



2 May 2018

Committee Secretariat

House of Representatives, Standing Committee on the Environment and Energy

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Parliament House

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Sent via email

Re: Inquiry into the Management and Use of Commonwealth Environmental Water

Dear Committee,

The Gwydir Valley Irrigators Association (GVIA) represents irrigation entitlement holders in the Gwydir Valley, in north-west NSW.

Our region has a long-history of environmental water management prior to the purchase of entitlements by the Commonwealth government under the 'no regrets policy' of the then government in 2008. Environmental water is primarily used to contribute waterbird and fish breeding events and to maintain the condition and extent of the internationally recognised Gwydir Wetlands but as the portfolio has grown, so has the application and use of environmental water.

We have provided the following brief submission to the Standing Committee on the Environment and Energy inquiry into the 2016-17 annual report of the Department of the Environment and Energy, focusing on the management and use of Commonwealth environmental water.

We recommend the committee visit our region for a local tour of the environmental assets and talk with members of the local planning group, the Environmental Contingency Allowance Operation Advisory Committee to learn how they engage and work with the Commonwealth Environmental Water Office. We would welcome your attendance and help to coordinate the visit with key stakeholders.

Our submission addresses the following six areas from a local perspective as identified as, relevant to the terms of reference.

1. Environmental Water Portfolio.
2. Management Arrangements.
3. Reporting.
4. Outcomes in 2016-17.

5. Constraints.
6. Recommendations

Please note that our members are also members of the NSW Irrigators Council and National Irrigators Council and we endorse the submissions by those organisations.

Environmental Water Portfolio

The total volume of water available to irrigators has been reduced significantly over time due to reforms as outlined below in Table 1: Summary of Water Reform. Entitlements owned for environmental purposes totals more than 186,000ML, which includes an Environmental Contingency Allowance of 45,000ML. NSW and Commonwealth environmental water managers are now responsible for 28.5% of high security entitlement, 29% of general security entitlement and 13% of supplementary entitlement for environmental purposes.

Table 1: Summary of Water Reform

Year	Program	Volume of entitlement
1970	Creation of replenishment flow	5,000ML
1995	Murray-Darling Basin 1993/94 Interim Cap established to limit future growth in access	
1996	Voluntarily reduced their general security reliability by 5%, by establishing the original Gwydir Valley Environmental Contingency Allowance (ECA) of general security equivalent water.	25,000ML General Security
2004	Gwydir Regulated River Water Sharing Plan further reduced reliability by 4%, primarily through increasing the ECA and enhancing its use and storage provision. Rules created for the WSP also reduced access, particularly to supplementary flow previously known as high flow.	20,000ML General Security
2006	Lower Gwydir Groundwater Source Water Sharing Plan reduced groundwater entitlements from 68,000 megalitres to 28,700 megalitres.	39,300ML Groundwater
2008 +	NSW State Government has purchased general security entitlement as well as supplementary for wetlands recovery programme.	17,092ML General Security 3,141ML Supplementary
	NSW Government infrastructure works	1,249ML High Security
	Commonwealth buy-back program.	88,133ML General Security 20,451ML Supplementary
2016	Commonwealth infrastructure programs.	4,508ML High Security 1,392ML General Security
TOTALS		5,757 High Security 156,617ML General Security (including ECA) 23,592 ML Supplementary

As a result, only approximately 19% of the total river flows are available for diversion for productive use¹. This equates irrigators holding 575,000ML from regulated entitlement (high security, general security and supplementary water) and 28,000ML available from groundwater aquifers.

Management Arrangements

As mentioned above, as the portfolio available to environmental managers has grown so has the need to ensure the appropriate governance, management and monitoring of environmental water usage. Whilst the GVIA has concerns with the multiple levels of bureaucracy around environmental water management and possible duplication of planning and decision making, the recognition of historical localised arrangements, like the Environmental Contingency Allowance Operational Advisory Committee (ECAOAC) by the Commonwealth Environmental Water Office is welcomed.

