

## RE: Post FPH program - WRPs & LTAAELs

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**From:** Andrew Brown  
**To:** Linda Holz  
 P Simpson  
 Raine  
 Dan Connor  
 Richard Beecham  
 Peter Hyde  
 Michael Sugiyanto  
 Allan

**Date:** Thu, 15 Apr 2021 05:49:17 +0000

Hi Linda

My suggestion is that BR goes ahead because the model has been around for a while and has been used a couple of times. It seems low risk to me.

For Namoi, it seems all quite new and given it is showing a large change, we should go through a really thorough review process and see if anything falls out of that first.

If it still looks ok, it would be wise to have a fairly detailed written explanation of why the two models give different results. That is almost part of the review function in a way.

Once we have that in place, then go ahead and make the cuts.

Until that happens we cannot know if anything else is required post FPH.

My suggestion is that it would be unwise to make promises that Namoi Source is ready to use in advance of actually doing that basic legwork and due diligence.

And no, I cannot suggest how long post review revisions might take if any are required before the reviews have even taken place.

**Andrew Brown**  
**Principal Water Modeller**

Water Analytics | Department of Planning, Industry and Environment

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**From:** Linda Holz  
**Sent:** Thursday, 15 April 2021 8:25 AM  
**To:** Dan Connor  
 Simpson  
 Andrew Brown  
 Richard Beecham  
 Allan Raine  
 Peter Hyde  
 Michael Sugiyanto

**Subject:** Post FPH program - WRPs & LTAAELs

Hi all,

Top of my mind is that with FPH rules in place, we will still have models showing growth in total diversions in the Border and Namoi. Border is minor (1%) however Namoi is significant (10-12% pending rainfall harvesting exemption decision). This would mean the Namoi would still have a fairly significant cut to Supp AWD post FPH rules. So keen to hear whether any post FPH program revisions are required and what the timeframes might be.

cheers,

Linda

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**From:** Dan Connor  
**Sent:** Wednesday, 14 April 2021 4:23 PM  
**To:** Andrew Brown · Simpson  
**Cc:** Siv Teh Hitesh Patel Linda  
Holz Richard Beecham  
Frances Guest Peter Hyde  
**Subject:** Re: New Barwon-Darling Cap Modelling

PPri/Browny,

Can you please work together on the language around B-D and Namoi models to;

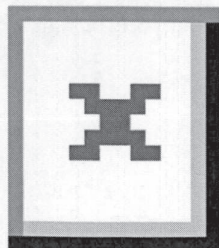
- \* reflect that the models are our best available estimate of plan limit and current conditions
- \* reflect that there is a formal process to go before these revised models will be used for Basin Plan purposes i.e. assessed as part of WRPs
- \* call out any specific limitations to the models and our process and timeframe for addressing them

Browny - I'd suggest that we need an urgent internal conversation about what we will and won't do for the re-submitted WRPs and how we will manage any sensitivities. This needs to involve both Peter and Vanessa.

Hope that this all makes sense.

**Dan Connor**  
Director, Healthy Floodplains Project Delivery  
Water | Department of Planning, Industry and Environment

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*The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

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**From:** Dan Connor  
**Sent:** Tuesday, 13 April 2021 3:55 PM  
**To:** Andrew Brown; Linda Holz; Richard Beecham; PPr Simpson; Frances Guest  
**Cc:** Siv Teh; Hitesh Patel  
**Subject:** Re: New Barwon-Darling Cap Modelling

Hey Browny,

I don't think that we are on the same page.....

The FPH work represents best available estimates (far from perfect but loads better than the past) of legal limits and current conditions and this is how we are messaging it.

We have Dept wide and MO agreement that these assessments are the basis for growth in use actions and Allan Raine and his team are gearing up to make 1 July 21 allocations based on these results.

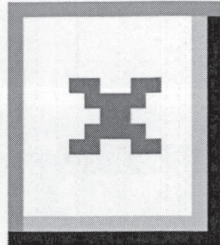
Our current WRPs are being withdrawn and will be re-submitted with the new FPH rules etc. The new BDL model will need to be submitted as part of this as well as new APT methods etc.

