Your ref: F161225

Our ref: DWERDG435/19

Enquiries: Adam Maskew 97264111

Hon. Paul Omodei Shire President Shire of Manjimup PO Box 1 MANJIMUP WA 6258

Dear Mr Omodei

SOUTHERN FORESTS IRRIGATION SCHEME: REQUEST FOR ACTION

Thank you for your letter dated 3 July 2019 in which you raised concerns over growing opposition to the Southern Forests Irrigation Scheme (SFIS) and recommended options to improve communication by the State Government that may address some of these concerns.

I am pleased that you and the Shire CEO were available to meet with Paul Brown, Executive Director Regional Delivery, Adam Maskew, South West Regional Manager and the Department of Primary Industries and Regional Development (DPIRD) on Friday 2 August 2019 to discuss your concerns and a way forward.

The Department of Water and Environmental Regulation (DWER) acknowledges that there continues to be sections of the community opposed to the scheme and there is a role for both levels of government and the SFIS Board to provide clear information about both the scheme and water licencing more broadly. Given that DPIRD is the lead government agency for the SFIS, both departments have important communications roles.

As you may be aware DWER has undertaken extensive consultation in regard to the modelling done to support the viability of taking water from the Donnelly River for the SFIS. This led to the public notice identifying revised allocation limits and the publication of the *Donnelly River Allocation Statement* in November 2018.

In respect to broader water licencing across the Warren Donnelly catchments, DWER acknowledges that there continues to be sections of the grower community who believe the scheme will impact their own water entitlements, particularly growers from the Middle Donnelly and Manjimup Brook/Yanmah-Dixvale subareas. DWER staff met with these respective groups in Manjimup on 9 May 2019 to listen and respond to their concerns, and will continue to meet with individuals and groups as requested.

In your letter you flagged six issues for DWER to consider and I have provided brief responses to each below:

1. Scaling back the take of the SFIS so as to not disadvantage the ability of landholders to access water for self-supply

Any 'scaling back' of the SFIS is a decision of the SFIS Board in conjunction with DPIRD. It is my understanding that the SFIS Board are not intending to reduce the water take request. DPIRD or the SFIS Board is best placed to respond to you on this matter.

2. Ability for landholders to store water in excess of their entitlements to provide water security

DWER does not consider self-supply users as being disadvantaged by the amended allocation limits related to the SFIS proposal. All water generated off the developed areas of the catchment has been made available for self-supply. Water generated from State Forest has been set aside to support the proposed SFIS.

Recent modelling has identified that only 30-50 per cent of entitlements are being utilised in the catchment. This does not support a change from the position stated in the *Warren-Donnelly surface water allocation plan* at this time, and the approach in matching entitlements to dam capacity will continue. This supports good compliance and management outcomes for all users, regulated and unregulated, and the environment.

3. Allowing water to be transferred across catchment boundaries

DWER has been investigating amending existing policy to support the movement of water between catchment subareas. This has been driven in part by a demand for access to water for self-supply, but equally acknowledges the proposed SFIS.

4. Clarifying the policy related to the storage of SFIS entitlements on properties

A grower may have entitlements from general (self-supply), variable take and from the scheme. I understand in discussion with you recently and the SFIS Board, the key issue for members of the SFIS is to take and store their scheme entitlements using robust accounting of water supply and subsequent use. It was agreed that DWER will work with the Southern Forest Irrigation Cooperative to provide case study examples for the various storage and licencing scenarios for storage of scheme water on property. The Department understands from the SFIS Board that these will be embedded into their water access agreements of their members.

5. Reviewing water allocation methodology based on gauged data

DWER uses existing gauged data to determine changes in streamflow and the volume of water that can be sustainably drawn from a resource. There are both permanent gauging stations and short term sites using probes in the Warren Donnelly catchment. Under the recent review of gauging stations and their cost effective management, there are sites at outflow points of high use sub-areas in the Warren Donnelly where permanent gauging stations are to be installed based on available capital funding. One of these sites is the outflow of the Manjimup Brook/Yanmah-Dixvale subarea of the Donnelly River catchment.

However, the DWER believes that there is enough gauging sites and effort within subareas in this catchment and there is not a requirement for further gauging.

The recent water allocation methodology completed in the Donnelly River has been peer reviewed externally and deemed suitable for the purpose of revising allocation limits in the Donnelly River. The Department intends to undertake a similar exercise within the Warren River catchment in the next couple of years which will lead to a broader review of the *Warren-Donnelly surface water allocation plan*, involving industry and community.

6. Reviewing the period of take specified on licences

The 'Winter Take Period' defined as a condition on water licences has been in effect since 2011. The current dates of 15 June to 15 October are based on scientific assessment undertaken in 2008, and the condition is being progressively applied to licences in the Warren-Donnelly. Approximately 60 per cent of licences currently reflect this condition and it replaces a number of redundant conditions that prevented DWER from supporting landowners with stream disputes during the drier months.

DWER will continue to engage with the community on this matter in the coming months, through a range of communication mechanisms including engagement with individual and small groups of licensees and stakeholders, and the second *Warren-Donnelly Water Update* newsletter.

Mr Paul Brown is the Department's executive lead on water licencing in Western Australia. Mr Brown will be visiting Manjimup again on Thursday 29 August or Friday 30 August to attend pre-arranged meetings with stakeholder groups. If you have any queries in the meantime, please contact Mr Adam Maskew, Regional Manager South West on 08 9726 4111.

Yours sincerely

Mike Rowe

DIRECTOR GENERAL

16 August 2019

cc Ralph Addis - DG, Department of Primary Industries and Regional Development