



GVIA

Gwydir Valley Irrigators Association Inc.

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Ms Tracey Brownbill

Principal Project Officer

Water Renewal Taskforce, Department of Planning, Industry and Environment

tracey.brownbill@dpi.nsw.gov.au

Lodged Electronically

Re: Active Management proposal in the Gwydir Valley

Dear Tracey

In following up from our targeted consultation session in Moree on 27th June 2019, we would like to provide the following feedback to be considered prior to drafting any changes to the *Water Sharing Plan for the Gwydir Unregulated and Alluvial Water Sources (2012)* "the WSP".

We thank you for the opportunity to be updated on the Water Renewal Taskforces approach to considering active management and the presentation of materials. It was evident during our meeting that the policy proposal has been developed to address the management of larger unregulated water sources, rather than those targeted in the Gwydir Valley.

Whilst the Gingham, Lower Gwydir and Mallowa water sources are historically targeted for environmental releases, the overall risk to held environmental water deliveries is minor. There are very few users who actively use their licence, current licence conditions are overly restrictive already and there are a number of natural and operational constraints that limit the use of held environmental beyond levels historically delivered. If these constraints are lifted, then the policy could be re-investigated. However, until such time, we do not see the need for any active management in our region for the following reasons:

Upper Gingham and Gwydir Water Sources:

- Current delivery constraints of the system and operational conditions of WaterNSW do not allow for much greater than 250ML per day held environmental water deliveries at the two points of extraction.
- Flows below 250ML/day are currently protected by cease to pump thresholds as outlined by Table B in Section 42 of the Water Sharing Plan.
- While the Gwydir Constraints projects may address these issues, this project remains undeveloped and unfunded and therefore, not an immediate risk.

Lower Gingham Water Source:

- Current licence conditions are prohibitive of pumping held environmental water and require significant unregulated natural flows to trigger conditions, which must be greater than:

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“Less than or equal to the minimal flow dept of 1.0 metre on the Gingham Bridge gauge or less than or equal to 4,000ML/day at the Gingham Bridge Gauge or visible flow at the Morialta Road” as measured “on the same day”.

- These conditions are inconsistent with those determined at the licence transfer and are inconsistent with comparable unregulated flow conditions that aim to protect base flows. As such should be rectified through a licence condition review.
- While the Gwydir Constraints projects may also result in a change of delivery pattern to this area, this project remains undeveloped and unfunded and therefore, not an immediate risk.

Mallowa Water Source (within the Mehi Water Source):

- There are three licence holders within the Mallow Water Source, each of these licence holders would be willing to transfer or trade their entitlements out of the Mallowa zone which is currently not permitted in the WSP.
- Amendment to trade rules for the Mehi Water Source should occur to allow for the movement out of the Mallowa zone, subject to hydrological assessment. We recommend keeping the restriction in place to limit movement of shares into the Mallowa zone.
- This change would nullify any need for an active management policy and enhance the opportunity to achieve environmental benefits by removing the risk of extraction by unregulated users.

We recommend that the instead of an active management policy, the Department should undertake further work to review licence conditions in the Lower Gingham Water Source as a priority and that immediate change to trade restrictions in the Mehi Water Source be amended in the WSP as part of the Water Resource Plan development process.

Finally, we note that during the meeting it was briefly mentioned that active management of floodplain harvesting was being investigated by the Water Renewal Taskforce. Floodplain Harvesting is a historical and legitimate form of water take by many of our members that occurs when water leaves a river and flows across the floodplain. NSW must firstly provide a volumetric licence conversion for water users, to improve regulation in the first instance. rather than considering additional management options like active management. In addition, we question the need for active management for floodplain harvesting when these events are unregulated and unmanageable and cannot be created using held environmental water given delivery constraints and WaterNSW operating licence conditions. Again, there appears to be an overstated risk, driving a need for investigation due to lack of practical and technical knowledge on this type of access. We would be more than willing to discuss these reasons with the taskforce in person, if given the opportunity.

Kind regards



Zara Lowien
Executive Officer