However, with an expansion of targeted outcomes outside catchment boundaries as with environmental flow deliveries from the Gwydir into the Barwon Darling River currently underway², it is apparent there is a need for another platform to engage stakeholders and seek advice outside the valley specific processes.

We recommend the establishment of a northern flow reference committee, including irrigators, river operators, indigenous representatives and environmental water managers across NSW and Queensland to provide advice to environmental water managers on potential watering opportunities. The group would also be a formal communication pathway for updating stakeholders on actions and outcomes of environmental watering events across the northern basin.

Reporting

The Commonwealth Environmental Water Office provides full disclosure on environmental holdings, availability, planned and actual usage and trade intentions which is welcomed. However, the GVIA has raised concerns with the timeliness of this information, especially monitoring reports which are available post planning for the upcoming water year and are used retrospectively for the following year. For example, the monitoring report for the 2015-16 water year³ was provided in late November 2016, which appears timely following the completion of the water year in June. But basin-wide and local planning process are required completed prior to June, meaning this information is not formally used to inform water actions until the following year and verbal updates are instead used throughout the planning process. Furthermore, the monitoring report for the 2016-17 is still not available on line whereas the NSW Government provided their report in April 2018⁴. If environmental water managers are to adapt and learn in a dynamic manner, this information must be more readily available.

¹ Based on IQQM long-term modelling and the volume of water purchased for the environment

² Connecting Northern Rivers <https://www.environment.gov.au/water/cewo/media-release/connecting-northern-rivers>

³ Commonwealth Environmental Water Office, Long Term Intervention Monitoring Project GWYDIR RIVER SYSTEM SELECTED AREA, 2015-16 Evaluation Report, 25 November 2016
<https://www.environment.gov.au/system/files/resources/e5625358-0002-4d94-a9f9-a13c28a21bc5/files/gwydir-ltim-report-2015-16.pdf>

⁴ Use of environmental water in NSW, Outcomes 2016-17
<http://www.environment.nsw.gov.au/research-and-publications/publications-search/use-of-water-for-the-environment-in-nsw-outcomes-2016-17>

Another challenge for regions that have multiple owners of environmental water as in the Gwydir Valley, we must utilise multiple sources of information to determine statistics about the 'total' environmental water portfolio. We have recommended to the NSW Government to improve their reporting to account for a need for the community to better identify environmental water usage and availability versus industry water usage and availability.

Outcomes in 2016-17

The NSW outcomes report⁴ outlined there was 22,847 megalitres of Commonwealth environmental water used in the Gwydir Valley in the 2016-17 water year. Although the Commonwealth Environmental Water Office's website outlined only 8,400 megalitres of water was used⁵. Upon review, the GVIA concluded that the Commonwealth Environmental Water website had not updated the section on environmental water actions and had used the previous year's data. The timeliness and accuracy of website content is of a concern.

Utilising the NSW report, environmental water was delivered to four locations across five separate events for targeted outcomes included wetland inundation and fish as outlined below in Table 2.

Table 2: Environmental water delivered in the Gwydir catchment during the 2016–17 watering year

	Location and Outcome	Start Date	Finish Date	NSW (ML)	CEWH (ML)	EWA (ML)	TOTAL (ML)
1	Gwydir Wetlands – wetland inundation, support habitat and vegetation	24 Jul 2016 25 Dec 2016	7 Aug 2016 28 Feb 2017	3,000	9,000	3,000 18,000	33,000
2	Carole Creek – fish outcomes and instream connectivity	15 Sep 2016	21 Sep 2016		1,351		1,351
3	Mehi River - fish outcomes and instream connectivity	17 Sep 2016	21 Sep 2016		5,000		5,000
4	Mallowa Creek and watercourse – inundation to support vegetation	13 Jan 2017	3 Apr 2017		7,496		7,496
TOTAL				3,000	22,847	21,000	46,847

Deliveries were reported to help achieve the outcomes within the identified locations, although no monitoring report is yet available to support these claims.

