwealth, working with Basin States, an extra two years to complete projects that offset water recovery.

The Commonwealth however must acknowledge the lessons of the past that developing and delivering complex water projects takes time. The Connections Project that upgraded the Goulburn Murray Irrigation District took over eight years to complete. Setting unrealistic timeframes undermines project development and delivery and does not allow for any certainty for rural communities.

## More Accountability

The draft Framework notes an additional Water for the Environment Special Account (WESA) Review by 30 September 2025. The second WESA review was only just completed in December 2021 and made publicly available in August.

The draft Framework does not mention the need for increased accountability on the implementation of Water Resource Plans. The Inspector-General identified this as an issue in September 2023 where he could not assess Sustainable Diversion Limit compliance as NSW had not completed its water resource plans.

*This situation in NSW is deeply concerning, particularly as there are an increasing number of areas on the interim SDL accounts pointing to an SSDL excess, specifically, the Barwon Darling watercourse by 40% and Gwydir surface water by 21% and the Murrumbidgee is trending toward the SDL compliance threshold at 18% SDL exceedance.<sup>1</sup>*

---

<sup>1</sup> <https://www.igwc.gov.au/media-releases/inspector-general-still-unable-assess-key-basin-states-compliance>

The creation of an additional WESA report as identified in the draft Framework does very little to address accountability issues. The draft Framework fails to address the real accountability problem. To date the Commonwealth has worked hard to avoid any accountability for properly listening and responding to affected regional communities.

The draft Framework fails to establish the Commonwealth as an accountable partner for delivering projects. Instead, due to unrealistic timelines rushed and poorly scoped projects (i.e. Constraints relaxation) are adopted without detailed business cases and delivery plans. The Commonwealth then washes its hands of the delivery problems and will blame state governments.

The draft Framework also fails to support the Commonwealth's duty of care to regional communities or any requirement to behave in good faith.

### More Funding

The draft Framework identifies that more funding has been set aside to support Basin Plan implementation, this includes more funding for water infrastructure projects, voluntary water purchase and community adjustment assistance.

The draft Framework notes that "funding is not available for publication due to market sensitivities". This comment provides little confidence to rural communities that the Commonwealth will genuinely compensate rural communities for water lost as the budget is unknown. Nor do rural communities know whether funding will be available for both capital and operation and maintenance costs. The draft Framework must provide greater clarification on the funds available.

### Delivering the 450GL – Enhanced Environmental Outcomes

The draft Framework notes examples of how environmental outcomes can be enhanced by water recovery on Page 8. The VFF considers that these examples of success do not provide justification for providing more water. In fact, they provide evidence that sufficient water has already been recovered.

The draft Framework needs to provide much better scientifically robust information about the incremental environmental benefits that will be delivered by the additional water and complementary works.

- 1) *Flush salt from the Basin and reduce salinity levels in the Coorong and Lower Lakes:*
  - The Murray Darling Basin Authority's Basin Plan Evaluation in 2020 found that salinity indicators are mostly showing positive trends since implementation of the Basin Plan.
- 2) *Support connectivity by increasing flows through the barrages to the Coorong;*
  - MDBA modelling for the Sustainable Diversion Limit Adjustment Mechanism determined that all flow and salinity targets set by South Australia for the Coorong, Lower Lakes and Murray Mouth will be met with existing water recovery<sup>2</sup>

---

<sup>2</sup> See page 11 of <https://www.mdba.gov.au/sites/default/files/publications/final-modelling-assessment-to-determine-sdl-adjustment-volume-1.pdf>

- Many large-scale estuaries with communities living in the landscape that use waterways for towns, industry and agricultural purposes now use dredges at the mouth to replace the volumes of flow (eg. Gippsland Lakes). If you have storages the size of Dartmouth, Hume and Eildon storing waterway flows, you are not likely to ever have enough water to keep the estuary open. Unless you choose to decommission the storage.

3) *Enhance in-stream outcomes and improve connections with floodplains, and their frequency, in the Southern Murray-Darling Basin.*

- The draft Framework is premised on having to recover more water, yet the complexities of connecting to floodplains relates to risks to people and infrastructure and community flooding concerns.
- Recovered water for environmental outcomes needs to be delivered in a way that does not increase community flood risk. Many sites require infrastructure to be able to do that and this must be a focus in the draft Framework.
- Environmental water holders have stated publicly that that they cannot effectively use their existing water holdings to get water onto floodplains. Additional water recovery will not help them to do this.<sup>3</sup>
- Living Murray environmental works enable connection of 35,000 hectares of high value floodplain along the Murray River and Victoria's proposed floodplain restoration project will connect another 14,000 hectares of floodplain – these ecosystems can be protected with existing environmental water including under climate change scenarios and during droughts.

