

South West Region  
Department of Water  
PO Box 261  
Bunbury WA 6231

## SUBMISSION ON WARREN-DONNELLY SURFACE WATER ALLOCATION PLAN

### Summary of Submission

Manjimup and Pemberton Landowners represent surface water licence holders subject to the *Warren-Donnelly Surface Water Allocation Plan (Allocation Plan)* which is open to public comment. Manjimup and Pemberton Landowners do not support the *Allocation Plan* because it doesn't provide sufficient water for agriculture in terms of security for existing water users in agriculture and for potential growth in agriculture in the 'food bowl of the South-West'.

In the alternative to the low amounts of water for agriculture in the *Allocation Plan*, Manjimup and Pemberton Landowners propose a greater percentage of water being allocated to agriculture, as proposed in the Table in this submission, at column 6. The Table proposes that water for agriculture in relevant sub-catchments in the Warren River catchment be increased from an average of 20% to 37% of annual flow, and in the Donnelly River catchment from 14 % to 28% of annual flow. For major agricultural sub-catchments, the allocations to agriculture are substantially increased, for the Wilgarup River from 31% to 60% of annual flow, for Smith Brook from 30% to 60%, for East Brook from 29% to 50%, and for Manjimup Brook / Yanmah-Dixvale from 29% to 60% of annual flow.

Further, and importantly, in proposing increased water allocations to agriculture, only some of the increased provision of water should be granted to new entitlements. As a precaution against a drying climate, a substantial component of the allocation to agriculture should be reserved and held for review and possible allocation ten years after introduction of the *Allocation Plan*, and beyond.

A Water Resource Management Committee, provided for at section 26GK of the *Rights in Water and Irrigation Act 1914* should be appointed to plan for and manage water allocations in the Warren and Donnelly River areas.

### 1. Introduction and Background

Our 'Manjimup and Pemberton Landowners' group is an informal association of representatives of agricultural sectors in the Manjimup and Pemberton area using water captured in private dams. This area is regarded as the 'food bowl of the South West' with annual agricultural production valued at over \$100 million, twice the value of production of the Ord River irrigation district which is heavily subsidised by the public (most recently by \$415 million in July 2009). Our group convened in March 2007 to respond to water reforms proposed by the former State Government; including response to harsh water licence fees that were subsequently twice disallowed by the Legislative Council. Manjimup and Pemberton Landowners have made submissions to the current State Government's inquiry into water resource management and planning charges, and preparation for the *Water Resources Management Bill*. Manjimup and Pemberton Landowners group members hold surface water licences and substantially represent surface water licence holders subject to the *Warren-Donnelly Surface Water Allocation Plan (Allocation Plan)* which is open to public comment.

Until mid-2008 water allocation process in the Warren and Donnelly River catchments was generally non-controversial. Prior to mid-2008, the Department of Water had given landowners and agriculture assurances that surface water was not over-allocated, and that the system for determining allocations was reliable. However, during July 2008, the Department began advising applicants for surface water licences they would not receive allocations from several catchments. The new allocation limits enforced by the Department were based on the '*Estimation of Sustainable Diversion Limits for Catchments in South West Western Australia*' report published by consultants SKM in

August 2008. The environmental bias context of the Sustainable Diversion Limits was made clear in the report's introduction, being "*The diversion potential represents an upper limit beyond which there is an unacceptable risk that additional extractions may degrade the riverine environment.*" (Part 2, page 1). The changes meant that 89% of the winter flow of streams was allocated to the environment and only 11% was available to agriculture and other uses. The dramatic effect of the new policy meant the Upper Lefroy was 493% overallocated, Smithbrook was 199% overallocated, Eastbrook was 171% overallocated, Wilgarup 163% overallocated and Manjimup Brook/Yanmah-Dixvale was 212% overallocated. Manjimup and Pemberton Landowners wrote to the Minister for Water on 10 November 2008 requesting the Minister's intervention to achieve a solution on water allocations to both sustain the stream environments and enable the exciting potential for further growth of the 'food bowl of the south west' (see letter to Minister for Water in [Appendix](#)). The changed policy on water allocations had an immediate negative impact on the local economy and economic outlook, with some substantial agricultural ventures unreasonably denied water allocations. It remains open to speculate just how much damage the Department of Water would have caused to local agriculture if Manjimup and Pemberton Landowners and others hadn't protested to the Minister for Water, and to other relevant Ministers and members of Parliament.

