



National Farmers' Federation

Submission to the Draft Great Artesian Basin Strategic Management Plan 2018

9 November 2018

NFF Member Organisations



Contents

NFF Member Organisations	i
Contents	2
Introduction	3
Response to guiding principles	4
1. <i>Coordinated governance</i>	4
2. <i>A healthy resource</i>	4
3. <i>Aboriginal and Torres Strait Islander values, cultural heritage and other values</i>	5
4. <i>Secure and managed access</i>	6
5. <i>Judicious use of groundwater</i>	7
6. <i>Information, knowledge and understanding for good management</i>	8
7. <i>Information management, communication and education</i>	8

Introduction

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the *Draft Great Artesian Basin Strategic Management Plan 2018* (SMP). The Great Artesian Basin (GAB) is a critically important groundwater resource supporting significant agricultural activities for farmers and must be managed for its long term social, economic and environmental sustainability. The NFF is the national representative for all GAB states and will comment on the guiding principles detailed in the SMP.

The NFF is the peak national body representing farmers and, more broadly, agriculture across Australia. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. Agriculture is a source of strength in the Australian economy, providing stable employment and income to rural communities. To achieve continued growth, the sector needs regulatory and public policy settings that foster growth and productivity; innovation and ambition.

Response to guiding principles

1. Coordinated governance

The NFF agrees with the long term vision of the SMP that emphasises judicious management by governments, communities and industries to ensure optimal use of water for the long term social, economic and environmental sustainability of the GAB.

Genuine stakeholder consultation is central to effective, coordinated governance. This necessitates having the appropriate structures and arrangements in place to facilitate engagement between governments, industry, community and indigenous stakeholders. A successful GAB-wide system for coordinated governance would allow the knowledge and expertise of water users to be accessed to ensure inclusive, effective and coordinated evidence-based responses to risks and opportunities.

The NFF strongly agrees with the SMP to enable inclusive community and industry engagement on matters of importance, which includes community and industry advice to GAB Ministers. However, detail for how this can be pragmatically achieved and implemented is lacking, and also does not include detail for robust feedback mechanisms that indicate how GAB governments have considered stakeholder feedback within the decision making process. There is considerable risk to the implementation of the SMP if this is not resolved, and can potentially undermine good faith, willingness and participation if stakeholders cannot adequately contribute to the process.

The Great Artesian Basin Coordinating Committee (GABCC) continues to be an important, centralised body forum for stakeholders to collectively express their views and provide advice to governments to inform policy.

2. A healthy resource

The NFF agrees that a healthy GAB is one where: water flows; artesian pressure and water quality is maintained; groundwater dependent ecosystems are supported; and water is supplied to meet the needs of communities and industries. The pastoral industry accounts for almost 50% of GAB water use, with almost half of that still serviced from uncontrolled bores.

The NFF strongly supports evidence-based water planning in respect of scientifically defensible extraction limits and management measures that sustain the use of GAB resources. The framework which supports this must be adaptive to incorporate new scientific knowledge and account for emerging challenges including changing demand for groundwater due to intensive agriculture and resource extraction uses, with potential for new third party impact from water pressure changes.

Protecting the long term sustainability of the GAB requires collective effort. The SMP notes that an issue for the sustainable management of the GAB is a lack of recognition that it is a declining and finite resource.

The GAB should be pressurised and recharge processes should be managed. The SMP notes that the GAB is in a state of natural decline as recharge rates have declined over geological time, meaning that it is not possible to achieve a balance between recharge and discharge rates at a system scale. Managing artesian pressure on a local to subregional scale is therefore the most practical way to sustain the GAB. However, previous programs, such as the Great Artesian Basin Sustainability Initiative (GABSI), have predominantly focused on water recovery and water pressure in the GAB, and whilst important, so too are the protection of recharge zones.

The NFF strongly supports improved management of recharge zones in the GAB. Physical landscape features within recharge zones must be protected from disruption or modification to prevent silting, contamination and ensure connectivity between surface and groundwater systems. However, this requires further investment to understand recharge processes, promote best management practices, and inform Water Resource Plans (WRP). The SMP needs to include pathways to better identify landscape features important to natural groundwater recharge and actions to encourage and support landholders to improve the management of recharge zones and processes in the GAB.

The SMP also indicates that water resource matters should be considered a part of land use planning and linked to regional natural resource management plans and activities. The NFF notes that there are existing legislative or voluntary land management frameworks that affect land use, and GAB governments should avoid unnecessary duplication of laws to prevent ‘regulatory creep’ being embedded into the final SMP. The risk is an inconsistent framework that is inefficient and counterproductive to effective land management outcomes.

3. Aboriginal and Torres Strait Islander values, cultural heritage and other values

The NFF supports making water available to sustain Aboriginal and Torres Strait Islander values, cultural heritage and other community values that are dependent on the GAB groundwater system. Ensuring indigenous stakeholders can provide input in coordinated governance arrangements is essential to ensure these values are considered in the decision making process.

The NFF also supports making water available to further the economic development of Aboriginal and Torres Strait Islanders, consistent with the existing market rules and arrangements. This could involve GAB governments providing funding to promote Indigenous participation in the water market or to access unallocated reserves. NFF notes that water for cultural purposes is independent of water for economic development.

4. Secure and managed access

The security of access and maintenance of GAB water pressure for existing rights and entitlement holders is sacrosanct. The NFF supports clear and secure statutory rights for authorised users, specifically for stock and domestic (S&D) and agricultural users. Water for S&D is a basic landholder right.

