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SUBMISSION

Natural Resources Commission: Draft Water Sharing Plan Review

Barwon-Darling Unregulated & Alluvial Water Sources 2012

Draft Report

August 2019



Introduction

The NSW Irrigators' Council (NSWIC) is the peak body representing irrigation farmers and the irrigation farming industry in NSW. Our Members include valley water user associations, food and fibre groups, irrigation corporations and commodity groups from the rice, cotton, dairy and horticultural industries. Through our members, NSWIC represents over 12,000 water access licence holders in NSW who access regulated, unregulated and groundwater systems.

NSWIC engages in advocacy and policy development on behalf of the irrigation farming sector. As an apolitical entity, the Council provides advice to all stakeholders and decision makers.

Irrigation farmers are stewards of tremendous local, operational and practical knowledge in water management. With over 12,000 irrigation farmers in NSW, there is a wealth of knowledge available. To best utilise this knowledge requires participatory decision making and extensive consultation to ensure this knowledge can be incorporated into best-practice, evidence-based policy. NSWIC and our Members are a valuable way for Governments and agencies to access this knowledge.

NSWIC welcomes this public exhibition as an opportunity to share local, practical and operational knowledge and expertise in water management. NSWIC offers the expertise from our network of irrigation farmers and organisations on an ongoing basis to ensure water management is practical, community-minded and follows participatory process.

This submission represents the views of the members of NSWIC with respect to the Natural Resources Commission (NRC) Water Sharing Plan (WSP) Review of the Barwon-Darling Unregulated & Alluvial Water Sources 2012, draft report.

Each member reserves the right to independent policy on issues that directly relate to their areas of operation, expertise or any other issues that they deem relevant.



NSW Irrigators' Council's Guiding Principles

Integrity	Leadership	Evidence	Collaboration
Environmental health and sustainable resource access is integral to a successful irrigation industry.	Irrigation farmers in NSW and Australia are world leaders in water-efficient production with high ethical and environmental standards.	Evidence-based policy is essential. Research must be on-going, and include review mechanisms, to ensure the best-available data can inform best-practice policy through adaptive processes.	Irrigation farmers are stewards of tremendous knowledge in water management, and extensive consultation is needed to utilise this knowledge.
Water property rights (including accessibility, reliability and their fundamental characteristics) must be protected regardless of ownership.	Developing leadership will strengthen the sector and ensure competitiveness globally.	Innovation is fostered through research and development.	Government and industry must work together to ensure communication is informative, timely, and accessible.
Certainty and stability is fundamental for all water users.	Industry has zero tolerance for water theft.	Decision-making must ensure no negative unmitigated third-party impacts, including understanding cumulative and socio-economic impacts.	Irrigation farmers respect the prioritisation of water in the allocation framework.
All water (agricultural, environmental, cultural and industrial) must be measured, and used efficiently and effectively.			Collaboration with indigenous nations improves water management.



Overview

NSWIC welcomes the opportunity to provide comments on the Draft Report of the NRC Review of the Barwon-Darling Water Sharing Plan (WSP). This submission on the Draft Report, is subsequent to the NSWIC initial submission during the first round of public consultation to inform the Draft Report [available [HERE](#)]. NSWIC reiterates the concerns and issues raised in the first submission.

NSWIC and our Member Organisations have a proud history of contributing towards water management, for the benefit of local communities and riverine environments.

NSWIC is disappointed with many of the statements made by the NRC in the Draft Report. These statements overthrow the hard work and valued contributions by farming families, corporations and organisations over years of reforms, and perpetuate falsehoods around agricultural water users which are now rampant in the media. As a statutory review process, it would be inappropriate for NRC reports to be anything but objective, balanced, evidence-based and comprehensive. This is the expectation of NSWIC and our industry.

Whilst NSWIC agrees with a number (not all) of the recommendations in the Draft Report, it is crucial that these recommendations are presented in the full and appropriate context, to avoid misrepresenting the issue. This involves ensuring they are not cushioned in a sensationalist narrative, take account of measures already underway to respond to the issues, fairly depict the position of industry and communities, and are supported by robust evidence to understand the implications (including effectiveness and potential damages) of any changes.

