



*Submission to the Department of Climate Change,
Energy, Environment and Water on:*

*Revised newly prescribed wetlands as a
component of the Public Exhibition Draft of the
Water Sharing Plan for the Gwydir Unregulated
River Water Sources 2025*

By:

Gwydir Valley Irrigators Association Inc

March 2025



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I Summary and Purpose

The Gwydir Valley Irrigators Association (GVIA) is the representative body for water entitlement holders in the Gwydir Valley and welcome the opportunity to provide our feedback to the NSW Department of Climate Change, Energy, Environment and Water (DCCEE) (the Department) for the revised newly prescribed wetlands as identified in the WSP Prescribed Wetlands Map available on the Department website as part of the public exhibition draft of the Water Sharing Plan for the Gwydir Unregulated River Water Sources 2025 from the perspective of our region.

This document aims to represent the concerns, views and experiences of our members and the community. Each member reserves the right to express their own opinion and is entitled to make their own submission.

We refer to the previous GVIA submissions on the 10th of January 2025 and the 1st of February 2025 into the public exhibition draft of the Water Sharing Plan for the Gwydir Unregulated River Water Sources 2025 and the Newly prescribed wetlands as a component of the Public Exhibition Draft of the Water Sharing Plan for the Gwydir Unregulated River Water Sources 2025 for more detail on wetlands and other aspects of the plan. In both documents we stated that we do not support the inclusion of wetlands as a component of any Water Sharing Plan.

This submission is focused primarily on the revised wetlands associated with the public exhibition draft of the Water Sharing Plan for the Gwydir Unregulated River Water Sources 2025.

The GVIA and our members, are members of the NSW Irrigators Council and National Irrigators Council and we generally support the submissions made by those organisations.

2 Overall Recommendations

Given the issues identified in this submission, the GVIA make the following overall recommendations.

1. **We request that any wetland identification not be included as a component of any Water Sharing Plan (WSP) regulated or unregulated now or at any time into the future as it adds no benefit to the public given that any changes to water access in WSP is already accounted for.**
2. **We request clarity on the financial, legal and production implications of gazetting wetland sites as members have major concerns as to how rules may be interpreted or adjusted in the future.**
3. **Although we do not support the creation of wetlands on private land, we request that the Department consult with all landholders directly and that ground truthing of any wetland include all sites gazetted in all earlier versions of the Gwydir Unregulated and Regulated Water Sharing Plans.**
4. **Although we do not support the creation of wetlands on private land, if the Department wishes to identify any new wetlands as a standalone process, unrelated to any Water Sharing Plan, the process must include individual consultation with all landholders likely to be impacted by the identification of a wetland, this includes all neighbouring landholders.**
5. **We request that following ground truthing and consultation with landholders, to confirm the existence of a wetland, if the Department continues to include them unnecessarily in Water Sharing Plans, then they should be included as a detailed list as in Schedule 4 and Schedule 5 of the Water Sharing Plan for the Gwydir Unregulated River Water Sources 2012 and be supported by the interactive map. We cannot accept a map alone as we have no confidence it will be tamper proof.**

3 Wetland identification and inclusion in Water Sharing Plans

The GVIA thank the Minister for her recognition of the issues associated with the initial proposals. We encourage the Minister to preclude any inclusion of wetlands into Water Sharing Plans (WSP) as there are no clear indication as to what value the inclusion of wetlands offers the people of NSW, nor what the implications of there proposed inclusion may be to landholders.

We would also like to thank the NSW Department for recognising the mistakes in the previous proposals and for reviewing the data used to select the revised wetlands.

Despite the removal of a significant number of sites we remain concerned on a number of fronts with regards the additional wetlands which have been included into the updated public exhibition draft of the Water Sharing Plan for the Gwydir Unregulated River Water Sources 2025 (the Plan). We believe that there are now 61 sites included in the proposed Plan, which include four Ramsar sites, 21 previously listed sites and an additional 36 proposed new sites. In a presentation from the department in early March it indicated there were 60 sites. This discrepancy is concerning.

The identification of the proposed sites utilising a desk top process without independent ground truthing and the lack of direct landholder consultation remains a significant concern.

