

# SUBMISSION TO TRANSGRID REGARDING THE VNI WEST DRAFT CORRIDOR REPORT

**RGA Submission**  
**September 2023**



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### OPENING COMMENTS

The RGA welcomes the opportunity to provide feedback to Transgrid regarding VNI West draft corridor report.

The positions put forward in this submission reflect the concerns raised by RGA members and rice industry stakeholders in relation to the draft corridor report and the proposed route on the VNI West Interconnector.

These positions directly relate to how the proposed route is in conflict with the RGA's Landuse Policy and how the draft corridor report was developed without local community consultation.

In particular, we will provide evidence to support the following:

- Conflict with the RGA Landuse policy
- Community consultation
- The interconnector must not impact negatively on the environment and in particular the flight paths of the Australasian Bittern and other water bird species.
- Inconsistencies and errors corridor in evaluation for Option 1.

### ABOUT THE RICEGROWERS' ASSOCIATION OF AUSTRALIA (RGA)

The RGA is the collective voice of rice growers in Australia. We represent the interests of around 1000 voluntary members, equating to roughly 98% of Australia's rice producers. Our main objective is to provide our members with strong and effective representation on issues affecting the viability of their businesses, their communities and their industry.

The RGA is made up of eight branches located across Northern Victoria and the Murray and Murrumbidgee Valleys of NSW. Every year the branches elect representatives to form the RGA Central Executive. The Central Executive represents their respective branches in determining RGA policy and projects. We operate as a member-based not-for-profit incorporated association, governed by a grower elected board.

Our members direct us in all the policy and advocacy work that we do. They were instrumental in formulating the views and opinions put forward in this submission.

The RGA aims to deliver policy-based advocacy for our members, focusing on three key areas: (i) water; (ii) productivity and industry affairs; and (iii) environmental sustainability.

## **THE RGA'S POSITION ON THE PROPOSED DINAWON TO THE MURRAY RIVER CORRIDOR**

### **RGA Landuse Policy**

“The RGA supports a farmer-landowner’s right to use their land in the manner they choose. The land-use or any infrastructure construction must however comply with all local, state and national regulations.

In addition, it must not impact on, or limit another land holder’s production system choices, farm management practices e.g aerial operations, road and machinery access or the wealth and well-being of those residing on neighboring land.”

The RGA believes, based on the proposed construction design and the proposed construction that the VNI West Interconnector will be in direct conflict with the RGA’s Landuse Policy.

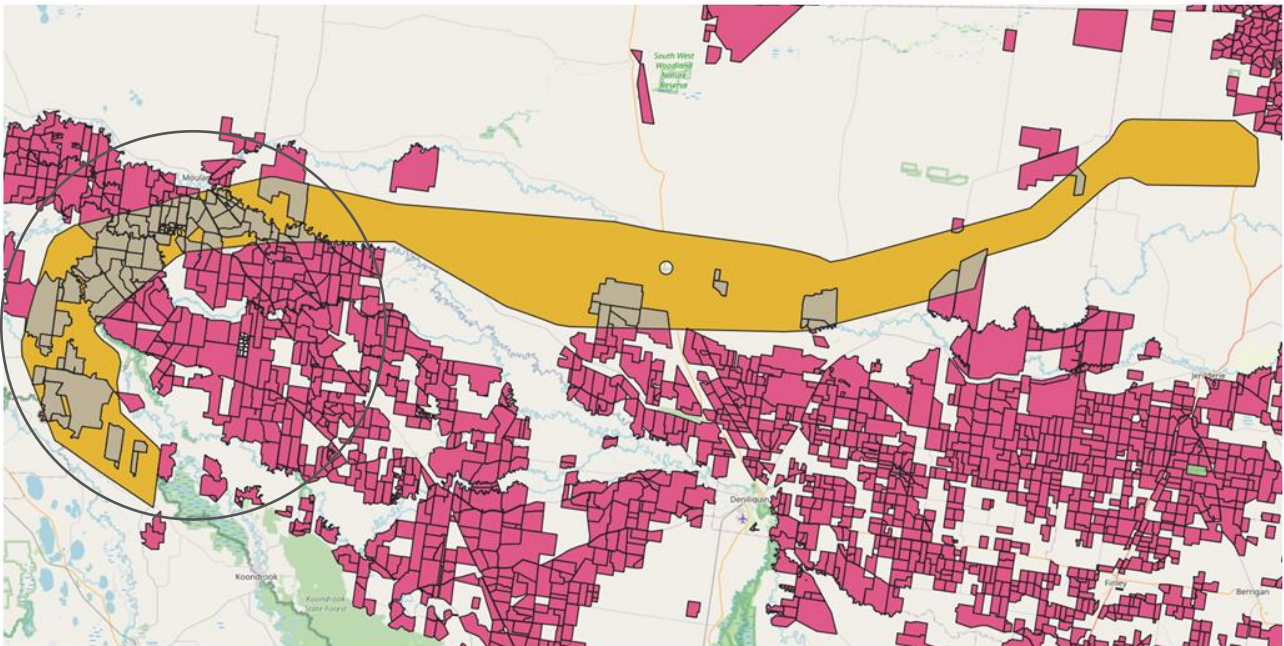
### **Rice crop production in the Western Murray Valley and the areas near the proposed VNI West Interconnector**