NSWIC withholds specific comment on localised issues to our relevant Member Organisations whom have been actively involved in positive contributions towards water management in the area, and we advise the NRC to liaise with these organisations in finalising the report. NSWIC respects the Stakeholder Advisory Panel process, and notes the SAP is working through amendments to the current plan, and this process should be allowed to continue in its present form to ensure the local and practical knowledge of those on the ground can continue to positively shape water management in the area.

NSWIC welcomes further engagement with NRC to ensure the Final Report is as constructive as possible to improving water management in NSW.

Submission

Objectivity

From the onset, NSWIC has expressed concern about the challenging scenario in which the NRC Reviews of WSPs commence. Not only is there a sustained extreme drought across the State, but the media and politics has become rampant with emotionally fuelled falsehoods about irrigation farming. In this challenging context, it is critical that NRC reporting pays exceedingly close attention to remain based on the facts, unbiased evidence and utmost



objectivity to ensure that the recommendations and supporting text is factual and not building from unsupported flawed foundations.

As a statutory review, this must follow due process with no bias or prejudicial outcome.

Whilst it is common for the media to blame small irrigation communities for the drought (even when they have not been able to extract water for over 12 months), NSWIC expects only fact from the NRC. There is no tolerance for the NRC or any Government agency to simply scapegoat our drought-stricken farmers for what is an unprecedented climatic disaster.

NSWIC is concerned that the language of the NRC draft report is emotional and approaching sensationalist. This is not helpful for constructive policy discussions, nor is it appropriate for statutory reviews. Industry has been working hard to restore the social licence to operate, and having an NRC report perpetuating the narrative against agricultural water use would only be counterproductive towards these innovative efforts towards sustainable resource access for a successful irrigation industry. NSWIC kindly asks NRC to reconsider the light in which the irrigation industry is portrayed overall in developing the final report and welcomes NRC staff to meet with NSWIC staff and its members to ensure the representation is accurate.

Drought Impacts

NSWIC was deeply disappointed to see the NRC accuse water users of bringing the drought below Bourke forward by 3 years. It was further disappointing to then see this statement inappropriately referenced to the Vertessy Report, which (contrary to what the draft report suggests on Page 4) actually found that:

“Extractions in the Barwon-Darling have been found to represent a small proportion of tributary system inflows, even when inflows are small such as in 2017-18 (Figure 10). The analysis of extractions, mid-system flows, and tributary inflows into the Barwon-Darling suggests that the majority of impacts from extractions on Menindee inflows, and therefore Menindee Lake volumes, are from tributaries above the Barwon-Darling and not the Barwon-Darling itself”.¹

The crippling drought impacting across the Basin is severe and is now considered the worst on record. There has been less than 1% of typical inflows into the Basin (according to WaterNSW) which will of course cause a crisis for communities and the environment alike, no matter what rules are in place.

Water management becomes difficult, when there simply isn't much water to manage.

¹ See page 26.