The adoption of Natural Resources Commission (NRC) recommendations without considering if it is required, reasonable or responsive, or demonstrating that it is in the public interest or if the benefits outweigh the costs, raises concerns for us¹. We thank DCCEEW Water for providing the Fact sheet DCCEEW's response to the Natural Resources Commission recommendations for the Water Sharing Plan (WSP) for the Gwydir Unregulated River Water Sources² although we question the changes in response to recommendation 7b.

We note that in the Water Management Act 2000³, Part 3, Management Plans, Division 8, Section 43A (3) it states

*(3) Before deciding whether to extend a management plan that deals with water sharing or to make a new management plan, the Minister is to **consider** a report of the Natural Resources Commission that reviews (within the previous 5 years) the following—*

(a) the extent to which the water sharing provisions have materially contributed to the achievement of, or the failure to achieve, environmental, social and economic outcomes,

(b) whether changes to those provisions are warranted.

We raise the specific reference to the fact that the Minister is only “to consider” the NRC report, and if those recommendations are not justified, or not able to be included with confidence then they must not be included.

We also note that as stated in (3)(a) that social and economic outcomes should be considered. We are not aware of any socio-economic analysis that supported any of the recommendations from the NRC for the Gwydir unregulated WSP. The Water Management Act 2000 also states under (3)(b) whether changes to those provisions are warranted. We are yet to be provided any relevant information that warrants the inclusion of these additional wetlands.

The department have indicated that the intent is that the draft rules relate to water access, such as no new water supply works, no trade into or between sites, only within sites, but that replacement works will be permitted. All these water access rules would be accounted for through the WaterNSW processes, where changes to a works approval must be approved, and trades are managed. If these are the only intended restrictions, they would be more practically implemented through noting the specific WAL's which would be impacted.

The Government has developed seven Better Regulation principles detailed following. *“The principles are the cornerstone of the government’s commitment to good regulation and must be followed in the development of every regulatory proposal. In doing so, it is demonstrated the proposal is required, reasonable and responsive.”*

As stated in our previous submissions, and despite the corrections to the number of proposed sites, we are of the opinion that the inclusion of these additional wetlands in the updated public exhibition draft Water Sharing Plan for the Gwydir Unregulated River Water Sources 2025,

¹ [TPP19-01 - Guide to Better Regulation.pdf](#)

² [DCCEEW Waters response to the Natural Resources Commission recommendations for the Water Sharing Plan for the Gwydir Unregulated River Water Sources](#)

³ [Water Management Act 2000 No 92 - NSW Legislation](#)

that the NSW DCCEEW have failed to adhere to the first five Better Regulation Principles. This is still our believed despite the review and reduction in the number of sites identified.

The Better Regulation principles

Principle 1: The need for government action should be established. government action should only occur where it is in the public interest, that is, where the benefits outweigh the costs.

Principle 2: The objective of government action should be clear.

Principle 3: The impact of government action should be properly understood, by considering the costs and benefits (using all available data) of a range of options, including non-regulatory options.

Principle 4: government action should be effective and proportional.

Principle 5: Consultation with business, and the community, should inform regulatory development.

Principle 6: The simplification, repeal, reform, modernisation or consolidation of existing regulation should be considered.

Principle 7: Regulation should be periodically reviewed, and if necessary reformed, to ensure its continued efficiency and effectiveness.

Principle 1 and 4: The public interest and benefits outweigh the costs and that Government actions should be effective and proportional.

The inclusion of initially 327 and now following revision 36 additional wetlands as part of the DCCEEW response to the NRC recommendation 7b⁴, where it recommended, “*As part of a Plan replacement, to protect significant wetlands and clarify operating rules for structures involved in delivering water to significant wetlands, DPE-Water should: b) update the Plan schedules to include all significant wetlands including those listed as part of endangered ecological communities, internationally, nationally and regionally significant wetlands in the Plan area.*”

We contend that as there are already significant areas of the Gwydir where wetlands have been identified (4 Ramsar sites and 21 other sites) and listed in the existing unregulated WSP (schedule 4 and schedule 5), that the “significant” wetlands have already been accounted for.

