



GVIA

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making every drop count

9 December 2016

Mr. Adrian Matheson
Water Planner
Department of Primary Industries - Water
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Armidale NSW 2350
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LODGED VIA ELECTRONIC MAIL

Submission on 'Gwydir Water Resource Plan – Surface Water: Status and Issues Paper'

Dear Adrian,

The Gwydir Valley Irrigators Association is writing on behalf of our regulated and unregulated members to provide a brief submission on the Gwydir Water Resource Plan – Surface Water: Status and Issues Paper released in October 2016.

The GVIA are committed to assisting DPI Water in the development of a Water Resource Plan in an efficient and timely manner but want to balance this outcome with our interest in reviewing the region's water sharing plans. To that end, we have provided our advice in three categories; resolved issues, missing issues and new issues. The remaining issues are therefore acknowledged as appropriate for further assessment.

Resolved Issues: As outlined at the Stakeholder Advisory Panel meeting on 30 November 2016, the GVIA believes the following issues are now closed with a resolution determined and should be removed from further assessments.

- Utilisation of ECA for Aboriginal purposes (agreed to incorporate).
- ECA crediting process (agreed to maintain current practice).
- Definition of equitable sharing of supplementary events (CSC to recommend).
- Trade of supplementary Water (maintain status quo).
- Minimum release from Copeton Dam (agreed to regulated current practice).
- Channel Capacity Constraints (CSC to recommend).
- Replenishment flows to include Mongyer Lagoon (agreed to incorporate).

Missing Issues: As outlined in previous submissions, the GVIA supports the incorporation of floodplain harvesting licences, their mandatory monitoring requirements and conditions as well as account management rules as part of the Water Resource Plan development process. We believe this is the most efficient manner for all parties and would reduce confusion for water users. This approach would also allow for simultaneous licence implementation as requested by industry, as all Water Resource Plan will be initiated at the same time.

We ask that this issue be prioritised as part of the development process.

New Issues: As outlined in our letter to the Deputy Director General, Mr Gavin Hanlon on 27 October 2016, we ask that DPI Water investigate the opportunity to remove the current barriers in account management for supplementary water users. We ask that alternative systems be investigated with an aim of encouraging greater sustainability in the industry and local community through economic activity by:

- Improving the efficiency of management and allocation of the resource by better accounting for the large variability of these events;
- Ensuring there is opportunity to access available water over the long-term; and
- Devolving risk onto licence holders.

The GVIA is open to determining the appropriate mechanism but would be interested in allowing carryover of unused supplementary allocations in combination with a rolling average of 300% usage over three years or 500% over five-years or different access arrangements like 'without debit access'. We ask that these options and their impact compliance with plan limits be investigated.

Further to this, the recent rainfall has again highlighted community issues around planned environmental water delivery in the valley and the delivery of three-tributaries water and the 50% share of supplementary events that are required to be delivered to the Gwydir wetlands. We would support further flexibility established around the use of planned environmental water, in addition to the cumulative 500,000ML trigger that currently exists. This rule addresses a post-flood management program but not the current situation of continuous, minor flows.

Greater flexibility will provide a win-win for all parties and modernise the approach of planned environmental water without altering long-term diversion limits, by:

- Ensuring that environmental water managers will be required to improve their management systems around water requirements of the wetlands;
- Recognising additional reform since 2004 that has recovered additional water for environmental use;
- Expanding the beneficial use of planned water by delivering excess water to other assets in the valley; and
- Minimising the risk of third-party impacts during key growing periods.

We ask that restrictions on directing three-tributaries and the 50% share of supplementary water are not compartmentalized to the Gwydir wetlands with the local Environmental Water Advisory Group being able to provide recommendations on the direction of this water as part of their planning processes. This issue is an expansion of the current issue around supplementary event sharing and is linked to the issue on the use and outcomes of environmental water.

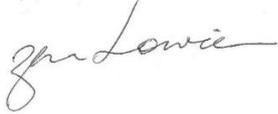
In summary, we request that the following three issues be included for consideration as part of the review process.

1. Floodplain harvesting licence implementation.
2. Review of supplementary account management rules.

3. Flexibility in determining environmental assets to benefit from three-tributaries inflows and 50% share of supplementary events.

We look forward to working with the Department and the other members of the Stakeholder Advisory Panel to develop the Water Resource Plan for the Gwydir Surface Water sources.

Kind regards



Zara Lowien
Executive Officer
Gwydir Valley Irrigators Association