## 2. Warren-Donnelly Surface Water Allocation Plan (Allocation Plan)

The *Allocation Plan* published in June 2010 for public comment is not a product of a development process with genuine inclusion of stakeholders. More comment will be made on consultation and management processes below at 6.

The *Allocation Plan* is accompanied by the '*Warren-Donnelly surface water allocation limits report*' (Report 40 of May 2010) which converts the principles embodied in the 'Sustainable Diversion Limits' of 2008 into 'Ecologically Sustainable Yield' (ESY) which the *Allocation Plan* at page 23 says is the "Amount of water that can be abstracted over time from a water resource while maintaining the ecological values (including assets, functions and processes)". The science underpinning ESY is weak, and other submitters may be challenging ESY in detail. However, if the Department of Water believes its science and value judgments for ESY, then adherence to ESY locks in 'water for the environment' and locks out agriculture from accessing water in that component.

For purposes of our comment on the *Allocation Plan* we refer to 'Mean Annual Flow' which is the measurement derived from stream monitoring stations before application of values of dubious scientific basis relating to ESY and 'Ecological Water Requirement' (Report 40, p 45). Based on data from the Upper Lefroy, Report 40 concludes that interception of water by farm dams is less than the increased run-off following clearing, with the exception of the driest year (1987) in the study period. This conclusion negates the misguided view that farm dams are bad for the environment. In contrast to the lack of evidence of environmental damage caused by dams, the dams are refuge habitat for more than 20 species of native water birds (typical) and for native freshwater fish and Marron that wouldn't occupy an otherwise dry paddock. Some of the birds (eg Black Swan) are refugees from wetlands in other distant areas which have been urbanised and depleted of water (eg Perry Lakes) through mismanagement of the resource. The Department of Water ignores these major environmental attributes of farm dams in consideration of water for the environment.

The 'Water Information Sheet' distributed to by the Department to surface water licence holders in June 2010 summarising the *Allocation Plan* doesn't show Mean Annual Flow, present licensed water volume, additional water for agriculture and other uses, and planned allocation for agriculture as a percentage of Mean Annual Flow. These are vital data to make informed decisions. The 'Water Information Sheet' provides the 'Allocation limit', which is meaningless out of context.

## 3. Water Allocations Proposed by Manjimup and Pemberton Landowners

Manjimup and Pemberton Landowners have prepared the Table below as a basis for informed decision making on allocations of water to agriculture in streams and sub-catchments important for agriculture in the Warren and Donnelly River catchments. We advocate a greater percentage of water being allocated to agriculture, as proposed in column 6; being the 'proposed percentage of Mean Annual Flow that should be allocated to General Licensing, including Agriculture'.

**Table: Warren-Donnelly Surface Water Allocation Plan: Streams and sub-catchments important for Agriculture**

	(1)	(2)	(3)	(4)	(5)	(6)
	Mean Annual Flow ML	Licensed ML Mar-10	<i>Allocation Plan</i> Limit ML	<i>Additional ML</i> General (inc Agric)	<i>Allocation Plan</i> Percentage of Flow	MPL Proposed Percentage of Flow
<b>Warren River basin</b>						
Perup River	11405	478	1571	956	14	20
Wilgarup River	25881	5637	8027	1713	31	60
Upper Warren	42623	1172	4368	2312	10	20
Quinninup Brook	20302	368	1422	899	7	20
Smith Brook	14601	3139	4362	606	30	60
Diamond Tree Gully	4767	253	682	370	14	30
Upper Lefroy	13609	5967	6975	0	51	60
East Brook (see note below)	12576	2477	3627	781	29	50
Lefroy Brook	12312	1546	2905	562	23	40
Four Mile Brook / Big Brook	20852	3244	5294	1261	25	30
Treen Brook	14015	799	2570	1546	18	30
Lower Warren	20015	312	1965	1478	10	20
Warren River sub-catchments total	212958	25392	41803	12484	20	37
<b>Donnelly River basin</b>						
Upper Donnelly	39314	370	3906	3188	10	20
Manjimup Brook / Yanmah-Dixvale	22318	4728	6441	1172	29	60
Middle Donnelly	12267	1115	2366	1047	19	30
Beedelup Brook (see note below)	12271	739	806	0	6	15
Fly Brook (see note below)	17359	795	867	0	5	15
Donnelly River sub-catchments total	103529	7747	14386	5407	14	28

