
Department of Climate Change, Energy, the Environment and Water (DCCEEW)

Discussion Paper:

Removal of 'Water Rule' for Forest Carbon Credit Projects

RGA Submission – November 2022

Thank you for the opportunity to provide feedback on your Discussion Paper.

The RGA supports rice growers in the NSW Murray and Murrumbidgee Valleys. Our main objective is to provide members with strong and effective representation on the issues impacting the viability of their businesses, their communities and their industry.

When water is available, our rice production is some of the world's most successful, delivering significant yields while leading the way in efficient use. Reliable access to water, that matches what licence-holders are legally allowed to draw upon under relevant water-sharing frameworks, will always be fundamental for the ongoing success of our industry.

While we support national efforts to address climate change, we're not convinced that the case has been made that the 'water rule' can be removed without having third party impacts.

Our members are located in two Valleys where available water is already fully allocated, and which are subject to Sustainable Diversion Limits (SDLs) under the Murray-Darling Basin Plan. Under the SDLs, if one form of water take increases (i.e., through increased plantation/farm forestry), other forms of take must reduce so the Plan's overall legal limits aren't exceeded.

We believe it's unfair for one national policy to negatively impact another national policy in this way; especially when it's the nation's food producers who are caught in the middle.

As such, in response to your three consultation questions our feedback is brief:

1. In terms of impacts for you to consider, for our members, we would need clear evidence that removal of the 'water rule' will have no impact on their current legal access to water.
2. In terms of 'any other' rule amendments, the implications of increasing plantation/farm forestry in fully allocated systems should be properly understood – to the extent that the principle of 'no third party impact' can be maintained for all existing licence holders.
3. Following on from this, broader supporting actions under the ERF should be aimed at ensuring that all licence holders are confident that our points at **1** and **2** are being met.