

Michael Egan

Warren.2824

30th April 2022

Natural resources Commission

Unregulated Water Sharing Plan Review-

Macquarie Bogan Unregulated River Water sources.

Dear Sir,

I am the only licence holder on the Gum Cowal reach of an extensive Lower Macquarie River water Source. I was also an active participant in the original Plan developed in 2012. The Plan was developed in a hurry to meet MDBA timeframes and as a result, is a very poor document.

Unfortunately, the department was always intent on writing their own plan, in their own language. The only Stakeholder on the review committee was Office of Environment and Heritage (OEH). All other licence holders were excluded from any meaningful input. As a result, the entire Water Sharing plan is a farce. All rules were implemented with the sole intent of making life difficult for all licence holders outside OEH control. The process was arduous and painful. It lacked genuine engagement or empathy.

I am so disillusioned by this constant barrage of so-called stakeholder engagement I question why I even bother submitting anything, as I know it will be a waste of my time.

The plan has failed its own Vision Statement in "equitable water sharing among uses." The plan also failed three critical Objectives around Market Trading, Account Management rules and flexibility of water use. What is more, the government Departments will be marking their own homework in part 2 -Performance Indicators. There is no intention of any real change or meaningful dialogue with those people who are effected by the current rules.

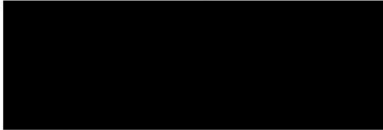
The first and fundamental change must be, the Review Panel itself. Without an industry representative, OEH has a conflict of interest. OEH have constantly used their influence behind closed doors in a government department only environment. This is to the detriment of stake holders who operate in the real world of economic cycles. Having a researcher from the department of Agriculture as a representative, does not cut it.

Secondly, Trade rules and other dealings need to be substantially relaxed to emulate the regulated river systems across the entire Basin, and to comply with the Federal Water Act and the Murray Darling Basin Plan. The current Trading rules has created winners and losers in an unequal and blatantly discriminatory manner. I have been excluded from many transactions because of the unfair rules imposed on the Gum Cowal Zone. I find it infuriating that the current rules allowed a trade that I was interested in, to move to a totally disconnected water source. This is a direct result of OEH influence and conflict of interest.

Whether you like it, or not, Floodplain harvesting licencing is going to happen within the next 12 months. The Unregulated WSP trade rules need to be seamlessly dovetailed into FPH framework. This is the perfect opportunity to rework all the dealing principles into a simple and concise framework that is suitable for both categories of water.

I think I have addressed Questions 3,4,5 already, and Q2 inadvertently. This leaves only Q1 about positive environmental outcomes. I cannot consider a WSP to be a success if the environment is the only benefactor. In my view the plan has failed in all other objectives.

Yours sincerely



Michael Egan