

Murrumbidgee

Groundwater Inc

Submission to

NSW DPI

**Murrumbidgee Alluvium Water Resource Plan Groundwater (GW9)
Status and Issues Paper**

Due by 26th May 2017

NSW DPI Water

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Murrumbidgee Alluvium Water Resource Plan Groundwater (GW9) Status and Issues Paper

Murrumbidgee Groundwater Incorporated (MGI) appreciates the opportunity to make this submission on the Murrumbidgee Alluvium Water Resource Plan Groundwater (GW9) Status and Issues Paper released on 13 April 2017. We also appreciate the extension granted to submit this submission.

Introduction:

MGI represents groundwater pumpers who pump water from the Lower Murrumbidgee Deep Alluvium.

There are a number of points MGI wish to raise in relation to the Status and Issues Paper.

New Issues.

MGI request that meaningful consultation surrounding the development of the WRP is undertaken. To ensure this occurs a formal process with defined outcomes through that process must be established, communicated and approved by stakeholders.

Existing Issues identified in the Issues Paper.

3.3 Improving Water Sharing- long term average annual extraction limit:

If evidence became available that the long term annual extraction limit could be sustainably increased, that the WSP provides the ability to enable an increase through the AWD process, notwithstanding other regulatory and legislative instruments that would require adjustment.

3.3 Improving Water Sharing- long term average annual extraction limit:

Increasing the compliance period from 3 to 5 years. MGI is supportive of mechanisms that are already in place which will allow the resource use to move towards the SDL to ensure that users and the NSW economy are maximising sustainable use of the resource. MGI members want a plan of how this will be progressed.

3.3 Improving Water Sharing- environmental values and aquifer integrity:

MGI does not support the practice of pumping excess river flows into the groundwater system to increase recharge (Managed Aquifer Recharge) without thorough scrutiny of the risks associated with the practice. If this mechanism became available it would require very careful consideration by both government and industry as the groundwater entitlements and infrastructure therein are of vital importance to our membership. MGI have concerns with of the risks posed by MAR surrounding water quality and impact on Available Water Determinations.

3.3 Improving Water Sharing- rules for granting access licences:

MGI are satisfied with the current mechanism for granting new licences (zero allocation) as long as the granting of the new licence does not impact on existing groundwater users and licence holders. MGI are always open to new and better ways of managing the groundwater resource as long as meaningful and true consultation has been carried out.

3.3 Improving Water Sharing- rules for granting water supply works:

MGI support a considered approach to distance restrictions, welcome the opportunity for constructive input and would like a firmer timetable of when this is likely to occur.

3.3 Improving Water Sharing- account management rules:

MGI supports account management rules that enable flexibility of water use, however the resource should be prohibited from being hoarded until drought conditions. Regular users should not be penalised by more variable users of the resource.

3.3 Available water determinations:

MGI does not support the proposition that AWD of greater than 1, provided that current account rules are not changed eg carryover, annual extraction limit and account limit. If any changes are considered, meaningful consultation with stakeholders must be undertaken.

3.3 Improving Water Sharing- monitoring:

MGI support that all new licences (even Zero allocation licences) have metering provisions that are the same as all other water licence holders and adequate staff to police them. The new zero entitlement WAL's have very generous extraction limits which are much higher than limits granted 10 years ago. This places additional pressure on a limited resource in certain seasons, and is encouraging more development.

Water extraction is determined not by the quantum of one's entitlement rather by the size and capacity of the groundwater works. MGI submits that all new and existing bores should be metered to appropriate standards that are equitable not by size of entitlement rather extractive capacity and risk to resource. MGI also notes that DPI Water is currently drafting a 'Water Take Strategy', we await the consultation on this matter also.

3.3 Improving Water Sharing- additional matters:

MGI believe the risk of downward movement of salts to deep groundwater source and risk of future rising groundwater levels resulting in broad scale land salinization is of no great concern.

3.4 Complying with the Sustainable Diversion Limit

MGI question why MDBA would propose a new method to assess compliance of groundwater take and ask if it is necessary. The existing NSW WSP method is a proven method. MGI would want to interrogate the data from both methods before making any comment or commitment to a new unproven method. Each water source should be assessed in isolation from all others, not a blanket assessment of all water sources.

3.6 Managing in Extreme events:

MGI feel that a proviso should be written into the WRP, that in extreme events the minister of the day can suspend the WRP, similar to what happened with the WSP during the millennium drought. MGI believe rules on paper will make the WRP inflexible and stymie the response and management options to any future extreme event. Any changes should be done in consultation with stakeholders.

Appendices Appendix 1: Draft objectives and strategies Environmental:

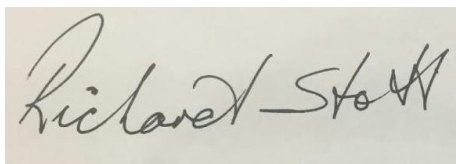
A number of the proposed strategies of the draft objectives and strategies outlined in Appendix 1 of the Issues Paper raises concerns.

In the third targeted objective of protecting and maintaining aquifer water quality from salinity increases MGI believe it should also include other pollutants such as chemical and fertiliser pollutants.

Appendix 2: Additional Issues identified by Aboriginal communities:

MGI have concern with the sentiments of the second issue, surrounding the waiving cost of water licences and looking at opportunities for 'excess' water. The six major inland alluvial aquifers (including the Lower Murrumbidgee) only just completed, in 2015, the process of the reduction in entitlements in order to meet the long term extraction limit. There is no 'excess' water and addition entitlement licences should not be granted. The Zero allocation licence and open water market mechanism is in place, is equitable and has shown to work so should not be tampered with.

Thank you for the opportunity to make comment on the Murrumbidgee Alluvium Water Resource Plan Groundwater (GW9) Status and Issues Paper.

A handwritten signature in black ink on a light-colored background. The signature reads "Richard Stott" in a cursive, slightly slanted script.

Richard Stott
Chairman Murrumbidgee Groundwater Inc.