We refer to the fact sheet “Identifying wetlands for inclusion in water sharing plans” where the departments state, “*It is not proposed to include every wetland area in the WSP schedule, nor is it intended to include areas such as rivers or creeks or floodplain vegetation communities that rely on periodic inundation, as the rules in the WSP restrict new water supply works or trades which require a permanent or semi-permanent waterbody.*” Yet many of the sites identified are actual river channels including Goonal Creek (ID 2,845), Wallon Creek (ID 3,001) and the Gil Gil (ID 2,943 and ID 2,902). Many of the sites that remain in the document are not

⁴ [DCCEEW Waters response to the Natural Resources Commission recommendations for the Water Sharing Plan for the Gwydir Unregulated River Water Sources](#)

permanent or semi-permanent, including ID 2,911. There are also several sites which are manmade having been dredged to allow additional stock and domestic water these include ID2955 and ID 2901 Baroona Waterhole and ID 2939 – Talmoi Waterhole. These are inundated for any extended timeframe only through the intervention of man.

We note that as part of meeting the Better Regulation requirements that “*the impacts of the proposal must be identified and justified through quantitative and qualitative analysis of all available data. The level of analysis should be proportionate to the significance of the proposal;*” We don’t believe that the impacts of the proposal has been clearly identified or justified appropriately. The department has stated that the draft rules relate to water access, i.e. water supply works and trade. As such we see no reason to identify any of the new, and arguably the existing sites as wetlands in the WSP. If in fact the intent of the WSP is only about restricting water access, then what is the justification for the identification of wetlands on maps?

A review of the Water Management Act 2000⁵ under Division 5 Floodplain management, 29 Core provisions where it states:

The floodplain management provisions of a management plan for a water management area must deal with the following matters—

(b) the identification of the ecological benefits of flooding in the area, with particular regard to wetlands and other floodplain ecosystems and groundwater recharge,

There is no benefit to the public for including any wetlands in WSPs, this is adding a superfluous layer of complexity and delivering no additional benefits. We note also that in webinars and presentations the department referred to the Ramsar and persistent wetlands identified in the Directory of Important Wetlands of Australia (DIWA). If in fact the intention is simply related to water access, why are the department not simply applying these water access rules to specific sites where water is extracted under the specific unregulated WSP in question?

As stated, any change to or additional works need to be approved through the WaterNSW works amendment or new approvals processes. These processes already protect these sites. There is no justification for the NRC to recommend WSP schedules include “significant wetlands.”

Pursuing an unnecessary recommendation by NRC has wasted significant department resources, at a time when the department have stated that they do not have the time, resources or funding to complete any ground truthing of proposed site. Our recent review of WAMC expenditure indicate that WAMC’s capital expenditure has been \$2.7 million (or 7%) higher than IPART’s capital expenditure allowances over the current determination period (WAMC pg. 108). The recent WAMC pricing proposal⁶ outlined the bill impacts for customers, that depending on location, would increase by between 41% and 188% over the 2025 determination period, or an average of between 7% and 28% per year. In the Gwydir unregulated river increases were proposed to increase by 101% in the WAMC pricing

⁵ [Water Management Act 2000 No 92 - NSW Legislation](#)

⁶ [Prices for Water Administration Ministerial Corporation \(WAMC\) from 1 July 2025 | IPART](#)

proposal. Given these expenditure issues we ask why the department pursued an NRC recommendation that was neither required, reasonable or appropriately responsive? In our reviews we have found no evidence of any analysis that demonstrates how any perceived benefits outweigh the costs. If such information does exist, we request that it be distributed to all impacted landholders to enable them the right to assess the analysis.

Principle 2 and 3: Objectives should be clear and impacts properly understood.

We thank the department for providing additional information on the methodology used in mapping the sites. However, there is still no clear understanding of the objectives overall nor for each of the individual sites identified. Why have the individual sites been selected, which criteria do they meet and what evidence is there to support the assessment?

What is the value proposition to the people of NSW from gazetting any wetlands in WSP when they are already accounted for in other government documents and no changes to works approvals can be made without applications and approvals being processed by WaterNSW? Interesting WaterNSW typically conduct site assessments before granting approvals for new or changed works, yet the department are not applying the same degree of quality control. When WaterNSW makes this assessment, they conduct the no more than minimal harm test, how can this be assessed when there isn't a baseline to assess "no change or no more than minimal harm."

The department have indicated that the intent is only to restrict new surface water supply works and trade, and that the mapping is the tool being used to identify the location of sites where these rules apply. As noted already there are existing mechanisms to prevent new surface water supply works or to change water supply works if not appropriate. The identification of additional wetlands does not add additional protections, it simply adds additional complexity to the system, with the potential to have management implications and repercussions for land and the mortgageable value of water entitlements across the state.

