

Submission to 2018 SA Murray Darling Basin Royal Commission
By Mr Keith A Greenham AM Victoria

1. This submission addresses Objects & Purposes C e,f of the Act and Basin Plan and the generality of your Commissions Terms of Reference. The issues are extremely complex. My submission is E&OE sensitive.
2. In summary I draw attention to
 - a. My submission, follow up hearing transcript and advocacy to the 2017 Victoria Parliamentary Committee Inquiry into the Management, Governance and Use of Environmental Water. Website <http://www.parliament.vic.gov.au/enrrdc/article/3044>
 - b. The evolution over more than 150 years of each of the Basin States water and land use policy and its impact on the overall Murray Darling Basin Plan development and Implementation.
 - c. The limitations of your Terms of Reference which do not factor in the Socio/economic/ environment impact of both the Basin Plan and unregulated Water Trading avoids the heart of our problems.
3. My personal background; retired 90 YO former Victoria floodplain irrigation grazier and dairy farmer, lifetime volunteer community leader and 1990,s voluntary pioneer accountability document writer. Past service includes the related fields of;
 - a. Pental Island River Improvement Trust (Chair) and successor River Management Board (Government Authority Vic,/NSW Interstate Levee Agreements 1926/1962 flood mitigation service provider),
 - b. Swan Hill Tyntynder Flats (large prior Vic/NSW stream Murray River lake bed) Irrigation Research Dairy Farm Committee (Chair) serviced the evolution of our regions 1914 subsistence farming allotment floodplain irrigation areas through Victoria Department of Agriculture
 - c. Lake Boga Community Development Committee (Sec.) 100 YO irrigation water carrier and recreation lake now mid-stream water storage preserving its recreation role, evaporation loss 7,000 ml. annually.,
 - d. Swan Hill State Emergency Service Region Chief Flood Warden and member of the Swan Hill Municipal Flood Response Planning Committee.
4. In my view the impact of the Murray Darling Basin Plan for Victoria has been to:
Overwhelm and negate the original objective of Unregulated Water Trading which was away from sleeping entitlement and unproductive salinized land use to positive economic use in the State & National Interest at a time of critical economic balance of trade problems and into the future.
5. It seems the activation of sleeping entitlement and an unusual 27 year lack of flooding winter/spring rains to regularly replenish the great dams triggered our environmental concerns and political backlash which threatens our Basin economy and Nations ability to grow its population. The 2011 midsummer flood event while replenishing the great dams resulted in major Victoria flood mitigation works failures, pondage on floodplain irrigation land and reduced environmental benefits.
6. In dealing with our environmental concerns during a period of unusually low rainfall we have been going through a period of experimentation which will hopefully through trial and error lead to new thinking and solutions.

7. Victoria Parliamentary Committee Inquiry into the Management, Governance and Use of Environmental Water 2017 submissions and hearing transcripts can be accessed on the internet. (See Cl 2a) My Submission No 5 is written in a Victoria/NSW geographic, historical, mid-Murray flood hydrograph info and strategic planning context and draws attention to the unrecognised critical role of flood mitigation works and floodplain irrigation across the Basin States in balancing the socio/economic/environmental issues created by the evolution of the great Murray River and tributary water storages, land & water use and population growth.

8. In my view there is a critical need to restore confidence in low economic value floodplain irrigation agriculture. My submission has been widely distributed to Victoria agencies delivering environmental, social and economic outcomes and I believe is generating related studies which may lead to a new big picture view of the future of the basin impacting on the claimed need for acquisition of more water for the environment.

9. In furthering the need for continuing floodplain irrigation agriculture I draw attention to the role of flood irrigation which mimics that of a natural flood in sustaining water bird habit and activity. Unregulated unbundled water trading to higher value use elsewhere and the environment has reduced flood irrigation by at least 50% with catastrophic consequences for bird life. The failure of the recent duck season is evidence of this side effect.

10. Widespread private land farming subsidised by Government in support of better flood irrigation practice is being abandoned reducing its economic benefits to the nation. The Victoria Irrigation Connections upgrade is under constant threat and the economic balancing role of irrigation in periods of drought has been lost. Our past Agriculture Department best practice floodplain irrigated summer and winter pasture development advice is no longer appropriate.

11. Market based transition from subsistence farming of the early 1900's and post 1914-18 WW1 and 1939-44 WW2 soldier settlement is proving exceeding difficult while larger scale business enterprises on retirement or failure fall back on the profitable Unregulated Water Market which now includes speculative ownership and subdivision into lifestyle allotments extending the subsistence allotment era.

12. Turning to accusations of water theft. In moving irrigation water to higher value use we have seen the development of private pump filled water storages in arid and semi-arid regions with high loss to evaporation and seepage. How these business models involving the inevitable loss to the environment of this river bank measured and purchased resource in competition with public storage based enterprise justify this is unknown.

13. Water quality problems [black water & fish kill] associated with Red Gum Forest watering have been the target of the VEWH Parliamentary Committee inquiry leading to the view that the current largely experimental practice should be drastically reviewed.

