

26/9/2014

Mr. Craig Knowles
Chair, Murray-Darling Basin Authority
GPO Box 1801
Canberra ACT 2601

Dear Mr Knowles

Re: Draft Basin-Wide Environmental Watering Strategy

The National Farmers' Federation (NFF) is writing in response to the call for feedback on the draft Basin-Wide Environmental Watering Strategy. NFF is the peak national body representing farmers and agriculture across Australia. NFF provides a unique viewpoint on water policy issues. On matters related to water and irrigation, NFF is the only national body that brings a 100% farmer-focused viewpoint. We represent the interests of farmers that are affected by water management decisions including irrigators, riparian and floodplain landholders.

The NFF holds the overarching view that water management needs to be administered efficiently and effectively. For the environmental water –efficient and effective management – including administration, planning, delivery and monitoring – is a priority.

Whilst the environmental watering strategy should be an important step forward to guide effective and efficient management, in NFF's view the draft strategy lacks clarity in certain areas – particularly in the delineation of management roles and responsibilities – that may lead to duplication of effort and inefficiency.

The attachment to this letter outlines NFF's desire to see more communication of the technical basis behind the identified environmental outcomes, the need for appropriate catchment-scale planning and management processes and a greater emphasis on the monitoring of environmental outcomes.

Further, NFF seeks clarification as to whether the identified outcomes can be achieved within current constraints – or whether key constraints need to be eased for success.

I would like to express my thanks to the MDBA team for taking the time to brief the NFF Water Taskforce, along with many NFF members, as part of its peak stakeholder engagement process. This stakeholder consultation is vital when undertaking water management of this scale, and the NFF looks forward to a continuing engagement with the MDBA.

NFF notes that the Authority must have regard to the views of local communities and those materially affected by the management of environmental water (Basin Plan, Chapter 8, Section 8.15) when preparing the Basin Wide Environmental Watering Strategy. We look forward to the Authority transparently publishing how they have regarded the views of stakeholders put forward in this submission process.

Should you wish to discuss NFF's submission further, please do not hesitate to contact Ms Jack Knowles, Manager Natural Resources Policy by telephoning 02 6269 5666 or by email jknowles@nff.org.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tony Mahar', written in a cursive style.

Tony Mahar
Acting Chief Executive

Attachment 1.

National Farmers' Federation (NFF) feedback on MDBA Basin Wide Environmental Watering Strategy

Communication of technical basis of identified outcomes

The NFF appreciates that the draft strategy is intended to be read by a range of audiences who have different expectations for and appreciation of the scientific basis of the identified environmental outcomes.

However, in NFF's view, the draft lacks the information to describe the technical basis behind the environmental outcomes identified. The absence of this information makes it difficult for NFF to support or otherwise the quantified environmental outcomes, such as those articulated in Table 1.

In NFF's view, a clearer articulation of the scientific basis of the identified outcomes and the links to the practical experience of environmental water management could be better described in this strategy. This would assist in garnering? the support of stakeholders – and develop their confidence in the overarching environmental outcomes.

The need for formalised planning processes

In NFF's view responsibility for water planning management should be devolved to the lowest possible scale as this promotes integrated management and the inclusion of local knowledge and expertise in management decisions.

In NFF's view, management at a catchment scale most supports the integrated management of all water dedicated to the environment, regardless of who owns it and regardless of its form (i.e. held or planned water). Catchment scale management also supports the integrated management of important environmental assets, recognising that the volume and timing of watering events is only part of the solution.

In the draft strategy there are examples of where catchment and local level planning can have significant environmental benefit, such as in Case Study 1. Currently, this is more often the result of informal collaborative arrangements – rather than more formalised processes that ensure that these approaches are adopted.

NFF is of the view there is a need to review the structures and processes associated with catchment scale environmental water planning and management to ensure collaboration happens as a matter of course, not just as a matter of practice. Such a review would also facilitate a clearer delineation of the roles and responsibilities of the many different forums and agencies involved in environmental water management.

The mixed and potentially conflicting roles of the MDBA

The draft strategy highlights to the NFF the mixed, and potentially conflicting role of the MDBA. The MDBA's roles include:

1. setting the overarching strategy and annual watering priorities;
2. assessing and reporting the extent to which others have implemented the strategy and associated water policies; and
3. providing operational advice for environmental watering planning and events – as the TLM environmental water manager and as River Murray Water responsible for river operations.

This wide and potentially conflicting range of roles undertaken by the MDBA causes concern for the NFF. It is in our view crucial that the River Murray Water be free to give the best operational advice to environmental water managers – even where this advice may not be fully aligned with the Basin wide strategy. In our view, the current governance arrangements in the MDBA means that there is a risk these types of issues – when they arise – may not be transparently managed.

NFF is of the view that active consideration of the institutional separation of River Murray Water from the rest of the MDBA's policy functions is long overdue. Our view is that such reform may greatly assist in addressing the issue of potential conflict in roles.

The importance of monitoring

NFF's takes this opportunity to reiterate its concern at the lack of focus and resources dedicated to monitoring the effectiveness of environmental water management. In NFF's view, the MDBA continues to focus on modelling outcomes, without the requisite focus on real monitoring to inform and ground truth models.

In NFF's view, the draft strategy continues this lack of emphasis on the monitoring required to inform the setting of environmental priorities as well as in measuring the extent to which these priorities are achieved. The importance of in-event monitoring – both to guide real time management and to inform future event management - is also considerably undersold in the draft strategy.

Constrained or unconstrained?

In NFF's view, the draft strategy is at times unclear as to whether the identified outcomes can be achieved within current constraints – or whether key constraints need to be eased for success.

In some areas of the document, the extent to which outcomes can be achieved depend on work to address constraints (for example see page 20). However, it is stated in other sections that the outcomes are able to be achieved within the current constraints (See page 49). The NFF seeks clarification as to whether the draft strategy is in fact set within the context of current constraints.

If specific constraints need to be addressed in order to achieve the identified outcomes, in NFF's view, the MDBA should more clearly articulate these..

Water management strategies

NFF supports regionalised management of environmental water. NFF's view is that the annual and catchment planning activities are the most appropriate processes to consider and decide the range of specific water management strategies to be deployed.

The strategies or management approaches articulated on page 38 of the draft strategy are supported by NFF. In our view, these points are the key guiding principles that should be adopted when managing environmental water.

However, NFF urges caution in the MDBA detailing specific management approaches or strategies that may unduly constrain environmental water managers. NFF seeks assurance that the more specific strategies explored in pages 49-54 will not constrain the catchment scale decision making processes of environmental water holders and other managers. The full range of management strategies should be on the table and the MDBA should not dictate the exact means by which environmental water holders undertake activities to achieve the intended outcomes.

Broader natural resource management considerations

The almost unilateral focus of the Draft Strategy on flow volume and timing highlights to the NFF that the importance of broader natural resource management action has again been over looked in the formal planning for the environmental water portfolio.

In NFF's view, the achievement of desired environmental outcomes requires the active management of weeds and feral pests, adoption of appropriate fire regimes, management of runoff and grazing pressure, the management of nutrient flows and addressing cold water pollution.

In NFF's view, planning and management processes that are devolved to the catchment scale promote more integrated management and the inclusion of local knowledge in management decisions.