20 May 2022

Email : regionalwater.strategies@dpie.nsw.gov.au

Dear DPE Water - Murrumbidgee Strategy Team

Response to Draft Murrumbidgee Regional Water Strategy

We write on behalf of the Murray Darling Association Region 9, specifically Griffith City Council, Leeton Shire Council, Carrathool Shire Council, Hay Shire Council and Narrandera Shire Council who resolved to feedback to DPE Water at a MDA Region 9 Meeting on 19 May 2022. Thank you for the opportunity to comment.

Firstly, we support the notion of a regional water strategy and applaud the initiative in principle.

Page 12 – in the explanation on the Murrumbidgee Region, we feel it should be front and centre that irrigated agriculture covers a significant footprint, borne out of NSW government decisions in the late 1800s / early 1900s to drought proof the country for food security. Today these schemes are worth billions of dollars. Perhaps their significance is best highlighted in or near the paragraph that speaks about the Wagga Wagga SAP and Snowy 2. We consider the Murrumbidgee and Coleambally irrigation schemes to be of equivalent status in terms of nation building.

Page 18 – we note DPE Water's definitions of water security, which is all about town supply. We consider water for productive use to be a security issue as well.

Page 19, page 27, page 35, page 45, page 54, page 190 – we note the future climate risk modelling is still under development. We are concerned that the government is using an overly conservation approach to climate modelling. Climate change will deliver more extreme weather, both dry and wet. It is vital that the modelling doesn't only focus on worst case dry scenarios. Taking an overly conservative approach will throttle the region's agricultural potential, especially in relation to annual cropping which helps significantly to diversify economic activity by sensibly and sustainably taking advantage of primary production opportunities in wet years.

It is premature to suggest that Councils generally support the use of the new climate datasets when they are still under development (see page 35).

Referencing not only the dry periods, but also the wet, needs to apply to all planning and reporting too.

Page 22 – we support the vision, noting it references in its mix enabling economic prosperity as well as water for local communities.

Page 23 and Page 181 – Leeton is home to significant agribusiness – all of whom are major employers – including JBS meats, SunRice, CopRice ,Berri Juice (Bega), Stahmann Webster Walnuts, Pacific Fresh) and should be included in the agribusiness growth list along with Griffith and Wagga Wagga. Further, the WRConnect Freight Intermodal should be added to the list of new transport investments (an important inland rail interface). For your information, Western Riverina generates more freight for international export than any other region in NSW in a normal rain year and Leeton and Griffith Council are working collaboratively on getting this freight intermodal established. WRConnect should be referenced specifically near page 181 in the section on jobs and industries.

Page 24 , Page 193 and Page 199 – when assessing the long list of options, we strongly suggest the addition of an extra bullet point to recognise the need to optimise irrigation infrastructure in the Murrumbidgee region to ensure the region's agricultural strengths are fully realised / harnessed.

Page 29 – we support the objectives as listed.

Page 31 – the table as presented is supported however we suggest that Priority 7 RWS objective be augmented to give specific reference to optimised use of irrigation infrastructure (eg. Aligned with all regional water strategy objectives, including optimal and responsible use of irrigation schemes for primary production).

Page 32 and Page 33 – We are delighted to see strengthened alignment between landuse planning and water plans. The table as presented is supported however please note in the section on economic prosperity that while renewable energy is supported in principle, largescale solar is not supported on irrigation lands (which have been categorised as important agricultural lands by DPE.) You will note that irrigation areas are not included in the solar zones.

Note that the Riverina Regional (Landuse) Plan identifies the region as "one of the most productive and diverse agricultural regions in Australia, giving rise to its claim as the 'food bowl of Australia….. identifying and protecting important agricultural land is fundamental to the future of agricultural production." The Riverina Regional (Landuse) Plan refers to the area as "an economic powerhouse ….for agribusiness and value-added manufacturing" and states that "Ongoing economic prosperity is closely tied to … water security <u>for industry</u>."

We think it is important that the new Regional Water Strategy should more strongly reflect the sentiments expressed above, including but not limited to, adding Direction 1 of the Landuse Plan in the list showing how the Regional Water Strategy objectives will align in regards enabling economic prosperity. In Direction 1 of the Regional (Landuse) Plan – Protect the region's diverse and productive agricultural land - it states that highly productive agriculture requires ready access to water (including irrigation).

Page 37 – we reconfirm our view that consultation with a broader sector of water licence holders needs to occur, including the agricultural sector. Ideally this should have occurred before the draft strategy was compiled.

Page 39 – we agree there needs to be alignment with existing reforms but flag that as a community we are not across the Yanco Offtake SDLAM / Better Bidgee project and think it is critically important that local councils and local communities understand the current status of these projects and implications for the environment (mid Murrumbidgee Wetlands in particular) and for irrigated agriculture.

Page 171 – what is the basis of these risk ratings? We are not across this information and were not consulted on this ahead of the publication of the draft Regional Water Strategy. We consider water security needs further discussion so that local water utilities can understand more fully DPE's thoughts and provide more considered responses. It is noted that even through the millennium drought, Leeton and Griffith on only limited occasions had their town supply allocation reduced.

Page 189 – we are glad to see the significance of water strongly recognised in this section. We are also pleased to see groundwater is being identified for inclusion in a industry growth and resilience framework.

Page 193 – Local councils and the MDA Region 9 would like to be active participants in the assessment of the long list of options, along with DPE, before final Murrumbidgee Regional Water Strategy is released. There will be other relevant stakeholders to include too.

Page 194 – we support the vision as presented but ask that 'allocated and delivered in the right time' be added to the sentence "To achieve this …..".

Regarding the **options**, which enjoy our general support, please note the following :

9. *LWU's should be involved with any review of drought rules*

10. *We consider allocation rules too conservative, unnecessarily impeding agricultural productivity. We appreciate the need for a degree of conservatism but it is understood that the amount of underuse is evidence that more could have been grown in dry years.*

14. *The draft Regional Water Strategy could do well to more overtly table the risk of a growing population of permanent nut plantings in the Southern Basin and how this will impact productive water security in the Murrumbidgee as the thirsty trees mature.*

15. *South Australia needs to carry a proportional share of any allocation reductions in dry years, at the very least.*

22. *Important for wellbeing / mental health.*

34. *This project has been endorsed and recommended for a feasibility study by the Murray Darling Association, MDA Region 9 and RAMJO. We recommend that follow up is not only about reviewing previous investigations as stated in the Draft Strategy but that the description column specifically states the need to consider new technologies and ideas to achieve this project that were not included in previous investigations. The description needs to be clear that this is a fresh project, not just an action related to revisiting old ideas. Please contact us if further information is required.*

40. *We would like to understand this more and consider it should be an action of last resort.*

41. *We would like to understand this more and what the implications are for achieving both environmental and productive outcomes in the Murrumbidgee region.*

47. *Suggest that 'better optimise their water allocations' be added to 'better manage their needs and risks'.*

52. *Of critical important but cannot be done in isolation of land use planning and water use planning. We need an integrated approach in the Murrumbidgee Region.*

Thank you again for the opportunity to comment. We look forward to engaging with DPE further as the next iteration of the Murrumbidgee Regional Water Strategy is delivered.

Yours sincerely

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