

Mr. Henry
Parks, Water and Environment,
1 Franklin Wharf
Hobart 7000

17/12/09

Dear Mr. Maxwell,

Re: South Esk River Catchment Water Management Plan:

Thank you for the 'phone notification of the extended period to lodge our comments on the above plan to the 18th December although as advised at that time our submission could have been lodged on the 11th December.

However we believe that there is a worrying aspect to the decision to grant this extension as we are reliably informed that this was for the benefit of larger organisations who should well have the resources to have been on time.

Further these interested bodies have already been intimately involved in the actual preparation of this draft plan, placing them in a position of considerable advantage.

Therefore in perception, if not in fact, this plan could be considered a foregone conclusion on behalf of the irrigation industry rather than a plan which takes an all inclusive approach for the well being of this catchment and the environment for future generations.

Anglers Alliance (AAT) wishes to raise a number of issues pertaining to the above plan.

We submit these in brief on the understanding that the consultation process will allow these matters to be discussed in detail as the plan becomes more equitable to all stakeholders and in particularly truly recognises the position of the environment at surety two within legislated State Water Management Plans.

Prior to listing this précis of our objections we wish to express surprise at the process thus far and the assertion that this plan has been drafted through consultation. The present process being undertaken for the Macquarie Catchment Water Management Plan is far more inclusive and rather devalues the South Esk process despite the Macquarie group's make up being heavily weighted towards irrigation interests.

Certainly the views of AAT, whose members have a significant interest in Tasmania's last major unimpeded river have not been sought or indeed those of the conservation movement who also have an obvious interest in any water management planning for the long term. Further it is our understanding that irrigation and farming interests were not only consulted but indeed took part in the Plan's creation whilst NRM interests were involved as observers only and if this is indeed the case then it shows demonstrably in the draft plan itself.

We note that the background papers provided on your web site does not provide detail on those who were consulted (so that authenticity could be judged) but the published general description of the advice sought could hardly be described as consultation.

Let it be known that AAT has no objection to farming or irrigation providing that the environment is considered at surety two and irrigation at surety five thereby ensuring the long term survival of this or any other catchment.

With all due respect AAT submits that the draft is far more akin to an irrigation plan justifying the quantum of abstraction (to the detriment of the South Esk River itself) as opposed to a “Catchment Water Management Plan.”

We suggest that the plan in its present form is unacceptable given its bias to the irrigation industry as opposed to the health of the catchment together with its associated environment which we believe is contrary to legislated water sureties.

Given this bias the final catchment plan must, in our view, conform to the conditions being laid down by the Commonwealth for all future irrigation projects.

In numerical and not order of importance we place the following on the record as matters for further and more detailed discussions:

1.4 Plan review:

Given the prevailing conditions since year 2002 we regard a ten year review period as being unwise in the extreme. The plan should be reviewed constantly and certainly with a major review after the first five years whether under section 34 (1A) or not.

Further, this review period has been fixed without reference to the CSIRO’s Sustainable Yield Project, due for release in January 2010, or the Tasmanian Climate Future Study, due to be published later that year, which may well be even more telling due it’s greater area specific detail.

Part 2 Vision and Objectives:

2.2.1 (d) We suggest that this is severely compromised throughout the plan in particularly when compared to environmental section **7.3.1. (b)**.

2.2.1 (f) and 7.3.2.(b) recognises the need for connectivity between ground and surface water. We suggest that no such recognition is given within the draft plan, considering the vast monoculture forests situated in the headwaters of the catchment.

It is generally accepted that tree farming places a major and increased burden on ground water systems. We understand that there is little scientific quantitative recognition of this within your Department but nevertheless we suggest that this usage must form part of the water catchment availability calculations as other knowledgeable sources estimate that this could be as high as 40,000ML.

2.2. 2 (b) seeks to “*Actively encourage the taking of water in winter and reduce etc etc.*” AAT suggests that the draft plan by its own admittance suggests reliance on off stream storage into the future. Given the proposed advantages for a single sector group within this draft plan the taking of water in the winter period should be a preminent condition and not merely an “encouragement.”

2.2.3: Social objectives:

Thus far the social objectives as stated have not been addressed.

3.2.5 Metering requirements:

As metering is a condition of Australia’s National Water initiative no new water should be abstracted before the installation of this appropriate recording equipment.

We also see the Llewellyn station as the last measuring site as being insufficient and suggest that more control regimes below this point are required.

4.3 Conversion of Direct Allocation:

We see the suggestion that there be a 30% increase in allocation as a good incentive to convert to off stream storage on condition that this occurs only in the winter period or at a time of exceptional availability.

4.41 Surface Water Yield:

Notwithstanding the above studies we note that the plan is based on annual median yields between years 1970- 2003. Given recent experiences we suggest that the years between 2003 and 2009 should also be taken into contention. Without this it would appear that there is no allowance for changing weather patterns.

We further note that that there is no mention of the 9,000 ML earmarked for the Midlands Irrigation scheme thereby further reducing surface water yield for the South Esk.