Clearly the draft corridor report has not considered the impact that the construction of the VNI West Interconnector can have on rice production and other irrigated farming activities. This is particularly the case for Western Murray Valley irrigation farms.

On page 52 the report the **Preliminary assessment /identification of constraints found** “The corridor contains some scattered areas of irrigated agricultural land between the border and Moulamein.” Added to this oversight there is no mention of rice production.

There are 86 rice farms within and or overlapping the proposed corridor. The total area of these farms is 59,675.51 ha. Not all of this area is developed for rice and other irrigated production systems.





3  
14  
3  
15

- Map Showing rice farms within and adjacent to the proposed VNI West Corridor. *source SunRice Agtrix GIS System*
- The yellow area is the corridor.
- The pink areas are all rice farm boundaries from the
- The brown areas are farm portions overlapping the corridor.

**Rice crop area, yield and returns to growers**

For the Western Murray Valley

Crop Year	Hectares Planted	Return per Hectare	Total Grower Payments
2021-22	16,558	\$5040	\$83,452,320.00
2022-23	11,652 flood-affected	\$5040	\$58,726,080.00
2023-24	Est. 22,500 full water allocations	\$5040	\$113,400,000.00

For the crops outside the Western Murray region but close to the proposed corridor (Denimein and Billabong-Yanco crops) the estimated area for 2023-24, is 4000ha, this adds \$20,160,000 of payments to growers on land with close proximity to the proposed route.

The estimated total return for growers 2023-2024 crop, planted under and near to the proposed power line is \$133,560,000.

All of this rice is milled at the largest mill in the Southern Hemisphere at Deniliquin. The regional and national economic benefits from the rice grown near the proposed route is significant. Any permanent reduction in crop area due to the interconnector's construction will be devastating to local and regional communities.

### **Reasons for a reduction in rice area**

Impacts on aerial agriculture; The interconnector is proposed to be constructed on a 70-metre-wide easement with 70-metre-high towers constructed with 400 metre spacings.

To avoid impacts on rice and broad acre irrigation production they will need to be located a significant distance from existing rice layouts.

- Aerial application of seed, fertiliser and crop protection chemistries is an essential component of rice production and other irrigated production systems. With the appropriate requirement for aircraft to maintain at least a 60 metre clearance from the powerlines, a minimum 120 metre barrier will be required from rice crops. In addition, when operating, ag pilots need to set flight paths that allow for appropriate chemical buffer zones and when seeding to avoid flying over other crops. To add the clearance required from the proposed interconnector to the existing flight constraints will require a much greater area of no fly than 120 metres.
- Operation of machinery to maintain irrigation infrastructure; large excavators are commonplace on irrigation farms. These are used to maintain the numerous irrigation supply channels within the proposed corridors. Clearance to operate these and other machinery will be required to ensure efficient operation of irrigation infrastructure.
- Rice farming soils; rice is grown on clay soils that limit accessions to water tables and enable water use efficient production. These soils are now fully developed for rice production. Any imposed reduction in suitable rice land will reduce the area of rice planted along with a reduction in regional incomes and employment.

As there is no more available rice soil in this region any restriction to irrigation layouts, machinery and aerial operations will see a reduction in available land to grow rice. Evidently the Draft Corridor report recommendation for Option 1 is in conflict with the RGA's Landuse Policy

### **Consultation and the draft Corridor report**

As RGA is a member of the Transgrid Regional Reference Group it is aware that no community members directly connected to the new proposed Option 5A (now Option 1) were aware of this proposed route until June 2023. This new proposed route was raised for the first time at the May 30 Transgrid Regional Reference Group meeting in Moama. The RGA was an apology to this meeting, however this is not noted in the minutes. It is clear from the minutes that at least

one reference group member raised a number of major environmental and land use issues at this meeting. The issues raised are equivalent to those used to change to route of VNI West on the Victorian side of the Murray River.

Transgrid however then proceeds to promote Option 1 ignoring this advice and without obtaining local advice from the directly affected landowners. Transgrid then proceeds to fast-track consultation with a community still recovering from the 2022 floods that has had NO INPUT into the new draft corridor for VNI West. If stakeholders on the Victorian side can raise real and serious issues for consideration before a corridor is selected, it is clearly inappropriate for Option 1 to be selected without equivalent community and stakeholder input.