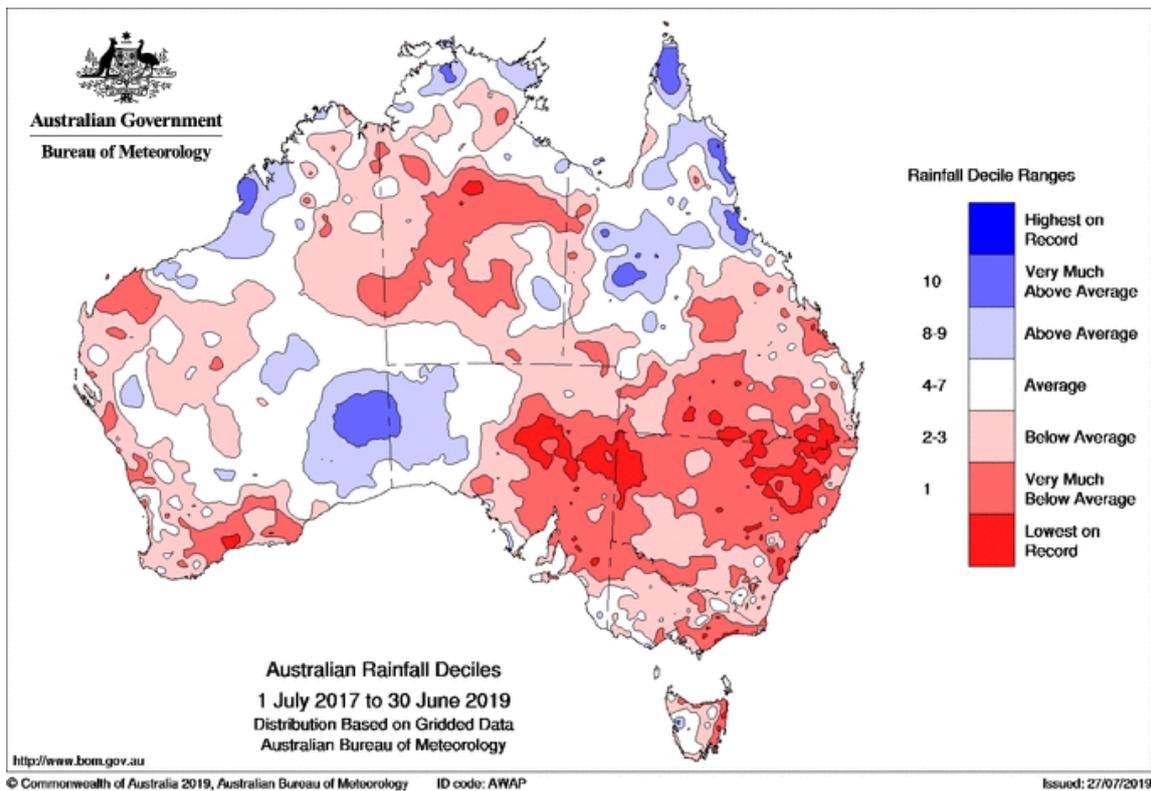


Figure 1: Bureau of Meteorology – 24-month rainfall deciles²

NRC cannot blame the drought on our farmers – who, like the rivers, are without water.

The lack of water available restricts the WSP from reaching its potential across every objective, and also restricts the connectivity of the system. The WSP is not a drought-proofing mechanism, nor was it intended to be, and it will not and cannot make it rain.

As a result of the lack of inflows, the Barwon-Darling has almost entirely ceased to flow. Aside from two environmental flows released from dams in 2018 and 2019, there have been no substantial inflows from the tributary catchments for almost two years.³ As a result of this, water users have not been able to extract water for well over 12 months. This is the rules, and the rules to which the irrigation industry respects and abides by. It is therefore grossly unfair, naive as well as factually incorrect to accuse water users of causing or bringing forward a drought.

² Bureau of Meteorology: <http://www.bom.gov.au/climate/drought/>

³ The only substantial flows in the Barwon-Darling above Bourke in the past 15 months were the environmental flows (Northern Connectivity Event 2018 and Northern Fish Flow 2019) that were released from the major headwater storages of Copeton Dam in the Gwydir catchment and Glenlyon Dam in the Border Rivers catchment.



Figure 2: Photograph near Walgett (December 2018) in the Barwon-Darling.

NSWIC is concerned that the extent and severity of the current drought, and the consequent impacts, are not adequately reflected in the draft report. Whilst admittedly the drought is not the only issue, it is a significant issue that greatly amplifies other challenges whilst also generating distress to all concerned. If the drought was not occurring, or was at least not as severe, many of the other issues would too be reduced in severity. NSWIC emphasises that farmers are amongst the victims of this drought, who are battling severe conditions in towns running out of water, and the towns are facing economic downturns and social crisis due to the lack of on-farm employment and economic activity resulting from the lack of water for production.

Recommendation: In the Final Report, NSWIC asks NRC to include a detailed acknowledgement of the current drought crisis, highlighting key facts and the impacts on water management, including:

- The volume of inflows into the Murray-Darling Basin overall (and specifically into the Barwon-Darling), and compare this to average figures as well as historical records;
 - According to WaterNSW, this is less than 1% of average inflows into the Murray-Darling Basin system.
- The extent of the drought in the WSP area:
 - Photographic images are advised to aid the public in comprehending the severity.
- The water allocations to irrigation farmers within the WSP within the time period of the WSP to date, including both the allocation (percentage of the licence able to be used) and the volume actually used – as well as the equivalent figures for environmental water use.



- Specifically note that: *“Irrigation farmers on the Barwon-Darling are also victims of the current drought and have not had access to water from the Barwon-Darling River since December 2017”*.

Unregulated River Systems

The Barwon-Darling is an unregulated river system. An unregulated river system is defined by the absence of a headwater dam to manage and control/regulate the river flows. As such, river flows rely purely on climatic factors like rainfall (minus the losses from the river system and extractions).