Do we need to discuss?

Thanks

**Dan Connor**  
**Director, Healthy Floodplains Project Delivery**  
Water | Department of Planning, Industry and Environment

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**From:** Andrew Brown

**Sent:** Tuesday, 13 April 2021 2:45 PM

**To:** Linda Holz

Dan Connor

Pri Simpson

Richard Beecham

Frances Guest

Hitesh Patel

**Cc:** Siv Teh

**Subject:** RE: New Barwon-Darling Cap Modelling

Hi Linda

The timeframes your looking at seem realistic to me and I think it speaks to the concept I'm trying to get at here.

Cap/Plan Limit have a life of their own, with processes that address formal requirements, and those will play out on a longer time frame then the couple of weeks that we have left in HFP.

HFP would be better off to be clearer about what these scenarios represent to avoid being sucked into a quagmire that will be created if it suddenly pops up with what looks like new Cap and Plan limit numbers.

The labels and surrounding words should make clear that it is a first pass, and more needs to happen. Somewhere else, and HFP is not going to tackle it.

Andrew

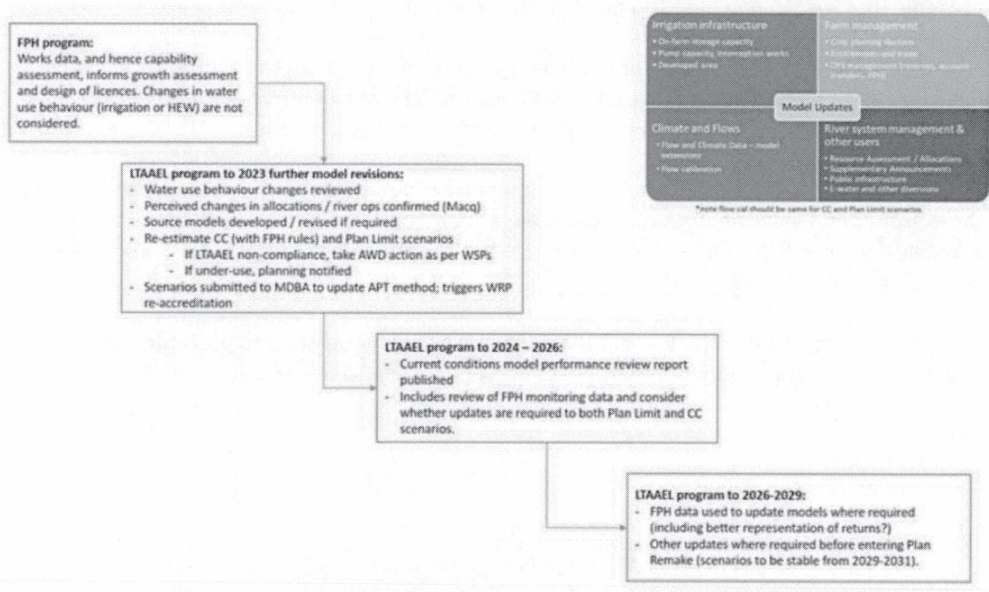
**Andrew Brown**  
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**From:** Linda Holz  
**Sent:** Tuesday, 13 April 2021 2:29 PM  
**To:** Andrew Brown; PPri Simpson; Dan Connor; Richard Beecham; Frances Guest  
**Cc:** Siv Teh; Hitesh Patel  
**Subject:** Re: New Barwon-Darling Cap Modelling

Hi Andrew,  
 I suspect you might have missed the boat on some of those messages. But I agree that we need to think about what can be achieved in FPH world and what we will do later. As Richard mentioned, I am hoping we can touch on this next week. This is a visual of how I see the next few years. Be keen to get feedback on this at some point.  
 cheers,  
 Linda



**From:** Andrew Brown  
**Sent:** Tuesday, 13 April 2021 1:14 PM  
**To:** PPri Simpson; Dan Connor; Richard Beecham; Linda Holz; Frances Guest  
**Cc:** Siv Teh; Hitesh Patel  
**Subject:** RE: New Barwon-Darling Cap Modelling

Hi PPri

I think it is important to recognise that the setting of a new Cap or LTAAEL etc is subject to a range of other processes.

