
Rice Growers Association of Australia Position Paper

Comments on the NSW Murray Draft Flood Management Plan

Executive Summary

This position paper presents the Ricegrowers' Association of Australia's (RGA) analysis and comments on the NSW Murray draft flood management plan, with particular attention to the impacts on irrigation farmers and rice growers.

The RGA recognises the importance of effective flood management for sustainable agriculture, but expresses serious concerns regarding cropping restrictions in certain management zones, the financial burden of compliance, adequacy of consultation, and mapping accuracy.

We urge policymakers to build on the lessons of previous flood management plans and improve the current draft through enhanced stakeholder engagement, transparent data, and practical compliance pathways.

Introduction

The Rice Growers Association of Australia is the peak body representing rice growers across the country, advocating for policies that foster viable, sustainable, and profitable rice farming.

Virtually all the rice grown in Australia is concentrated in the Murray and Murrumbidgee Valleys of southern NSW (the 'Riverina'). Our headquarters and production facilities are located primarily in Leeton and Deniliquin. Like most irrigated agriculture, rice is a good source of high-paid employment in remote NSW locations.

With the NSW Murray region being a major rice-growing area, any changes to flood management policies have wide-reaching implications for our members, local communities, and the broader agricultural sector.

This submission responds to the NSW Murray draft flood management plan, focusing on its potential impact on rice growers and irrigation farmers.

Overview of the NSW Murray Draft Flood Management Plan

The NSW Murray draft flood management plan aims to mitigate flood risks, enhance land and water resource management, and protect communities and infrastructure. The plan introduces management zones with varying land use restrictions, compliance requirements for works, and updated mapping of flood-prone areas. Its objectives include reducing flood damage, supporting agricultural productivity, and ensuring environmental outcomes.

Potential Impacts on Irrigation Farmers and Rice Growers

Almost all of Australia's rice production occurs in the NSW Murray and Murrumbidgee where the flat land, heavy clay-based soils and access to irrigation infrastructure are suitable for modern mechanised production. Rice growers depend on irrigation and the ability to landform across the plains is essential for efficient water use and crop production.

While most of the rice production in the region occurs on areas that fall within Management Zone C, there is concern the draft plan's proposed changes could substantially affect farm operations, water access, and long-term viability for rice growers. Key concerns include:

- Failure to explicitly exclude irrigation layouts from the FMP could be interpreted as potentially leading to restrictions on landforming limiting flexibility and productivity.
- Costs of remedial works for authorised/approved on farm infrastructure such as access roads to ensure compliance with the FMP. Eg; construction of causeways.
- Potential delays and costs associated with obtaining required approvals, particularly if complex hydrographic modelling is required.
- Uncertainty regarding the plan's integration with existing water management frameworks and past flood management lessons.

Management Zones and Cropping Restrictions

The introduction of management zones is a central feature of the draft plan. Notably, management zone **A** prohibits cropping altogether. While this is acknowledged, it is crucial to clarify that no cropping currently occurs in zone **A**, so the direct impact is limited to future land use potential. However, restrictions in other zones may impede the ability to landform, reconfigure irrigation layouts, and adapt to changing conditions. These limitations could undermine productivity and the capacity for innovation in rice growing systems.

The RGA appreciates the efforts of the Department to refine the maps and management zones in accordance with feedback received during the first phase of consultation. We also appreciate the inclusion of Part 9 enabling amendments to the Plan and associated map; however, we note that there is no requirement for the Minister to consult on proposed amendments. Given any amendments to the plan have the potential to impact across the entire FMP area, it is crucial to require proposed amendments be open to public scrutiny.

The RGA recommends that proposed amendments be publicly accessible and must be advertised with time and opportunity for feedback and adjustment prior to being adopted.

Cost of Compliance

The draft plan raises significant concerns regarding the cost of compliance, particularly where there are existing works that will now require assessment and approval. Where there is a requirement for hydrographic modelling as part of the licence application, in the first instance we question the ability and feasibility of individual farms undertaking complex modelling of flood movements. Additionally, the cost is especially burdensome, with costs running into tens of thousands of dollars per farm. Such financial strain risks excluding smaller growers and deterring investment in modern irrigation infrastructure.

The RGA recommends that a pragmatic approach to compliance is adopted, including streamlined licence processes and reasonable modelling requirements, based on existing floodplain modelling, etc.

Effectiveness of Previous Flood Management Plans

Rice growers have participated in numerous flood management initiatives over the years. It is hoped that the lessons learned from previous plans have informed the new draft, rather than the process starting anew. Past plans have delivered valuable insights into flood behaviour, landholder needs, and practical management strategies.

The RGA recommends building on these foundations as essential to ensure continuity, avoid repeating mistakes, and foster landholder trust in the regulatory process.

Consultation Process

Many landholders have expressed dissatisfaction with the consultation process for the draft plan. The preference is for broader town hall meetings, allowing collective discussion and transparent exchange of views, rather than relying on individual consultations. Town hall meetings promote equity, ensure diverse

perspectives are heard, and strengthen stakeholder buy-in. This position is supported by the Department's 'what we heard' report, which highlights stakeholder calls for more inclusive consultation methods.

The RGA recommends that future engagement prioritise open forums and provide clear opportunities for feedback with adequate timeframes.

Mapping and Data Concerns

Accurate mapping is fundamental to effective flood management. Landholders have raised concerns about the transparency and accuracy of the mapping used in the draft plan, including discrepancies between mapped flood extents and on-ground experience. As mentioned previously, we appreciate efforts to refine the maps based on feedback and encourage the Department to continue to do so. Inaccurate mapping can lead to inappropriate zoning, unfair compliance costs, and reduced confidence in the plan. The Department's report to assist stage 2 acknowledges these issues and recommends ongoing improvements in mapping and data communication.

The RGA recommends that the application of the floodplain management frameworks enables the adoption of a lower level of compliance where floodplain mapping is incomplete or requiring an update.

Recommendations

1. Maintain flexibility for landforming and cropping in management zones where rice growing is viable, avoiding unnecessary restrictions.
2. Ensure compliance requirements, including works licences and hydrographic modelling, are proportionate and do not impose unreasonable costs on growers.
3. Explicitly build on the lessons and frameworks of previous flood management plans to enhance continuity and effectiveness.
4. Prioritise broad, inclusive town hall meetings for stakeholder consultation, supplementing individual discussions where necessary.
5. Continue improving mapping accuracy and transparency, involving landholders in ground-truthing processes.
6. Post implementation, proposed Plan amendments be publicly accessible and advertised with time and opportunity for feedback and adjustment prior to being adopted.

Conclusion

The Rice Growers Association of Australia urges policymakers to address the concerns raised in this submission and work collaboratively to refine the NSW Murray flood management plan. By supporting practical compliance, meaningful

consultation, and evidence-based mapping, the plan can deliver positive outcomes for rice growers, irrigation farmers, and the wider community.



References

- NSW Department of Planning and Environment, 'What We Heard' Report.
- NSW Department of Planning and Environment, Report to Assist Stage 2.

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