(1) Mean Annual Flow 1975 to 2007 in megalitres (ML)

(2) Licensed entitlements as at 24 March 2010, it includes some additional allocation made in the Upper Lefroy in 2010

(3) Plan Allocation Limit ML includes public water supply and unlicensed dams of less than 8ML, but not major stream headwater dams and run-off dams

(4) Additional ML of water for General Licensing, including agriculture; the 781ML in East Brook is committed to pre-Plan licence applications

(5) Water allocated under Plan as a percentage of Mean Annual Flow

(6) Manjimup and Pemberton Landowners (MPL) proposed percentage of Mean Annual Flow that should be allocated to General Licensing, including Agriculture

The proposed alternative allocation as a percentage of stream flow reflects the experience of water users who have lived in the particular sub-catchments for all of their lives. Even though 2010 has been one of the driest years on record, there is still plenty of water for the environment flowing from the Upper Lefroy after dams have been filled and are still filling. Please see image below taken at a waterfall on Lefroy Brook near Channybearup Road on 8 August 2010, below the dams in the Upper Lefroy. In general, the dams that have been slow to fill this winter are unlicensed off-stream run-off or overland flow dams. The majority of licensed in-stream dams had filled by the end of August.



Manjimup and Pemberton Landowners submit that a substantial component of the additional water sought for agriculture should be held in reserve for 10 years to evaluate potential impacts of a drying climate, changes in legislation, and other factors affecting approach to allocations. This precautionary approach is important to protect and secure the entitlements of existing licence holders.

#### 4. Reasons for non-support of the *Allocation Plan* prepared by the Department of Water, and support for alternative allocations proposed by Manjimup and Pemberton Landowners.

##### 4.1 Insufficient water for Agriculture in the 'food bowl of the South-West'

The *Allocation Plan* allocates only a minority of available water to agriculture in the area regarded as the 'food bowl of the South-West'. The *Allocation Plan* proposes that water for agriculture in relevant sub-catchments in the Warren catchment be an average of 20% of annual flow, and in the Donnelly catchment 14% of annual flow. The meager additional allocations in the *Allocation Plan* are inadequate. For example, 781ML of additional water allocated for East Brook by the *Allocation Plan* in June 2010 was already sought in pending applications being processed; the 606ML for Smithbrook and 562ML for Lefroy Brook could rapidly be taken up by just a few applications of the type that have been made in East Brook; no provision for additional water was made at Beedelup Brook and Fly Brook where growth in Avocado plantings are expected.

If water for agriculture in relevant sub-catchments is capped at the volumes in the *Allocation Plan* (at 20% of annual flow) and entitlements are granted to those volumes, a drying climate causing reduced stream flow could cause damage to agriculture while the majority of water (approx 80% of volume) remains allocated to the environment to satisfy ESY and 'Ecological Water Requirement'. The inadequate apportionment of water to agriculture is even worse when the total catchments are considered, being 15% of flow of the Warren River and 5% of flow of the Donnelly River.

The Table above at column 6 proposes that water for agriculture in relevant sub-catchments in the Warren catchment be increased from an average of 20% to 37% of annual flow, and in the Donnelly catchment from 14 % to 28% of annual flow. For major agricultural sub-catchments, the allocations to agriculture are substantially increased, for the Wilgarup River from 31% to 60% of annual flow, for Smith Brook from 30% to 60%, for East Brook from 29% to 50%, and for Manjimup Brook / Yanmah-Dixvale from 29% to 60% of annual flow. In the Upper Lefroy the allocation is increased from 51% to 60% of annual flow; however, we propose a cautionary approach to further allocations in the Upper Lefroy, most of the additional water should be held in reserve for 10 years to evaluate potential impacts of a drying climate, and as a buffer against consumptive pools (see 4.2).