In addition, we need the government to guarantee that when entitlement holders renew their works approvals that this wetlands process will not have any impacts on their renewal. Can we please ensure that replacement works, and renewal of works approvals are treated so that there are no impediments to either.

Given that the Department indicate that the draft rules relate to water access (water supply works and trade) we request that the Department justify why sites, which do not have any works associated with them have been included?

For example, ID 2,946 – Whittakers Lagoon. There are no works approvals linked to this site, and as such no water able to be extracted from the site. In fact, the facilitation of wetting of the site is supported by an adjacent landholder. Other sites where there are no works approvals include ID 2,911, ID 2,912 and ID 2,845. Given that no water is currently extracted from these sites, that no works can be given access to these sites without going through the WaterNSW approvals process and that the department state that the intent is to restrict new surface water supply works and trade, why are they being identified in the Gwydir Unregulated WSP 2025?

Although the Department claim that there will be no implications for land use, landholders either adjacent to or with existing wetlands on their properties are already facing impacts in the management of their country. A member of the organisation has not been able to get a

commercial spray applicator to spray an area of his property. The property is adjacent to an existing wetland, although the application was not intended to be in close proximity to the wetlands site.

The practical implications of Department decisions are more far reaching than the department is acknowledging. Our members are concerned as to how these rules may be interpreted or adjusted in the future.

Although we do not support the inclusion of wetlands on private land in the Plan, if the Government insists on their inclusion, we would like to have all these uncertainties properly addressed prior to the Government proceeding with the inclusion of any wetlands into the Water Sharing Plans for the Gwydir Unregulated River Water Sources 2025 or the Gwydir Regulated Water Source.

Recommendation

- 1. We request that any wetland identification not be included as a component of any Water Sharing Plan (WSP) regulated or unregulated now or at any time into the future as it adds no benefit to the public given that any changes to water access in WSP is already accounted for.**
- 2. We request clarity on the financial, legal and production implications of gazetting wetland sites as members have major concerns as to how rules may be interpreted or adjusted in the future.**

Principle 5: Consultation with business, and the community, should inform regulatory development.

There was no consultation with business nor the community prior to the release of the public exhibition draft Water Sharing Plan for the Gwydir Unregulated River Water Sources 2025. We note that the government indicate that they have written to individuals who have unregulated entitlements and are impacted by proposed new wetlands. Many impacted landholders are not unregulated entitlement holders and to the best of our knowledge have not been notified that there are proposals for newly prescribed wetlands on their properties. This is unacceptable.

We would argue that it is not appropriate to gazette wetlands on properties, without the consent and support of the individual landholders. We raise this as we feel it is relevant now, with the proposed inclusion of an additional 36 wetland sites in the most recent (March 2025) public exhibition draft of the Water Sharing Plan for the Gwydir Unregulated River Water Sources 2025 and with the inclusion of the sites identified in the 2012 plan.

The identification of 37 Sites in the earlier 2012 version of the Water Sharing Plan for the Gwydir Unregulated River Water Sources is of concern. Following consultation with landholders impacted by the identification of the Mallowa Wetlands as detailed under Schedule 4, we believe that at least some of the landholders were not consulted individually, although there may have been some more general consultation.

We are unaware of the level of engagement or consultation with landholders for any of the 37 sites listed in Schedule 4 or Schedule 5 in the 2012 plan. With this in mind we request that the Department consult with all landholders directly and that ground truthing of wetlands include all sites gazetted in all earlier versions of the Gwydir Unregulated Water Sharing Plan. If these

sites remain in the Plan, we ask also that it be confirmed that these sites do in fact fit the classifications adopted in this draft.

We reiterate our first recommendation:

1. We request that any wetland identification not be included as a component of any Water Sharing Plan (WSP) regulated or unregulated now or at any time into the future as it adds no benefit to the public given that any changes to water access in WSP is already accounted for.