The NFF agrees that clearly specified, understandable and enforceable rights and responsibilities associated within GAB state and territory authorisations for groundwater access are essential to ensure compliance. A transparent and consultative process to develop policy which guides government decisions relating to the extraction of groundwater is necessary to achieve this. The NFF also agrees that a healthy, cooperative relationship between governments and stakeholders is critical to develop a culture whereby the rules established in legislation and plans in GAB jurisdictions to manage the resource are understood and adopted.

It is important that the entitlements framework is a nationally consistent and streamlined between jurisdictions. This should be reflected in relevant state and territory legislation and respective WRPs. Some states, however, have parallel WRPs to manage other water resources including the Murray-Darling Basin. To ensure consistency and certainty, the NFF is of the view that GAB WRPs should not conflict with Murray-Darling Basin WRPs except maybe in managing recharge zones.

The NFF supports further economic development within the GAB by making groundwater available to new users in a manner which does not compromise the certainty, security and reliability of water entitlements for existing users and does not risk the long term sustainability of the water resources. Because entitlements are managed by the States, there must be a clear hierarchy of access established within State legislation that prioritises S&D over other consumptive uses of water.

In respect to the accounting for all authorised groundwater extraction; as it is an absolute right for landholders, the NFF supports the exclusion of S&D water from trading, mandatory metering and water pricing regimes. NFF also does not support volumetric limits (unless voluntary) on S&D water as usage is limited by the carrying capacity of the land to which they are attached.

The SMP notes that risk-based compliance systems and education programs is an outcome of secure and managed access. The NFF supports promoting a culture of judicious use of water through education, knowledge and information, with penalties imposed in accordance with compliance measures. However, the compliance framework should be developed in consultation with stakeholders to ensure that it is well-understood and effective. While the NFF understands the need for appropriate penalties to minimise non-compliance, it prefers voluntary or non-regulatory mechanisms where possible.

5. Judicious use of groundwater

Judicious use of groundwater is imperative to guarantee the long-term sustainability of the GAB and involves arresting declining artesian pressure. The SMP notes that improper maintenance and decommissioning of water delivery infrastructure is leading to structural failure, wasted water and lost water pressure. More than 535 uncontrolled bores and 6,700 km of open bore drains have not yet been replaced by closed delivery systems.

The NFF emphasises the importance of completing remaining capping and piping work and supports a partnership approach to do so. While substantial progress has been made, significant risk remains with uncontrolled or poorly maintained infrastructure. NFF welcomes recent funding announcements to extend the GABSI program with \$36.9 million over 6 years, but it is not a realistic timeframe to complete capping and piping largely due to a lack of bore drillers available. NFF notes that further funding is likely to be required perhaps for the life of the SMP, but recognises it is beyond the budgetary cycle at this point.

Maintenance, renewal and replacement of groundwater infrastructure is the sole responsibility of the bore owner, or, in the instances of collective schemes, the entity (e.g. bore trust), who directly benefits from the infrastructure. Bores that are not maintained, replaced or properly decommissioned risks contaminating the GAB and diminishing artesian pressure locally. The NFF recognises an expectation among landholders that governments should support asset maintenance and renewal programs. Clear lines of responsibility for management and maintenance must be communicated to all water users.

Water saving technologies to minimise water wastage are useful measures to mitigate water loss from the GAB. However, NFF cautions against the use of regulation mandating the uptake of water use efficiency measures, and prefers non-regulatory measures where possible. This could include incentivising water use efficiency measures at the initial allocation of unallocated reserves as well as information and education resources. Excessive regulation may undermine existing long-term capital investments and affect confidence in entitlement security and, if needed, should be developed in consultation with stakeholders.

The NFF supports trading of water entitlements within the GAB. However, this should be underpinned by robust scientific evidence and understanding of the system, physical connection, consistent and appropriate trade rules, and third party and environmental impact avoidance and management.

6. Information, knowledge and understanding for good management

The NFF recognises the importance of accurate, accessible and high quality information to inform and develop effective policy. Knowledge gaps preventing understanding and management of the GAB should be targeted with the goal to better inform policy. NFF supports an adaptive management approach that presents no significant risk to the integrity of the GAB.

The NFF supports a coordinated system of research that enables collaborative and involve working relationships between research organisations, industry, water users and government. This will facilitate easy acquisition, access, consolidation and dissemination of information to promote best practices and inform policy development. However, adequate baselines must be developed before new development occurs, especially if untested, or for new users. This would include natural recharge and discharge processes, water flows, water balances and risks to those processes.

Metering is one useful tool that can provide better information for resource modelling and management. However, the benefits and costs of doing so should be considered. In particular, water for S&D is an absolute right of landholders and the costs of installation of meters across the GAB would be expensive and unnecessary. Monitoring needs to be cost-effective and risk proportionate, targeting areas with greatest risk of over allocation or other unsustainable use.

7. Information management, communication and education

A comprehensive understanding of the GAB is essential for ongoing and judicious use its water resources and confidence in the implementation process. Ensuring information is credible and well-communicated is critical to its successful management. This involves easy and navigable access to information for all water users and stakeholders within the GAB as well as clearly defined channels of communication between stakeholders. NFF supports an open access and centralised hub for reliable GAB-wide information.

A GAB-wide resource condition report that is communicated and updated 12 months prior to each five-year review of the SMP, to include ‘dashboard’ indicators of the current state of GAB resources and management, and identification of emerging trends, risks, challenges and opportunities is also supported.

The SMP acknowledges perspectives that result from GAB-wide dialogue and critical analysis are often the most efficient way to add value, achieve consensus, and generate support for decision-making processes. The GABCC is an invaluable body to develop shared understanding of GAB-wide perspectives to assist governments. NFF strongly supports the continuation of the GABCC as a mechanism to provide a genuine voice for all stakeholders.