4) *Enhance instream outcomes and improve connections between rivers including during low and cease to flow conditions in the Northern Murray Darling Basin*

- The Commonwealth should invest in improving environmental outcomes in the Northern Basin, rather than simply looking to rule based changes.
- The most serious environmental issues are occurring in the Darling River and the Northern Basin, Water flows into Menindee Lakes from the Darling River have decreased by 80% over the last 20 years. 30-40 million fish died in March 2023 on the Darling and additional fish deaths occurred in 2018 and 2019.
- The Inspector General for Water Compliance found that for the last 3 years there has been over use on the Darling system. For 2021-22 the Barwon Darling over used water by 40%.
- The proposed draft Framework does nothing to address the environmental problems on the Darling.
- The draft Framework should focus on the most pressing environmental issues. These are in the Northern Basin. The draft Framework should place obligations

<sup>3</sup> See page 79 and 80 of [https://www.water.vic.gov.au/\\_data/assets/pdf\\_file/0033/669426/social-and-economic-impacts-of-basin-plan-water-recovery-in-victoria.pdf](https://www.water.vic.gov.au/_data/assets/pdf_file/0033/669426/social-and-economic-impacts-of-basin-plan-water-recovery-in-victoria.pdf); Page 29-30 of [https://parlinfo.aph.gov.au/parlInfo/download/committees/estimate/f5a251e5-48d3-4283-b5a2-530558521771/toc\\_pdf/Environment%20and%20Communications%20Legislation%20Committee\\_2020\\_10\\_20\\_8212\\_Official.pdf;fileType=application%2Fpdf#search=%22committees/estimate/f5a251e5-48d3-4283-b5a2-530558521771/0000%22](https://parlinfo.aph.gov.au/parlInfo/download/committees/estimate/f5a251e5-48d3-4283-b5a2-530558521771/toc_pdf/Environment%20and%20Communications%20Legislation%20Committee_2020_10_20_8212_Official.pdf;fileType=application%2Fpdf#search=%22committees/estimate/f5a251e5-48d3-4283-b5a2-530558521771/0000%22); and page 13-14 of [https://www.aph.gov.au/-/media/Estimates/rrat/bud2021/Hansards/5\\_231020CrossPortfolio.pdf?la=en&hash=2E673C937502B5E1E6EF4973F0425AE0B6E443C0](https://www.aph.gov.au/-/media/Estimates/rrat/bud2021/Hansards/5_231020CrossPortfolio.pdf?la=en&hash=2E673C937502B5E1E6EF4973F0425AE0B6E443C0)

on the Commonwealth to act to address the serious environmental problems on the Darling River.

5) *Support water bird breeding and provide healthy foraging and roosting habitat.*

- The draft Framework misrepresents waterbird populations The Murray Darling Basin Authority's Basin Plan Evaluation in 2020 found that waterbird numbers had been maintained.

6) *Improve native fish diversity and numbers by supporting spawning, movement , condition and habitat.*

- The draft Framework misrepresents fish populations The Murray Darling Basin Authority's Basin Plan Evaluation in 2020 found that there had been recovery in native fish populations.
- The Darling River is clearly in crisis with many millions of native fish dying in a series of fish kill events and the draft Framework doesn't seek to prioritise the health of this river.









It is common knowledge that there are more important threats to native fish in the Basin. In many areas of the Basin carp can exceed 80% of the fish biomass in the Murray-Darling Basin.<sup>4</sup> Carp are one of the major threats to and have decimated native fish populations in the Basin.<sup>5</sup>

---

<sup>4</sup> <https://www.frdc.com.au/knowledge-hub/national-carp-control-plan/carp-problem>

<sup>5</sup> <https://www.agriculture.gov.au/biosecurity-trade/pests-diseases-weeds/pest-animals-and-weeds/national-carp-control-plan>

Table 6: 2020 Evaluation assessment of outcomes in the Coorong, Lower Lakes and Murray Mouth

