



Nature Conservation Council

The voice for nature in NSW

NSW Department of Industry – Water

By email: ltidle@dpi.nsw.gov.au

16 July 2018

Response to Consultation Paper: NSW updated factors for water recovery

Dear Sir/Madam,

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 150 environment groups and thousands of supporters across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

Thank you for the opportunity to comment on the Consultation Paper: NSW updated factors for water recovery.

NCC does not support the methodology used to change the planning assumptions for environmental water recovery under the Basin Plan.

The consultation paper states that feedback from stakeholders has consistently expressed concerns about the 2011 factors used in the development of the Basin Plan. This statement needs to be qualified. The stakeholders questioning the cap factors have been a specific set of irrigation interests. There has been no feedback, to our knowledge, from environmental interests questioning the suitability of the 2011 factors.

The technical paper does not provide a clear comparison of the planning assumptions used to develop the 2011 factors and the 2018 factors.

The consultation paper requires feedback on two areas:

1. Estimates of supplementary and general security entitlements
2. Historical usage

Supplementary and General Security Entitlements:

We are concerned that the full value of supplementary entitlements over the long term is used as an assumption in the modelling for the 2018 factors. Linking supplementary water use with general security water use under the assumption that all supplementary entitlement is used, is a problematic approach. This does not reflect water usage under Water Sharing Plan rules.

The 2018 factors appear to have significantly increased supplementary and general security water use in many catchments while decreasing stock and domestic, town water and high security water use.

These changes appear to be using higher priority water allocations to fill the gap in environmental water recovery.

Historical usage:

The factors have not included water extraction in the Border Rivers, Gwydir, Namoi, Macquarie and Barwon-Darling through floodplain harvesting.

This is a significant volume of water being removed from the environment that must be included in planning assumptions.

NCC does not support that the Macquarie has been over-recovered by nearly 20 GL or that the Gwydir has been over-recovered by nearly 8 GL. The volume of floodplain harvesting extraction in these catchments must be factored in, so that full historic use is included in the calculations for environmental water recovery.

The long term diversion limit equivalence (LTDLE) must include the volume of extraction through floodplain harvesting so that the full impact of water extraction is understood in each catchment.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kate Smolski', with a stylized flourish at the end.

Kate Smolski
Chief Executive Officer