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30/11/2008

Submission to: - VICTORIAN GOVERNMENT - Sustainable Water Strategies Branch, Office of Water

I submit these comments for consideration re:

“Draft for Community Comment - Northern Region Sustainable Water Strategy”

Having studied the extensive report of 228 pages it is obvious that there has been little attempt to come to terms with **the current 80%+ reduction of the inflows to the Reservoirs of this Region.**

The latest records and trend lines indicate, there is an increasing risk that 30% water allocation will not be reached consistently. This year is a prime example with the majority of the region’s irrigation systems on 0% allocation. In fact there is little chance that 30% will be reached in any of the systems this season.

Page 81 Proposal 5.2 - Seasonal Allocation Policy

This proposal to only start reserving water for next year when 30% allocation is reached in the current season will be **inactive in many of the years to come especially in extended dry periods.**

Therefore proposal 5.2 will not provide a sustainable water supply during most of the future climate and catchment change scenarios. The last 35 years of declining inflow trend lines indicate we should plan for a drier climate in the future with still further reducing inflows.

This means many future seasons will have less inflow than the current season’s inflow.

Consequently, I strongly advocate that this Proposal be modified, to start reserving water for the following season from the first 1% of resource inflow, on a 50/50 basis, until 50% allocation is reached for the next season.

If this was to be done it would guarantee that at least 50% as much allocation would be available in the following season as in the current season, even when no inflows are experienced in the following season. This would avoid the possibility of the agricultural industry being faced with a situation of having up to 30% allocation one year and zero the next. (Currently new record low inflows are being set each year).

Page 34 Bulk Water Entitlement 15 year review

Water resource and management in the Northern Region – 15 year review.

It is stated in the Water Act 1989 that there be a review every 15 years or when there is evidence of a hydrological change of 2 ggalitres or more.

The first review was due to be brought on in 2004, due to the massive hydrological changes that occurred during 2000 to 2004, these changed conditions now make it impossible to supply the allocation or the 99 year security level that the bulk water entitlement (BE) was set up to achieve. Clause 15 of the Campaspe system conversion order 2000 has been violated.

The past and present governments have refused to instigate this review.

The second, not the first, review is due in 2019.

If there had been a review in 2004, the decline in water availability would have been addressed; resulting in a new water allocation BE system, to rebalance the hydrological state of the catchments.

As this process was not acted upon, at the proper time, it is now essential that a proper and complete review be carried out ASAP using the latest records and current trend lines projected into the future.

This review should not be left unaddressed till 2019 as most of the regulating parameters of the Water Act 1989 have now been exceeded many times, in the Campaspe system.

Similar failures of the BE have now occurred to the other systems as well in this region.

The total collapse of the whole region is imminent under the current BE rules and the **proposed changes** will do little to avoid continuing disasters. The loss of most permanent plantings and the irrigated dairy industry seems inevitable under the current BE rules.

This will most likely be when the next El-Nino year descends upon us, due 2009 – 2010

The next wet year is not due till 2011, see website: www.thelongview.com.au

Damage, such as has already occurred in the Campaspe and Loddon system, may be avoided in the other systems if **security of supply is made the prime objective** of this Sustainable Water Strategy. A detailed review cannot be put off till 2019 without causing irreversible damage to the whole system. I believe the state government is negligent and culpable for postponing this review.

Page 89 Proposal 5.5 Amending existing carryover rules

If the government is not prepared to manage the water sustainably the least that they can do is give the individual irrigator the option of averaging his own allocation. The proposed 50% limit on carry over is too low to enable the individual to make best use of the allocated water. I suggest that the maximum amount of Allocation that can be carried over to the next season, needs be raised to at least 60% and be written into the Bulk Water Entitlement as a permanent rule. Future carry over water should only be proportionally lost from the Irrigators Bank when the reservoirs overflow, or due to the 5% annual reservoir evaporation loss.

Page 37 Reference chapter 3, Pressures, risks and forecasting water availability

The decline in central Victoria's rainfall since the 1970's decade has been gradual and consistent delivering a 35 year downward trend that has seen our peak rainfall years reduced by 50%. e.g. Bendigo 1973-1,017mm, 1978- 659mm, 1983- 698mm, 1988- 711mm, 1992-771mm, 1996-672mm. Since 1997 peak years have only averaged 520mm. The years 2001 to 2009 have average approximately 404mm, this includes my forecast rainfall figure for 2008 of 360mm. This reduction of the peak rainfall years, and the overall lower averages, has resulted in major changes to the hydrological balance of central Victoria. This has seen an ongoing 90% average inflow loss to the Eppalock system, similar losses are now being recorded in the Cairn Curran and Coliban reservoirs. These have been Bell Weather Indicators for the other systems and should not have been ignored. During the last 18 months we have progressed through the latest La-Nina cycle, **the driest one on record, delivering only 450mm in Bendigo. Not the typical 750mm of last century.** The first intermediate year is almost over, we need to plan for a drier year in the immediate future, "the next El-Nina season". The long term trend lines indicate we most likely will not see our reservoirs over flow again **in our life time.** **All the latest evidence indicates that, in the future, we will be privileged if we can average 30% allocation across the Northern Victorian region.**

The figures used in The Draft Sustainable Water Strategy are not **the most recent** and do not reflect the dramatic drop off **of all inflows to the present day.** Past longterm averages are no longer relevant, only the most recent averages are, especially the current **trend lines projecting into the future. These are not referred to in the draft paper!**

For the benefit of the community as a whole, **the uncontrolled proliferation of small farm dams must be reversed.** Climate change conditions have resulted in **these small farm dams consuming 75% of all runoff in the central Victorian region, during the last 8years. This is not an equitable sharing of the existing resource. We cannot afford the 95% losses that are associated with the use of these dams. A comprehensive piped stock and domestic system filling tanks only, is the only way to supply the critical human needs to this region. Storage within the new tank system will benefit the whole state by providing storage of water for firefighting at every property.**

Please refer to attached information:

The Chinese Effect. The Changing Climate Cycles. Bendigo's Declining Decadal Averages
Why has Eppalock not filled? All the above information and more is available from,
www.thelongview.com.au

Thank you for the opportunity to make comment on this draft proposal.

Kevin Long

Cc: Mr. John Brumby, Mr. Ted Ballieu, Mr. Peter Walsh, Ms Wendy Lovell
Ms. Penny Wong, Ms. Wendy Craik, Mr. John Forrest Mr. Darren Lipton.