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Department of Primary Industries - Water
PO Box 829
Albury NSW 2640
gwydir.gw.wrp@dpi.nsw.gov.au

LODGED VIA ELECTRONIC MAIL

Submission on 'Gwydir Alluvium Water Resource Plan – Groundwater: Status and Issues Paper'

The Gwydir Valley Irrigators Association is writing on behalf of our groundwater members to provide a brief submission on the 'Gwydir Alluvium Water Resource Plan – Groundwater: Status and Issues Paper' released in February 2017.

The GVIA are committed to assisting DPI Water in the development of a Water Resource Plan in an efficient and timely manner but want to balance this outcome with our interest in reviewing the region's water sharing plans. To that end, we have provided our advice on three emerging issues only, these are issues that have been identified following a review of the Status and Issues Paper. These issues are therefore, in addition to those outlined in our previous two submissions^{1,2} into the review of the Water Sharing Plan for the Lower Gwydir Water Source, which DPI Water received in 2015 and 2016 respectively.

The remaining issues outlined in the status and issues paper are acknowledged as appropriate for further assessment. It is our view that no issues have been missed as part of the Status and Issues assessment.

Groundwater dependant ecosystems (GDE): The GVIA notes that DPI Water have undertaken two projects separately to gain a better understanding of GDE in the region but has only provided the methodology report for one of the projects; being the 'Methods for the Identification of High Probability Groundwater Dependent Vegetation Ecosystems' report. We request the 'High Value Ecological Value Aquatic Ecosystem' framework in addition to an assumed, final methodology report that resulted in the outputs summarised within the Status

¹ GVIA, *Submission to the Department of Primary Industries – Water and the Natural Resources Commission on Review of Water Sharing Plan for the Lower Gwydir Groundwater Source*. 2015.

² GVIA, *Submission to the Department of Primary Industries – Water on Review of Water Sharing Plan for the Lower Gwydir Groundwater Source*. 2016.

and Issues Paper. Without this background information, it is difficult for the GVIA to assess the suitability of the methodology employed for determining GDE in our region, noting that each separate methodology has inherent limitations in the data output and that these were somehow combined to determine GDE location and extent.

We note within the Status and Issues paper summary that a large proportion of the GDE identified follow riparian corridors because of an assumption around shallow groundwater access, which is highly influenced by surface water availability. The current assumptions may stem from the GDE definition being “ecosystems that require access to groundwater to meet all or some of their water requirements to maintain their communities of plants and animals, ecological processes and ecosystem services”³.

With a regulated river source being the primary driver for water in many of the GDE identified, we question these outputs based on the low dependency of some. We believe that DPI Water should consider those ecosystems only, where the degree of dependency is high and there is no other major water source. The current results appear to overstate GDE and thus we have the large areas depicted within both the upper and lower Gwydir regions that we would assume are more dependent on surface water. Hence, we would recommend DPI Water map GDE for their dependency rating.

Such analysis could also help to streamline the risk assessment, where we would also assume that the risk assessment for surface water WRP will address those assets that are highly dependent on surface water. Therefore, the groundwater risk assessment should focus on those assets that groundwater can influence directly or has high dependency.

Cultural water: We note that the Status and Issues Paper and Appendix 1 and 2, provides significant detail on the Aboriginal values and uses for groundwater resources and issues. We welcome the constructive involvement of Aboriginal people in the water planning and decision-making process and support capacity building to enable that to occur whether through the AWI program or other mechanism.

We believe there is capacity for greater engagement of Aboriginal people in planning for water use, decision making and management but that there needs to be a shared understanding of the scope of involvement, as with other water users and interest groups. Government’s must clearly communicate the possible outcomes that involvement may bring and manage community expectations.

SDL Compliance: The GVIA requests analysis of the Sustainable Diversion Limit (SDL) compliance rules and their impact on past access as a precursor to future access arrangements. The changes are a substantial movement away from the current compliance system. We also request information regarding possible *reasonable excuses for non-compliance* with the SDL to be agreed with the Murray Darling Basin Authority.

Further to these issues, we seek clarification from DPI Water on their assessment of the long-term average annual extract limits and the commitment for NSW to provide WRP that meets the Basin Plan’s SDL. Whilst GVIA appreciates that the status provided is technically correct,

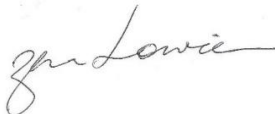
³ Department of Primary Industries, a Division of NSW Department of Industry, Skills and Regional Development. *Methods for the identification of high probability groundwater dependent vegetation ecosystems*. 2016.

it does omit that there is scope within Part 4 of the *Basin Plan 2012 (Cth)* where changes can be made to groundwater SDLs due to 'new or improved information'⁴ and that these changes can be up to '5% of the total groundwater SDL for the Basin water resources'⁵.

As outlined in our previous submissions to the review of the Water Sharing Plan for the Lower Gwydir Water Source^{1,2}, we believe there is a case for a review the extraction limits, requirements for environmental provisions and recharge estimates for the Lower Gwydir resource, resulting in new information that could justify a change. The magnitude of change being requested in the Gwydir is estimated to be less than a percent⁶ of the Basin's groundwater resources. We therefore, encourage the NSW Government to continue to allow the review of the WSP for the Lower Gwydir Groundwater Source as part of the WRP development process to assess such changes. Any changes should seek a triple bottom line and therefore, should aim to provide benefit to the community through sustainable and reliable agricultural production without impacting the environment or in this case aquifer integrity in the long-term.

We look forward to working with the Department and the other members of the Stakeholder Advisory Panel to develop the Gwydir Alluvium Water Resource Plan - Groundwater.

Kind regards



Zara Lowien
Executive Officer
Gwydir Valley Irrigators Association

⁴ *Basin Plan 2012 (Cth)* s7.24

⁵ *Basin Plan 2012 (Cth)* s7.26

⁶ Percentage change calculated as 0.17% of Basin groundwater resources, being 5.7GL (current environmental water provisions or 15% of the Lower Gwydir aquifer's sustainable yield) divided by the Basin Wide extraction limit of 3,334 GL