

Sarah Moles



Tuesday 17 July

NSW Department of Industry – Water

By email to: [ltidle@dpi.nsw.gov.au](mailto:ltidle@dpi.nsw.gov.au)

Re: NSW updated factors for water recovery

Dear sir / madam,

I am writing as a longterm member of the Gwydir ECAOA Committee and a former member of the MDBA's Northern Basin Advisory Committee.

Cap factors have been a long-running and complex issue within the MDB Plan process. The term 'cap factor' has been used inter-changeably with 'conversion factor', 'long term average cap equivalent' and long term annual average extraction limit (LTAAEL). There may be others. To the best of my knowledge, none of these terms has been specifically defined and the fluidity of their use has done much to muddy the waters (puns intended!)

Not only has there been no apparent consistency in the interpretation of a 'cap factor', there has been little or no transparency in the approach to defining a cap factor. The discussion paper does not make the methodology clear and suggests that a different set of cap factors will be established for the northern and southern basins. This will only serve to increase the inconsistency in approach.

Many in the MDB community are concerned that different cap factors have been used to estimate the volume of recovered water through infrastructure projects and that this approach is maximising volumes for the purpose of extraction and minimising the volumes to be returned to the environment. Furthermore, a different set of reliability factors appear to have been used for extractive licences and those used to calculate environmental recovery for general security and supplementary allocations.

The proposed changes to planning assumptions of the yield of some entitlements in the Macquarie and Gwydir valleys bears no relationship to the condition and environmental watering needs of the Ramsar listed wetlands in those catchments. The SDLs need to be based on achieving ecological outcomes, not models of questionable accuracy

I am particularly concerned that the updated set of factors do not reflect the use of best available information. The history of all water take has been incorrectly calculated in the Northern Basin because the volume of floodplain harvesting extraction in the Border Rivers, Gwydir, Namoi, Macquarie and Barwon-Darling is not included in the planning assumptions.

It is my understanding that there is no metering of floodplain harvesting diversions and that estimates are likely to be gross under-estimations. It is suggested in the draft NSW Floodplain Harvesting Implementation Policy that the short term average floodplain harvesting take during the relatively wet period 1998- 2013 gives a more accurate representation than the long term annual

average. But there is not a shred of evidence nor data is to back up this claim and the analysis of flow data do not show this.

In discussion with some of my departmental colleagues they have opined that it is very highly likely that the proposed entitlements and rules for floodplain harvesting in Gwydir will trigger very significant growth in flood plain harvesting in the valley. The proposed measures will not be sufficient to control this growth and the impacts – on an already over-allocated system will not become evident until long after they have occurred.

Finally, a crucial concern for landholders and particularly on the Barwon-Darling is the reliability of stock & domestic and town water supply will decrease under the new factors.

I look forward to the existing cap factors being upheld.

Thank you for the opportunity to comment.

Yours sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the bottom, positioned below the text "Yours sincerely,".