



Submission to IPART on:

WaterNSW Operating Licence Review

By:

Gwydir Valley Irrigators Association Inc

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making every drop count

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1 Summary and Purpose

The Gwydir Valley Irrigators Association (GVIA) as the representative body for irrigation entitlement holders in the Gwydir Valley and welcome the opportunity to provide our feedback to IPART for consideration as part of their WaterNSW Operating Licence Review.

The GVIA and our members, are members of the NSW Irrigators Council and National Irrigators Council and endorse the submissions made by both those organisations.

2 About the GVIA

2.1 Our region

The Gwydir Valley Irrigators Association (GVIA) represents more than 450 water entitlement holders in the Gwydir Valley, centred around the town of Moree in North-West New South Wales. Our mission is to build a secure future for our members, the environment and the Gwydir Valley community through irrigated agriculture.

The Moree Plains Shire region alone is highly dependent on agriculture and irrigated agriculture for economic activity contributing over 72% of the value of gross domestic product (cotton is around 60%), employing 20-30% of the population and accounting for almost 90% of exports from the Shire¹.

The 2011 agricultural census estimates that the total value of agricultural commodities for the Moree Plains Shire region was \$911,951,079 up from \$527,744,851 in the 2005-06 census. This is an estimated 7.83% of NSW's total agricultural production from a 1,040,021Ha principally used for agricultural crops².

The Gwydir is characterised as having low water reliability with most water held as general security water in Copeton Dam with a reliability of 36% (that means irrigators could expect in the

¹ Cotton Catchment Communities CRC Communities and People Series 2009

² 2010 2011 Agricultural Census Report – agdata cubes, 71210D0005-201011 Agricultural Commodities, Australia

long-term just over a third of their entitlement can be accessed). Supplementary water entitlement is somewhat more reliable with 55% but accounts for less than a quarter of the total volume. Groundwater reliability is considered 100% but there is less than 30,000ML available. Floodplain harvesting licences were issued in 2022 and contribute almost a quarter of the water use in the region over the long term. However, access is episodic, in line with moderate to major floods.

The total volume of water available to be accessed by irrigators has been reduced significantly over time due to reforms as outlined on the [GVIA website](#)³. Entitlements owned for environmental purposes totals more than 186,000ML, which includes an Environmental Contingency Allowance of 45,000ML. The 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 use. As a result, only approximately 19% of the total river flows are available for diversion for productive use⁴. This equates irrigators holding 575,000ML from regulated entitlement (high security, general security and supplementary water) and 28,000ML available from groundwater aquifers.

The main broad acre irrigated crop is cotton with occasional irrigated wheat, barley and Lucerne occurring depending on commodity prices. The total broad acre irrigated area is up to 90,000 ha (although recent analysis indicate that maximum planting area is now 70,000ha) but is rarely cropped in one year. In 2010-11 census data indicated the total production value of irrigated cotton was \$623M and is estimated to be worth three times that to the local community using the Cotton Catchment Communities Research Corporation economic multiplier for cotton regions⁵.

There are also pecans and oranges being grown covering approximately 1,500 hectares and generating an estimated \$31M with considerable benefits to the local community as high intensity, permanent crops. There is significant potential for expansion into horticulture and improvement in water utilisation, but the area of expansion is limited by the availability of high security water.

Changes in water availability either through climate or government policy has a direct impact on the productivity of the region as well as on the local economy. Analysis by the Murray Darling Basin Authority highlighted this relationship during the northern review and revealed that for both Moree and Collarenebri social and economic indicators declined through 2001 to 2011 including education, economic resources and disadvantage, resulting in an estimated 200 jobs lost due to the implementation of the Basin Plan in the region⁶.

³ [Gwydir Valley Irrigators Association Inc - History of Water Reform \(gvia.org.au\)](#)

⁴ Based on IQQM long-term modelling and the volume of water purchased for the environment

⁵ Social and Economic Analysis of the Moree Community, 2009. Cotton Catchment Communities CRC

⁶ MDBA Catchment Profiles for the Socio-economic analysis to inform the Northern Review

2.2 What we do

The GVIA's mission is to build a secure future for our members, the environment and the broader Gwydir Valley community through irrigated agriculture, we can do this together by making every drop count in the river or the aquifer, on-farm, for the environment, or for our community⁷.

GVIA members hold entitlements within the Gwydir regulated and un-regulated surface water areas, in addition to groundwater resources. All of which are managed through water sharing plans, which have been progressively developed since early 2000.

