

Hon Alannah MacTiernan MLC  
Minister for Regional Development; Agriculture and Food;  
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West Perth, WA 6005  
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Dear Minister

## MEETING ON INTERESTS OF SELF-SUPPLY WATER USERS, MANJIMUP & PEMBERTON

Thanks for the opportunity to meet with you on 20 December to discuss the concern of self-supply water users in relation to the Southern Forests Irrigation Scheme (SFIS). Below are memoranda and a request.

**Concern:** Self-supply water users are concerned the SFIS is associated with closure of growth in access to self-supply water. Causing an unnecessary cost for water for food in Manjimup and Pemberton which will reduce competitiveness of produce, and profitability. The map of the 250km SFIS distribution pipes presented by your Department at the meeting shows water being irrationally piped from the forested Donnelly River to cleared farm land water catchments where there is abundant water that should be available for growth in food production. Please see Table attached. Examples of highly relevant catchments and additional available water for self-supply are:

- Smith Brook 3718 ML
- Upper Lefroy 2478 ML
- East Brook 3175 ML
- Lefroy Brook 3123 ML
- Four Mile/Big Brook 4437 ML
- Treen Brook 2164 ML
- Manjimup Brook Yanmah-Dixvale 6285 ML

Being a total of 30160 ML that should be made available for food production without any cost to food producers and the State and Federal Governments. This is three times the 9235 ML of water proposed to be supplied by the SFIS at a capital cost of \$19 million to the State Government and \$40 million to the Federal Government.

**Water allocation priority must be for Agriculture:** Prime agricultural land which is zoned 'Priority Agriculture' in local planning schemes should have priority use of water. In contrast, the Department of Water and Environmental Regulation allocates water on farm land based on a theoretical 'Ecologically Sustainable Yield'. The water is there, but not being allocated to agriculture. Based on the experience of landowners, we submit that up to 70% of mean annual stream flow should be available for self-supply water users where the land is zoned 'Priority Agriculture'. 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.

**Cost of water:** Under the SFIS, an example food producer constructing a new 100 ML farm dam will be required to pay \$100,000 for access to water and annual charges by SFIS of \$17,200. Neither of these costs would be incurred by a self-supply water user accessing the abundant water that flows through their property in the catchments mentioned above. Self-supply water food producers should not be coerced into the costly SFIS by irrational restriction on access to self-supply water by the Department of Water and Environmental Regulation.

**Comparison:** Self-supply water is the basis of \$230 million in food production in the Shire of Manjimup. In November 2017 there was 47911 ML licensed for self-supply across 350 licence holders, an additional 10096 ML 'Variable Take' and an estimated additional 10000 ML non-licenced self-supply water (springs,

head water, run-off dams). This 68007 ML of self-supply water is seven times the 9235 ML of water associated with 70 members of the SFIS. The interests of self-supply water users are the majority interest compared to the SFIS and must be recognised by the State Government.

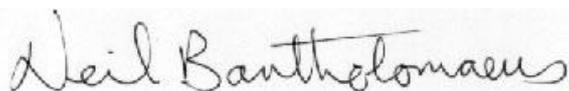
**No consultation with stakeholders:** The '*Warren-Donnelly surface water allocation plan*' (2012) states at page 31 '*Consideration of future large scale irrigation schemes is beyond the scope of this allocation plan.*' The *Rights in Water and Irrigation Act* (1914) at 26GZG provides for amendment to an allocation plan following consideration of written submissions from stakeholders. With the introduction of the SFIS, counter to the *allocation plan*, no opportunity for submissions has been provided by the Minister for Water pursuant to the *Act*. On 19 February 2018, Manjimup and Pemberton Landowners wrote a detailed letter to the Premier on 'DENIAL OF PROCEDURAL FAIRNESS FOR FOOD PRODUCERS IN MANJIMUP', of which we provided a copy to you on 21 February 2018. It provided evidence of failure of the State Government to properly administer legislation for management of water resources.

**\$25 million Government funding blows out to \$59 million:** The WA Department of Regional Development published an 'Infrastructure Audit' in March 2016 with a forward by the Hon Terry Redman as Minister for Regional Development. The Audit proposed 'Build 2-gigalitre dams in Southern Forests'. The project to store an additional 12 gigalitres of water across six 2-gigalitre dams required the State and Federal Governments to contribute a combined \$25 million to the cost. This project failed to attract sales of water into the dams; proposed 'water trading' failed and so did the six-dam scheme. This has now morphed to become the SFIS, requiring \$19 million from the State Government and \$40 million from the Federal Government. In just three years the required public funding has blown out by \$34 million. With this volatile track record, it is unlikely this heavily subsidised irrigation scheme won't require more than \$59 million in external funding. Any additional costs of the SFIS must be paid by members of the SF Irrigation Co-operative Limited, not by costs imposed on self-supply water users by the State Government. The proposed \$6,668 fee to renew a water licence is a bad omen for self-supply water users. Will unfounded water resource management charges be next?

**Conclusion and request:** Self-supply water food producers, if allowed access to water for growth, can generate greater value for the local, State and National economies than SFIS, without requiring public subsidy. Prime agricultural land which is zoned 'Priority Agriculture' should have priority use of water, at up to 70% of mean annual stream flow. Minister, please convince the Minister for Water to increase the allocation of water for self-supply water food producers. This is the lowest cost option for more 'water for food' in the 'food bowl of the South West'.

We await your advice on what action you take regarding our request.

Yours sincerely



Neil Bartholomaeus  
Convener  
Manjimup and Pemberton Landowners

Other Landowners at meeting: Kim Skoss, Garry Kilrain, John Kilrain

Attachment: 2019 Analysis: *Warren-Donnelly Surface Water allocation plan* (2012): Streams and sub-catchments important for Agriculture.

**Table: 2019 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	Allocation plan 2012 Limit ML	Licensed ML November 2017	Plan % Licensed / % Flow	MPL Proposed Percent of Flow	MPL ML Agriculture
<b>Warren River basin</b>						
Perup River	11405	2056	606	30 / 5	20	2281
Wilgarup River	25881	7806	6136	79 / 24	60	15528
Upper Warren	42623	1892	2322	124 / 5	20	8524
Quinninup Brook	20302	472	338	72 / 2	20	4060
Smith Brook	14601	5073	5042	99 / 35	60	8760
Diamond Tree Gully	4767	1429	213	15 / 5	30	1430
Upper Lefroy	13609	5581	5687	102 / 42	60	8165
East Brook	12576	4336	4370	104 / 35	60	7545
Lefroy Brook	12312	2947	3033	103 / 25	50	6156
Four Mile Brook / Big Brook	20852	5989	5989	100 / 29	50	10426
Treen Brook	14015	1816	2040	112 / 15	30	4204
Lower Warren	20015	491	258	53 / 1	20	4003
Warren River total	212958	41803	36034	20 / 17	38	81082
<b>Donnelly River basin</b>						
Upper Donnelly	39314	4025	220	5 / 1	20	7863
Manjimup Brook / Yanmah-Dixvale	22318	7105	7105	100 / 32	60	13390
Middle Donnelly	12267	2759	1353	49 / 11	50	6133
Beedelup Brook	12271	3432	1570	46 / 13	20	2454
Fly Brook	17359	3767	1629	43 / 10	20	3472
Donnelly River total	103529	21088	11877	20 / 11	32	33312

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

(2) Allocation Plan 2012 Limit ML.

(3) Licensed ML at 16 November 2017, does not include 10096 ML 'Variable Take' which was not in Allocation Plan.

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

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

(6) ML to be allocated to Agriculture under MPL proposal that Agriculture be the priority use.