The GVIA on the 11 October 2016, wrote to the then Commonwealth Environmental Water Holder requesting a meeting to discuss the use of water for fish outcomes as used in September 2016 and in previous seasons, raising concerns around the "little direct benefit" and that any "indirect benefits...[are] marginal and highly inefficient".

Whilst we met with representatives of the CEWO and discussed our concerns, water actions for example in 2017-18 water year have either occurred or are planned for early season stimulus and recruitment flows for fish⁶ despite no monitoring available on the more recent deliveries and known constraints to delivering outcomes, like the impact of cold water pollution downstream of Copeton Dam. As outlined earlier, the reporting and planning timeframes at multiple scales appear to be impacting the CEWH's ability to be appropriately adaptive, allowing environmental water managers to effectively continue 'trialling' approaches regardless of the outcome.

⁵ <http://www.environment.gov.au/water/cewo/catchment/gwydir/history>

⁶ <http://www.environment.gov.au/water/cewo/catchment/gwydir/water-use>

Constraints

The GVIA believe there are a myriad of constraints which limit the effectiveness of the use of environmental water. These must be considered and addressed if we are to get the most from the environmental water portfolios and even achieve more with less.

There are several limitations to the effectiveness of environmental use for the Gwydir wetlands, these being:

- land management of wetland areas;
- management of adjacent lands;
- delivery constraints due to limited channel capacity;
- instream and riparian pest management; and
- weed control.

Environmental water deliveries outside of the Gwydir wetlands, as with the instream deliveries for fish in the Carole and Mehi River have had limited responses. The monitoring and evaluation report in 2014 -15⁷ outlined that the targeting of hydrographs is having little response for fish populations in the valley. The lack of response is in response to a number of limiting factors like:

- poor fish passage;
- in-stream habitat;
- riparian land management; and
- cold water pollution.

The GVIA believe that through targeting some of the known non-flow factors or complementary measures in this region, environmental water managers will be more likely to achieve environmental outcomes. This will efficiently use environmental water in the best interests of communities and the broader public.

Furthermore, the GVIA would be interested in understanding the Government's responsibility to investigate, consult and address delivery constraints within the Gwydir region as proposed under the Gwydir Constraints project contained within the unsuccessful Northern Basin Amendment.

The disallowance of the Northern Basin Amendment has resulted in a loss of willingness for governments to address these concerns, as they focus back on water recovery targets and not environmental outcomes and have lost the proposed source of government funding.

However, there is opportunity for the Commonwealth Environmental Water Office to utilise funds from the recent temporary trades of environmental water in the Gwydir Valley for example⁸, to start to address these concerns. The legislative change to the Water Act 2007 (Cth) has been a critical step in which the Commonwealth Environmental Water Holder can now invest in projects to help achieve better environmental outcomes, outside of funding requirements of government.

⁷Commonwealth Environmental Water Office, Long Term Intervention Monitoring Project GWYDIR RIVER SYSTEM SELECTED AREA, 2014-15 Evaluation Report, 9 November 2015
<https://www.environment.gov.au/system/files/resources/84ae3a3e-7bf5-414a-a928-07d87308206e/files/gwydir-ltim-report.pdf>

⁸ Sale of Gwydir water provides win-win <https://www.environment.gov.au/water/cewo/media-release/sale-gwydir-water-allocation-provides-win-win>

Recommendations

As contained within this submission the GVIA have provided the following two key recommendations.

We recommend and welcome the committee to undertake local site visit within the region to hear directly the GVIA together with local environmental water managers and landholders, involved the managing and planning for the use of environmental water in our region. We would also invite you to meet with local landholders who at times are impacted either beneficially or otherwise, by the use of environmental water to understand the range of issues summarised in this submission.

We recommend the establishment of a northern basin flow reference committee, including irrigators, river operators, indigenous representatives and environmental water managers across NSW and Queensland to provide advice to environmental water managers on potential watering opportunities in the northern basin.

Ends.