

24 April 2020

Natural Resources Commission

GPO Box 5341

Sydney NSW 2001

**Re: Review of the Water Sharing Plan for the Greater Metropolitan Region Unregulated River Water Source**

To Whom It May Concern,

Turf NSW is writing requesting an extension of the consultation period with regards to the review of the Water Sharing Plan for the Greater Metropolitan Region Unregulated River Water Source.

Turf NSW, together with other industry bodies and individuals did not receive adequate communication, advice or notice to respond effectively to the key questions the Natural Resources Commission (NRC) is asking. Turf NSW found out through a third party less than two business days before the submission was due. This is not a fair and reasonable time frame to respond adequately to this complex plan.

Turf NSW recommend that a summary for each component of the plan be communicated in simple language that outlines the potential impacts for each group that is reliant on the plan. This summary, and consultation with other groups such as the Lower Hawkesbury Nepean Water Users Association and the NSW Department of Primary Industries would allow for a more considered and detailed response to this review.

In the interim, Turf NSW would like to table the following general comments and more specific comments with regards to the implementation of the Non-Urban Water Metering Framework within the region.

General Comments-

a. Overview of the Turf Production Industry and the Need for Certainty with Water Supply and Availability-

The Turf Growers Association of NSW (Turf NSW) is the Peak Industry Body for turf producers in NSW. Over half of the turf production in NSW occurs in the Greater Sydney Metropolitan region for which this water sharing plan covers.

The turf production industry is a significant industry in the region with an estimated value of \$83 million a year to the NSW economy and contributes to the environmental, social and mental health and wellbeing of millions of people. A recent research study commissioned by Hort Innovation demonstrated that green open spaces with irrigated natural turf are worth an estimated \$5.3 billion dollars per year to the Greater Sydney region.

Turf is grown, irrigated and harvested on farm then delivered to a range of residential and commercial applications both within and outside the Greater Sydney region.

Certainty of water supply and availability is crucial in the production of sod turf and the future business viability of our members. The importance of water is demonstrated through a major National Turf Statistics Survey undertaken by Turf Australia that guaranteed access to water supply and availability was one of the top ranked priorities for turf producers to ensure our industry remains viable.

Turf NSW supports the efficient and effective use of water both on farm and in a variety of market applications for which turf is sold. In the recent drought, Turf NSW worked closely with Sydney Water and other industries to ensure that water restrictions and exemptions were provided for newly laid turf. This included negotiating a sustainable watering regime for newly laid turf in residential settings.

The economic impact of Level 2 Water Restrictions introduced by Sydney Water in December 2019 had a significant socio-economic impact on our industry. Sales into the residential market had dropped by up to 90% in some instances. This also had a major impact on the economy and led to a significant reduction in the employment of thousands of people across the wider amenity horticulture sector.

Turf NSW supports a fairer and more equitable way of communicating water restrictions across the state and greater consistency in trigger levels when introducing the different levels of water restrictions.

Turf NSW are a part of a newly emerging NSW Green Space Alliance which is advocating for greater certainty in the maintenance of existing irrigated greenspaces and the development of new irrigated green spaces provided by the NSW Government and various Local Government Authorities.

Water is the lifeblood of our industry. A significant charter of this new NSW Green Space Alliance is ensuring that our industry is not unfairly impacted by future water restrictions and these discussions have

part in, but not limited to:

- Reducing greenhouse gas emissions
- Filtering nutrients and improving water quality
- Improving the value of residential homes by up to 20%
- Reducing the Urban Heat Island effect and keeping our cities cool
- Reducing mental health illnesses, cardiovascular diseases and diabetes
- Preventing and reducing crime rates due to a range of play spaces available for a variety of age groups
- Acting as a bushfire retardant in public and private interfaces, and
- An area to exercise given the current COVID-19 restrictions in place.

A recent study undertaken by the NSW Department of Planning, Industry and Environment (DPIE) entitled "Greater Sydney Outdoors Study" identified open spaces, and the protection of existing green spaces as crucial to the future aspirations of Sydneysiders. The ability to supply irrigated turf and water it is crucial to satisfy the millions of people who rely on natural turf to walk the dog, exercise, participate in a variety of sports or simply read a book in a park.

