

NSW Department of Planning and Environment

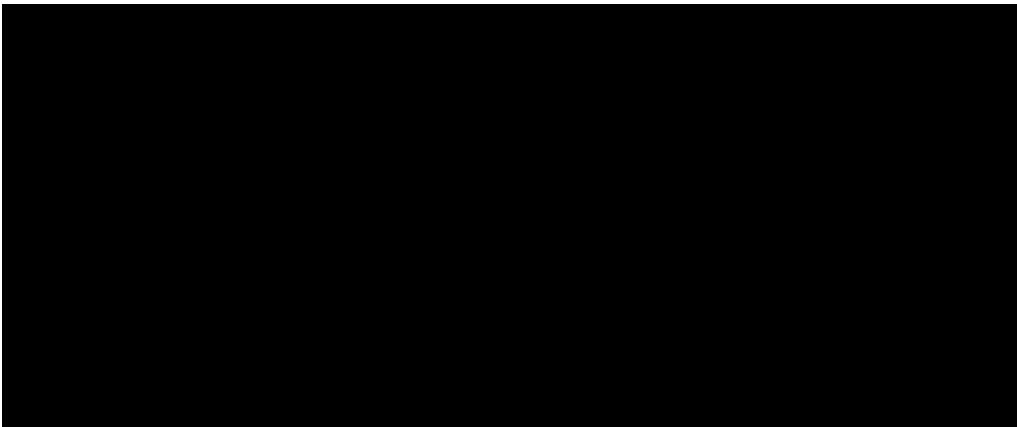
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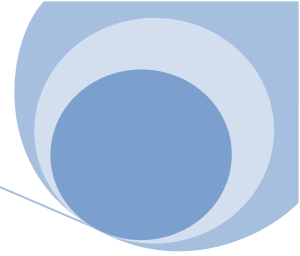
Submission on the Murray Regional Water Strategy by the NSW South-West Water Users Association

Thank you for the opportunity to provide a written submission in respect of the NSW Murray Regional Water Strategy.

If you have any questions arising from this submission or require any further detail please contact myself with details below or Rachel Strachan

Yours sincerely





Submission by the NSW South-West Water User Association
May 2022

The NSW South-West Water Users Association

The NSW South West Water Users Association (SWWU) represents NSW licensed water users on the Murray River downstream of the junction with the Murrumbidgee River to the South Australian border, and licensed water users on the Lower Darling River downstream of the Menindee Lakes water storage scheme.

Our members use water for domestic and stock purposes, as well as irrigation of high value permanent plantings (horticulture and viticulture) and annual crops, using both NSW high security and general security entitlements.

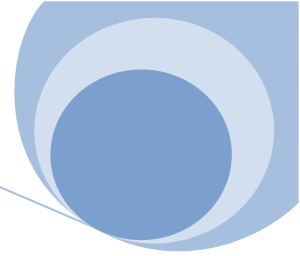
Located in the far south-west of NSW, our water needs are reliant on the supply of water from upstream and depend on the cooperative management of water resources with other jurisdictions, including Victoria and Queensland, and the management of water in upstream catchments and river valleys in NSW.

Inclusion of the Menindee Lakes and Lower Darling in the Murray Regional Strategy

The SWWU generally supports the objectives of the NSW Murray Regional Water Strategy but considers the inclusion of the Menindee Lakes and Lower Darling River valley in the strategy is necessary.

Water from the Menindee Lakes and Lower Darling is an important contributor of water into the Murray River system, and is managed under the Murray-Darling Basin Agreement. Water entitlements in both the Murray and Lower Darling are subject to the NSW Water Sharing Plan.

The management of the Lower Darling River and Great Darling Anabranch has far more in common with the management of the Murray River system than with the management of the unregulated Barwon-Darling River. However, the water flowing into the Menindee Lakes is dependent on management of upstream catchments of the Barwon-Darling River and must be managed as a connected system.



Priority 1: Build community confidence and capacity through engagement, transparency and accountability

Increased regional accountability

The SWWU believes there has been a significant reduction in community confidence in water management over the past decade, with the loss of regional expertise and accountability. Too often, senior departmental and MDBA officials fly in and out of the region and lecture, rather than engage with water users.

The NSW government needs to strengthen regional management of water resources and provide regional staff with accountability.

Increased transparency and accountability through metering

SWWU believes that it is essential for transparency and accountability that all water users be metered and that meters be owned and maintained by government utilities.

Over many years there has been record of meter tampering and/or non-compliance. The installation and maintenance of meters for rural industries by the appropriate water supplier, such as occurs with town water, electricity and gas supply, is essential in providing community confidence in rural water management.

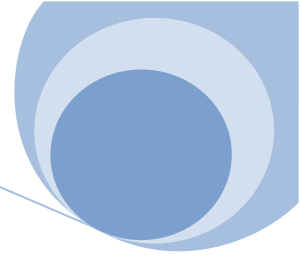
Priority 2: Recognise First Nations/Aboriginal people's rights and values and increase access to and ownership of water for cultural and economic purposes.

The SWWU support greater involvement of First Nations/ Aboriginal People's involvement in water management and in increasing access to and ownership of water.

Priority 3: Improve river, floodplain and aquifer ecosystem health, and system connectivity.

SWWU strongly supports this priority, and in particular that management of rivers in NSW must consider impacts on downstream water users, communities and the riverine environment.

SWWU strongly supports the need to improve river and riverine health and productivity.



