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Sent: Thursday, 12 September 2019 2:21 PM
To: NRC
Subject: Submission to the natural Resources Commission

Subject - **Review of the Peel Water Sharing Plan**

The Regulated Peel's Long Term Average Annual Extraction Limit (LTAAEL) is unacceptable by any measure.

If this review of the Peel's Water Sharing Plan does nothing else, it is essential for the survival of the Regulated Water Users in the Peel Valley that the Peels LTAAEL is increased to bring it into parity with all of the other Regulated Valleys in the NSW portion of the Murray Darling Basin.

LTAAEL's were established to try to achieve the right balance between the Environment and socio economic outcomes associated with water extraction.

This was achieved in the other regulated valleys via extensive consultation through River Management Committees consisting of government agencies (Water NSW, Fisheries, EPA) Catchment Management, Local Government, Aboriginal representation, Regional Development, local and peak environmental groups and irrigation water users associations. These management committees met for day long meetings over 3 years around 2000 - 2003 with the Namoi Regulated Management Committee having 43 of these meetings. All aspects of River Management were dealt with in detail.

What happened in the Peel? An inexperienced inter-agency Panel consisting of three agencies, Water NSW, NSW Primary Industry and the EPA with the Catchment Management being present as an observer, determined the Peel WSP in great haste, little consultation and investigation in order for NSW Government to meet the deadline to access funding from the Federal Government.

The result of this unreasonable and inadequate process is the current Peel's WSP with all of its issues which need to be addressed in the same way that all other Water Sharing Plans were developed. The current rushed process being put forward by the Natural Resources Commission is totally unsatisfactory to the Peel Valleys community. But given that it is highly likely that the government bureaucrats are no doubt going to do the three monkeys trick with hands over their eyes, ears and mouths, I put forward the following Facts about the Peels Regulated LTAAEL. For you to address in this review in the hope that the review panel will read, listen and effectively communicate to the Peel Valley Community during the review of the Peel's Water Sharing Plan.

The Peel's LTAAEL is 15.1 GL with 9.0 GL attributed to town water use and 6.1 GL attributed to all other water users out of a total entitlement of some 48 GL which equates to 32% of total entitlement and only a 20% long term average use of General Security Entitlement. This is a disaster waiting to happen and if this is what the NSW Government want it should buy out the surplus General Security Entitlement at commercial rates

No other Regulated valley in the NSW Murray Darling Basin has an extraction limit to entitlement ratio anywhere near as low as the Peel as shown below.

TABLE 1 LTAAEL as a function of entitlement

Namoi 90%

Murray 81%
Gwydir 73%
Murrumbidgee 71%
Macquarie 58%
Lachlan 45%
Peel 32%

Why is it that the Namoi which is the same Murray Darling Basin Valley as the Peel has a LTAAEL of 90% of entitlement compared to the Peel at 32%? The LTAAEL within a Murray Darling Basin Valley should be constant not varying along the length of the Valley. If the Peel and Namoi were combined into a single extraction limit for the entire Namoi MDBA valley it would equate to an 81% access to entitlement for both the Peel and Namoi Water User groups. This would result in an LTAAEL in the regulated Peel WSP of 39 GL a much more viable number for the Peel Valley with no adverse environment or socio economic effects as demonstrated below

TABLE 2 Long Term Rolling Average as a function of LTAAEL

Lachlan 66%
Macquarie 66%
Namoi 69%
Gwydir 67%
Murray 82%
Murrumbidgee 91%
Peel 105%

Note 1. With a ratio of 66 - 69% a breach of the extraction limit is not possible hence there is no socio economic impact of reducing the Namoi's LTAAEL to accommodate the Peel.

Note 2. The Peel's long term average use 11491 ML ex Chaffey dam and 4300 ML from Dungowan = 15791 ML

This is a remarkable result. All of the Northern Valleys (except the Peel) - Lachlan, Macquarie, Namoi and Gwydir have effectively the same long term average use to extraction ratio of 66% - 69%. Anyone could be forgiven for thinking that the IQQM had been programmed to achieve this result. The higher ratios for the Murray and Murrumbidgee are no doubt a direct result of the better water security resulting from more reliable run off from the snow fields.

Why did the Peel miss out? Because the Peel's WSP was done 7 years after all of the other Regulated WSP were gazetted and different bureaucrats with different philosophies, attitudes and, methodology determined the Peel's LTAAEL under great duress to ensure that NSW did not miss out on the Federal Governments Funds. Note following the gazetal of the Water Sharing Plans in 2004, all of the Regional directors who worked so hard to convince the community that WSP's were the way to go were made redundant (speared) and the Mega - department of DLWC / DIPNAR disaggregated into the low morale, fragmented and disengaged shamozal that exists in the water bureaucracy that is in place to day in NSW.

The Peels LTAAEL should be at least the same ratio as all of the other Northern valleys ie 68% or an LTAAEL of 23 GL

Note 1 The current Peel LTAAEL at 15.1 GL represents 0.275% - **that's right a miserable 0.275%** of the combined 5,548,885 ML LTAAEL of NSW Murray Darling Basin Valleys.

The Regulated Peel could have an LTAAEL of 48 GL equivalent to 100% of its entitlement without any measurable impact on the MDB extraction limits. As this at less than 1% impact is well within the accuracy

of even the new fangled water meters let alone the ordinary metering which was used to calculate the current LTAAEL's with numerous unlucky carp stuck in the Dethridge wheels.

So there is no doubt that the Regulated Peel's LTAAEL should as a matter of urgency be combined into the Namoi Water source or increased to 23 GL to bring it in line with the extraction limits of all the other Northern Valleys.

Footnote

The Peel Water Source was to have been included in the Regulated Namoi Water Sharing Plan but about 8 months into the process the committee was notified by the DLWC that it did not have the resources to dedicate to the Peel because of the high work load associated with all of the other WSP's that the department had to deal with at the time. A decision, as it turned out to be, a disaster for the Peel !!!

Laurie Pengelly

