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From: [REDACTED]
Sent: Sunday, 6 February 2022 [REDACTED]
To: NRC
Subject: Namoi and Peel Rivers Water Sharing Plan

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

Lodged online via electronic mail

Re: Submission pertaining to the Water Sharing Plan Review of the Namoi and Peel Unregulated Rivers Water Sources 2012.

Dear Professor Durrant-Whyte,

I am not a water entitlement holder in the Namoi Valley but I have been involved in farming here since 2010. I run a contracting business that is supported solely by irrigators and I employ 3 staff in our business.

I fully support and endorse the technical submission from Namoi Water and I look forward to a transparent process that engages properly with stakeholders. However it seems this is never the case given the submission process for this review is once again different to other water sharing plan reviews.

Water is important to my business, my community and my region, in this review you have asked for how I feel about the plan. As a contractor and concerned citizen my thoughts on the water sharing plan are detailed below;

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 stakeholder 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, cease to pump conditions and 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. On farm revenue creates a 2.5 times multiplier in terms of dollars generated on farm and the value to the region.

There is limited public communication about how and why we manage unregulated water, and usually this comes into focus when we go through drought. Lack of water is often perceived to be the irrigators fault, therefore a broader understanding of the social importance and value of this water is needed, and this isn't just about plan rules it is also about broader communication. Water issues are easily manipulated in the media and the lack of general understanding of what the water sharing plan does means that generally, people aren't aware of the plan 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. Unregulated users often have a limited window for access and storage of high flow, therefore timing is central to the efficient use and value of the water access licence.

Water sharing plan rules when they are clear and well defined allow certainty for financial investment.

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

The plan is there to set out the rules and conditions for access for licence holders, and it shares water between different types of uses. The value of my licence is tied to the structure of the water sharing plan. My licence is limited by pump size limits, licence volume and cease to pump conditions relevant to the water source. I would support the return of the previous accounting rules for Unregulated. The current rules set out a 2 year accounting period, this should be returned to 3 years as it was previously. Many unregulated systems do not link with the river and therefore they do not provide a great deal of additional flows to regulated systems, this coupled with the inconsistency of unregulated flows it would seem an equitable solution to return the accounting rules to their previous state.

In terms of the environment, these extraction limits are there to ensure that a large portion of flows are maintained for these purposes. 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 is providing 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. In 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 and this means when water is available for sharing it has been available within limited timing for some unregulated users.

Water users have 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 mindful 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 poor monitoring 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 when considering embargo conditions.

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. Accurate gauging stations is a topic many users alongside namoi water have argued is absolutely key. The gauges are the responsibility of waterNSW, NRAR have expressed to users in the past that if they pump outside their cease to pump conditions for one minute they can be held to the letter of the law. Yet users are missing out on hours and hours of pumping because gauges are constantly delayed in updating but no one holds Waternsw to account for users missing out. This is grossly inequitable for users.

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 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 actual long term average annual extraction limits when a suitable fit for purpose model is developed.

Regards,

Jack Maunder

Date: 6/2/22