



# Moirira

## Board of Management

T.M.L.

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| M.D.B.C.  | FA 0533 |
| Comm. No. | 19372   |

**Moirira Private Irrigation District**

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5<sup>th</sup> July 2000

RECEIVED  
10 JUL 2000  
M.D.B.C.

Dr. Tony Mc.Leod  
Review of the Operation of the Cap  
Murray - Darling Basin Commission  
G.P.O. Box 409  
CANBERRA A.C.T 2601

Dear Sir,

We have enclosed our comments on The Murray Darling Basin Cap in the N.S.W. Murray Valley.

Would you please provide us with copies of any further reports and findings which result from this project.

Yours Faithfully,

Deputy Chairman

## THE MURRAY DARLING BASIN CAP IN THE N.S.W. MURRAY VALLEY

### Submission by Moira Private Irrigation District

1. The statement that environmental degradation would have been worse requires further explanation and evidence. Since the implementation of the Cap water diverted has been below levels of more favourable periods and it may be assumed that the true tests have not yet been encountered. We have not been convinced from the content of the document that improvement has been achieved.
2. The Project Board has concluded that there is no certainty that the Cap is sustainable at its present level and that some refinements may lead to the lowering of the level of the Cap in some valleys. We consider that this requires considerable attention. Whilst we support the definition many issues emerge. All water extractors must be subjected to the same rules of sharing and foregoing supply on an even handed basis. Security users and the environment appear to be privileged. It is too easy to take water from agriculture. All of the proposed methods and systems that are expected to produce better outcomes must be tested under all types of conditions and be available for examination by all interested parties before any binding arrangements are concluded.
3. The Project Board considers that there is compelling evidence that the Cap has already delivered significant economic and social benefits to the Basin yet we have not had this demonstrated amply. If the Board is so confident it should be able to table such evidence for closer scrutiny.
4. Research has been carried out on several systems across the Basin. We have not been made aware or had an opportunity to participate in this research and as our scheme would be a representative example of diverse agricultural activity in the Basin we would like to have access to such research findings.
5. The guarantee of security of water supply is far from certain. The assumption of a more certain climate for long term investment is highly questionable and cannot, as yet, be based on fact. The comments asserting that high value agriculture and value adding will be attracted is a statement of hope more than a well balanced judgement of likely outcomes.
6. The Cap has certainly brought about forced restraint but as to whether it has been orderly has not been demonstrated. Further, there is

nothing put forward to demonstrate that economic development has proceeded.

7. The Project Board, once again, has not demonstrated the economic and social and benefits it claims. Those who are not convinced suffer from exposure to vague claims which are not substantiated.
8. Reference to Cap arrangements for Queensland and A.C.T. are beyond our level of experience to comment.
9. A moratorium period of five years should be determined during which "sleeper/dozer" issue should be evaluated. Inactive licence holders should be provided with an opportunity to establish a worthwhile use to continue with their licences at the conclusion of which time unworked licences might be foregone and added back to the systems for re-allocation.
10. We have not had an opportunity to study the report of IAG and, therefore, cannot comment.
11. Computer modelling is very fashionable and we do not have a better suggestion to offer, at this stage. However, we strongly recommend that all statistics accumulated over the next five years be compared, in detail, with the relevant models which are used as a basis for decisions in the management of the Cap and that such results be published and be available for comment in the same manner as comments are presently being sought in this review.
12. It is evident that the Cap conditions must apply across the nation and that all regions must comply to the same principles, unconditionally.
13. Schedule F should be reviewed in conjunction with principle users and local communities to obtain the benefit of local knowledge which would be invaluable in understanding local needs and to gain support for the Cap.
14. Our response to IAG recommendations are covered by points nos. 15 to 17 following.
15. We suggest that the Project Board should address the issue of removing end of valley flows as a method of Cap compliance on a valley by valley basis.
16. Arrangements for remedial actions should only be implemented after consideration on a valley by valley basis to ensure accountability within regions which will not affect other areas.
17. Provided all of the uncertainties have been resolved beforehand we would agree to start with the 2000/2001 year.
18. The proposal represents a considerable change from the original and

requires a full explanation, the manner in which it would be determined and of the management steps that would follow to bring about the anticipated outcome.

19. Whilst attention is being applied to the Cap we consider that other Important issues are being subordinated if not, entirely disregarded, for example the volumes of water being made available for environmental use and the priority being applied ahead of well established needs, especially, agriculture. During the period in which the Cap has applied weather conditions have been abnormally dry and we believe that a completely different outcome would have resulted if there had been periods of normal rainfall. Under more natural conditions both the environment and extractive users would have had more access to water and this would have provided a more positive approach to accept the Cap levels.