Indicator	Condition		Contribution of the Basin Plan	
	Rating	Confidence	Rating	Confidence
<b>Hydrology</b>	 <b>5</b>	 <b>High</b>	 <b>5</b>	 <b>High</b>
Salinity and water level targets have been met for the Lower Lakes. Targets in the Coorong have not been met but the indicators have improved.	Hydrology indicators are mostly showing positive trends since implementation of the Basin Plan. Salinity indicators are mostly showing positive trends since implementation of the Basin Plan, despite the salinity target in the Coorong not being achieved.	5 of 5 indicators were assessed. Data has largely come from gauges.	The evidence suggests that mechanisms of the Basin Plan are having a positive impact towards the expected outcomes. However, it appears that under the drying climate the target for the Murray Mouth opening is unachievable.	5 of 5 indicators were assessed. Data has largely come from the CEWH's long-term intervention monitoring program.
<b>Ecology</b>	 <b>4</b>	 <b>Medium</b>	 <b>4</b>	 <b>Medium</b>
There has been some recovery of native fish and vegetation. Waterbirds have been maintained, although their numbers are variable.	There is a mix of positive and negative results. However, in general, the ecological indicators are being maintained or are improving.	7 of 9 indicators were assessed. Key data sources included: southern Coorong ruppia monitoring, University of Adelaide annual Coorong Waterbird census, The Living Murray monitoring.	The evidence suggests that the mechanisms of the Basin Plan are having some positive impact towards the expected outcomes, while in other cases, they are not.	6 of 9 indicators were assessed. Key data includes monitoring from The Living Murray program.

Refer to pages 6–9 for more information on Evaluation assessment and confidence ratings scales



7) *Restore health of internationally significant Ramsar wetlands and waterways that support them.*

- There are 16 Ramsar listed sites in the Basin that the Water Act demands they must be protected. Of those 16, five are located in Victoria, six in NSW, three in SA, one in Qld and one in the ACT.

There needs to be a greater focus on ensuring the environmental health of all these sites and not those politically motivated by votes in South Australia.

VIC	NSW	ACT	QLD	SA
Barmah Forest	Paroo River Wetlands	Ginini Flats Wetland Complex	Currawinya lakes	Riverland
Gunbower Forest	Narran Lakes Nature Reserve			Banrock Station Wetland Complex
Hattah-Kulkyne Lakes	Gwydir Wetlands			Coorong and Lakes Alexandrina and Albert Wetland
Kerang Wetlands	Macquarie Marshes			
Lake Albacutya	Fivebough and Tuckerbil Swamps			
	NSW Central Murray Forests			

- The Commonwealth Government refusing to fund environmental projects for Victorian Ramsar sites clearly shows the political nature of this debate. This is not about environmental outcomes but rather securing votes in South Australia.

8) *Restore the condition and resilience of Basin riparian and floodplain vegetation such as river red gum, black box and coolabah forests and woodlands, and wetland vegetation and lignum communities.*

- As highlighted in point 3, delivery infrastructure provides opportunities to rehabilitate our floodplains. Sites such as Hattah Lakes and Lindsay Wallpolla islands will never have the ability to get watering to the level the environment recommends without increasing the flood risk to the towns along the Murray.
- The worst thing you can do is hold even more environmental water in the big dams without being able to provide into these sites while having severe socioeconomic impacts on Basin communities.

## Delivering the 450GL – Minimising socio-economic impacts

The draft Framework notes examples of how socio-economic impacts will be minimised on Page 9.

1) Support diversification and resilience:

- *Support transition of regional communities to prepare for a future with less water;*
- *Focus on job creation and sustainable economies;*
- The draft Framework fails to address how the Commonwealth is preparing regional communities for a future with less water. Instead, it compounds the challenge by transferring more water from communities to the environment. It ignores that farmers are already having to cope with less water as a result of a drying climate. The removal of water will impact food production and nowhere does the Draft Framework touch on the importance of water for food security. This needs to be addressed.

