

Peel Valley Water Users Association Inc

The only organisation that represents the Irrigation Industry in the Peel Valley



Submission to the MDBA on the topic of the proposal to recover a further 8,800ML From the Namoi/Peel Valleys

Background information:

For all purposes other than the Murray Darling Basin Plan, the Peel Valley is treated as a separate valley from the Namoi Valley.

The Peel Valley has its own Water Sharing Plan, it has its own pricing structure, and it is managed as a separate valley for all water allocation and distribution purposes.

The Murray Darling Basin Authority is now apparently seeking to recover a further 8,800ML of water for the environment from the combined Namoi Valley and Peel Valley.

The Peel Valley Water Users Association represents the interests of irrigators in the Peel Valley. Tamworth Regional Council is a major stakeholder in regard to access to regulated water in the Peel River, but because Local Water Utilities are exempt from reductions in access to water, the Peel River irrigators are the only party that is impacted by any proposed reductions in the amount of water that is available for productive agriculture.

During the development of the Murray Darling Basin Plan, and since the implementation of the Plan, the Peel Valley irrigators have consistently been assured in writing that no additional water will need to be recovered from the Peel Valley. We have documentation from various MDBA staff assuring our Association that no water will be recovered from the Peel Valley, and despite the fact that we were not permitted to be represented on the Northern Basin review we have a commitment from that review that no water will be recovered from the Peel Valley. Further, we have documentation that assures the irrigators in the Peel Valley that no additional water will be recovered from the Peel Valley as a result of the new 2018 'factors' that have been developed by the MDBA to assist in the determination of the water that is to be recovered from each valley in order to meet the Basin Plan requirements.

With the above assurances taken into account, we are confident that the MDBA will abide by the commitments that have already been made to the PVWUA in writing.

Therefore, we are submitting the following reasons in justification of the fact that no additional water needs to be recovered for the environment from the Peel Valley, and we are doing so to remind all participants in the decision making process – particularly those in new positions - of the commitments that have previously been made regarding the Peel Valley.

Reasons why the Peel Valley should not be called upon to contribute any more water to the environment:

1. The Peel River already contributes 95% of the average annual end of stream flow to the environment and downstream users – the irrigators and Tamworth Regional Council combined use less than 5% of the water in the Peel River. Therefore there is no justification for any further contribution of environmental water from the Peel Valley.

If every valley in the Murray Darling Basin equally contributed 95% of the end of stream flow to the environment, then the Murray Darling Basin Plan would be simple.

2. There is currently 6,257ML of environmental water annually in the Peel River – 1,257ML which is held by the Commonwealth Environmental Water Holder as a result of the STBIFM Funding Program, and 5,000ML which is held by NSW Office of Environment and Heritage under the Water Sharing Plan.

The Peel Valley already contributes a massive amount of water towards the environmental needs of the Murray Darling Basin, bearing in mind that the irrigators' Long Term Average Annual Extraction Limit is just 6,100ML. That is - 6,257ML for the environment, versus 6,100 for productive agriculture.

Instead of recovering more water from the irrigators in the Peel Valley, we believe that there is a genuine case for returning more environmental water back to productive agriculture in the Peel Valley – the system is out of balance.

3. The extraction limit relative to the average use is wildly out of perspective between the Peel and the Namoi Valleys.

The Peel Valley has already often breached the long term annual average extraction limit, while the Namoi Valley still has plenty of room to manoeuvre before it remotely approaches their extraction limit. Therefore, any recovery of water for the environment from the Peel Valley will drastically impact the Peel Valley, compared to having virtually no impact in the Namoi Valley.

4. General Security Entitlement holders in the Peel Valley have a total entitlement of 31,500ML yet can only access 6,100ML annually under the Water Sharing Plan. We are already enormously penalised by the low level of access relative to our entitlement under the Water Sharing Plan, and no further penalty can be justified.

Conclusion

The members of the Peel Valley Water Users Association soundly reject any possible recovery of additional water for the environment from the Peel Valley for the foregoing reasons.

If the MDBA has any intention to alter the long standing position that has been established by the MDBA in regard to the need for no further recovery of water from the Peel Valley, then the PVWUA requests that appropriate opportunity is given to the PVWUA to discuss the matter with relevant members of the MDBA before any final decisions are made.