6.1.7 River Health and Water Quality Monitoring:

The contention that environmental monitoring on the basis of the availability of Departmental resources and “programmes as they are implemented from time to time” is an abrogation of responsibility. AAT believes that there must be a permanent and timely monitoring system which is publicly transparent.

7.3.1 (a) Environmental objectives:

If this draft plan is to encompass the needs of a sustainable catchment water management plan as opposed to an abstraction plan then the environment must be considered of prime importance following the fulfillment of human and stock needs.

The statement in paragraph three pertaining to the “maintaining or mimicking key flow components of natural regime” cannot be regarded as reasonable given the past interferences with the rivers’ flow resulting in acceptance of the status quo becoming the “natural regime.”

There is considerable evidence that the South Esk catchment is already stressed and impacted through present use and the view of some is that there is no extra water available for abstraction to the detriment of the environment.

Surely key flows can only be calculated using total water availability and any plan dealing with catchment management which is to become enshrined in legislation should not accept or assume the status quo as the base line.

Whilst trout may be seen as an invasive species the trout sport fishery as part of “Brand Tasmania” is nevertheless an important social and commercial part of the equation and as such trout must be recognised as part of freshwater ecosystem values.

7.3.1 (b) Provide adequate environmental base flows:

The premise that it is acceptable for river flows to “**naturally**” fall below the cease to take threshold is not a true reflection. Many years past practices of abstraction, taken without sufficient scientific evidence or control regimes, have resulted in an acceptance of the **artificial** as the **natural**.

Clearly scientific recommendations are for a minimum environmental flow of 100-160 ML/day and that the cease to take threshold of past years has been set at 40ML/day solely, it would seem, through experience.

It is of no consequence that the December-April period may drop below the scientific minimum recommendation as clearly this is caused through the excess abstraction presently undertaken thereby reducing acceptable environmental flows.

This plan should be one of sustainable water management and written from a new and scientifically based standpoint eliminating the use of past practices as the standard for the setting of flows.

AAT does not believe that minimum environmental flows should be allowed to be dictated by irrigation take and that the continued use of 40ML/day as a cease to take level is entirely unacceptable resulting, not in a “pragmatic outcome,” but a complete imbalance between the environment and irrigation. If winter take is increased and in consequence summer abstraction reduced then any flow exceeding 40ML/day will enhance the environment.

The statement that “whilst it would be preferable to set cease to take flow thresholds as recommended (scientifically), the potential impact on irrigation water supply would be significant” is an anathema and totally contrary to the sureties contained in the State’s water management legislation.

We understand the need for DPIPW to greatly accelerate water management plans as required by the National Water Initiative in order to address the Government’s irrigation agenda. However in the case of the South Esk and presumably others as

they are quickly addressed it is evident that water management plans are being run in parallel with future irrigation schemes contrary to spirit of catchment care.

AAT would like to know why “50% maintenance of available habit” is acceptable and based on what evidence other than the making of water available for farming practices? We are also interested in what values and effects have been measured by the sacrifice of the other 50% of available habitat and whether that % figure applies to 160 or 40ML/day?

7.3.1 (d)

AAT suggests that the statement contained within the draft plan that “environmental water receives a greater level of security than consumptive water other than domestic water supply” is fallacious and that it is abundantly clear that surety two water rights are being ignored in preference to surety five and again this is unacceptable.

7.3.1. (f)

There is no allowance that we can see in the draft plan concerning the connectivity between ground and surface water considering tree plantations of some 15,000 hectares in the system’s headwaters. We believe that it is essential that this water take be included in availability calculations.

7.3.3 Social Objectives:

These are clearly not met to any degree within the draft plan and require major consultation.

7.4 Water Quality objectives:

Given the statement in paragraph two as to the importance of water qualities we believe that these must be included within the final plan together with what measures and mechanisms will be put in place to ensure their enforcement

7.6 Plan Effects:

The statement “Of most significance, whilst detailed scientific assessments indicated that the cease to take threshold flow during the direct take period should ideally be raised significantly, the status quo has been maintained under this plan. This is in recognition of the likely significant impacts on water dependent businesses (irrigators alone) had the recommended flow thresholds been adopted” **makes nothing short of a mockery of the need to install meaningful water management plans and further may well contravene existing water management legislation.**

The contention that the “South Esk River has a large annual discharge and can be considered a highly reliable water source particularly with respect to winter flows. Whilst summer flows may become less reliable due to climate change and drought, winter flows will continue to provide a high level of resource security and offer scope for additional irrigation development” predominantly flies in the face of the remainder of the draft plan.

In general this plan appears to use the irrigation experiences of recent years as the base line from which to chronicle a water management plan. We believe that this is scientifically flawed and that flows should be allocated in line with legislated water sureties.

We reiterate that we have no animus towards the farming community and indeed support sustainable farming practices. However we see much of this plan as being self contradictory given the Department's two defining statements above.

Our interest is the maintaining of the environment for future generations and fair sustainability for the community at large and we avail ourselves for the next stage of consultation.

Richard C. Dax
(Chairman)