NSWIC is concerned that the nature, and thus limitations, of an unregulated river system is not appropriately captured in the Draft Report.

Given that Barwon-Darling river flows are not regulated by a headwater storage, there are no practical solutions to the hydrological drought in the Barwon-Darling River until climatic conditions change, rain returns, and tributary inflows return.

Whilst rules can be changed to manage the water that is available, there can be no measurable change until, very simply, there is water for those rules to be applied to.

Whilst in the Draft Report NRC describes the Barwon-Darling as a unique system whereby *“development of the water sharing plan is inherently complex”*, the final report would benefit from unpacking the nature of this complexity so that the limitations to change can be made clear.

Recommendation: Explain the nature and limitations of an unregulated river system so that it is clearly understood. For example: *“In an unregulated river system (where flows are not regulated by a headwater dam) the river flows are determined by rainfall (minus system losses and diversions). That means – if there is persistently no rain – there will be a crisis”*.

Water Use and Management in the Barwon-Darling

It is critical that the facts on water usage in the Barwon-Darling are identified from the forefront in the Final Report.

As is well understood, Australia’s climatic variability means that water availability greatly fluctuates. Consequently, water management rules and the practices of farmers in using water (across the State), have developed in respect to this climatic variability.

Put simply – when there is little or no water in the system, farmers do not and cannot extract water; but when water is available, some can be extracted under the rules.

This fluctuation is needed for both farmers and the environment (upstream, downstream and midstream). This means that demand on the system in critically dry times is reduced, and also that water is stored so that towns and farms can be resilient to the climate variability.



This particularly occurs in the Barwon-Darling area due to the lack of public water infrastructure (dams) to store water in the river system, and consequent need for on-farm water storages. This is an important characteristic to understand the nature of, and rules around, water management in the Barwon-Darling.

When this WSP was originally presented by the Department, it was premised on this need to allow flexibility during climatic extremes and mimic climatic variability.

Water users are not able to access their water allocations every year because flows are often below the *commence-to-pump thresholds*. These thresholds were developed in 1998 (adopted in 1999/2000) by the Barwon-Darling River Management Committee (with a diverse breadth of stakeholders from industry, environmental and First Nations representatives), and based on findings of a Scientific Panel.

These rules lifted the threshold pumping levels along the Barwon-Darling substantially above previous levels, to be more respectful to low flows by limiting extractions during these times. Specifically:

- A class at Bourke – raised to 350 megs/day past Bourke.
- B Class pumping threshold at Bourke – raised from 390 megs/day to 1,250 megs/day;

These rules were adopted into the 2012 Barwon-Darling WSP, with the NSW Government's Interagency Regional Panel and NSW Office of Water noting that: *"A review of environmental monitoring and associated research of the flow access thresholds adopted in 2000/01 revealed that these thresholds have and will continue to deliver in-stream environmental benefits for the Barwon-Darling River."*

NSWIC highlights to the NRC that water users cannot allow their water accounts to go into the negative, meaning the only previously accumulated allocations can be used.

NSWIC is aware that many of the water management practices, and the subsequent rules and regulations, are complex and poorly understood by the general public. It is important the final report explains the practices and rules, **including the history and reason for why they were developed**, in order for the issues to be truly understood and the recommendations fully evaluated.

Recommendation: In the Final Report, explain the reasons for current water management practices and rules, as well as provide data to show actual water use. For example:

- Average use to date, in the 6 years since the Barwon-Darling WSP was introduced (October 2012) has been well the expected long-term average use of just 111,000 per annum, and with consideration of the current water year (virtually 0 extractions) this figure is even less.⁴
- The extent of diversions in the Barwon-Darling, according to published MDBA figures, is just 0.5% of all flows in the Basin, and less than 2% of total Basin diversions.

⁴ NSW Water Registry data for the Barwon-Darling.



- With the introduction of Sustainable Diversion Limits (SDL) for the Murray-Darling Basin Plan, the Barwon-Darling SDL was set at the average annual long-term cap of 189GL (previously 523GL) less another 6GL local reduction under the Basin Plan.
- So far, the SDL reduction has been 32.6GL – more than 5 times the original reduction target.
- The cap limit of 189GL is under-utilised by irrigation farmers because the water simply isn't there. The current amount is 111GL, just 59% of the cap amount of 189GL.
- This underuse is highlighted by the cumulative cap credits⁵ for the Barwon-Darling/Lower Darling being 635GL.

