

16 March 2020

Bellinger Area WSP
Department of Planning, Industry and Environment
Level 3, 26 Honeysuckle Drive
Newcastle, NSW, 2300
bellinger.wsp@industry.nsw.gov.au

Comments on the Bellinger River Area Unregulated and Alluvial Water Sources Water Sharing Plan

Dear Bellinger WSP Team,

The NSW Irrigators' Council (NSWIC) is the peak body representing the irrigation farming industry with over 12,000 water access licence holders in NSW who access regulated, unregulated and groundwater systems. The Council is an apolitical entity that engages in advocacy and policy development on behalf of all our stakeholders.

This letter provides comments on the draft Water Sharing Plan (WSP) for the Bellinger River area. It represents the views based on overarching NSWIC principles and policies with respect to Coastal Water Sharing Plans.

We welcome the public exhibition of the draft WSP for the Bellinger River area and the opportunity it offers for providing input to achieve a water management process that is practical, community-minded and participatory for all the coastal water-users. The draft WSP needs to demonstrate clearly defined objectives that address economic, environmental, cultural and social priorities for the river. It is the view of NSWIC that these requirements have been considered in the draft WSP for the Bellinger River Area Unregulated and Alluvial Water Sources.

NSWIC nevertheless has concerns over the strategies for achieving some of the draft WSP objectives. The environmental objectives are reliant on volumetric strategies that are most likely to constrain access for productive water-users. Many of the approaches proposed in Chapter 10, Section 3 are most likely to further erode access for consumptive irrigation farming. For instance, Section 3a (page 9) preserves all water volumes in excess of the long-term average annual extraction limits (LTAAEL) for the environment but does not take into account the generally reduced allocations in recent years due to drought. The draft plan sets LTAAEL of 350 ML/year, which can possibly be increased to 1050 ML/year, for the Bellinger River Coastal Floodplain Alluvial Extraction Management Unit (Division1, Sec 28(2), page 72). These volumes are low compared with the 2519 ML of irrigation water used in the Bellinger Local Government area a decade ago¹, which was also just over half of the 4,643 ML total extraction from the Bellinger River Extraction Management Unit up to 2008².

¹ <https://www.abs.gov.au/ausstats/abs@.nsf/7d12b0f6763c78caca257061001cc588/a0f290f247b4efaeca25771300180450!OpenDocument>

² https://www.industry.nsw.gov.au/_data/assets/pdf_file/0010/166834/bellinger-background.pdf

Reliable water availability is a significant and ongoing concern for irrigation farming throughout the coastal catchments. The issue was stressed to Minister Melinda Pavey at the NSWIC General Meeting in March 2020 and to which she made a commitment to progress the harvestable rights as part of addressing water supply challenges on the coast. The provision in the draft WSP to restrict new developments of in-river dams on third-order streams or higher in several rivers and creeks (Division 2, section 46(1)) will only exacerbate poor water supply especially during droughts. The coastal catchments face an increasing challenge of meeting increased water demand from expanding population and from emergence and growth of new water-dependent industries. For instance, Bellingen Shire experienced a 1.2% population growth between 2011 and 2016³. The recent/present drought and predictions of more in the future means the water storage capacity needs to be expanded, whether in the form of individual on-farm or cooperative or public storages.

The proposed changes to access and trade rules should be approached with caution. At the first reading, it appears that the draft WSP will increase reliance on telemetric gauges mostly downstream from the current locations (page 5 fact sheet on the Proposed Changes⁴) and reduce the number of gauging points. Although these changes are being introduced in compliance with NRC recommendation, they are likely to threaten access for some current licence holders with changed cease to pump conditions. There is a need therefore to provide guidance for water-users on accessing these data and how they can be used for compliance with cease to take conditions.

We noted in an earlier submission to NRC on the review of Coastal Water Sharing Plans, how water trading and water markets in these coastal areas are stifled by fragmentation⁵. Coastal valleys are generally broken into small trading areas based on types of flows and a breakdown of the market system. This situation seems not to have been adequately addressed in the draft WSP. In fact, the parts of the legislation on dealings in water access are quite complex and intimidating to an average market participant, in this and similar catchments, as presented in the legislation⁶. A market participant must find and understand the total access shares accumulated in the access receiving Zone.

In summary, we recommend that:

1. a revision of LTAAEL taking in to account the pre-drought extractive water-use,
2. review of harvestable rights to address water supply challenges,
3. improve clarity on salinity monitoring and its application to cease to pump events, and
4. provide clear explanations on the operations of the water trade in the catchment.

We hope that the feedback provided in this submission will be a valuable contribution to the development of effective and efficient WSP for this catchment.

Yours faithfully,



Luke Simpkins
CEO

³ <https://www.bellingen.nsw.gov.au/news/2016-census-results>

⁴ https://www.industry.nsw.gov.au/_data/assets/pdf_file/0006/290076/proposed-changes-bellinger-area-unreg-alluvial-wsp-replacement-fact-sheet.pdf

⁵ <https://www.nswic.org.au/submissions-2019/>

⁶ <https://www.legislation.nsw.gov.au/#/view/regulation/2008/203/part12/sec73>