2) Place-based:

- *Place-based and focussed investment*
- *Engage local people as active participants in development*
- The draft Framework fails to enable place based, focussed investment. Place based and focussed investment is only possible after the Commonwealth has identified the location of the additional environmental benefits to be delivered and the amount of water and complementary actions required to deliver these benefits

3) Proportionality

- *Investment to each state proportional to water purchased;*
- *Investment in each community proportional to impacts observed*
- The draft Framework's proportionality intention is inconsistent with the place-based approach above. It also fails to acknowledge the differing levels of reliability in the water products across the Basin. Northern Victoria has a highly reliable produce and therefore it has seen the development of the horticultural and dairy industries. These industries also have a large manufacturing footprint operating in the regions. This debate needs to consider much more that the volume of water purchased. It needs to consider the industry that the water is being purchased from and how many jobs are being taken away from the region as a result of less water.

4) Co-design:

- *Co-design across government*
- *Consultation with communities, first nations, local government, and regional industries;*
- The draft Framework provides lip service to the principle of co design, which is supported by the VFF. The technical analysis and engagement with the consultative committee that prepared the Victorian Constraints Feasibility Study took about 18 months. Further community engagement is required to develop a fully costed business case.

5) Strategic alignment

- *Consistent with Commonwealth Regional Investment Draft Framework*
- *Aligned with regional and First Nations' priorities and plans*
  
- VFF supports the draft Framework's concept of strategic alignment, but the draft Framework is of little assistance. What are the regional and First Nations' priorities and plans that the Commonwealth are seeking to align with?

6) Transparency and integrity

- *Clear outcomes and objectives and value for money*
- *Transparency through administration and evaluation*
  
- The VFF supports the draft Framework's intention, but past experience shows that the Commonwealth does not behave in good faith. The Commonwealth, including the Minister has consistently rejected, without evidence or analysis detailed reports documenting the adverse effects of water purchases on regions. Instead it chooses to rely on arguments that many factors affect the irrigation sector and dependent communities and the effects of water buy backs cannot be distinguished for these other factors.

7) Evidence-based

- *Underpinned by agreed evidence and data.*
  
- The VFF supports the draft Framework's intention but, because the draft fails to describe the location, type and magnitude of the environmental enhancements and the amount of water required, there is no basis for assembling evidence and data about socio economic effects.
  
- The VFF note that in 2018 the Productivity Commission concluded that:

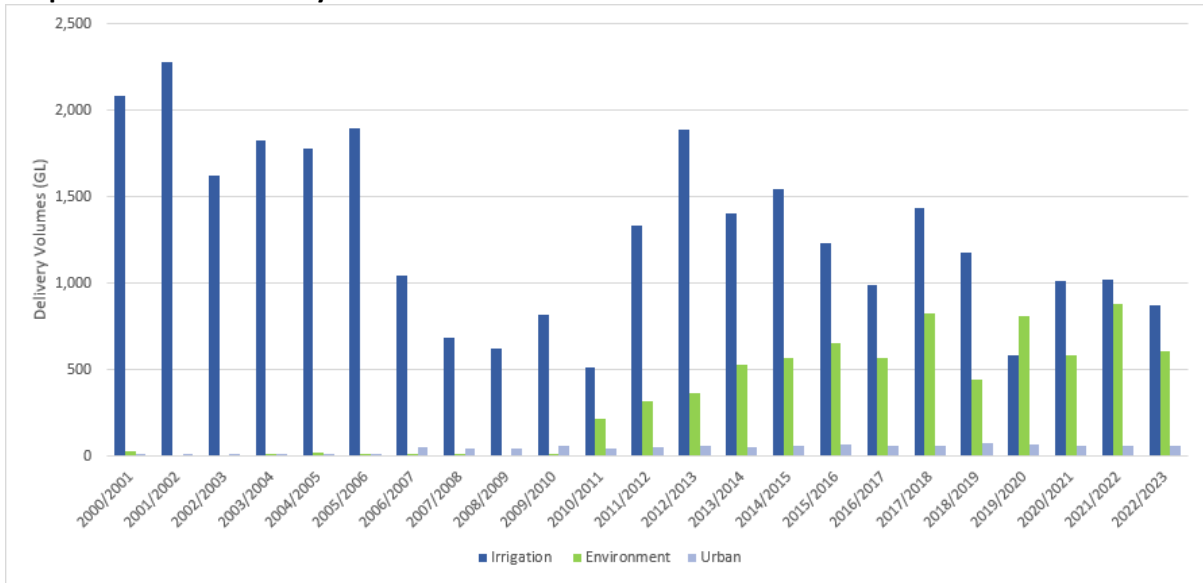
*there is little evidence to indicate that structural adjustment programs have been effective at supporting communities adjust to the Basin Plan (Pg 37)*

This position remains true six years on. There have been no true programs that have assisted rural communities adjust to less water.

