

MURRAY VALLEY PRIVATE DIVERTERS (INC)

NSW Murray Valley

13th July 2018

Mr Jeremy Kinley

Manager Snowy Water License Review

Intergovernmental and Strategic Stakeholder Relations/Water

NSW Department of Industry

Dear Mr Kinley

Murray Valley Private Diverters (Inc) represents the interests of direct river pumpers and smaller irrigation schemes in the Murray Valley (NSW).

We are a member of NSW Irrigator's Council and acknowledge comments made currently and previously on behalf of irrigators more generally in NSW.

Murray Valley Private Diverters (Inc) (MVPD) however wishes to raise specific issues of concern that will need to be addressed in any review of the Snowy Hydro License as it affects the NSW Murray Valley.

We encourage the NSW Government to continue direct discussions with MVPD as our members are directly affected by any changes in water management, including the Murray Darling Basin Plan, operations of Hume Dam, Dartmouth Dam and Snowy Hydro. With structural changes to NSW DPI, increasing dialogue on the complexities and specific issues that are unique to this area, is seen as critical with the newly formed NSW Department of Industry/Lands and Water.

The NSW Murray Valley is widely recognised as incurring higher social and economic impacts as a result of the Murray Darling Basin Plan. This is confirmed both in Murray Darling Basin Authority (MDBA) reviews and independent reports conducted by Rendell McGuckian jointly commissioned by stakeholder's interests, in the NSW Murray Valley.

Any adverse changes to the Snowy Hydro License may add to the cumulative risks already experienced and identified in the future stages of the implementation phase of the Basin Plan, in NSW Murray region.

Changes to major Southern storage operations and to Murray River operations (ie changes in flow patterns and/or elevated flooding risks) can impact both the property rights of water and/or land property rights of our members.

The impacts are separate to other identified concerns such as those in the major irrigation schemes such as Murray Irrigation Limited. This is because MVPD members are direct pumpers on the myriad of water networks in the Murray, Edward Wakool system.

Changes to Murray River operations can impact timing and availability of water orders in the Murray and Edward Wakool region.

Alternatively, changes can have significant implications for flooding risks which can have major adverse impacts on this region.

In 2017 NSW DPI called for submissions to the 10-year Snowy Water License Review however consultation and detailed discussions on issues needed to be further explored.

During that period MVPD was also aware that a wide range of issues including the Basin Plan, NSW Departmental structural changes etc created challenges in expectations for stakeholder consultations.

Consultation:

We encourage the NSW Government to have direct discussions on the details of the proposed changes to the Snowy Hydro License and for continued dialogue on an ongoing basis to address specific risks in the NSW Murray region.

We acknowledge the role of NSW Irrigator's Council, however we would like to stress the importance of direct discussions/consultation on issues affecting NSW Murray, directly with stakeholders in this region.

There is considerable merit in avoidance of risks and finding the best possible methods to meet the electricity, operational and other existing license conditions of Snowy Hydro.

Improving capacity to work through the details of proposed changes directly with stakeholders affected by the decisions would be mutually beneficial.

Therefore, we strongly support direct and detailed consultation, with MVPD on any proposed changes to Snowy Hydro License, on any proposed changes as part of the Sustainable Diversion Adjustment Projects and any related decisions relevant to releases of environmental flows.

MVPD also seeks direct consultation to improve understanding of cumulative risks arising from the Basin Plan, SDL Adjustment Mechanism Projects, Snowy Hydro license changes and Commonwealth Water Holder's decisions on environmental flows.

MVPD is concerned there is a perception that the SDL projects business cases affecting NSW Murray have gone through detailed consultation with stakeholders.

This is not the case!

A number of NSW and/or joint NSW/Victorian Business cases have not been provided at all, a number have not been agreed to and risks assessments were done internally by NSW DPI at the time.

Given the complexities associated with the NSW Murray Valley and related risks, MVPD does not support the view that adequate risks assessments have been done.

Of note also :

- DPI Risk Management Workshop (joint Murrumbidgee/Murray Stakeholder workshop) prevented any inclusion for risks assessment on projects affecting NSW Murray (*NSW Murray Region is likely to incur the majority of risks*)
- A number of SDL projects that have direct linkages were not developed in unison. An example of this is the Hume to Yarrawonga Constraints Management Project being developed separately from the Yarrawonga to Wakool Junction SDL projects.
 - Note: the two Murray River reaches cannot be developed in isolation of each other
 - Note: in addition, the Hume to Yarrawonga project describes the downstream flow for the Murray River at different heights from the Yarrawonga to Wakool Junction project
 - *Note: Incorrect assumptions have also been made on levels of stakeholder support for proposed flow heights for the Murray River*
- Flood risk assessment or management options have not been considered in SDL projects
- Business cases can only be described as ‘concept plan’s yet it is unclear whether proposed decisions will affect Snowy Hydro license conditions

Public Reporting

MVPD is keen to create ongoing dialogue with the processes for preparing and implementing Snowy Hydro Annual Operating Plans. This is critical for the Murray and Edward Wakool System because of the complex nature of this region.