#### 4.2 Insufficient water for Agriculture could lead to Consumptive Pools

Insufficient provision of water for agriculture could force important sub-catchments into highly regulated consumptive pools while the majority of water is allocated to the environment, in excess of what is required for the environmental health of the Warren and Donnelly Rivers. Under the *Allocation Plan*, the Upper Lefroy and East Brook catchments are deemed fully allocated with declared status 'No water available'. If a drying climate or other factors (see 4.4 below) stressed water users in the Upper Lefroy and East Brook such that some licence holders had insufficient water for irrigation, the licence holders could request the Department of Water apply regulations for a consumptive pool, or the Department could take that action without requests. The pending *Water Resources Management Bill* is expected to provide powers to implement consumptive pools. For example, an 'allocation announcement' (see 5 below) could determine landowners within the pool could only use 80% of their water access entitlement. Consumptive pools would be accompanied by regulation that is opposed by Manjimup and Pemberton Landowners; including separation of water access entitlement from land title, mandatory metering of water use, 'use it or lose it', and water trading, allocation auctions and tenders. The increased regulation and compliance monitoring could be accompanied by unacceptable water management and planning charges. Clearly, Manjimup and Pemberton Landowners are strongly opposed to such a scenario causing increased costs and insecurity for agriculture. While examples are made for the Upper Lefroy and East Brook, consumptive pools would also threaten with Smith Brook, Lefroy Brook and Manjimup Brook / Yanmah-Dixvale catchments where there is little margin of additional water in the *Allocation Plan*.

#### 4.3 Ecological Water Requirements in Warren-Donnelly contrast with Others Resources in WA

While the restrictive limits in the *Allocation Plan* are proposed to apply to water for agriculture in private dams in the Warren and Donnelly catchments, public dams on streams in the Darling Range (eg Serpentine, South Dandalup, Collie, Harvey) are not limited to enable provision of water for the environment to the same extent. In contrast to the 85% provision for water for the environment in the Warren catchment and 95% in the Donnelly catchment, there is no similar consideration for water for the environment in other major catchments in WA, some examples being:

Canning River: pre-regulation average annual streamflow 58GL, now, following dam construction, average annual streamflow is 1.2GL, being a 98% reduction in stream flow;

Wungung Brook: pre-regulation average annual streamflow 27GL, now, following dam construction, average annual streamflow is 1.7GL, being a 94% reduction in stream flow;

Serpentine River: pre-regulation average annual streamflow 64GL, surface water licence (SWL) allocations to the Water Corporation are 54GL;

South Dandalup River: pre-regulation average annual streamflow 36GL, SWL allocations to the Water Corporation are 27GL;

North Dandalup River: pre-regulation average annual streamflow 29GL, SWL allocations to the Water Corporation are 22GL;

Helena and Darkin Rivers: pre-regulation average annual streamflow 44GL, SWL allocation to the Water Corporation is 22GL;

Collie River (at Wellington Dam): since 2001 average annual streamflow 74GL, SWL allocation to irrigation is 68GL;

Ord River: pre-regulation average wet season flow 5,600GL, post-regulation 1,890GL, being a 67% reduction; and

Harvey River: below the Harvey Dam, the post-regulation Harvey River is referred to as the 'Harvey drain', after yielding 53GL commitment to SWLs for irrigation and to the Water Corporation.

It is worth noting that 85% of the land irrigated in the Harvey Irrigation Area (SWLs of 153GL) is for pasture and only 11% for vegetables, citrus and grapes; in contrast, the dominant use of water in the Warren and Donnelly catchments (SWLs of 33GL) is for high value horticulture (vegetables, fruit, vines), virtually none is used for pasture. Similarly, with water supplied from public dams on catchments in the Darling Ranges, 38% of water supplied to homes is applied to lawns and gardens.

Manjimup and Pemberton Landowners are proud of the Warren and Donnelly Rivers, and would never want to see them degraded to the extent of the rivers mentioned above. However, the disproportionate approach to Ecological Water Requirements in the *Allocation Plan* is unacceptable.

