



## Transparency measures

### Submission to the Water Reform Action Plan

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# Southern Riverina Irrigators

SRI is a peak organisation providing advocacy for our membership comprised of five landholder associations representing irrigators operating within the footprint of Murray Irrigation Limited in the southern Riverina of NSW.

Formed in the 1960s, SRI now represents over 1,600 water users committed to producing food and fibre through environmentally and economically sustainable practices.

Our key principles are:

- We recognise the property rights of water entitlements
- Water reform must deliver against the “triple bottom line”.

## Key industries

Our region is highly productive utilising water sourced from the NSW Murray above the Barmah Choke. Industries have developed to suit the highly variable water product that is predominant in the region. Despite seasonal variabilities, we continue to produce high quality crops sustainably and efficiently contributing significantly to the gross value of irrigated agricultural production.

Industry	2015-16 (\$M) (23% water allocation)	Average 2010-2016 (\$M)
Rice	\$26.5	\$105.3
Cereals	\$72	\$60.8
Other broadacre (inc cotton)	\$10	\$10
Dairy	\$112	\$99
Livestock	\$58	\$56

Source: ABS Gross Value of Irrigated Agricultural Production 2015-16, NSW Murray

## Active trade

SRI played a pivotal role in the development of what is now the Murray Irrigation Water Exchange, which was the first of its kind in Australia.

Originally established in 1987, prior to the privatisation of Murray Irrigation, to facilitate the transfer of water allocation between landholders in the Murray Irrigation Districts, SRI was the body responsible for recording offers and keeping a register of transfers.

The Exchange has evolved through privatisation and technology, however, the original principles remain to facilitate transfer of water in an open and transparent manner without compromising individual business integrity.

## SRI is pleased to provide the following comments on the *Transparency measures* consultation paper for the Water Reform Action Plan.

The following comments are based on issues relevant to consumptive water users in the Murray Irrigation network. Irrigators within this system, or other irrigation infrastructure operators, are not unique Water Access Licence (WAL) and therefore our individual activity and the level of information we can access is determined by the WAL holder (the infrastructure operator). We provide the following comments based on the experience of irrigators within our system.

SRI supports full compliance with water take and access rules. The best way to achieve this is have real-time data share between water users and water regulators. Once that level of communication and accountability is achieved, there is enough information already in the public domain; however, it is difficult to access, disjointed and presented without a clear narrative as to what, how or why it is relevant.

## Consultation questions

- 1. Is the information already available on the NSW Water Register and Water Access Licence Register enough to provide greater transparency of water use? If not, what else is needed and why?**

The key public information needed by water users in order to be well informed and operate efficiently within the rules is:

- Access rules for their held water entitlement – available in Water Sharing Plans (WSPs);
- Allocation against held entitlement – available from Department of Industry – Water (DoI-Water) updated bi-monthly until allocations reach 100% or the end of the season;
- Flow share/channel share/restriction advice – available from relevant authority (WaterNSW, Murray Irrigation);
- Water trade information such as trade restrictions (Inter-valley trade limits), price and volume available.

As individual water users, we also need access to up to date account balances and usage capacity to ensure we do not exceed our account limits; however, this information does not need to be in the public domain.

Within Murray Irrigation, as a contractual right holder, each individual account holder can access real-time account balance and usage figures. This is important for both business management decisions and to ensure we, as landholders, do not exceed our account balances and that we operate within the rules of the system.

## 2. Is the currently available information too complicated and difficult to access?

The short answer is yes.

While it is common knowledge that there is a register of WALs, how to access it or how to use it is not commonly known. The fact that someone can pay a fee to search a WAL number and get identifying information is also not common knowledge among landholders and may concern a few – particularly when you realise that with that information you can then study the various registers and follow the information chain to a licence holder’s trading activity exposing potentially commercially sensitive information.

Even information that is required generically for good farm business management is disjointed and sometimes difficult to access and decipher.

## 3. How could it be simplified?

SRI would support the development of valley specific pages that explained, in plain English:

- Entitlements – type and volume on issue;
- Allocation and access rules;
- Intervalley trade limits and balances;
- Any access restrictions that apply;
- Generic trade information regarding price and volume available or traded.

## 4. What information should be prioritised for access?

Paramount is establishing the level of access.

Murray Irrigation, as the licence holder, must have access to an individuals account information. The closer to real time the better for both their system operations and to ensure maximum compliance. This can be likened to the information WaterNSW needs.

It is our understanding that the level of access WaterNSW has to real-time data is inconsistent across the State. This must be the priority. Public information must be secondary to ensuring the river operator has the best possible line of sight to access rules, account balances and water use. That will improve compliance. Public information should be secondary.

## 5. Are there categories of information that should not be made public? What are they and why?

As individual account holders and small businesses, SRI finds it difficult to understand why – if the regulatory and compliance regime is operating as it should – any individual account details should be made public.

Ken Matthew’s likened water to real estate; however, we would argue it is more like a bank account. Currency, in a generic sense, in the market is a public asset that underpins our economy; however, money in an individual account and associated loans and transfers is predominantly a private matter. By the same token, water in the system is the “public asset” Mr Matthews discusses, however, allocation in someone’s account is private.

**6. Are there ways that sensitive information can be managed and still made public? For example, by publishing account balances quarterly?**

SRI agrees there can be better access to information. Consolidating all relevant information in one place and on valley specific pages would be a first step. By doing so, water users have access to better information and may find compliance easier. This may also allay the public's concerns.

Upgrading systems to ensure both the individual account holder and the regulator can have access to real-time account data will also improve compliance, as it has done in the Murray Irrigation system.

Once that is done, using information that is already publicly available, there may be no need to progress further to provide personal and commercially sensitive information in the public domain.

As account holders in a joint scheme that has implemented the above points, we would see no benefit what-so-ever in publishing any personal account information. Murray Irrigation now has very few, if any, compliance issues. We know how much is in our individual accounts confidentially and we are updated weekly regarding the system accounts and usage.

## **Conclusion**

SRI is committed to transparent water regulations to the extent that they preserve individual account holder's confidentiality and business integrity while providing the market place and the public with confidence regarding the integrity of the system.