We encourage the NSW Government to improve communications prior to and post Water Consultation and Liaison Committee (WCLC) meetings to ensure sufficient information is obtained prior to decisions (*note direct consultation with regional stakeholders impacted by decisions*)

Communications:

MVPD considers it is vital to improve communications between Snowy Hydro, the Murray Darling Basin Authority (MDBA) and Water NSW on Snowy Hydro operations and releases.

MVPD sees this as critical to avoid any reduced reliability in NSW Murray General Security entitlement yield.

It is also seen a vital to avoid miscommunications, in the event of managing flooding risks.

The 2016 catastrophic flood affecting the NSW Murray region from Albury (Murray River) and Edward Wakool River system highlights the range of risks both in terms of management decisions by the MDBA, communications issues between Snowy Hydro, MDBA and Water NSW.

There needs to be a complete review of that 2016 Murray Flood and the *Lessons Learnt* document as it is seen as grossly inadequate to review past and future risks.

River Murray Increased Flows:

MVPD encourages direct and detailed discussions on any proposed changes to Snowy Hydro License conditions that result in changes to Murray River operations (*both higher and lower water release implications*)

It should be noted that while there may be a level of support for such options in other NSW Valleys or at NSW Irrigator Council level, MVPD contends no amendments should be made unless specific issues of risks are worked through directly with those affected by the proposed changes.

To date such detailed discussions have not occurred and therefore it would not be appropriate to include such changes in Snowy Hydro license until these issues are fully explored.

MVPD understands that a proposal to call out approximately 70GL is being considered however there is insufficient detail/discussions to know whether it is confined to the 70GL (Snowy River Water recovery) , whether there are other proposed parcels of water for release and the timing of such releases.

MVPD therefore is concerned that without detailed consultation on the proposals directly with stakeholders, decisions should be delayed until further discussions have explored both potential positives and negatives of such concepts.

Required Annual Releases:

MVPD does support investigations for increased flexibility associated with the RAR on the basis that there would be no detrimental impacts to property rights of water entitlements and/or land property rights.

Flexibility with RAR's can potentially assist yield on Murray General Security Entitlements if there was sufficient flexibility to preserve water in Snowy Storages in wet years and maximising water yield on water entitlements in dry years.

MVPD is extremely concerned that Murray GS entitlements have and will be subject to a range of influences affecting yield and accessibility. This includes decisions relating to modelling of dry sequence inflows, assessment of storages under climate change predictions, management of resources in high rainfall years and provisions for the environment.

It would be particularly beneficial to explore all avenues to maximise early season allocations and flexibility on decisions for RAR may enable this to occur.

MVPD is concerned however if any changes to the RAR negatively impact Murray River flows.

- Timing of releases is seen as critical to underpin flow regimes in the Murray and Edward Wakool system having direct implications for water orders (*eg dropping Murray River levels can prevent access to entitlements*)
- Timing of releases in wet years can have major implications for elevating flooding risks

MVPD strongly encourages direct discussions on these risks to further explore potential benefits.

Evaporation:

It is not clear whether revised evaporation modelling would have implications (positive or negative) to assumptions made by the MDBA when developing the Murray Darling Basin Plan.

Changes to assessment/modelling of evaporation may mean NSW General Security is disadvantaged where outcomes could negatively impact yield (ie allocations). At this point it is not possible to be informed on the risks.

MVPD encourages consideration at all levels of Governments /departments, to adequately assess and explore options for reduced evaporation, including in the Lower Lakes in SA. The evaporative losses in the Lower Lakes is seen as a major omission in the MDBA Basin Plan management decisions yet is critical in overall water management decisions affecting Murray River operations.

Any assessment on evaporation for example at Menindee Lakes, should also involve an assessment of evaporative losses on the Lower Lakes (SA)

In addition, there remains considerable uncertainty about details of proposed SDL Adjustment Projects including the Menindee Lakes Project. Therefore, any assumptions/modelling changes on evaporation need to be carefully explored prior to decisions.

Unused spills:

MVPD has not had sufficient explanation of the implications of Snowy Hydro proposed changes to 'unused spills'

We believe therefore given the risks to MVPD members, direct discussions are required to provide explanation on proposed changes and issues of risk need to be fully explored prior to any decision

Wet sequence provisions:

MVPD has had no direct notification or discussions on any proposed changes under Wet Sequence Provisions.

MVPD reinforces why wet sequence management is critical to the NSW Murray and Edward Wakool Region but can only make a limited response in the absence of actual details.

