

[REDACTED]

From: Kathleen Gardner [REDACTED]
Sent: Saturday, 14 September 2019 3:59 PM
To: NRC
Cc: [REDACTED]
Subject: Submission of water sharing plan for Peel Valley

Please accept this submission from Wayne and Kate Gardner and Adam and Sarah Gardner of [REDACTED], Dungowan.

Introduction

[REDACTED] is predominately a fodder production property on the Peel River consisting of approximately 24 hectares of irrigated lucerne and 24 hectares irrigated summer/winter cereal crops. It also supports a small herd of cattle.

Currently [REDACTED] is supporting two families.

The following issues that affect the farm are listed below:

Extraction Limit

The long term average extraction limit of 6,100 ML needs to be addressed as the entitlement of licensed holders is currently 31000ML. It is our view that the limit of 6100ML is far too low for our industry and particularly our farm to operate.

Environmental Contingency Allowance

5000ML of environmental contingency allowance needs to be reassessed. The ECA was originally set at 1600ML annually, however, since the increase of the holding capacity of Chaffey Dam the ECA is now 5000ML. In addition to the ECA there has also been a further increase of 1257ML giving a total of 6257ML annually compared to the extraction limit for irrigators of 6100ML annually. As you can see there is a clear imbalance of resources between the current allocation for the ECA as opposed to the extraction allowance for the irrigators. Another consideration that needs to be addressed is water that is allocated to the ECA is only environmental water whilst it remains in the Peel River, once the ECA flows in to the Namoi River it is no longer treated as environmental water and is available for extraction by the Namoi Valley water users. We believe this is ridiculous, is it environmental water or is it not environmental water regardless of what river system it flows in to.

Available Water Determination (Allocation)

The rules for AWD for the Peel Valley are clearly laid out in the water sharing plan. For the 8 years following implementation of the Peel water sharing plan these rules have been applied. In 2018 the AWD was drastically changed to a much lower allocation all because one bureaucrat decided to view the water sharing plan differently, this resulted in 29% allocation (after revisions were made the allocation was increased to 38%) if the determination was applied correctly there should have been a much higher allocation of at least 54%. It is unacceptable for one individual's views to override the current water sharing plans regulations.

Storage set aside for Tamworth Regional Council (TRC)

In 2018 , Tamworth Regional Council sought the intervention of the then Minister for Water to amend the water sharing plan so that a greater proportion would be stored in Chaffey Dam for TRC. If this application had been approved ,instead of getting 38% of allocation , irrigators would have only received a 6% entitlement which would have crippled the irrigation industry.

TRC has been negligent in sourcing new water or using funds that was offered to them to increase Dungowan Dam , which is owned and operated by TRC. TRC are quite happy to use and abuse access to water in Chaffey Dam at the expense of the irrigation industry in the Peel Valley.


TRC should not be allowed to make applications outside the current water sharing plan regardless of how incompetent they have acted in the past in sourcing water.

Peel Valley Alluvial Ground Water Allocation

Under the current water sharing plan, Peel Valley Alluvial Ground Water Allocation is set at 51% plus whatever percentage allocation is applied to the Peel River. There should be no connection between alluvial ground water allocation and Peel River Allocation . Alluvial Ground Water needs to be set and remain at 100% regardless of Peel River Allocation.

Conclusion

We as a family feel that unless all of the above points are addressed and acted upon with a positive outcome for the irrigation industry within the Peel Valley, we believe the irrigation industry in the valley may well cease to exist. As the Peel Valley is a major source of fodder production for not only Tamworth Region, New England Region and beyond, it would be an absolute disgrace for the Industry to be allowed to cease to exist. Given that it produces fodder for not only the equine, but the cattle and sheep industry as well.

Thank you
Gardner Families

Dungowan
Sent from my iPad