The NSW Premier, the Hon. Gladys Berejiklian MP has publicly stated in 2019 that it is a Premiers Priority to have more public open spaces within walking distance of home. Irrigated turf, together with trees and play areas is an important component of these open spaces.

b. Implementation of the Non-Urban Water Metering Policy-

Turf NSW request that there be no changes to existing water allocations within the current Water Sharing Plan or any future Water Sharing Plan. Business needs certainty to produce turf and supply it to the market, particularly given the recent drought conditions.

Given the reliability of supply of water on farms throughout the recent drought, Turf NSW does not support any changes to access rules nor the implementation of 'cease to pump' rules.

From the period 2009-2012, an extensive Australian Government funded project was undertaken to install water meters on the Hawkesbury Nepean river system. These meters were paid for by the Australian Government and managed by the NSW Office of Water (now Water NSW).

Irrigators, and many of our members were told it was an individual's responsibility to maintain and pay for the meters after 3 years of installation. This was poorly communicated to water users within the region.

Many meters were never commissioned properly with reliability of the meters a major ongoing issue for our members.

In addition, there has been a range of issues with these meters including, but not limited to:

- Poor installation
- How the data is recorded and stored not communicated effectively
- The full rollout of meters was never completed
- Lack of backup and technical service
- Meters were installed and never used
- Inadequate training in the use of the meters.

One example of a faulty meter was reported by a Turf NSW member to Water NSW in 2019. They were advised that it would take up to 18 months for a technician to repair the meter.

Since 2018, Turf NSW have been in discussions with the NSW Government and Water NSW with regards to complying with the new Non-Urban Water Metering Policy. More specifically, the issue of transitioning all NSW Government owned meters to private ownership.

Turf NSW does not support the NSW Government's decision to transition surface water meters to private ownership.

In the Hawkesbury Nepean river system, floods are a major risk to the future viability of our members and the whole community at large. Having to replace meters that are impacted by floods is an unfair cost that private owners should not have to bear.

Many of our members have multiple farms and meters (up to 6 or more in total). In the advent of a flood, it is estimated that it would cost up to \$100,000 for an individual business to replace these meters.

Turf NSW also have major concerns with regards to the lack of mobile phone coverage in the region using a telemetry system. This would make reporting difficult for many of our members if such a scheme is introduced.

A preferred alternative for Turf NSW would be an agreed system of users recording usage on an annual basis and submitting to the appropriate authorities that could circumvent some of the reliability and

them and repairing meters in an acceptable timeframe.

Therefore, Turf NSW do not support the NSW Government's decision to transition surface water meters to private ownership and wish to work closely with the relevant authorities to resolve this issue.

In 2019, the Natural Resources Access Regulator (NRAR) also undertook inspections of several properties to ensure compliance with the policy.

Turf NSW, in the main have been very disappointed with the way this new organisation is treating our members and growers. Many growers feel like they are criminals, often unsure what the expectations of the policies are and what they need to do to comply with it.

Reports of inconsistent advice being given to our members by NRAR and Water NSW is of major concern. Clearly, better communication needs to occur to understand the roles and responsibilities of each party.

A meeting has been arranged between NRAR, Turf NSW and the Lower Hawkesbury Water Users Association to work through these issues in late April 2020.

Significantly, many of our members have invested in water saving measures over the life of the current Water Sharing Plan such as:

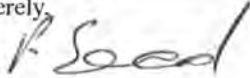
- Upgrading irrigation systems including mainlines and sprinklers
- Use of precision watering systems and fertigation
- Purchasing variable speed pumps
- Use of wetting agents and aerators
- Designing and implementing irrigation and drainage management plans
- Recycling water.

In closing, Turf NSW is working with the various agencies and the NSW Government on a variety of issues and thank you for the opportunity to comment.

Please provide clarity on the extension of the consultation period and further advice so any future submission reflects the detailed response it requires.

I can be contacted on [REDACTED] for further information.

Yours sincerely,



Paul Saad

President

Turf Growers Association of NSW Inc