### **Environmental Issues not covered by the Corridor Report**

The draft corridor report has failed to research existing biodiversity management plans, wildlife surveys, threatened species studies and recovery projects, environmental watering programs and listen to Regional Reference Group feedback. Examples of key environmental issues that have not been considered include:

- Threatened species including the nationally threatened Australasian Bittern; 40% of the Australasian population of the Australasian Bittern use Riverina rice crops for habitat.

(<https://www.sciencedirect.com/science/article/abs/pii/S0167880919302154>)

In autumn after harvest the majority of Australasian Bitterns leave the Riverina rice fields and nearby wetlands and fly to coastal wetlands to feed over the winter months. <http://www.bitternsinrice.com.au/wp-content/uploads/2015/01/Robbies-gone-a-roaming-2.pdf>. The Western Murray Valley rice crops play a key role in providing breeding habitat for the Nationally Threatened Australasian Bittern.

- Private wetland watering in the Murray Valley [Private wetland watering in the Murray and Lower Darling valleys | NSW Environment and Heritage](#)  
Since 2001, more than 65,000 megalitres of water for the environment has been delivered to over 200 wetlands and 280 kilometres of ephemeral creeks throughout the Murray Valley. The sites watered vary in size from 5 to 300 hectares and include black box depressions, lignum swamps and river red gum floodplains. The significant majority of these wetlands are in the Western Murray Valley and near the proposed corridor, Option1. Currently a project is being established to increase the volume of environment water used in this region to further improve the environment health and the breeding success for a raft of wetland species.

The significant habitat enhancement activities, the threatened species recovery projects and the remarkable natural habitat that the region provides means there will be substantial numbers of larger water birds and raptors impacted by the

construction on this proposed interconnector. Overhead powerlines are a major cause for larger water bird and raptor collisions and deaths. Nature and Biodiversity Conservation Union of Germany estimates that in Germany at least 1.5 million birds annually die after colliding with medium and high-tension grid lines. <https://www.birdlife.org/news/2022/10/24/new-study-how-to-stop-birds-from-getting-electrocuted-by-and-colliding-with-power-lines-across-the-eu/>

Dead pelicans and swans are regularly found dead under the powerline adjacent to the Tullakool Evaporation ponds. The proposed VNI west interconnector will transect one of Australia's most significant water bird fly paths.

This environmental issue has been ignored by Transgrid in the draft corridor report.

### **Flood plain and hydrology**

The report states; "The corridor contains a substantial number of creeks and tributaries within the western part of the corridor between the Victoria/NSW border and east of Moulamein. This includes the Wakool River, Magpie Creek and the Edward River. A number of small lakes are also present within the corridor south of Moulamein." There are nine rivers and creeks to cross to construct the interconnector under the proposed Option 1. With these crossings accompanied with the likely flood impacts (2 major floods since 2016) from the flood plain, it is difficult to believe that the additional construction costs have been included in the Option 1 project cost estimate. In addition, during flood events, how will the interconnector be maintained and repaired. During 2022 floods much of the area from Moulamein to the border was closed to vehicle traffic including 4-wheel drive vehicles.

### **Factors raised against Option 5 in Victoria to force the change of route**

The VNI West Project Assessment Conclusion Report Volume 1 (page 6) states that after extensive consultation; "Some stakeholders, including local councils, identified the need to consider a modified area of interest to cross the Murray River north of Kerang, avoiding some environmentally and culturally sensitive regions within the area of interest for the proposed preferred option identified in the Additional Consultation Report. Factors of concern raised included potential impacts on the critically endangered Plains-wanderer bird species, firefighting concerns, sensitive areas of national significance such as Ghow Swamp, tourism and recreation activities around Echuca and Moama, agriculture (particularly irrigated dairy districts), and community impacts in both Victoria and New South Wales.

The RGA believes that there are at least comparable issues and constraints, as raised in this submission, to those raised by Victorian stakeholders to force the change of the VNI West Interconnector on their side of the Murray River.

## Concluding comments

The RGA cannot support the proposed Option 1 for the VNI West Interconnector. The proposed construction will impact on:

- Rice production under and adjacent to the powerline.
- Any reduction in rice area will impact heavily on local and regional communities.
- The population of a raft of larger water bird and raptor species, including Nationally Threatened species.

The RGA believes there are alternate routes and construction methods that can avoid the impacts and constraints describe in this submission. Alternative routes should be investigated.

The RGA is interested to support Transgrid in the evaluation of alternatives to Option.

*Nick Bull*

Policy and Project Manager  
Ricegrowers' Association of Australia

