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From: Daniel Kahl [REDACTED] >
Sent: Friday, 4 February 2022 [REDACTED]
To: NRC
Subject: Submission pertaining to the Water Sharing Plan Review of the Namoi and Peel Unregulated Rivers Water Sources 2012.

ATTN: Professor Hugh Durrant-Whyte
Commissioner
Natural Resources Commission
GPO Box 5341,
Sydney, NSW 2001

Lodged online via electronic mail

Dear Professor Durrant-Whyte,

I am a water entitlement holder in the Namoi Valley and our family business has been farming here since 1961. We currently employ 25 staff on farm.

I fully support and endorse the technical submission from Namoi Water and I look forward to a transparent process that engages properly with stakeholders.

Water is important to my farm, my community and my region, in this review you have asked for how I feel about the plan. As a farmer my thoughts on the water sharing plan are;

To what extent do you feel the plan has contributed to environmental outcomes?

The Water Sharing Plan (WSP) sets out a framework for how water is to be properly managed. As a farmer I recognise it is important to have rules that protect water for environmental needs. The current plan rules work sensibly noting the ephemeral nature of unregulated catchments, the conditions on licences, the limits on pump sizes and now the metering of unregulated works provide a robust system to manage take in line with social expectations.

Environmental outcomes are influenced by how much rain we had during the plan which is a 10 year period. This is also affected by land use changes and other external factors outside the control of the plan.

To what extent do you feel the plan has contributed to socio/economic outcomes?

The plan should give certainty around industry and employment and allow for recreational and cultural use. There is a significant regional economy based on irrigation in the Namoi, the rules of the plan allow for economic activity which provides a range of positive outcomes for the community, centred around employment and business investment. Irrigation has a 2.5 multiplier in terms of dollars generated on farm and the value in the region.

There is limited communication about how and why we manage unregulated water, and usually this only comes into focus when we go through drought. Lack of water is perceived to be the irrigators fault, therefore a broader understanding of the social importance and value of water is needed, and this isn't just about plan rules it is also about broader communication. Water is easily manipulated on social media and the lack of understanding of what the water sharing plan does means that generally, people don't know what the plan is and what it's supposed to do in terms of

socio economic outcomes.

A better understanding of the plan can lead to better confidence that the rules are workable and deliver balanced socio economic outcomes. The water sharing plan needs to highlight water is important to all sectors. Unregulated users often have a limited window for access and storage of high flow is central to the efficient use and value of the water access licence.

One important aspect in unregulated catchments is the need for accurate and reliable gauging stations and a system that reports this information that is accessible by the general public and water users. Plan reviews will not be as effective as they could be where there is a lack of gauging station data or an understanding of development in each water source.

Water sharing plan rules when they are clear and well defined such as in the current plan allow certainty for financial investment.

To what extent do you feel the plan has met its objectives?

To me the plan is there to set out the rules and conditions for access for licence holders, it shares water between different types of uses. The value of my licence is tied to the structure of water sharing plan. My licence is limited by pump limits and conditions relevant to the water source.

In terms of environment, the extraction limit is there to protect water for the environment. As a water user complying with the rules of the plan and complying with my water licence limits are the parts of the plan I contribute to and metering will provide greater accountability within each system.

There is priority for the basic landholder right (stock and domestic) in the conditions applied to unregulated water access and this use fits within the natural system, it's a right while the water is available. Harvestable rights should be quantified as any growth can have impact on surface water flows into unregulated catchments.

The plan wasn't designed to nor could it cover every single climate scenario, as a natural system no rain means no flows and this is a part of managing climate cycles. In recent times we have seen intense floods and droughts this means when water is available for sharing it has been available within limited timing for some unregulated users.

Water users proactively self-embargoed to protect flows and in consideration of the stress on the groundwater systems. This should not be seen as a flag for first flush rule but a recognition that plans do not cater for every climate circumstance and water users are at the forefront of managing our water sources in a socially responsible way.

When the embargoes were formally applied they had significant negative impact on unregulated water users due to a lack of knowledge of the water sources and flows occurring on the ground. This is a direct result of inadequate gauging and subsequent removal of regional staff with experience in how unregulated systems work. This cost regional businesses in the Namoi and transferred this water from the Namoi to be accessed in the Barwon at the stroke of a pen.

The plan has allowed for a reasonable level of satisfaction on environmental, social economic objectives. As a farmer I am concerned water will continue to be removed from consumptive use regardless of whether objectives are met. Trading off between our community and economic activity and the environment needs to be clearer in terms of how decisions are made in the plan.

Trading of water within each water source is allowed following an assessment process, the current rules provide reasonable approach to trade in the Upper Namoi.

In the downstream systems such as the Lower Namoi where they are hydrologically connected

the trade rules are restrictive and a number of water users have requested a review of the trade rules.

The monitoring of the plan isn't particularly visible to the community and this can make it difficult to assess if the plan has succeeded.

What changes do you feel are needed to the water sharing plan to improve outcomes?

There should be continued improvement of the plan, this doesn't mean taking more water away from productive use. It means a whole of catchment approach is needed. Providing clear communication about what the plan does and the limits of what the planning process/rules can do in a natural system. We need firmer requirements regarding how the department and Water NSW engage and consult with all stakeholders particularly in embargo situations.

Water users have lost more social licence since it started raining from a lack of information about managing flows. When droughts break as they inevitably do, the timing of restrictions and access can have significant impacts if poorly managed. It is clear the unregulated users in the top part of the catchment were adversely impacted due to a lack of gauging data and timely information.

The water sharing plan uses long term models as a planning tool, the models require accurate and well-placed gauging data, updated irrigator behaviour and climate calibration. Model build reports should be provided to the community in both technical and general form to improve the understanding of agreed planning processes.

There needs to be certainty in WSP rules that allow for long term business planning. It is not just agribusiness alone that benefits from irrigated agriculture. The widely accepted standard multiplier of 2.5 for every dollar from on farm income that flows through the entire community resonates across the catchment. This is money that is spent by employees and their families at local retail businesses, who in turn spend that money again.

It must be noted the Namoi Unregulated system is not the same as other systems, it is highly developed in some water sources and not at all in others. An important next step is the reporting of take via metering and the assessment of long term average annual extraction limits when a suitable fit for purpose model is developed.

Regards,

Daniel Kahl

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