

INQUIRY INTO FLOODPLAIN HARVESTING

Organisation: Environmentally Concerned Citizens of Orange (ECCO)

Date Received: 13 August 2021



environmentally concerned citizens of orange

PO Box 1582 Orange NSW 2800

ecco.orange@gmail.com

www.eccoorange.org.au

**Re: The NSW Upper House Inquiry into Floodplain Harvesting
Friday, August 13, 2021**

I write this submission on behalf of the Environmentally Concerned Citizens of Orange. Founded in 2006, we have consistently advocated for the environment on a range of issues including those associated with water and water management. Orange is situated in the Macquarie River catchment, which gives us reason to be concerned about the management and health of the Macquarie River and the Murray Darling river system. We consider floodplain harvesting to have a significant impact on the health of the rivers systems of inland New South Wales, so we welcome the opportunity to comment on the issue of floodplain management.

Unregulated flood plain harvesting is a practice that should have been legally regulated a long time ago. Its continued operation has for many years threatened the natural ecology of our river systems. Unregulated use prioritises irrigation over the environment. Floodplain harvesting ignores the cultural and social values of the first nations people who have for millennia established a close association with our river systems. Irrigation has its place in the system, but it should not continue to be given the opportunity to inappropriately exploit scarce water resources.

If water management is to address these issues, it is obvious that there must be regulation put in place that prioritises the environmental and social issues-not for the benefit of those who seek to extract water from the system for their own economic advantage regardless of the consequences..

ECCO supports the recommendation that any on farm storage works should not be constructed without appropriate approval.

We object to any proposal that considers an exemption to exclude rainfall run-off from licensing. We maintain that all annual rainfall over the 10% harvestable must be licensed.

ECCO is supportive of the requirement that floodplain harvesting works must be fitted with compliant metering, with no exemptions at Ministerial discretion.

We are in support of licensing using a cap system. We do not support historical intake. Licensing must address any installed floodplain harvesting infrastructure that is illegal.

Downstream flow targets must also be introduced to ensure that the environmental, cultural and basic landholder needs are addressed.

The management of water in our river systems often tends to prioritise the needs of extraction rather than those of other users and values. The effect of licensing should be such that this does not occur. It is essential that all floodplain infrastructure that is obviously responsible for this imbalance should be removed, and that any subsequent installation be subject to rigorous independent environmental assessment..

Referring to the Macquarie Valley, it is essential that any Sustainable Diversion Limit assessed should be reflective of the environmentally sustainable level of take. ECCO joins other environmental groups in strongly objecting to the history of floodplain harvesting extraction which has been licensed in the Macquarie river. The Macquarie continues to be over extracted, with dire environmental consequences to wetlands such as the Macquarie Marshes.

ECCO is strongly opposed to the 500% “carryover “ rules. This is an obvious case of overallocation and prioritising the needs of irrigation over the environment. It is also essential that any environmental advantage not be lost in the process of water trading.. Water trading in the context of floodplain harvesting should not be allowed, but if reason does not prevail, then any trading should be subject to rigorous environmental assessment..

For floodplain harvesting to be successfully regulated, there must be processes put in place that allow for accurate measurement and monitoring of floodplain water. Any future regulation must be based on actual data, including water returning to the rivers from floodplains.. There must be transparent independent reviews of models by the Natural Resources Commission..

The effects of climate change on water management need to be taken into consideration when it comes to water management. Climate change modelling indicates that we are going to suffer weather events that will have severe impacts on our water supply. Floodplain management needs to take these impacts into consideration. NSW climate modelling must be used in the assessment of floodplain harvesting. Current proposed volumes of floodplain harvesting entitlement for Border Rivers, Gwydir and Macquarie could cause the capture of all moderate and low flows in the future. This over allocation needs to be rectified from the commencement of licensing. Recent rain events have given river systems in the Murray Darling basin a window in which they can recover from recent drought and over allocation. This is our opportunity to rectify existing problems and ensure that they are managed through appropriate regulation.

Yours sincerely
Nick King
Secretary, ECCO