The GVIA organisation is voluntary, funded by a nominal levy, cents/megalitre on entitlement. In 2022-23 the levy was paid and supported by more than 92% of the eligible entitlement (excludes entitlement held by the NSW and Commonwealth governments).

Much of the activity of the association revolves around negotiating with government at a Federal, State and Local level to ensure the rights of irrigators are maintained and respected. While the core activities of the Association are funded entirely through the voluntary levy, the Association undertakes programs to maintain and improve the sustainability of members on-farm activities and from time to time, performs special projects, which can be funded by government or research corporations.

The Association is managed by a committee of a minimum 11 irrigators and employs a full-time executive officer and a part-time administrative assistant, as well as hosting a Project Officer funded through the Cotton Research and Development Corporation, the Gwydir Valley Cotton Growers Association and the GVIA.

2.3 Contacts

Gwydir Valley Irrigations Association

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Chairman: Jim Cush

Acting Executive Officer: Louise Gall

3 Key Questions

3.1 Flood management

The GVIA notes that the operating licence for Water NSW must operate the bulk water management works in accordance with the asset management system.

⁷ For more information, see our corporate video on <https://vimeo.com/177148006>

However, there is a distinct disconnect between the performance standards for customers and water supplied and the asset management systems, at a valley level when it comes to operating a dam (or water management work during floods and spills).

For example, the Water Supply Work agreement for assets in the Gwydir Valley state that:

“Dam Operation during Floods and Spills

13. The Approval Holder must operate the authorised water supply works during times of flood and spilling of water so as to maintain the safety of those works, and to minimise risks to public safety.

14. Providing it is consistent with condition thirteen (13) of this approval, operation of the water supply works authorised by this approval, during times of flood or spilling of water:

(a) should leave the water storage levels of the authorised water supply works at full supply level at the completion of the flood or spilling of water;

(b) should ensure the rate of outflow from the authorised water supply works does not exceed the rate of inflow to the authorised water supply works until after the flood has peaked;

(c) should lessen downstream flood damage, where possible; and

(d) may involve temporary storage of water above the normal full supply level to reduce flood effects, and management of the rate of release of this water to avoid aggravating downstream flood damage.”

However, there are no performance measures associated with the WaterNSW operating licence or the asset management system that relates to this outcome.

In the Gwydir Valley in September, October and November 2022, WaterNSW operated Copeton Dam on spill release strategy for a number of inflow periods. In early November 2022, an airspace committee was established to discuss the process. Following this, WaterNSW decided to pre-release a large volume of water during the next inflow period. Copeton Dam’s management resulted in a loss of surplus allocation, which could have been held without impact for allocation to customers when account space was available.

At 30 September – there was 1329.9GL in storage with releases of 327GL for spill releases and some orders (less than 1 GL) and inflows were 317GL.

https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0005/536585/WAS-Gwydir-20221010.pdf

At 7 November for the 31 October 2022 resource assessment – there was 1,286.64GL. Releases for airspace management were 490GL while inflows were 450GL.

https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0006/542184/WAS-Gwydir-20221107.pdf

At 30 November 2022 – there was 1,304.69GL in Copeton Dam with releases from Copeton Dam totalled about 102 GL in November, mainly for airspace operation and flood management (5.5GL were for orders) and inflows were 125GL.

https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0009/546696/WAS-Gwydir-20221207.pdf

Thus over the period, excluding orders there was 913.5GL releases for 892GL inflows, creating a deficit of 21.5GL unaccounted for difference which could have been reserved allocation, in surplus and allocated when account airspace was created. This was

particularly evident in the pre-release of water in late October/November, which was not topped up with natural inflows as predicted by Water NSW.

We recommend there should be guidance provided by the IPART licence conditions to monitor and report performance against dam spill operations and a clarity provided to WaterNSW how to balance the management of their works during high stress times, such as flood operations.

3.2 Obligations to and Consultation with WaterNSW Customers

WaterNSW is currently required to consult with customers through Customer Advisory Groups (CAGs). CAGs enable involvement in issues relevant to the performance of WaterNSW's obligations under the current Licence or the Customer Service Charter.

The current Licence includes a range of conditions for WaterNSW in CAG meetings as detailed in the issues paper. The GVIA recommend that the agenda for these meetings contain content driven by customers up to 50% to ensure that the CAG remains relevant to customer needs so that customers can share information, raise concerns and work to address challenges.