



13 December 2019

The Hon David Littleproud MP,
The Hon Dr Anthony Lynham MP,
The Hon Melinda Pavey MP,
Mr Mick Gentleman MLA,
The Hon Lisa Neville MP,
The Hon David Speirs MP,
Murray-Darling Basin Ministerial Council

Dear Ministers

Re: Concerns regarding NSW Water Resource Plans

The National Farmers' Federation (NFF) is writing to raise concerns about the consultation process as part of development of NSW Water Resource Plans (WRPs). The NFF has received mounting evidence of the poor consultation process being conducted by NSW that appears disingenuous and does not reflect proper nor appropriate standards. This follows numerous concerns raised by the NFF about the importance of genuine community consultation.

The NFF has received complaints from multiple sources across various WRPs being developed. Specifically, we have been informed that the consultation process to date has amounted to Government officials going to affected valleys, receiving feedback, and then returning at a later date to tell them what would be in the WRP without considering their feedback.

NFF has been informed that during consultations, including through the Stakeholder Advisory Panel process (SAPs), there has been no opportunity nor appetite to change rules for improved conditions for productive users. Furthermore, the SAP process has been primarily comprised of Departmental staff without any water users; insufficient information was provided to SAPs to support informed decision-making — no local knowledge was made available given limited local officials whom were able to provide detailed responses to local impacts; and, WRP development has been insufficiently resourced, resulting in delays and unresponsiveness.

Stakeholders have had requests for further consultation ignored. Departmental delays in preparing draft plans have left little time for proper community engagement, and have been consistent across numerous WRPs. Draft water sharing plans exhibited for public comments have raised significant concerns about water being diverted to the environment at the expensive of allocations to water entitlement holders — and it appears these concerns have not been addressed nor explained to stakeholders about why this is the case.

If this is correct, the NFF expresses concern about the consultation process for all WRPs across NSW. We understand the accreditation process requires consultation to be demonstrated under clause 10.07 within chapter 10 of the Basin Plan, and urge the Murray-Darling Basin Authority (MDBA) to not approve any WRP that has not been conducted through a proper and effective consultation process.

WRPs remain an integral part of the Plan and must have the appropriate rules in place to ensure it is fair, and accepted by the community. The NFF understands the relatively short time frame

both NSW and the MDBA is working under to finalise WRPs; however, poor WRPs due to a rushed and/or poor processes, particularly complex WRPs, would undermine the integrity of the Plan.

We need the MDBA to ensure the WRPs are developed according to best practice consultations and allow further consultation or specific review clauses as necessary. Should you seek further advice or information please contact the undersigned or Warwick Ragg, NFF's General Manager, NRM on wragg@nff.org.au or 0262695666.

Yours sincerely



TONY MAHAR
Chief Executive Officer