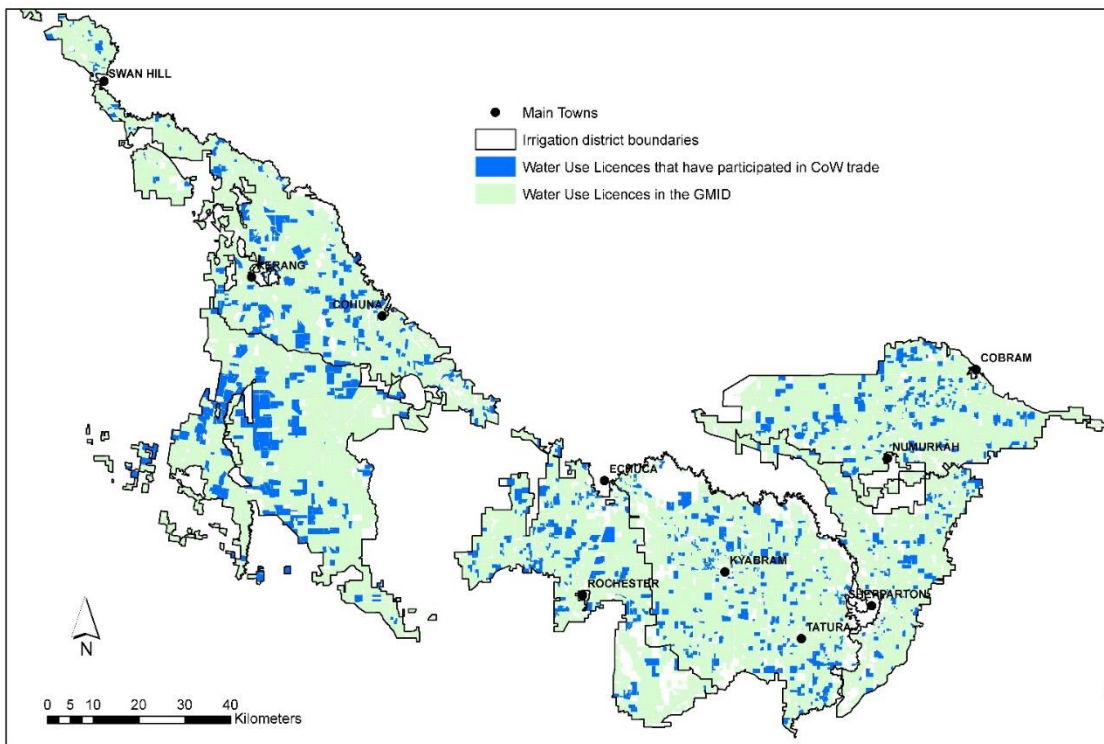
Northern Victoria was unfairly targeted in the 2008 buybacks and we had more high reliability water purchased than any other state. Over 600 GL of high reliability products were purchased during this time and over 500GL came from Victoria alone.

We know these buyback programs resulted in stranded irrigation infrastructure assets, which ultimately drives up the costs to the farmers that remain. This has been witnessed in both the Goulburn Murray Irrigation District and Lower Murray Water's pumped irrigation districts around Mildura, Red Cliffs and Merbein.

**Graph1 : Goulburn Murray Water Deliveries over time:**



Goulburn Murray Water is the largest water authority in Australia. Its water deliveries to irrigators have halved since the introduction of the Basin Plan. Decreasing water deliveries threatens the viability of the water authority. Lower Murray Water in the Mallee faces similar issues. In 2019/20, it was the first time in the water authority’s history that environmental deliveries were actually greater than those used for irrigation. This was a drought year and the environment received more water than farmers.



The previous buyback program clearly illustrates the issues of stranded irrigation assets. The blue dots represents those that sold water in 2007-10 and the grey area are total water use licenses. The scattered approach to these purchases clearly highlights stranded irrigation assets.

Since 2007, the Goulburn Murray Irrigation District has been modernised at a cost of \$2 billion. These works helped to shelter farmers from increased costs as a result of less farmers using water. If buybacks proceed, it will result in stranded irrigation infrastructure and less farmers to pay for it, ultimately undoing the great work of a \$2 billion irrigation infrastructure upgrade in the largest water authority in Australia.

