



Hon. Diane Evers MLC
Member for the South West Region

Attn: Mrs Maddison Evans, Committee Clerk
Standing Committee on Environment and Public Affairs
Parliament House
PERTH WA 6000

Dear Committee Members,

PETITION NUMBER 123 – SOUTHERN FOREST IRRIGATION SCHEME

Thank you for the opportunity to provide a written submission to the Standing Committee on Environment and Public Affairs regarding Petition No. 123 – Southern Forest Irrigation Scheme (SFIS). I confirm that I wish the Government/Committee to inquire into the matters raised in the petition. To the best of my knowledge, the issues described in this petition have not been taken to the Parliamentary Commissioner for Administrative Investigations (Ombudsman).

I share the petitioners' concerns about the SFIS and reiterate their request that the proposed scheme to take water from the Donnelly River be stopped. Many people in the area have argued that this proposal falls short on a number of fronts, particularly the risk it poses of causing irreparable ecological damage to the Donnelly River. Local researchers have explained to me that the Donnelly River is highly sensitive to rainfall in its catchment and takes much longer to run than the Blackwood or other nearby rivers, partly because it is forested and because of greatly reduced rainfall. While hydrological modelling has been used to inform this proposal, it is important to note that 'there is no universally accepted linear relationship between flows and environmental outcomes'¹, therefore all modelling, including that which the SFIS proposal rests on, is scientifically contestable. The most prudent approach would be to adopt the precautionary principle in this case, and protect the Donnelly River from this flawed proposal. The prospect of serious environmental harm is unacceptable in itself, but is particularly unpalatable given that the proposed scheme has dubious foundations democratically, and is based on a business case that relies on outdated supply and demand data². The petitioners have raised a number of valid concerns that require urgent attention, including that:

- There is no guarantee that water flows will be sufficient to fill the dam;
- The estimated costs of the pipeline installation and routing across private land are out of date;
- The destruction of forest for the dam, weir and pipeline is unnecessary and will decimate native bushland, important habitat and culturally significant sites;
- The water flows past the dam and weir will be altered and have a subsequent impact downstream;
- The ecological systems in the area of the dam and the river above the weir will be altered;
- The water flows have not been proven to come from the forest rather than from the cleared agricultural land above the Donnelly River weir, where water restrictions impede opportunities to develop these properties;

¹ Crase et al. 2012, cited in Grafton, R. 2019. Policy review of water reform in the Murray-Darling Basin, Australia: the "do's" and "do'nots". *Australian Journal of Agricultural and Resource Economics*, 63, pp. 116–141.

² See for example Avocados Australia. 2018. *OrchardInfo Report*. Avocados Australia Ltd.



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- The properties with access to the scheme water are gaining substantial personal benefit from a very targeted government handout that could be used more equitably by a greater cross section of the community.

I would also like to know more about the intended fate of irrigation drainage waters in terms of where they would be discharged, whether they would contain nutrients and pesticides, and the properties of the soils to be irrigated and any correlated risk of increasing salinity.

Despite the numerous, well-founded objections to this particular proposal, there is appetite for sustainable and democratically-designed development initiatives in the Manjimup area. Other approaches have been suggested for consideration. For instance, one well-informed constituent has suggested a system to reduce evaporation in dams in Manjimup /Pemberton, which lose 1.2 mL to evaporation each year - more water than the SFIS will provide. In fact, it would be advisable for the Government to work more collaboratively with the community to ensure they have framed the problem of development needs in the area correctly to begin with. A better strategy for water security in the region should be developed in a more democratic, participatory manner, based on consideration of integrated environmental, economic and social factors using up-to-date and complete evidence.

Recent research from the Australian National University on the governance failures of the Murray Darling Basin emphasises that the most important “Do Not” is to avoid ‘decision-making from ‘on high’ that claims to deliver an outcome when the best available evidence shows otherwise’, and that ‘highly centralised and short-term decision-making that ignores robust evidence’ leads to poor decisions and poor implementation. This research shows that ‘first, and foremost, decision-making must be exposed and be transparent’³ – something that far too many people from the SFIS region argue has not taken place in this instance, as evidenced by the number of people from a small regional population base who have signed this petition. It would be advisable to refuse to fund this proposal, and undertake a process in collaboration with the local community to better determine the environmental, economic and social needs of the region and appropriate infrastructure and business models to meet those needs. There are platforms that would enable this, such as the Food Energy Environment Water Network’s systems approach to understanding risks, engaging decision makers and enabling action⁴.

The Petitioners’ request that the Legislative Council recommend to the State Government that any further progress on the Southern Forest Irrigation Scheme be discontinued until planning results in a more equitable distribution of water allocations across the district, with a scheme that does not impact negatively on the environment, and represents a viable investment of funds. I support their request.

Yours sincerely,



Hon Diane Evers MLC

³ Grafton, R. 2019. Policy review of water reform in the Murray-Darling Basin, Australia: the “do’s” and “do’nots”. *Australian Journal of Agricultural and Resource Economics*, 63, pp. 116–141

⁴ <http://www.fe2wnetwork.org/>