In this specific case, there cannot be a new Barwon-Darling Cap model until it has been through an internal review phase, then proposed formally to MDBA who can be expected to commission an independent peer review that we can expect will make further recommendations for changes or improvements, and then MDBA may or may not at some point formally adopt a new Cap model for the Barwon-Darling. None of that has been discussed or initiated.

Our WSP links us to the MDB agreement process under schedule E, so we cannot simply pretend that all this doesn't exist and the FPH program has reset the Cap.

I strongly suggest that FPH structures its words carefully when talking about "Cap" models so that we do not inaccurately present this work to stakeholders as being the new formal Cap model, with all the inevitable reactions when they see a lower Cap number.

I think it would be compatible with my understanding of Dan's overall concept here if we were to describe these scenarios as drafts, or in development work that incorporates that latest information that we have, but is subject to a lengthy future exercise that includes compulsory stakeholder consultation. However the FPH program is choosing to use this work in its incomplete state to set entitlements in the expectation that this provides the best chance available that we can minimise the need for future adjustments via an AWD process.

I do not think it is in the interests of the Healthy Floodplains program to become entangled in issues around growth and/or model changes because the scope of effort required to resolve those things is many orders of magnitude greater than what you have left.

The key to avoiding that pitfall will be to be very specific about the wording we use when describing these scenarios. Please do not simply call them a "Cap Model" or a "LTAAEL model", particularly in public documentation, when those terms mean a specific formal thing that these scenarios do not satisfy.

I would encourage HFP to think about the messages they can construct to push the inevitable debate into a different work program, probably within Allan Raine's area.

Andrew  
**Andrew Brown**  
Principal Water Modeller



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**From:** P. Simpson  
**Sent:** Tuesday, 13 April 2021 11:11 AM  
**To:** Dan Connor  
Richard Beecham  
Andrew Brown  
Frances Guest  
Linda Holz  
**Subject:** Re: New Barwon-Darling Cap Modelling

Apologies - the new Cap LTA number is 181 GL/year (not 175). Accidentally put in the result from another scenario.

Same issues to consider though.....

 Simpson  
Director -  Simpson Consulting Pty Ltd

On Tue, 13 Apr 2021 at 10:59,  Simpson wrote:

All,

Now that we have (almost) final modelled outcomes for the Barwon-Darling, I would like to highlight again that we have an update to the estimate of diversions under the 1993/94 Cap.

For the A, B, and C class licences, the number of shares is set to be equivalent to the Cap level. We have discussed previously, the department will need to decide whether it will adjust shares as a result, given that further adjustments can be expected as new metering is being rolled out and the model will transition to Source.

Its worth recognising that the current shares for A, B, and C total 189,000 (at 100% allocations, this is equal to the previous Cap modelled long-term average annual diversions under Cap), but the new modelling estimates the long-term average diversions under Cap to be 175 GL/year (assuming that HEW is being utilised as per the LTDLE factor of 1, and including modelled estimates for the unmetered A and small B class users of about 4.6 GL/year). This is closer to the original 173 GL/year modelled before the commencement of the WSP.

One would expect water users to be unhappy with this lower outcome, as it will reduce the value of their water licences and the water they will receive in the future. However, there may also be wider concern if the shares or allocations are not being adjusted to reflect the new modelled results as this would potentially allow diversions in excess of the LTAAEL. We will probably need to confirm a position on whether any changes to AWDs/shares will or will not be made at 1 July before we commence consultation.

I suspect this may also focus attention on the relatively large amount of HEW in the Barwon-Darling, and its relative utilisation now that Active Management is available.

Cheers

  
 Simpson  
Director -  Simpson Consulting Pty Ltd