

Natural Resources Commission – Richmond/Wilson Water Sharing Plan

Our family has irrigation licences for both Richmond/Wilson tidal and non tidal irrigation extraction.

Environmental Outcomes

The current plan has not delivered improvements to river health that it should have achieved, particularly in the low flow 90+% levels.

Only 3-4% of Richmond/Wilson total flows is licensed for irrigation – 95+% of this extraction occurs at drought or low flow levels. Most in the last 10 percentile of river flows.

No provision was given in the catchment for Hi/Flow conversion dams. (It was asked for by irrigators when the original plan was being formulated nearly 20 years ago) The department would not allow irrigators an incentive to get out of the low flow high river stress period.

Lack of an opportunity to store water in periods of hi flow, low stress results again in poor river health.

This was asked for and included a lifting of the harvestable right storage from a meagre 10% to at least 30%. (The department allows 3 year averaging on river extraction) again gives no incentive to get out of low flow extraction.

The allowing of construction of dams (harvestable right) only on a 1st or 2nd order stream has stopped a lot of water storage. Coastal catchments including Richmond/Wilson are short and steep so most farms are into 3rd order streams before they are outside their boundaries.

In summary the plan provides no alternative but low flow extraction and no incentive for irrigators to get out of low flow extraction so the current plan can never improve river health.

Social Outcomes

With no coastal stake holder advisory panels planning policies are quite often out of line with water user problems and expectations. The department is often lagging behind in water usage changes, crop changes and community expectations.

For example rice is now being grown on the Richmond/Wilson as its traditional growing area Murray/Darling doesn't get the water it used to. Tea tree has expanded and tree crops (nuts, etc.) are being grown under irrigation.

Watering systems have changed – with more efficient pumps and better infrastructure allowing more water take in all pump sizes.

Other water users particularly urban (because of the growth of beach side towns and villages) are placing more demand on water sources in this catchment.

Summary - With a need to be more engaged and up to date, the department (DPIE) should have Coastal SAPs.

Economic Outcomes

Water pricing policy – There must be something wrong with the current pricing policy: e.g. more than 3000Mg/L handed in to the Department from the tidal pool of the Richmond/Wilson alone.

The cost of transferring water within each sub catchment is extremely high when the rules are set and the department really is only rubber stamping the deal. The time it takes to do a deal is too long and can place enormous stress both financially and mentally on people (especially in drought) waiting for a rubber stamp.

Summary – Most stake holders see the department's economic outcomes as in the main to look after itself first! – Particularly from middle management up.

Meeting Objectives

The current WSP cannot meet its objectives – a water sharing plan should do exactly that and each user should be accountable for their extraction.

A metering/monitoring policy has been put into place in NSW with expected outcomes of 90+% water take measured. The exemption of pumps below 100mm is not helping irrigators. All people in town have meters. Riparian (stock and domestic) users see any unmetered irrigation as potentially impacting their home and livelihood.

The current metering policy means that less than 10% of licence holders in the Richmond /Wilson catchment are metered. Irrigators are now drawing a lot of animosity in the community and can't justify to that community that they are doing the right thing.

Because the plan is for 10 years, metering should be included for all irrigation. The current metering/monitoring policy is already out of date as metering costs are less than half what they were when this policy was implemented. Technology has allowed much greater extraction rates with all pumps and currently virtually no unregulated metering occurs, meaning that nearly 1300 pumps in this catchment will remain unmetered after 2023.

Other stakeholders in our WSP are pointing the bone.

Plan to improve outcomes – In summary

- Environmentally : Changes to harvestable Right Dams
- : High Flow Conversion
- Social : SAPs immediately (DPIE)
- Economic : Water Pricing
- : Transfer costs
- : Time Delays
- Meeting Objectives : Metering all irrigation from Richmond/Wilson

The aim of this review should go some way to restoring river health. At this stage the department does not give the impression it will implement any changes to reduce low flow stresses.

Thank you for taking the time to read this submission.

Regards

Dave Clift

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[REDACTED], NSW [REDACTED]

A recent meeting of the Richmond Wilson Water Users Group was called to discuss the review of the Richmond Wilson Water Sharing Plan.

Emails as well as a radio interview and radio notices meant all members were well informed of both the meeting and upcoming review.

Several resolutions were made including:

Trading between Wyrallah and Coraki tidal pool be allowed as they are inter connected – all agreed

Cease to pump –that NSW Water advise of approaching cease to pump controls as well as cease to pump points by text or email – all agreed

Harvestable right – that this be lifted to 40%, the same as requested by NSW Farmers for coastal catchments – All agreed

Tagged Water – that water traded down a system be tagged so a similar amount can be traded back up the system at a later date – all agreed

Flood Plain Harvesting – According to the department mapping there are no coastal flood plains so there can be no flood plain harvesting – so no resolution either way.

Irrigators be able to build a dam to store their entitlement from the river on a one for one basis – all agreed. (Certainly takes the pressure off low flow extraction and provides more certainty for irrigators.

Clarification of precedence – it was moved that the DPIE clarify in writing which takes legal precedence – is it the irrigators water licence or WSP rules – all agreed

Hi Flow conversion Dams – It was noted that Rous Water has a Hi Flow Extraction licence for urban water use. It was moved that irrigators be allowed Hi Flow Conversion in line with the same rules as apply to Rous Water – all agreed.

Water metering and data logging – It was moved that all irrigators with pumps down to 50mm should be metered bringing Richmond Wilson Irrigators in line with NSW Farmers and NSW Irrigators Council policies of better measurement – all agreed with only one person wanting his no vote recorded.

A lot of discussion on this resolution occurred prior to the motion being put.

Issues raised:

Large numbers of irrigators are not metered – 1370 licensed irrigators with maybe less than 100 being metered. (This does not fall within the 95% of all take being measured) Taking the threshold down from 100mm to 50mm would pick up a lot more regular irrigators.

It was suspected large numbers of smaller irrigators were not adhering to either restricted hours pumping or the cease to pump rules with no more than a log book justification.

Cost of metering – it was shown that 47/47 compliance meters for pumps below 100mm were now below \$1000 each and a telemetry compatible data logger could be purchased for \$300 + GST. Not a big outlay when a 3” hard hose irrigator and pump and motor and ancillaries would run to over \$80,000.

Social Consensus – it was seen that when urban users are on level 5 water restrictions and irrigators were not even being metered and still irrigating then it created a bad image for all irrigators.

It was felt that data loggers provided a better and more accurate record than log books and a lot of the data on log books did not make sense.

The urban user is not required to say whether they used their water in the sink, shower, washing machine or toilet – except that they used a metered volume of water.

The issues of tagged water – 2 part tariff – pumping to farm dams and each irrigator only extracting their entitlement would be so much easier with more accurate measurement. Even if all irrigators had the \$300 data logger the “cowboy” irrigators would be more accountable and so much easier for NRAR to enforce. The overall feeling was the same as NSW Irrigators policy –“If it can’t be measured it can’t be managed”.