

**Submission  
No 27**

## **INQUIRY INTO FLOODPLAIN HARVESTING**

**Organisation:** South Western Water Users Association

**Date Received:** 11 August 2021

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## Select Committee on Floodplain Harvesting

Submission by South Western Water Users Association

August 2021

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### South Western Water Users

South West Water Users (SWWU) represents private water diverters in South Western NSW. Representation area covers the NSW Murray River from the Murrumbidgee Junction below Balranald to the SA border, Menindee Lakes & the Lower Darling River.

Security of water supply in the Lower Darling River has reduced over the past two decades, mostly as a consequence of increased irrigation development upstream of the Menindee Lakes reducing inflows.

The priority for the SWWU and the basis of this submission is to ensure that the water needed to maintain the health and productivity of the river and the communities that depend on this needs to be a priority for water managers. Further, this submission stresses that the critical human needs of towns and the domestic and stock water needs of riparian landowners are provided for prior to any extraction or diversion, ensuring downstream critical needs are absolute priority. Their use of and reliance on Barwon Darling flows pre-dates by many decades, if not more than a century, the irrigation developments permitted in the northern Basin, at the expense of and to the detriment of such downstream users.

SWWU submits that it is the protection of, and the management of the first flows that follow a dry period in the Barwon-Darling River and Lower Darling to the River Murray, that is essential to achieving and maintaining a healthy and productive river.

For this reason SWWU rejects proposals of current Flood Plain Harvesting licensing until the following issues are addressed, clearly articulated and legalised protections legislated to promote river connectivity on a whole of river basis are prioritised before irrigation extraction is permitted.

- FPH must be able to be turned off in dry periods
- FPH must only be accessed once downstream river flow targets and Menindee Lakes storage targets are met, and these targets need to be realistic, reasonable, and when established, enforceable.
- FPH structures must not flood out upstream neighbours nor deny water to downstream neighbours



- Carryover is not supported by SWWU - if the river cannot deliver 100% allocation in a particular year it should not be expected to deliver 500% the following year
- The suggestion of 500% carryover is preposterous, and if allowed, or indeed if any carryover were allowed, it would exacerbate the disadvantage or detriment of the downstream users who presumably would have suffered comparably from the dry upstream. There should not be any carryover at all.
- FPH should be opportunistic bonus water and only allowed after the environmental needs of the river and critical cultural and community needs have been met per the requirements of the Water Management Act 2000 and the Murray Darling Basin Plan
- FPH licenses should not be tradable or transferable
- SWWU has no confidence in the proposed measurement of take for FPH as it is not transparent and therefore not credible.

Recent reports including the Matthews Report, MDBA response to the Matthew's report, the Vertessy report into the Menindee fish kills, the Academy of Science report into the Menindee fish kills and the NSW Natural Resources Commission Review of the Barwon-Darling Water Sharing Plan all recognise the importance of the protection of flow events for the health of the river, highlighting how vital it is to prevent further catastrophic environmental damage.

The SWWU believes it important that flow triggers in the Northern Tributaries, Barwon-Darling and Lower Darling, and storage volumes in the Menindee Lakes be determined that will ensure that the protection of the health of the river is made a priority before diversion of flood plains is allowed.

The South Western Water Users Association appreciates the opportunity to provide a submission to the Select Committee on Floodplain Harvesting and would welcome further consultation for and on the draft report.

If you require any further information regarding this submission please contact me on

Yours sincerely,

Rachel Strachan  
South Western Water Users Assoc  
Tulney Point Station