14. Based on Hearing Transcripts the Victoria Parliamentary Committee has been shocked by the extent of problems created outside of their self-generated Terms of Reference into the operations of the Victoria Environmental Water Holder (VEWH) as agent for the Murray Darling Basin Authority

15- A submission to the above Inquiry indicates that in excess of 8 Inquiries into the Murray Darling Basin Plan are now in progress.

16. The limitations of your Terms of Reference like those of relevant Parliamentary Inquiries are of concern however they can be balanced by an understanding of evolution of irrigation agriculture.

17. I argue that there is a case for a reduction in environmental water ownership by the Murray Darling Basin Authority and that ultimately population growth and food security will have the last say and that Basin community economies will not have to continue to adjust as demanded by the environmental lobby.

18. In regard to my advocacy.

1 & 2 In arguing for high security/reliability irrigation water to be given a higher legal ownership delivery status to that of environmental water ownership I have become aware that the ACCC believes that currently they are of equal status.

3. Justified compulsory acquisition to replace market based purchase of further environmental water aims to minimise the damaging side effects of further fracturing of Floodplain Irrigation Districts and Private Diversion areas.

19. The following is the basis of my oral hearing presentation at Kerang (Vic.) and amended advocacy. My formal Submission and Hearing Transcript is available on the internet. See CI 2a

Keith A Greenham AM 6/4/2018

VEWH Inquiry Oral Submission Statement - Keith Greenham AM Sub. No 5

Mr Chairman and Members

My formal submission (No 5) relates to the management and use of VEWB entitlement in the Southern Murray Darling Basin and is written in a back to basics geographic, strategy, and historical context and contains advocacy for the socio, economic and environment way ahead.

My specific area of interest is the Swan Hill/Kerang Region where I highlight the strategic link between floodplain irrigation agriculture, flood mitigation infrastructure and the environment.

Having regard to historic past mistakes I am acutely aware of your responsibilities as we review the evolution of environmental water acquisition and management.

Amended Advocacy

In seeking socio, economic, environment sustainability in an unregulated Water Trading environment I advocate restoring critical long term confidence in floodplain irrigation agriculture through:

1. The Victoria Environmental Water Holder (VEWH) not activating its annual Murray Darling Basin Region Watering Plan until full irrigator high security entitlement is assured.
2. Review of MDB Region Watering Plan carry over provisions to ensure Cl.1 full irrigator high security entitlement is achieved.
3. That acquisition of further environmental water be justified by Compulsory Acquisition rather than further corruption of the unregulated Water Market.
4. Review of the Victoria Floodplain Management Strategy in regard to floodplain flood protection/mitigation infrastructure management and its strategic environmental role.
5. Review of the impact of the Liability for a Flow of Water provisions of the Water Act and any VCAT or earlier judgements.
6. That VEWB be required to exercise its 'duty of care' for the Local, State & National economy.
7. The methodology and accuracy of measurement of environmental water use and return flows must be disclosed in the VEWB Annual Report. Purpose to balance the penalties imposed on irrigators for overuse. An audit is required.

8. That minimum Murray River flow at Torrumbarry Weir be raised from 1950 MLD to improve the built environment (pumping costs & recreation) and avoid the water access problems of the past year.
9. In seeking a solution to Black Water events:
 - a. That environmental watering of Red Gum forests in all climatic seasons has a similar effect on water quality to a flash flood and that return of contaminated environmental flows to the river must be avoided.
 - b. The principals of the Liability provisions of the Water Act must be the discipline which governs Red Gum Forest watering. These involve best scientific practice and local knowledge.

Justification

As a retiree I have no pecuniary interest in the outcome of the inquiry.

I am alarmed that as a result of unbundled water trading and the Murray Darling Basin Plan thousands of hectares 'A' class floodplain irrigation agricultural land are no longer productive. It's called the 'Swiss Cheese' effect and impacts on infrastructure provision.

Studies into the problem in 2006 and 2012 reminded that we live in a democracy, warned of the long term severity of the socio/economic impact and reminded Local Government of their duty of care to their communities.

As a Nation we have a duty of care not to become blinded to the reality of population growth and food security by our obsession with preserving the natural environment and our Indigenous and European heritage.

I have provided hydrographic information on the evolution of Murray River flood flow in the Swan Hill Region before and after commissioning Lakes Hume and Elden.

Operationally in Victoria any negative environment impact is balanced by reduced floodplain and lake pondage through wall/levee bank protected urban and irrigation agricultural development, lake based evaporative salinity management, lake based mid stream water storage and recreation use with some permanent lake closures.

Sustainable floodplain irrigation and a healthy river system are dependent on flood protection/mitigation engineering works which must now like salinity management works be considered strategic environmental infrastructure whether on public or private land under the Victoria Floodplain Management Strategy.

I list 16 government strategies which impact on the way ahead. To provide beneficial environment outcomes they must be coordinated around the sustainability of floodplain agriculture.

Finally

In contributing to your Inquiry I seek to halt the decline in productive floodplain irrigation agriculture for the benefit of the environment as well as our economy.

I thank you for the opportunity.

Keith Greenham AM 13/10/17