



SUBMISSION

Water Management Planning
25th June 2018

Poppy Growers Tasmania Inc (PGT) welcomes the opportunity to make comment in respect of the May 2018 "Opportunity for Comment – Generic Principles for Water Management Planning."

Please find herewith PGT's feedback in relation to the consultation draft for new Water Management Plans to be introduced across Tasmania and affecting, in the main, farmers who take, store and apply irrigation water from their own sources under licenced arrangements.

- It is clear that the Draft does not contemplate irrigation water supplied from Tasmanian Irrigation Schemes.
- While PGT obviously supports the Water Management Plan process, it being in place since the last decade, the basis or need for a new system is not entirely explained or agreed.
- Consideration has been given to the previously prepared Water Management Framework (WMF/Framework).
- The 2009 Framework contained this core generic principle:

... (Framework to meet) the dual aims of providing certainty to water users and protection for our water resources

- As we fast forward to the present draft in 2018 the kind of language that was used in the original WMP Frameworks is more "problem" biased, i.e. *the Department applies a risk-based approach to water planning.*
- Given the historical tension between the above dual aims, from 2009, which PGT says has been adequately balanced under the still current framework, there are a few or no adequate reasons for change exhibited.
- Our PGT analysis of the consultation draft began with the Foreword. Three central tenets for change are promoted in the Foreword. These were that this consultation including a need to bring the Framework into a "Contemporary" sense especially as to communication. Other reasons advanced were an emphasis on preparing plans that are "simple to use and understand" and finally, greater emphasis on "desired outcomes from water management planning".
- PGT's position is that the Consultation draft does not sufficiently explain and justify the 3 central tenets. Ironically, the draft, from a water user perspective at least, does not make its rationale clear.
- Other than stylistic template changes, the focus on making the WMF "Contemporary" is not apparent. A description of the need for a Water Management Plan in an area is unclear, at some point a WMP will start with a ministerial decision – but what is the lead up or cause for the making of a Ministerial decision?
- PGT represents, at various times, approximately 90% of the poppy grower base and this cohort is largely representative of conventional cropping systems across the state, with poppies grown by the majority of crop growers and mixed farms. Accordingly, PGT is poised to be aware of water management issues at all times. PGT is able to state that it is not and has not been receiving feedback from its membership about Water Management Plans.

- The observation is also made that once a Water Management Plan process is triggered the first public step is to run newspaper ads. In a “contemporary” sense this appears to be a narrow notification process with nothing about direct notices, emails, text messages to phone numbers linked to licences, Facebook posts and the like.
- In terms of identifying what facts or evidence, from an administrative perspective, may lead to a decision by the Minister to prepare a new Water Management Plan, it is stated that:

Preplanning (is) where departmental officers undertake preliminary work to understand what the issues are...

- If obvious issues, such as sustained below average rainfall, lack of winter water flow, indications of additional extraction, are not apparent then what issues are to be looked for?
- PGT is concerned that there is a likelihood of suggesting problems which are not present or uppermost in the production systems of the dominant farmer user group.
- Taken from Principle 2 it is stated that:

Effective consultation requires that stakeholders have access to information to understand:

- *why a water management plan is being developed;*

- PGT observes that this fundamental indicator is not answered!
- Essentially, the question posed is an open one but this leads to further questions, such as; Is the process political, economic, ideological, scientific and if so on what evidence?
- PGT is familiar with recent studies published by DPIPWE such as *Dry Season Impacts on Tasmanian Rivers (November 2016)* as well as the *Surface Water Allocation Framework July 2015*. The effect of such thinking on altered Water Management Plans is a matter to be determined. Farmer groups do not appear to have been engaged in such studies, especially where the end goal is “Tasmanian Sustainable Yields”.
- Also unclear from the Framework process is the “*Stakeholder Engagement Strategy*”.
- PGT is acutely aware of the importance of involvement in administrative decision making processes and where farmers are the dominant user group in certain watercourses and catchments, PGT is concerned to see that farmers will be adequately represented, not only in how the Framework process is set up but in individual Water Management Plans. How is the Consultation process to be broadly representative of competing objectives is NOT made clear in the Draft.
- Options for inclusion may involve Land area, Licence volumes and environmental assessments of watercourses “As Is”. That is to say, it is the historical experience of certain watercourses that since Water Licences were introduced under old legislation there has been modification of some watercourses in the state where environmental flows are not the same as prior to land clearing and landscape modification that follows European style agricultural practices.

In almost all cases, the Department will consult with the community to establish a Consultative Group that is representative of the various interest groups for the water resource.

- The procedures for representativeness are all motherhood statements and allow potential for hijacking by interests antagonistic to farmer licence holders and those who have high surety access to water without licences is an uncertainty that is of concern.
- In a nutshell, PGT is keen to see that if WMP's are to be changed that it is very clearly articulated.
- In simple words:
 - what is the problem?
 - why is it a problem?
 - whose problem is it?
- The nature of the catchment assessments and a need for change is not self-evident when licenced volumes and changes to same under the Water Management Act are publicly available on the DPIPE website
- The statement that *In Tasmania, the water required to service environmental values is assessed and preserved before water can be allocated to consumptive uses...* overlooks industrial nature of certain limited-extent highly modified landscapes due to dams for horticulture and on-farm storages.
- PGT is also concerned about risks for reduction in new allocations as well as reallocation and reduction in surety levels. The adoption of fixed rules as to allocation, is not considered consultative:

"In areas where no unallocated water can be identified, or where the issuing of unallocated water would cause a negative outcome for meeting Plan objectives, new water allocations will generally not be provided for."

- The Draft was reviewed fully and despite the worthy goal of being contemporary, it was lacking in discussion and analysis of irrigation systems and practices which in an evidential sense have altered greatly since the turn of the century. A fear to farmers of allocation risk based on "new environmental science" is offset when the methods of use, technology, sprinklers, pivots, solid set, drip, tape and related technologies are not mentioned at all.
- Similarly, PGT has been surprised at the omission of discussion about the impact, cost and limits of water schemes. Surely it is critical that before new WMP's are set up that there be a rigorous analysis of the Tasmanian Irrigation Schemes?
- Also not mentioned is the timing of the process such that, where there is to be "No One Size Fits All" that farmer groups such as PGT are able to broadly respond to arguments that may affect farmers either way.

In conclusion PGT is very keen to be involved in discussion with Government about this Water Management Framework discussion and throughout the Consultation process and through the development of Plans.

PGT is the peak industry organisation charged with representing the interest of Tasmanian poppy growers in respect of security, governance and commercial matters at all levels of government, State, National and International including ongoing liaison and negotiation with the three licensed and approved Australian poppy companies.

While some poppies are grown on mainland Australia, Tasmania poppy growers provide approximately 50% of the global demand for pain management material derived from opiate poppies.”

Philip Loane

President

Poppy Growers Tasmania Inc

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