



Agricultural Competitiveness Taskforce
Department of the Prime Minister and Cabinet
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Submission to the Agricultural Competitiveness Green Paper

Chapter 9 of the Green Paper states that “*Agricultural production is underpinned by the sustainable use of land and water resources*”. It is important that this not be interpreted too narrowly - it must be environmentally sustainable.

Use of Land

Page 72 contains the statement “*The Government places a priority on the productive use of natural resources for economic growth and development, including the development of new farming areas.*” This statement completely ignores the conservation of the natural environment and is not consistent with best practice. In the case of the Cliefden Caves which would be affected by a dam on the Belubula River NSW (identified as Needles Gap Dam in Table 4) , the idea that economic growth and development would override protection of the significant environmental qualities of the bat habitat, fossil deposits, caves and other karst features is simply appalling. It appears that the government is unable to understand that sheep and cattle grazing on this land is not inconsistent with the protection of the natural environment (including the bats, fossil deposits, caves and other karst features). The local landowners have protected these environmentally significant features since land was first taken up in the area in 1832, yet have received no compensation or recognition from any level of government for their excellent environmental stewardship. Agriculture is more that squeezing the last dollar out of the land, it is about environmentally sustainable use of the land.

Financial Viability

Page 74 contains the statement “*In 2014 the Minister for Agriculture chaired a Ministerial working group to identify how investment in water infrastructure, such as dams and groundwater storage, could be accelerated and to identify priorities for investment that can deliver Australia’s water supply needs in the future. This working group consulted States and Territories and identified a number of projects worthy of further investigation and consideration by governments. Most of the project proposals the working group examined were preliminary concepts or in the very early stages of assessing feasibility. Because major water infrastructure has long lead times, and requires substantial capital and maintenance for many years, any public or private investment needs to be based on comprehensive analysis of cost effectiveness and feasibility. Projects also need to be financially sustainable for water users and avoid any negative third party impacts.*”

We are very concerned that such a meeting was convened by the Minister without any representation from stakeholders other than the finance and construction industry. There was, we understand, no representation from the general agricultural sector, and there was certainly no representation from experts on the problems dams cause to the environment.

In fact dams are no longer *financially sustainable* for water users and always result in *negative third party impacts*.

That the proposed dam on the Belubula River could still be included in the green paper is beyond our comprehension. It must have been known to the government and the Minister that this site is unsuitable for a dam on environmental grounds. If the Minister was not aware, then it shows a serious breakdown within his department and does nothing to inspire confidence in this green paper/white paper process.

SAVE CLIEFDEN CAVES ASSOCIATION

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Private Investment in Dams and Water Resources

It appears from the Agriculture Minister's media release earlier this year that the government's vision is that private enterprise will provide most of the funds for future dams. This would probably be in the form of a Public Private Partnership (PPP).

Recent experience in PPPs in Australia has not been very successful and has never been used for dam construction in this country before! We see the use of the PPP model for dam construction as defacto privatisation of water as both the dam and the water they contain will be controlled and owned by private companies. This will result in huge increases in water costs for agriculture.

Should the Dam Proceed?

Figure 19 on page 75 set out the "Principles for Commonwealth involvement in water infrastructure projects". It is hard to see how the proposed dam on the Belubula River NSW could ever meet these principles. In particular it would never be "*in the national interest*" to destroy the bat habitation sites, fossil deposits, caves and other karst features at Cliefden NSW. Nor could this destruction provide the "*highest net benefit . . . taking into account . . . environmental impacts*".

Why is the Cliefden Area Important?

The following web sites contain extensive information on the importance of the Cliefden Area:

<http://www.bookproduction.org/savecliefdencaves/>

<http://www.savecliefdencaves.org.au/>

https://en.wikipedia.org/wiki/Cliefden_Caves

In addition, the recent nomination by the National Trust NSW for the Cliefden Area to be included as an item of NSW State Heritage, provides an excellent summary of the importance of the area. This nomination has been supported in writing by our organisation (the Saves Cliefden Caves Association), the Australian Speleological Federation, and the Linnean Society of NSW. We are submitting this National Trust nomination to you as additional background information.

It should be noted that the Cliefden Caves and Needles Gap Areas were added to the Register of the National Estate in 1987, however protection is no longer afforded by this register as the federal government has changed the legislation. This has had the unfortunate, but unintended, consequence that the NSW state government did not include that area in its own heritage protection controls. The original listing can be found at http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;place_id=958

Yours sincerely,

Bruce Welch

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