



Re: NSW updated factors for water recovery

Please find attached a submission from Ramps Ridge Pty Ltd regarding the new cap factors produced for the Redbank North area of the Murrumbidgee Valley.

We believe that the Redbank North area as a whole, and more specifically the Lake Marimley area within Redbank North, may form an important part of future water recovery in the southern valleys of NSW, should the SDL adjustment package not proceed as expected or fail to yield the water saving equivalents originally estimated.

Ensuring that the Redbank North cap factor genuinely represents the appropriate history of utilisation and that the option to apportion usage against the Lake Marimley Water Access Licences remains an option, may be important in optimising the potential value of this area in any future water recovery to NSW, should the need or opportunity arise.

Our submission contains three recommendations:

- 1. That the apportionment of modelled diversions between Redbank North and South be recalculated on the basis of historical diversions, consistent with the approach taken for factors elsewhere in the Murrumbidgee Valley.**
- 2. That DoI Water provide further information about how the change in modelled diversions for Redbank North has occurred, and;**
- 3. That DoI Water establish a separate water recovery factor for the Lake Marimley property, with an appropriate extension to the deadline for submission of the history of use data to support the calculation of a factor.**

We would be happy to discuss our submission in person with the appropriate staff from DoI Water and look forward to your favourable response to our recommendations.

Yours faithfully

Ron Harris
16 July 2018

Submission on updated NSW factors for water recovery

Thank you for the opportunity to provide input to this very important process.

The proposal to determine factors for supplementary access licences based on modelled use of those licences under current conditions is an important step in recognising the real value of these licences and, as a holder of Lowbidgee (Supplementary) licences, I support this important step forward.

Apportionment of modelled Redbank (Lowbidgee) diversions

The proposed factors for Redbank North and South include a change to the method of calculation compared to the previous factors. It appears that the factor proposed for the Redbank North area has been virtually halved, principally as a result of a new approach to apportioning the modelled diversions between Redbank North and Redbank South on the basis of "area" potentially able to be watered.

- This changes the previous North:South 50%:50% split used in the 2011 factors to a 35%:65% apportionment in favour of Redbank South.
- This subdivision of the lumped Redbank diversion in the model appears to be at odds with the historical diversions, which have tended to favour Redbank North.
- The use of area to subdivide the modelled Redbank diversion does not appear to be consistent with the statement made in the consultation paper that water usage is the primary consideration in establishing the updated factors, and also inconsistent with the treatment of other subdivisions of modelled diversions where two or more licence categories are lumped as a single diversion within the model. The DoI technical paper indicates that similar subdivisions of lumped diversions into the Murrumbidgee and Coleambally Irrigation Corporations have been split into the various licence categories based on the historical diversions from 2004 to 2016.

It is recommended that the apportionment of modelled diversions between Redbank North and South be recalculated on the basis of historical diversions, consistent with the approach taken for factors elsewhere in the Murrumbidgee Valley.

It is expected that a review of historical diversions will indicate that Redbank North diversions have been, on average, approximately 60% of the total Redbank diversions. It is understood that the historical annual diversions into Redbank North and South have been collected each year, and have been included in the ongoing reporting to demonstrate compliance with the 1993/94 Cap. This information is likely to be readily available within DoI Water, and was originally collated as part of a recognised process that is reported publicly (at an aggregated level).

Changes to modelled diversions

As outlined in the DoI discussion paper, the modelled long-term diversion limit for the BDL has changed for each valley. It is understood that changes to modelling can be expected over time, such as the extension of the modelled period to cover the millennium drought, and that the 2011 LTDLE factors compiled by the Commonwealth may have contained some errors.

Whilst there is a relatively small change in the Murrumbidgee compared to some valleys, the “BDL share” for Redbank, which is understood to be equivalent to the modelled diversions, appears to have reduced by approximately 15% from 122 GL/year to 105 GL/year. Given that the Redbank North and South factors are directly calculated from this modelled diversion, this has a noticeable impact on the proposed factors.

It is recommended that DoI be requested to provide further information about how this change in modelled diversions has occurred.

Individual water recovery factors

The Lake Marimley property is situated at the top of the Redbank North system and has been the major water user in the Redbank North area for many decades. This history of higher water use is not reflected in an average factor for all the landholders. The shares associated with Lake Marimley have been separated from the original North Redbank group supplementary (Lowbidgee) access licence, and a separate water recovery factor would complete that separation.

To support the calculation of a separate water recovery factor for Lake Marimley, further information is required to fully establish the history of use. This information is likely held by Water NSW, and may take some time to access.

It is recommended that DoI Water is requested to establish a separate water recovery factor for the Lake Marimley property, with an appropriate extension to the deadline for submission of the history of use data to support the calculation of a factor.