#### 4.4 Impact of Water Resources Management Legislation on Water Allocations

The State Government is proposing major changes to water legislation through the pending *Water Resources Management Bill*, which could require unlicensed dams in stream headwaters, run-off dams, spring fed dams and tree plantations be granted water entitlements. It would be unacceptable that licence entitlements for these water uses be taken from the meager allocations to agriculture in the *Allocation Plan*. The *Allocation Plan* recognises water uses presently exempt from licensing but only estimates use of water in dams of less than 8ML in capacity, and estimates that is an average of 9% of the 33GL of water licensed in the Warren and Donnelly catchments. The *Allocation Plan* at page 7 says that in regard to water uses other than the less than 8ML capacity dams: "As part of the ongoing allocation process we will refine estimates of unlicensed use (Section 6.1), including water uses other than stock and domestic water use. This will better define how much water is available for licensing." Given the *Allocation Plan* separates the water in the less than 8ML capacity dams from the 'Licensable water' within the 'Allocation limit' made after provision for water for the environment, this statement implies that water in large unlicensed dams in stream headwaters, run-off dams, spring fed dams and water used by tree plantations could also be subtracted from the 'Allocation limit'. This would make most sub-catchments relevant to agriculture fully allocated and then deemed status of 'No water available'.

Manjimup and Pemberton Landowners submit the amount of unlicensed water use from dams in stream headwaters, run-off dams and spring fed dams is probably four times the 9% of the water in farm dams estimated for dams of less than 8ML capacity. Many large orchards and other growers are only using water from dams on their properties that are not required to be licensed under current legislation. The *Allocation Plan* provides no confidence there is a plan to account for this water; will it be included in the Allocation limit or licensed outside of the Allocation limit? Stakeholders repeatedly requested the Department of Water clarify this crucial issue. In the face of these uncertainties, more water must be allocated to agriculture, as proposed by Manjimup and Pemberton Landowners in column 6 of the Table above.

#### 5. Duration of the Warren-Donnelly Surface Water Allocation Plan

The *Allocation Plan* doesn't have a five or ten year duration, it is a plan with no duration, but instead subject to an 'annual evaluation statement' (page 22). The *Allocation Plan* says "The statement will be available on the department's website or by contacting the South West regional office in Bunbury or Busselton." (page 22). This is totally unacceptable as a basis for participants in agriculture to secure essential water resources and for purposes of planning growth in agriculture. The outline in the *Allocation Plan* of the approach to be taken with the 'annual evaluation statement' doesn't mention any opportunity for input by stakeholders in agriculture or by other stakeholders. Further, the stated 'Performance indicators for plan objectives' (page 21) provide no performance indicators for active consultation with stakeholders.

If the Department of Water is convinced of its scientific basis and value judgments for determining Ecological Water Requirements, and relative to those requirements agriculture must operate within the allocation limits in the *Allocation Plan*, then it appears the allocation to agriculture is what would suffer with any adjustments to the *Allocation Plan* made in an 'annual evaluation statement'. The 'annual evaluation statement' approach is what would accompany management of consumptive pools that could be imposed within the meager allocations of water to agriculture.

The duration of the *Warren-Donnelly Surface Water Allocation Plan* should be ten years, and the plan should be administered by a local Water Resource Management Committee (see 6 below), in conjunction with the Department of Water, and in consultation with stakeholders. As a basis for the ten year plan, more water must be allocated to agriculture, as proposed by Manjimup and Pemberton Landowners in column 6 of the Table above.

## 6. Consultation and the need for a Water Resource Management Committee

There are three deficiencies of process for development and administration of the *Allocation Plan*:

- (i) the local Warren Donnelly Water Advisory Committee (appointed by the Department of Water) was presented with the *Allocation Plan* prior to its release, but was not given the opportunity for influential input in development of the *Allocation Plan*. The Department made clear to the Committee that the *Allocation Plan* was the Department's plan, not a plan to be approved by the Committee before public comment was sought. Such attitude by the Department meant the *Allocation Plan* was defective through absence of stakeholder input and ownership, and stakeholders were offended and alienated;
- (ii) the Department of Water is the party who receives public comment on the *Allocation Plan* that it developed and published, there is no relatively independent third party in the process. The Waters and Rivers Commission established by legislation in 1995 was abolished in 2007, along with any statutory input by stakeholders on the Commission in water resource management. If the Waters and Rivers Commission hadn't been abolished, it would have been the appropriate third party to receive public comment on the *Allocation Plan*, and to approve the *Plan*; and
- (iii) the Department of Water that developed, published, processes comments and approves the *Allocation Plan* will also administer the Plan without further opportunity for stakeholder input.

