



# National Irrigators' Council



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cc. Carl Binning – MDBA  
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Dear Rachel

National Irrigators' Council would like to indicate our support for the points made in the NSW Irrigators' Council submission regarding the NSW updated factors for water recovery.

NIC certainly has had reservations about recalculation of cap factors. In particular, for Southern Basin Rivers.

However, we do broadly accept the fact noted by NSWIC (and CICL) that achieving factors that are as realistic as possible should reduce the possibility of post 2019 water use exceeding the relevant SDL.

In accepting this point, we do endorse concerns about the failure to separately estimate extractive and environmental water use. It does not seem logical to assume that the patterns of use are the same. The concern in the longer term is that if environmental use is higher than the estimate (as would seem possible) less water will be available for consumptive use.

NIC endorses the recommendation NSWIC has made in this regard that the *“NSW Government, in conjunction with the MDBA, develop a mechanism to manage the risk of growth in use of the held environmental water holdings.”*

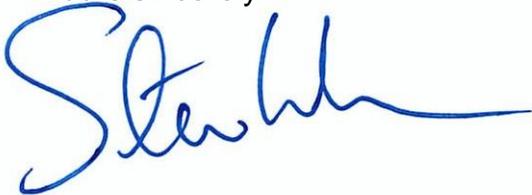
We have an ongoing concern about the impact revised cap factors will have in the Southern Basin particularly on water recovery targets including the 450GL of so called 'up-water' and the 605GL of SDLAM projects.

NIC endorses the points made by NSWIC on dealing with over-recovery we would urge the Commonwealth to provide some clarity on this issue.

NIC notes we have not seen a similar public process for calculations from Victoria and South Australia, however we have been informed that South Australia has revised its figure. NIC would appreciate confirmation and some public information on methodology for both States from the MDBA.

As mentioned above the NIC supports the points made in the submission from the NSWIC.

Yours sincerely



Steve Whan  
CEO