



National Irrigators' Council

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COFFIE program
Water Division
Department of Agriculture and Water Resources
GPO Box 858
Canberra City ACT 2601

Dear Sir/Madam

Re: Commonwealth On-Farm Further Irrigation Efficiency Program

The National Irrigators' Council (NIC) is pleased to provide the following comments in response to the Commonwealth On-Farm Further Irrigation Efficiency Program.

While the NIC has long supported the use of infrastructure and efficiency works over other water recovery methods as mechanisms of least harm to communities, our view remains however, that there should be no acquisition of 450 gigalitres of up-water until the existing recovery target is met.

It must also be remembered that this measure was an 'add on' to the Basin Plan. The 450 GL has not been subjected to the same level of scrutiny as other aspects of the Plan principally due to the fact that this measure was a last-minute inclusion to secure the support of the South Australian Government. Despite our repeated requests, there has been no clear explanation as to what benefits and outcomes will be achieved by removing an additional 450 GL at a cost of \$1,575 million to Australian taxpayers.

It is noted that the MDBA completed two 'relaxed constraints' scenarios where eight key river operating constraints were relaxed in the southern connected system to model flows of 2800 and 3200 GL/year and that the MDBA concluded that *'that the constraints relaxed modelling confirmed the MDBA's previous assessment that increasing the SDL to 3200 GL/year without changing some of the restrictions on environmental watering would achieve few additional benefits'*.

The MDBA modelling at the time found that the combination of relaxing constraints and an additional 450 GL would allow it to reach 17 out of 18 targets for the River Murray compared to 11 under current constraints. Subsequently, in December 2014, the MDBA released its Constraints Management Strategy Annual Report which made it clear that not all of the eight key constraints could be relaxed and the flow targets could not be achieved, yet there are still plans to acquire the additional volume.

Concern remains that the MDBA appears to depend on modelling parameters that in some cases conflict with existing knowledge of maximum flow rates.

It would therefore be premature to move to recover the 450 GL at significant cost at this point.

Yours sincerely

Tom Chesson
CEO