Recommendation

- 3. Although we do not support the creation of wetlands on private land, we request that the Department consult with all landholders directly and that ground truthing of wetlands include all sites gazetted in all earlier versions of the Gwydir Unregulated Water Sharing Plan.**
- 4. Although we do not support the creation of wetlands on private land, if the Department wishes to identify any new wetlands as a standalone process, unrelated to any Water Sharing Plan, the process must include individual consultation will all landholders likely to be impacted by the identification of a wetland, this includes all neighbouring landholders.**

The Department held two webinars. These webinars should have been managed more appropriately. The initial webinar failed to provide the necessary insight into how the wetland mapping was completed. The wetland webinar that was added following landholder feedback provided more insight, but was poorly facilitated, questions were claimed to be answered, when they were not. Some questions (mostly from effected landholders) were completely ignored. This has been followed by a third webinar, where the information presented was more useful, however once again the facilitation was poor. The way in which the department manages questions associated with webinar presentations need to improve as the current approach is not delivering to stakeholder needs.

We do thank the department for holding additional presentations on this topic at the NSWIC meeting in March and again online following that meeting. This provided good discussions and enhanced understanding and was well managed, Thank you

We acknowledge that the interactive map provided by the Department, was useful to assist landholders to determine if their country was impacted by the proposal. We believe that the interactive map is a supporting tool to an actual listing of sites. The existing Water Sharing Plan for the Gwydir Unregulated River Water Sources 2012⁷ includes specific listings in Schedule 4 and Schedule 5. These listings clearly identify the water source and the specific location utilising a Lot number and DP. We believe that the WSP Prescribed Wetlands Map⁸ under clause 7 in the public exhibition draft is not suitable as a mechanism to clearly identify wetland sites if not accompanied by a listing, there is a risk that the map could be altered without landholder knowledge. In addition, we note that the potential for mistakes is high, as demonstrated in the case of the initial map released in early November 2024 where there were significant errors (1,000's of hectares of errors).

⁷ [Water Sharing Plan for the Gwydir Unregulated River Water Sources 2012](#)

⁸ [draft-gwydir-unregulated-wsp-prescribed-wetland-map.pdf](#)

We have reviewed the map and have been able to count 61 sites included in the proposed Plan, which include four Ramsar sites, 21 previously listed sites and an additional 36 proposed new sites. A summary slide presented by the department at the NSWIC meeting in early March indicated there were 60. We also note that there are 37 sites listed in schedule 4 and schedule 5 in the existing WSP. This justifies the need to have the map as a supporting document to a detailed list.

Following ground truthing and consultation with landholders, despite not supporting the inclusion of wetlands on private land in Water Sharing Plans, if they are incorporated, wetlands should be included as a detailed list as part of the plan, supported by the map.

Recommendation

- 5. We request that following ground truthing and consultation with landholders, to confirm the existence of a wetland, if the Department continues to include them unnecessarily in Water Sharing Plans, then they should be included as a detailed list as in Schedule 4 and Schedule 5 of the Water Sharing Plan for the Gwydir Unregulated River Water Sources 2012 and be supported by the interactive map. We cannot accept a map alone as we have no confidence it will be tamper proof.**

4 About the GVIA

4.1 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 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 Shire⁹.

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 crops¹⁰.

The Gwydir is characterised as having low water reliability with most water held as general security water with a reliability of 36% (that means entitlement holders could expect in the 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, significantly reducing access

⁹ Cotton Catchment Communities CRC Communities and People Series 2009

¹⁰ 2010 2011 Agricultural Census Report – agdata cubes, 71210D0005-201011 Agricultural Commodities, Australia

for the region, 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.

Environmental water management is not new in the Gwydir Valley, we have had environmental water in one form or another since the construction of Copeton Dam in the late 1970's. Our region experienced rapid growth in the environmental portfolio from 2008 onwards with the purchase of licences by the NSW and Commonwealth Governments.

The Gwydir has had more environmental water recovered than required by the Murray Darling Basin Authority modelling and legislation. There is an additional 5,000 megalitres of water owned by Government's above the legislated amount for our region¹¹. The total volume of water available to be accessed by water entitlement holders has been reduced significantly over time due to reforms as outlined in Table 1: Summary of Water Reform.