- Flooding impacts can occur via Hume Dam releases and or combination of Dartmouth and Hume operations
- Flooding impacts can occur via Victorian unregulated tributaries eg Ovens, Kiewa
- Flooding impacts /risks are elevated depending on flow heights of the Goulburn River (Vic) Note: 50 – 83% of Murray River flood water can be diverted into the Edward Wakool system depending on flood /wet conditions in the Goulburn River
- Flood impacts can occur from singularly or from a combination of all above points

Flooding impacts have direct correlation also in relation to whether major regional Forests (eg Barmah Millewa /and /or Perricoota Koondrook and/or Werai have experienced wet or dry conditions:

Pre Wetted conditions have major implications for flood risks and heights.

- Natural rainfall or high river events
- Release of environmental flows

MVPD seeks direct consultation on any proposed changes in relation to Wet Sequence Provisions

CUMULATIVE CHANGES:

MVPD considers it is vital that a comprehensive risk management assessment is developed in consultation with stakeholders, to ensure that there is sufficient consideration of the cumulative impacts of proposed changes arising from the Basin Plan, Snowy Hydro License Review and the future releases linked to the Commonwealth Water Holder.

MVPD does not believe this has occurred and the limited internal departmental risk assessments are not sufficient to fully informed decisions.

On this basis, MVPD urges NSW Government and relevant departments to prepare a risk assessment that incorporates the following:

- Reliability impacts on NSW General Security Entitlements including any implications on accessibility (ie capacity to meet water orders)
- Cumulative risks to irrigation entitlements (Snowy Hydro license changes, Basin Plan)
- Flood management implications, risks management and decision framework

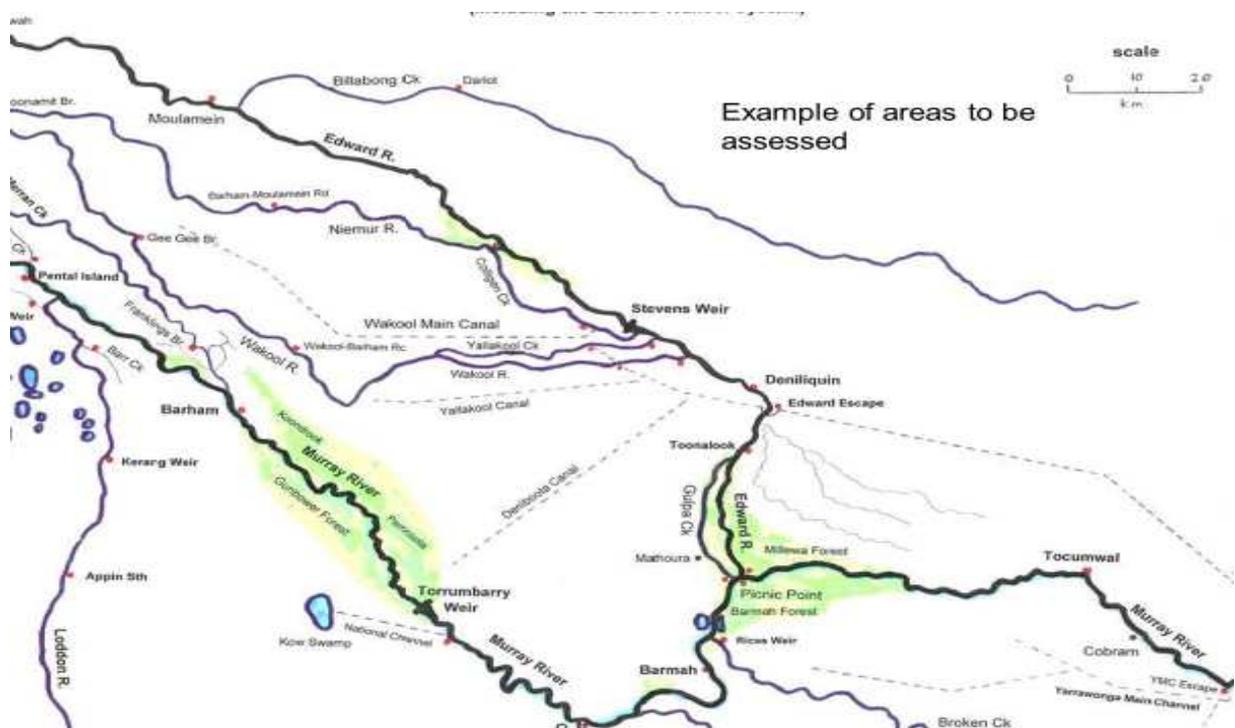
MVPD welcomes the opportunity to work collaboratively with you to progress areas of concern and explore potential options to improve opportunities for the NSW Murray Valley.

Yours faithfully

Louise Burge

Executive Officer

Murray Valley Private Diverters (Inc)



map of region