The third deficiency, and recurrence of the first, must be remedied by appointment of a Water Resource Management Committee for the Warren and Donnelly River areas, provided for at section 26GK of the *Rights in Water and Irrigation Act 1914*. Provisions for Water Resource Management Committees were made by amendment to the *Act* in 2000. Section 26GK and related provisions empower a Management Committee with many relevant functions, including functions exercised by the Minister which the Minister can delegate to the Committee. When new members were appointed to the local Warren Donnelly Water Advisory Committee in 2007, briefing papers provided to them said the relevant legislation for their appointment was section 26GK of the *Rights in Water and Irrigation Act 1914*. The briefing papers were incorrect and misleading, no Water Resource Management Committee has been appointed in WA under provisions of section 26GK of the *Act*.

Manjimup and Pemberton Landowners submit that a Water Resource Management Committee, provided for at section 26GK of the *Rights in Water and Irrigation Act 1914*, be appointed to plan for and manage water allocations in the Warren and Donnelly River areas.

Yours sincerely



Convenor  
Manjimup and Pemberton Landowners

APPENDIX: LETTER TO MINISTER FOR WATER, 10 NOVEMBER 2008

Neil Bartholomaeus  
PO Box 534  
Manjimup WA 6258  
10 November 2008

Hon Dr Graham Jacobs MBBS FRAGP MLA  
Minister for Water  
12<sup>th</sup> Floor, Dumas House  
2 Havelock St, West Perth WA 6005

Dear Minister

**WATER ALLOCATION LIMITS: IMPLICATIONS FOR MANJIMUP AND PEMBERTON**

I write on behalf of the 'Manjimup and Pemberton Landowners' group, an informal association of representatives of agribusiness sectors in the Manjimup and Pemberton area dependent on water from the Warren and Donnelly River catchments captured in private dams. Our group convened in March 2007 to respond to water reforms proposed by the previous State Government; the initial challenge was responding to harsh water licence fees. Here, we wish to express our concern regarding recent radical change by the Department of Water in the approach to allocation of surface water licences, and to request you review the new allocation limits which, in our view, are biased towards water for the environment to the detriment of water for agriculture. We also request you meet in Manjimup with members of our group who represent the range of water-related agribusinesses.

Prior to mid-2008, the Department of Water had given landowners and agribusinesses assurances that surface water was not overallocated, and that the system for determining allocations was reliable. However, during July 2008, the Department began advising applicants for surface water licences they would not receive allocations from certain catchments. The changes mean that 89% of the winter flow of streams is allocated to the environment and only 11% is available to agriculture and other uses. The dramatic effect of this new policy means the Upper Lefroy is 493% overallocated, Smithbrook is 199% overallocated, Eastbrook is 171% overallocated, Wilgarup 163% overallocated and Manjimup Brook/Yanmah-Dixvale is 212% overallocated. The effect of this changed approach to allocations is to stop growth of agriculture in some priority agriculture area catchments and limit growth in other catchments. Further, the new 89% bias of water allocation in the Warren and Donnelly catchments towards the environment, at the expense of agriculture, is so extreme that existing surface water licence holders have no margin for comfort that their allocations are secure.

