

Response to DECC

Draft Wetlands Policy for NSW

081208

Introduction

NSW Irrigators' Council (NSWIC) represents more than 12,000 irrigation farmers across NSW. These irrigators are on regulated, unregulated and groundwater systems. Our members include valley water user associations, food and fibre groups, irrigation corporations and commodity groups from the rice, cotton, dairy and horticultural industries.

In providing these comments, NSWIC acts on behalf of its members. Each member reserves the right to make their own submission on the matters contained in this paper.

Comments on Policy

"Where have we been?"

This section contains the statement "inland wetlands continued to decline due to river regulation, poor management, drought and invasive species – precisely the things that had threatened them since European settlement."¹

NSWIC is concerned at the implied connection between "drought" and "European settlement." Drought most certainly existed well prior to European settlement of Australia. Whilst Council agrees that human induced climate change may have affected weather patterns, in the current context of climate change debate it is inappropriate to suggest that European settlement has *caused* drought.

"Where are we going?"

"Inland Wetlands"

The draft policy refers² to a NSW Government Floodplain Harvesting Policy that has been "adopted". NSWIC notes that this policy remains in the draft stage with further consultation required prior to it being formally adopted. In light of that, it is inappropriate for the Wetlands Policy to allude to the contents of the Floodplain Harvesting Policy.

"The threat of climate change"

Irrigators manage climate variability as part of their daily operations. Water Sharing Plans manage that variability on a broader scale.

The adoption of Water Sharing Plans and the process of Available Water Determinations in NSW should be highlighted in this policy. NSW moved ahead of

¹ Pages 4 - 5

² Page 5

any other state to ensure that water – including water for environmental wetlands – was adequately managed to protect economic, social and environmental assets.

Principle 2: Water regimes needed to maintain or restore the ecological resilience of wetlands should be provided through water management planning, water purchase and/or water recovery, recognising that a balance between environmental and human requirements must be reached.

With respect to climate change, as opposed to variability, NSWIC recognises that potential for a shift in baseline parameters. It is important that any shift affect each of the identified assists – environmental, economic and social – equally. To that end, the policy should explicitly state that wetlands management plans must be made on the basis of a maintained share of the available resource, which will potentially be at a lower overall quantum of water.

In terms of obtaining a further share of the available resource, NSWIC holds a clear position that infrastructure investment offers the twin benefits of maintained productivity whilst providing water for environmental purposes. We submit that this preference should be iterated in the policy, relegating “water purchase” to a second, or at a minimum, complementary option.

This principle suggests that “environmental water management plans should be prepared for affected valleys.” NSWIC is concerned that this principle and, indeed, the policy as a whole, does not refer to the newly constituted Murray Darling Basin Authority, the Basin Plan or the Environmental Watering Plan that will be contained within it. NSWIC is concerned at the capacity for redundant work and, particularly, the potential for this work to be “cost recovered” from our constituents.

This principle identifies that “run-off from ... farms may contain toxic substances or high levels of nutrients.” Irrigators in the past have effectively managed runoff to ensure that these substances do not enter waterways. We are concerned that the current Draft Floodplain Harvesting, in limiting the amount of runoff that may be captured, may have an adverse impact in this respect. It is important that the Wetlands Policy and the Floodplain Harvesting Policy are not contradictory. To that end, NSWIC submits that DECC and DWE must confer prior to adoption of either policy. Any changes must be referred to stakeholders.

Further, NSWIC notes that DECC are developing a Diffuse Source Water Pollution Strategy. We submit that work in that field and this must not be duplicated but, moreover, must be done in conjunction to ensure identical, workable outcomes.

Principle 4: Wetlands of international, national, state and regional significance should be identified and given priority for conservation.

NSWIC notes the support within this Draft Principle for the NSW National Parks Establishment Plan. We submit that the purchase of any productive agricultural land, particularly irrigated land, must be preceded by a social and economic impact statement, together with a determination to purchase land only with a high ecological and environmental significance.