Work already underway

NSWIC notes that many of the recommendations made by the NRC have already been addressed by the Stakeholder Advisory Panel (SAP) processes, or through existing or commencing Government programs.

The SAP includes broad community representation from various stakeholder groups along the Barwon-Darling, who are people who will be most impacted by changes to rules and operations. Many of these people have a long history of involvement in water planning for their area, and a vast knowledge of the needs in that system. Their knowledge and ongoing contributions cannot be overlooked. The current SAP process is working through amendments of the current WSP, and this process must be able to continue in its present form. NRC should closely work with the SAP process in finalising the recommendations.

The Final Report must note the Government work programs which have commenced, or will shortly commence, to ensure that the Final Report depicts an accurate and full representation, and ensure the report does not create unnecessary alarm and public inflammation by leading the public to believe an anarchical nature to water management in the region, which is simply not true.

Water is one of the most highly regulated resources in NSW. We are amidst an overhaul to the way water is managed in NSW. Whilst recently introduced measures will take some time to assess effectiveness – it remains important to note that they are occurring to avoid unnecessary public alarm and inflammation.

For example, in recent times (non-exhaustive list):

⁵ Cap-credit occurs when actual extraction is below the agreed limit of the Murray Darling Basin Cap on extraction. Under the *NSW Water Management Act 2000*, the Water Sharing Plan limits were set below each valleys cap, and therefore the difference between the plan limit and cap has resulted in all NSW valleys being in credit under this process. Note - cap credit accounting became obsolete with the shift to Sustainable Diversion Limits whereby all existing cap credits will be extinguished.



- In response to the Matthews Inquiry, there has been an overhaul of water compliance in NSW, with the establishment of the **Natural Resources Access Regulator (NRAR)**. There are firm, and strictly enforced compliance standards for water use (which is not only highly supported by industry but was called for by industry).
- The NSW Government has committed to a new **Water Reform Action Plan** – a robust new metering framework to improve the standard and coverage of non-urban water meters across NSW, which commenced on 1 December 2018.
- The NSW Government introduced the **Floodplain Harvesting Policy** in 2013 to stop unconstrained floodplain harvesting by bringing it into a licensing framework. This year, the NSW Department of Industry and the MDBA, commissioned an independent peer review of implementation of the Floodplain Harvesting Policy in northern NSW.
- An **independent assessment of social and economic conditions in the Basin** has just commenced, with an interim assessment due in December 2019, and final assessment report on 30 April 2020. The Panel's assessment will be used to support longer term efforts to monitor and understand social and economic conditions in the Basin, and the impacts of water reforms on Basin communities.
- **ACCC review of water market operations**, with the Terms of Reference announced in August 2019.
- The **Basin Plan Compliance Compact** was endorsed in December 2018 by the Council of Australian Governments, which sets out the compliance implementation framework which each jurisdiction must meet.
- The Australian National Audit Office is conducting an audit of the procurement of strategic water entitlements, which is due to report in December 2019.
- The MDBA has recently commenced a **Climate Change Research Program** in partnership with the independent Advisory Committee on Social, Economic and Environmental Sciences (ACSEES). We refer to the MDBA "Climate change and the Murray–Darling Basin Plan — discussion paper"⁶.

We are pleased to say that NSW is now considered a leader of many of the new reforms, such as being the strongest on compliance.

Whilst the system of water management is not perfect, and there remains work to be done, the work underway must be clearly communicated in the Final Report.

Emphasis on Compliance

The draft report does acknowledge some positive progress by Government (Page 2 of the Draft Report – *Positive progress is being made by Government*), however, NSWIC is concerned that the focus of this section is simply on compliance. Whilst it is important to highlight the critical progress on compliance, this distracts from the far broader improvements to water management in recent times. Further, the positioning of this work on compliance on Page 2 creates an implication that the severe issues outlined in Page 1 (and subsequently in the draft report) are the result of non-compliance and water theft. This is untrue and misleading.