The proposed allocation limits are based on the '*Estimation of Sustainable Diversion Limits for Catchments in South West Western Australia*' report published by consultants SKM in August 2008. The environmental bias context of the Sustainable Diversion Limits is made clear in the report's introduction, being "*The diversion potential represents an upper limit beyond which there is an unacceptable risk that additional extractions may degrade the riverine environment.*" (Part 2, page 1). The expert panel that provided direction for the study and report didn't include any agricultural scientists, causing a fundamental flaw in the process. It appears the claimed overallocations to agriculture reflect the SKM conclusion that "*If the recommended SDL rules are implemented, the median SDL for the unregulated catchments of south-west Western Australia is 11.0% of mean winterfill period flow.*" (Part 1, page 78); which means massive volumes of fresh water will flow into the Southern Ocean during winter and spring that could otherwise be captured and used for growth of agriculture in what is regarded as the 'food bowl of the south west'.

Ironically, while these restrictive limits are proposed to apply to water for agriculture in private dams in the unregulated Warren and Donnelly catchments, public dams on regulated streams in the Darling Range (eg Harvey, South Dandalup) will not be limited (to enable provision of water for the environment) to the same extent. Minister, please consider the contrast in 89% provision for water for the environment in 'unregulated catchments' (per Warren and Donnelly) and no apparent consideration for water for the environment in 'regulated' catchments, some examples being:

CANNING RIVER: Pre-regulation average annual streamflow 58GL, now, following dam construction, average annual streamflow is 1.2GL, being a 98% reduction in stream flow

WUNGONG BROOK: Pre-regulation average annual streamflow 27GL, now, following dam construction, average annual streamflow is 1.7GL, being a 94% reduction in stream flow

SERPENTINE RIVER: Pre-regulation average annual streamflow 64GL, surface water licence (SWL) allocations to the Water Corporation are 54GL

SOUTH DANDALUP RIVER: Pre-regulation average annual streamflow 36GL, SWL allocations to the Water Corporation are 27GL

NORTH DANDALUP RIVER: Pre-regulation average annual streamflow 29GL, SWL allocations to the Water Corporation are 22GL

HELENA AND DARKIN RIVERS: Pre-regulation average annual streamflow 44GL, SWL allocation to the Water Corporation is 22GL

COLLIE RIVER (at Wellington Dam): Since 2001 average annual streamflow 74GL, SWL allocation to irrigation is 68GL

ORD RIVER: Pre-regulation average wet season flow 5,600GL, post-regulation 1,890GL, being a 67% reduction

HARVEY RIVER: below the Harvey Dam, the post-regulation Harvey River is referred to as the 'Harvey drain', after yielding 53GL commitment to SWLs for irrigation and to Water Corporation. It is worth noting that 85% of the land irrigated in the Harvey Irrigation Area (SWLs of 153GL) is for pasture and only 11% for vegetables, citrus and grapes; in contrast, the dominant use of water in the Warren and Donnelly catchments (SWLs of 40GL) is for high value horticulture (vegetables, fruit, vines), virtually none is used for pasture. Similarly, with water supplied from regulated catchments in the Darling Ranges, 38% of water supplied to homes is applied to lawns and gardens.

The bias towards water for the environment at the expense of water for agriculture has been implemented by the Department of Water without appropriate opportunity for input from agribusiness in our community. There was no consultation by the Department with the longstanding Warren Donnelly Water Advisory Committee in regard to the radical change to allocation limits. Several members of our Manjimup and Pemberton Landowners group are also members of the Committee, representing the community of water users. Remedies through water trading in the Warren and Donnelly catchments suggested by the Department of Water at a public meeting in August 2008, are both commercially unattractive and of dubious legal status until the proposed *Water Resources Management Bill* is enacted, perhaps providing required legal clarity. The net effect of water trading here would be to artificially increase the cost of water, to the detriment of agriculture, while massive volumes of high quality water would be unnecessarily lost into the Southern Ocean.

Minister, in our view, there is urgent need for you to review the new allocation limits and their major implications for water-related agribusiness in the Manjimup and Pemberton area. We invite you to visit the Manjimup and Pemberton area to meet with members of our group who represent the range of water-related agribusinesses, to discuss solutions on water allocations to both sustain the stream environments and enable the exciting potential for further growth of the 'food bowl of the south west'.

We trust you can agree to meet with us in Manjimup and visit some of the agribusinesses exemplifying sustainable and productive use of surface water from private dams.

Yours sincerely

Neil Bartholomaeus

cc Member for Blackwood-Stirling