Small and medium flooding

In the Murray River, Hume Dam absorbs most small freshes and minor floods that would otherwise provide overbank flows and environmental benefits associated with floodplain connection. SWWU does not support mitigation of floods to prevent flooding downstream properties on floodplains.

The NSW government and MDBA should maximise water storage and reinstate wherever possible, natural freshes and overbank flows by maximising water storage and removing flood mitigation at Hume Dam where the dam would otherwise fill and spill.

Similarly, flood management at the Menindee Lakes to protect (a few) inappropriately built downstream residences is having a significant environmental impact by mitigating high flows that would otherwise pass onto the floodplain and fill riverine wetlands and lakes. This is reducing significant environmental and economic benefits provided by improved natural pastures and grazing and improved wetlands, supporting lakebed cropping where appropriate.

The NSW government should consider relocating or removing inappropriate buildings and developments where these impact on natural flooding.

Community accountability

The SWWU supports the greater involvement of community groups such as the Murray-Darling Wetlands Working Group in working with landholders and community groups, including First Nation and Aboriginal communities in the rehabilitation of wetlands and the riverine environment.

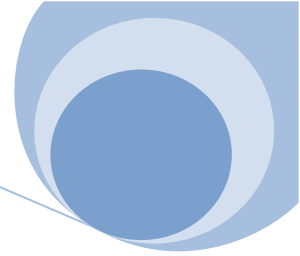
Priority 4: Increase resilience to changes in water availability (variability and climate change).

SWWU is acutely aware of the reduced water availability in the NSW share of Murray River system inflows since 2000, compared with those from 1895 to 2000.

High security and general security entitlements

The NSW entitlement system of high security and general security entitlements is adapted to water variability. In the Murray Valley, NSW high security entitlements are typically used for town water, stock and domestic supply and high value permanent plantings. NSW general security entitlements are typically used for pasture production and annual cereal cropping.

The SWWU supports the retention of the current entitlement system in the NSW Murray Valley.



The SWWU does not support conversion of general security entitlements to high security entitlements. Where this has been considered previously, it was shown that conversions would reduce the security of supply to existing high security users in dry year sequences, while increasing water available to remaining general security entitlement holders in wet year sequences when it was of limited value.

Impacts of increased horticultural development downstream of the Barmah Choke

The draft Murray Regional Water Strategy notes the increased irrigation development downstream of the Barmah Choke in recent decades, increasing the potential for system and delivery shortfalls.

The draft Strategy does not identify that this development is based on the activation and trade of Victorian water entitlements, which constitute about 75% of entitlements downstream of the Barmah and the management by Victorian authorities that have allowed entitlements that were previously used in spring and autumn pasture watering to be traded to horticulture developments that use water in summer. Similarly, Victorian authorities have allowed entitlements to be traded from the Goulburn River system to the Lower Murray, and by subsequently reducing flows from the Goulburn to the Murray is increasing the potential for shortfalls.

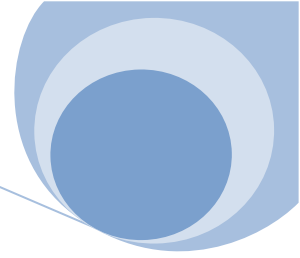
The SWWU believes the increasing potential for shortfalls is a consequence of inappropriate management of Victorian entitlements, and that NSW entitlement holders should not be subject to any restrictions as a consequence of this.

SWWU believes it essential that the integrity and reliability of NSW high security entitlements should be maintained and not be compromised as a consequence of developments downstream of the Barmah Choke based on the use of Victorian entitlements.

Trade rules upstream to downstream of the Barmah Choke

SWWU is aware of the impacts of increasing flows, or maintaining high flows through the Barmah Choke.

SWWU believes that the NSW government should reinstate its pre-existing policy introduced in the mid-1990's of no trade (permanent or temporary) of entitlements or allocation water from upstream to downstream of the Barmah Choke. The reintroduction of this policy, as opposed to no nett trade, would potentially reduce the need for constant high flows through the Barmah-Millewa Forest over time, and reduce the environmental damage.



Long-term options for managing delivery capacity

The SWWU supports investigation into long-term options for managing delivery capacity where options will reinstate the capacity of the Barmah Choke rather than enlarging it. Enlarging the capacity of the Choke would increase the potential to trade water from upstream to downstream of the Barmah Choke that would increase potential delivery shortfalls, continue environmental degradation and have social and economic impacts on the central Murray region.

Priority 5: Support economic growth and resilient industries within a capped system

SWWU believes that the current system of capped water entitlements, different reliability of entitlements (within NSW and between states), permanent trade of entitlements and annual trade of allocation supports economic growth and resilient industries.

However, trade of entitlements and allocation should only occur where the water can be delivered when it will not impact on existing users or have a detrimental environmental impact.

Priority 6: Support resilient, prosperous and liveable cities and towns

There is a long history of flooding in the Murray Valley, and NSW towns are relatively well protected from floods through existing planning standards.

The SWWU believes planning departments must be responsible for ensuring that inappropriate developments are excluded from floodplains and flood prone areas. This would enable the better management of flows for water storage, economic, environmental and water quality outcomes rather than for flood mitigation.

Priority 7: Enable a future focussed, capable and innovative water sector

SWWU believes that the current water management and entitlement system in NSW provides for a future focussed, capable and innovative water sector but that it is essential for regional communities to assume greater responsibility, supported by government.

SWWU acknowledges that respective governments are responsible for water management within their own states and importantly believes that the water management by one state should not impact on water availability and reliability of water entitlements in another state.