Not only does this perpetuate the falsehoods of rampant water theft and unjustifiably misrepresents the sector, but also distracts from better understanding what the critical issues

⁶ MDBA, "Climate change and the Murray–Darling Basin Plan discussion paper". Available here: <https://www.mdba.gov.au/publications/mdba-reports/climate-change-murray-darling-basin-plan-discussionpaper>



for water management are and how they can be constructively addressed. This was clarified in the Matthews Final Report (*Independent Investigation into NSW water management and compliance - 2017*) which stated:

“Second, irrigators have expressed concern to me that the Four Corners program and my report have left an impression that non-compliance by irrigators is rife across the state. I want to make clear that that is not my view. The overwhelming honest majority of NSW irrigators take compliance seriously themselves and are firmly in favour of action against the small minority who may not be playing by the rules. They too, want the system fixed.”

NSWIC recommends that the extent of non-compliance (water theft) is outlined, as this is significantly lower than the public may otherwise assume. As of 2 July 2019, only 3 prosecutions for water theft had been made⁷. This is despite the tremendous (and much welcomed) efforts of NRAR with a strong presence both on the ground, and by monitoring water use through high-tech satellite use.

Industry has zero tolerance for water theft, and those found guilty should face the full force of the law, however, it cannot be blown out of proportion if we truly wish to constructively identify issues and their solutions.

Recommendations:

- NRC should closely work with the SAP process in finalising the recommendations, and ensure the current SAP process which is working through amendments to the current WSP continues in its present form.
- The final report must recognise that water management in NSW is in the early stages of an overhaul, with many newly commenced measures at both a State and Federal level. Details of these measures must be clearly outlined to accurately depict how issues are currently being managed.
- The final report should outline the extent of non-compliance, and (whilst ensuring text noting the positive progress on compliance remains) ensure it is not the centrepiece of the report as that would be inappropriate and misleading.
- Note that many of the new measures, particularly compliance, are not measures ‘done to industry’ but ‘called on by industry’ which have been welcomed and respected. The current narrative of this information is incorrect.

Socio-Economic Impacts

NSWIC does not believe that the value of irrigation is appropriately captured in the draft report.

Irrigation farmers are proud of their contributions to local communities, by providing employment on their farms, and the multiplier effects of this income throughout the town generating economic development for the community more broadly. Irrigation farmers are

⁷ <https://www.industry.nsw.gov.au/natural-resources-access-regulator/about-nrar/nrar-news/water-regular-marks-first-anniversary-with-an-80-percent-increase-in-cases-finalised>



also proud that their work enables people across Australia to have access to fresh food and fibre grown with utmost ethical standards of those involved in the production.

NSWIC advises NRC to examine the work conducted under the Northern Basin Review on the socio-economic impacts of water recovery for communities. NSWIC also encourages NRC to seek guidance from the Independent Panel conducting the Assessment of Social and Economic Conditions in the Basin.

NSWIC emphasises that without water in the system, the amount of water bought back will not make a difference. Any buy-back proposal should be supported by modelling to:

- Demonstrate how the proposal will make any substantial difference to river flows and overall river health during low-flow periods (such as the present) as value for money and ensuring objectives are actually met is critical; and
- Demonstrate the consequent socio-economic impacts through economic modelling of the flow-on effects from a loss of water from a town.

NSWIC notes that 32.6GL has been bought back from the Barwon-Darling under the Basin Plan.

Third-Party Impacts

Decision-making must ensure no negative unmitigated third-party impacts, including understanding cumulative and socio-economic impacts.

It is critical that any third-party impacts can be identified with confidence and specificity and justified or responded to accordingly.

It is a risk to the social licence of irrigation if public perception views irrigation as causing unmitigated third-party impacts to other water users (including the environment) downstream, upstream or mid-stream.

It is critical that the connectivity of WSP is fully understood, and further work may be required by Government to understand the interrelationships of WSPs within NSW.

NSWIC supports recommendations to improve modelling of the Barwon-Darling, noting this has been called upon by industry for years.

NSWIC has continued to call on Government to invest in using the latest technology to enable the public to monitor flows, such as satellite flow monitoring of water at a valley level. NSWIC has also called on Government to improve data availability through enhanced monitoring of unregulated river systems for the purpose of ensuring transparency and public confidence.

Specific Recommendations

NSWIC refers the NRC to the submissions provided by its relevant Member Organisations regarding the specific recommendations and how those recommendations will impact upon the people and environment in their local area.



