

INCREASED SELF-SUPPLY WATER ALLOCATIONS FOR FOOD PRODUCERS IN MANJIMUP

Manjimup and Pemberton Landowners (MPL) request the priority allocation of water on cleared agricultural land be for agriculture rather than the environment, and the *Warren-Donnelly surface water allocation plan (2012)* be revised for this purpose.

There is no actual shortage of water for agriculture on cleared land in the Warren and Donnelly River catchments. The Department of Water and Environmental Regulation (the Department) has caused artificial water shortages through irrational policy favouring (a) water for the environment ahead of agriculture, and (b) water markets.

The Table below titled '2018 Analysis: *Warren-Donnelly Surface Water Allocation Plan (2012)*: Streams and sub-catchments important for Agriculture' is a revision of the Table provided in MPL's submission on the draft *allocation plan* in 2010. At the request of MPL, the Department provided data on water allocations by sub-catchment at 16 November 2017 when the Department ceased allocating water to self-supply users in eight sub-catchments of the Donnelly and six other sub-catchments of the Warren and Donnelly vital to agriculture. The Table shows:

- Sub-catchments vital for agriculture are deemed fully allocated with substantially less than 50% of the mean annual stream flow being allocated (see column 5).
- Upper Warren, Smith Brook, Upper Lefroy, East Brook, Lefroy Brook, Treen Brook, Manjimup Brook / Yanmah-Dixvale and Four Mile Brook / Big Brook are deemed fully allocated with much less water than MPL in 2010 advocated should be available, shown in column 6 of the Table.
- Based on the Department's planned allocations for the Donnelly River catchment, if a 15 gegalitre dam is constructed to supply 10 gegalitres of water to the Southern Forests Irrigation Scheme, then no more water would be available for self-supply water users in the catchment (columns 3 and 4).

Based on experience with the *allocation plan (2012)*, MPL submits that up to 70% of mean annual stream flow should be available for self-supply water users where the land is zoned 'Priority Agriculture' in Local and State Government planning schemes. On average, the annual volume of water intercepted by farm dams is just over half of the additional flows released by clearing many decades ago. On average between 50 and 70 per cent of water in licenced irrigation dams is used to water crops in a normal year. Thus, there is no net negative impact of self-supply water users on environmental water in major streams and rivers. Both the Warren and Donnelly River catchments are predominantly forested; only one third is cleared, it is the forested areas that should cater for 'environmental water' in a natural environment.

The Department has a bias towards water for the environment, stating: "*The environmental flow studies use an approach known as PADFLOW (proportional abstraction of daily flow) to calculate environmental flow and the ecologically sustainable yield. PADFLOW is a holistic approach which accounts for water requirements at the ecosystem scale. This includes water dependency of suites of animals and plants, predator-prey relationships and recruitment processes to parent populations.*" (*Allocation Plan Methods Report*, 2012, page 43). This bias puts Water Rats and Tiger Snakes ahead of food production.

The '*Warren-Donnelly surface water allocation plan*' (2012) states at page 31 '*Consideration of future large scale irrigation schemes is beyond the scope of this allocation plan.*'. Thus the State Government's current water *allocation plan* makes no provision for water markets for the Southern Forests Irrigation Scheme. Despite this, the State Government has ignored the *allocation plan* and shut down fourteen vital sub-catchments for new farm dams, to favour the Irrigation Scheme. The Southern Forest Irrigation Scheme has twice failed merit assessment by the National Water Infrastructure Development Fund (in 2017 and 2018). This contrasts with the commercially proven self-supply water system in the 'food bowl of the South West'.

The State Government has acted against the majority interests of efficient self-supply water users to favour water markets in an Irrigation Scheme. The limits to access to more water for self-supply users imposed by the Department on 16 November 2017 must be removed, and water allocations to agriculture increased.

2018 Analysis: Warren-Donnelly Surface Water allocation plan (2012): 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> 2012 Limit ML	Licensed ML November 2017	<i>Plan</i> % Licensed / % Flow	MPL Proposed Percent of Flow
Warren River basin						
Perup River	11405	478	2056	606	30 / 5	20
Wilgarup River	25881	5637	7806	6136	79 / 24	60
Upper Warren	42623	1172	1892	2322	124 / 5	20
Quinninup Brook	20302	368	472	338	72 / 2	20
Smith Brook	14601	3139	5073	5042	99 / 35	60
Diamond Tree Gully	4767	253	1429	213	15 / 5	30
Upper Lefroy	13609	5967	5581	5687	102 / 42	60
East Brook	12576	2477	4336	4370	104 / 35	60
Lefroy Brook	12312	1546	2947	3033	103 / 25	50
Four Mile Brook / Big Brook	20852	3244	5989	5989	100 / 29	50
Treen Brook	14015	799	1816	2040	112 / 15	30
Lower Warren	20015	312	491	258	53 / 1	20
Warren River sub-catchments total	212958	25392	41803	36034	20 / 17	37
Donnelly River basin						
Upper Donnelly	39314	370	4025	220	5 / 1	20
Manjimup Brook / Yanmah-Dixvale	22318	4728	7105	7105	100 / 32	60
Middle Donnelly	12267	1115	2759	1353	49 / 11	50
Beedelup Brook (see note below)	12271	739	3432	1570	46 / 13	20
Fly Brook	17359	795	3767	1629	43 / 10	20
Donnelly River sub-catchments total	103529	7747	21088	11877	20 / 11	28

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

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

(3) *Allocation plan* Limit ML, excludes public water supply (eg 894 ML in Upper Lefroy).

(4) Water for General Licensing, including Agriculture allocated as at 16 November 2017. Does not include 'Variable Take' which was not in *Allocation Plan*.

(5) *Allocation plan* % Licensed and as % of Mean Annual Flow.

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