There is overwhelming evidence from multiple sources that the 450GL cannot be recovered without causing social and economic harm. Based on this empirical evidence it is the VFF's position is that the Basin Plan does not require the 450GL to be recovered. Furthermore, it is the VFF's position that there must be no further reduction in the amount of water available for food production to avoid cost of living increases and threats to food security.

Frontier Economics' independent review of the *Social and Economic Impacts of the Basin Plan Water Recovery in Victoria* found that a buyback program of 750GL would result in a \$900 million reduction in agricultural output.

Furthermore, Frontier Economics also found that in a repeat of the Millennium Drought, the socio-economic impacts of the Basin Plan will also affect horticultural industries of the Victorian Mallee and surrounding areas — killing 25,000 hectares of high value horticulture because the critical water supplies needed to support these orchards has been transferred to the environment.

ABARES argued against water buybacks and on-farm projects in 2020 and found that “buybacks reduce the supply of water available for irrigation so therefore increase allocation prices”.

There is extensive evidence available to show that water buybacks are not answer and should not be pursued.

Sunraysia irrigators are very concerned about further water buybacks as they consider the Sunraysia pumped irrigation districts of Merbein, Mildura and Red Cliffs of being particularly vulnerable to its effects especially when compared to other pumped districts growing permanent horticulture crops.

Lower Murray Water fees and charges are considerably higher than those in other similar pumped districts. For example, and according to the *Lower Murray Water: Independent Benchmarking Study of Rural Irrigation Services (2015)*, irrigators in the CIT low pressure systems of Cobdogla, Kingston, Lyrup and Moorook and using 100 MLs are charged \$5,663 while an irrigator in the First Mildura Irrigation District low pressure system and using the same volume of water pays \$13,598. (While these are 2015 figures the difference between the two have increased in the years from 2015 to 2024). It should be noted that the effects of further water buybacks will not be felt by Sunraysia irrigators until the next dry period when water becomes scarce.

Many of the horticulture industries within the pumped districts are currently enduring particularly hard economic times, suffering very poor returns and are nearing breaking point. For example, the wine industry is suffering from very low prices resulting from high Chinese tariffs.

There are considerable irrigable areas within the Sunraysia Districts that are currently serviced by LMW's water delivery infrastructure but are not being irrigated. Any further drying off of the

irrigable area as a result of water buybacks will further increase inefficiencies within LMW's water delivery system and will result in further rises in fees and charges.

## Value for Money

The draft Framework on Page 10 identifies the proper use and management of public resources under four headings:

1) Efficient:

*Efficient relates to the achievement of the maximum value for the resources used. In procurement, it includes the selection of a procurement method that is the most appropriate for the procurement activity, given the scale, scope and risk of the procurement.*

- The VFF supports the draft Framework's intention but the fixed timelines in the draft and the experience to date in delivering complex landscape scale projects guarantee that this intention will not be met.

2) Effective:

*Effective relates to the extent to which intended outcomes or results are achieved. It concerns the immediate characteristics, especially price, quality and quantity, and the degree to which these contribute to specified outcomes*

- The VFF supports the draft Framework's intention but to be effective the draft must provide much greater clarity about the intended environmental and socio economic outcomes.
- The VFF question how effective the purchase of water can be given it cannot be delivered. For example , if any more water purchased on the Goulburn to store in Eildon it would not be able to be delivered down the Goulburn without damaging the river. If it cannot be delivered it will be left to spill.

3) Economical:

*Economical relates to minimising cost. It emphasizes the requirement to avoid waste and sharpens the focus on the level of resources that the Commonwealth applies to achieve outcomes*

- The VFF rejects this narrow view of 'economical' - to be economic, projects must demonstrate that benefits exceed costs. The VFF is shocked that the Commonwealth proceeded with amending the Water Act without presenting a Regulatory Impact Statement to Parliament.