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 |

¹¹ The Gwydir Valley has met the legislative requirements of the Murray Darling Basin Plan of 42,000 megalitres of LTDLE entitlement for local/instream environmental outcomes and a further 7,600 megalitres for shared contribution to the northern basin. The NSW and Australian Government's hold 54,600 megalitres LTDLE entitlements. Based on IQQM long-term modelling and the volume of water purchased for the environment

| Year | Program | Volume of entitlement |
|---------------|---|---|
| 2016 | Commonwealth infrastructure programs. | 4,508ML High Security 1,392ML General Security |
| 2022 | Licencing of Floodplain Harvesting in the regulated and unregulated water sources | 24.8% reduction equating 10.4 GL long-term take |
| TOTALS | | 5,757 High Security 156,617ML General Security (including ECA) 23,592 ML Supplementary |

Entitlements owned for environmental purposes total 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. Environmental water is primarily used to contribute waterbird and fish breeding events, to maintain the condition and extent of the Gwydir Wetlands. This significant environmental portfolio altered behavioural assumptions and influenced how the system operates, it has impacted what environmental and economic outcomes can be achieved and how the community is affected by the sharing of water resources. As the environmental water portfolio has grown, so has the application and use of environmental water.

As a result of water reform, only approximately 19% of the total river flows are available for diversion for productive use¹². This equates irrigators holding 575,000ML from regulated entitlement (high security, general security and supplementary water) and 28,000ML available from groundwater aquifers.

The reform was difficult as regional communities such as those of Collarenebri and Moree were forced to adjust to a region with less water, and less capacity to recover from droughts. The impacts of the reforms are still evident in these communities.

Changes in water availability either through climate or government policy has a direct impact on the productivity of the region and 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 region¹³. We are currently seeing this impact play out with ongoing social issues in our region.

¹² Based on IQQM long-term modelling and the volume of water purchased for the environment

¹³ Refer to the Murray Darling Basin Authorities Socio Economic condition reports, Social and Economic Analysis of the Moree Community, 2009. Cotton Catchment Communities CRC

[630-nbr-community-profile-moree-hr.pdf \(mdba.gov.au\)](https://www.mdba.gov.au/sites/default/files/publications/630-nbr-community-profile-moree-hr.pdf)

<https://www.mdba.gov.au/sites/default/files/publications/630-nbr-community-profile-collarenebri.pdf>

4.2 Our region's hydrology and geomorphology

The Gwydir River is an inland terminal river network classified as “distributary” network by the Murray Darling Basin Commission during water sharing plan development. The rivers become a series of branching channels that distribute flows across large areas especially during floods (MDBC, 2007a). This distribution of water represents the watercourse areas of Gwydir Wetlands. There are four parcels of land within the Gwydir Wetlands listed under the Ramsar Convention on Wetlands (MDBA, 2010c).

This natural geomorphology means the Gwydir River under natural conditions would have a very low ability to contribute to surrounding catchment inflows. The State of The Darling Interim Hydrology report puts the average percentage flow of the Darling River from the Gwydir River to be 12%, although updated estimates have this percentage between 8- 7% as reported in the Independent Assessment of the 2018-19 Fish Deaths in the Lower Darling. The low contribution, which is consistent with other terminal wetland systems, is a result of most of the water within the system flowing naturally towards the terminal wetlands and watercourse.

The natural hydrology has been altered via modification of the river and operations with an increase in end-of-system connectivity. This channelisation and re-regulation occurred throughout the last century to initially deliver regular stock and domestic water supplies to users and then to deliver irrigation water more efficiently. Flows are now regulated down the Mehi, Moomin and Carole, which can now join the Barwon River. However, even with these modifications there remains limited capacity to move water through these systems with channel constraints limiting the daily flows.

4.3 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 do this together by making every drop count in the river or the aquifer, on-farm, for the environment, or for our community¹⁴.

GVIA members hold entitlements within the Gwydir regulated and unregulated 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 regulated, unregulated and groundwater water entitlement. The levy is paid and supported on average by 85% of the eligible entitlement (excludes NSW and Commonwealth entitlement).

The Association's primary activities revolve around negotiating with government at a Federal, State and Local level to ensure equality and the rights of entitlement holders are maintained and respected. The core activities of the Association are funded entirely through the voluntary levy, the Association does however undertake programs and projects to maintain and improve

¹⁴ For more information, see our corporate video on <https://vimeo.com/177148006>

the sustainability of members on-farm activities, which can be funded by government or research corporations.

The Association is managed by a committee of a minimum 11 entitlement holders 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.

4.4 *Contacts*

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