In-principle, NSWIC welcomes recommendations based on improving engagement with communities, improving climate change considerations, improving engagement and outcomes for First Nations and improving the consideration of groundwater in the WSP.

NSWIC emphasises that industry expects the final recommendations to be supported by evidence to demonstrate their merit, and expected improvements from the recommendations if they were to be implemented. We note that the Department of Planning, Industry and Environment has provided the SAP with modelling on the expected outputs from changes to the plan, which is critical to give communities along the river an understanding of the benefits and costs of any changes. NSWIC members expect the same standard of information from NRC and ask for this to be included in the final report.

NSWIC also notes that the property rights of all holding water must be fully respected. This includes not only irrigation farmers, but environmental and cultural water holders, as a fundamental principle. Industry fully supports protecting environmental water that has been purchased by the CEWH, and in the same manner there must be full support to protect the water purchased by irrigation farmers. This shared respect of water holders is fundamental.

Media

NSWIC was disappointed with the way the media reported on the draft report, particularly the way irrigation farmers and the irrigation industry came to be portrayed. This undoubtedly has impacts on the social licence of irrigation, as well as the mental health and well-being of those in the area who have been repeatedly demonised by the media.

NSWIC believes that NRC has a responsibility to ensure balanced media reporting coming from the publication of sensitive and controversial areas of work as this. As there are several upcoming NRC reviews on other WSPs, it is critical that this process is a balanced statutory review, and not an opportunity for the misinformed media attacks on farmers to perpetuate. With the current media attention on water management, and the particular focus of many mainstream media outlets threatening the social licence of water for farmers, extreme caution must be taken to ensure the media cannot easily misconstrue or misrepresent the information presented.

Recommendations: NSWIC recommends that NRC actively ensure that balance is provided and that opportunities for the media to misconstrue or misrepresent information are limited as a preventative measure. This should include:

- Revisiting the wording of some of the most controversial areas to ensure balance is provided, and risk of misrepresentation by media is minimised.
- Adopting case studies of positive work being undertaken by industry. NSWIC has provided one example below and can seek further examples upon request.

Cultural Water

NSWIC agrees in-principle with the need to improve the engagement and outcomes of First Nations people.



NSWIC wishes to draw the attention of the NRC to an exciting and innovative project currently being investigated as a collaboration between NSWIC and First Nations to improve these outcomes.

NSWIC, in partnership with its Principle First Nations Advisor Feli McHughes, have formed a partnership to develop a project to improve cultural water management in the NSW Murray-Darling Basin.

The project is based on an award-winning pilot project of the Ngemba Old Mission Billabong, supported by CSIRO research, and seeks to replicate the method of billabong restoration to holistically self-empower the ecosystem and communities, to other billabongs within the Basin.

The project is intended to be part of the delivery of the National Cultural Flows Research Project⁸. Funding for the project is currently being sought.

The objective is to improve Indigenous water management by holistically self-empowering ecosystems and communities through billabong restoration, recognising cultural water values and interests, and allowing the cultural creativity of custodians to manage local environments through Community Development Employment Programs.

This is an important example of the collaboration required between First Nations, the agricultural sector and communities.

NSWIC and its Principle First Nations Advisor have met with the NRC following the release of the Draft Report, and further information has been provided.

NSWIC encourages NRC to use this as a case study of the successful and respected collaboration between the irrigation industry and First Nations. NSWIC seeks the endorsement of NRC for this project, to support this strong partnership between industry and First Nations.

NSWIC requests that NRC contact NSWIC prior to publishing any information regarding this project, as it remains under development, and further information can be provided upon request.

Recommendations: NSWIC seeks the endorsement of NRC for this partnership and encourages NRC to use their findings to assist with securing funding and support to further develop this partnership.

Conclusion

NSWIC welcome reviews of water management in NSW to ensure that scarce water resources are managed in the most effective and efficient manner, with the least possible third-party impacts on other users, communities and the environment. This is critical to evidence-based policy and adaptive management.

However, NSWIC does have a number of concerns with the Draft Report, largely relating to the unfair and incorrect depiction of the irrigation industry overall, and tendency for emotive

⁸ As being implemented by the National Native Title Council.



and sensationalist language that risks what must be an objective, balanced and comprehensive statutory review process.

NSWIC welcomes the NRC approaching NSWIC with any questions or requests for further information.

Kind regards,

NSW Irrigators' Council.