#### 4) Ethical

*Ethical relates to honesty, integrity, probity, diligence, fairness and consistency. Ethical behaviour identifies and manages conflicts of interest and does not make improper use of an individual's position.*

- VFF supports the draft Framework's intention to be ethical. However, does not believe the Commonwealth has been behaving ethically or in good faith as evidenced by its decision to destroy over 100 years of collaborative management of the Murray River by proceeding without the agreement of Victoria.
- The recovery of water breaches the ethical test. A socio-economic test was developed in 2018 and endorsed unanimously at Ministerial Council to ensure regional communities were protected by ay recovery of the 450GL. This draft Framework is designed to bypass the socio-economic test.
- Former Water Minister, Tony Burke, promised in 2012 that no water for the 450GL would be recovered by buybacks as it created too much "downside". This promise has been broken.
- The Commonwealth's persistent misrepresentation of the Basin Plan to win political support in South Australia and its refusal to consider socioeconomic impacts on communities or make even the most rudimentary efforts to document the additional environmental outcomes it is seeking further erodes the public confidence in government. It is certainly not acting impartially or in the national interest.
- The VFF believe there needs to be an honest acknowledgement in the draft Framework by the Commonwealth on what water can actually be delivered.
- Environmental water deliveries have been challenging and currently cannot be delivered effectively to environmental sites.
- The Commonwealth Environmental Water Holder, Jodi Swirepik in 2020 stated that getting more water for the 450GL was not her priority and noted the environmental gains to date in a Senate Estimates hearing on 23<sup>rd</sup> October 2020 that:

*Even in the record-breaking drought, environmental flows have provided positive outcomes across the basin. For instance, this year marks 10 years of continuous flows into the Coorong since the breaking of the millennium drought in 2010. This means that the Basin Plan has worked as the recent drought did not result in the same terrible impacts and the risk for the end of the river system.*

- The Productivity Commission in 2018 found that:

*There has been no update to the 2012 modelling to estimate what environmental benefits can be realistically achieved under the revised constraints proposals (Pg 40)*

***Recommendation 5.1:** The MDBA should comprehensively update and publish modelling to confirm, the enhanced environmental outcomes that can be achieved with additional water*

- It is now six years on, since these recommendations were made, and they have largely been ignored.
- It is the VFF position that no more water should be recovered for the environment until such time that environmental benefits of recovering additional water are demonstrated to be commensurate with the costs.
- Page 17 of the draft Framework mentions the release of “Impact Analysis” that updates the 2012 Basin Plan Regulatory Impact Statement.

This issue was also discussed at Senate Estimates on Friday 16 February 2024.

- How can the Commonwealth prepare a proper RIS when they cannot or will not identify where the water will be coming from and therefore cannot quantify costs, benefits or impacts?
- The VFF question the Commonwealth’s notion of transparency;- How is putting legislation before Parliament without an accompanying RIS transparent?

## Northern Basin Water Recovery

The draft Framework notes on Page 15 states that rules-based changes will be permitted in the Northern Basin but also says rule based changes will require a transfer of entitlements. Rules based changes are a type of planned environmental water, by definition they are not held environmental water and cannot be entitlements. The VFF is seeking greater clarification on what is proposed.

Given the failure to finalise WRPs there is little confidence in the rule changes to give environmental outcomes in the Northern Basin.

## Southern Basin Water Recovery

### **No Time:**

The draft Framework notes on page 16 that the Constraints relaxation road map will determine the flexibility to deliver additional water, but does the Commonwealth propose to limit water recovery where there are delivery constraints?

The draft Framework notes complementary water purchases and infrastructure rationalisation may help minimise the socio-economic impacts as a result of water purchases.

The VFF does not believe there is sufficient time to adequately consider this issue unless the Commonwealth plans on using coercive powers to close down irrigation networks and dry off farms. If this what the Commonwealth proposing, then it is unfair for States to manage this issue on their own, particularly given it is being forced upon them by the Commonwealth Government.



**Leaseback:**

Page 12 of the draft Framework suggests the leaseback of water as a way of delaying the transfer of water to the environment.

This ultimately results in a water purchase and takes water out of production. If this was a genuine lease, it would see the water leased back to the farmer into perpetuity and therefore remains used in the production of food.

**Water Purchase outside of irrigation districts:**

The draft Framework fails to acknowledge that land and water have been separated in Northern Victoria. This means that water could be transferred to a diverter outside of an irrigation district but ultimately the negative impact of the purchase will be felt in the irrigation district.

**Basin Plan Review**

The Commonwealth's draft Framework leaves it open that the Basin Plan Review will require additional water to be recovered. This is completely unacceptable.