

INQUIRY INTO FLOODPLAIN HARVESTING

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By email to floodplainharvesting@parliament.nsw.gov.au

Thank you for the opportunity to submit to this very important review into Flood Plain Harvesting.

We are 5th generation Graziers and Irrigators. Our family irrigated grapes and fodder at Wilcannia in the late 1800's and we currently irrigate at Kallara Station, on the Darling River at Tilpa.

There is only one water source in the Murray Darling Basin and this source must be protected for the benefit of the environment and all Australians.

Creating another take i.e. Flood Plain Harvesting from the one source will only have one effect; and that is, less water downstream.

It is inevitable that some form of Floodplain harvest will be licenced. When this happens downstream communities and other irrigation communities must be protected by the following:

The water management act must be upheld and be relevant to every licence condition including .

1. basic landholder and community rights
2. Water Quality
3. Meeting environmental needs

And that:

- All take must be bought under Cap 93/94
- Their must not be growth above the 93/94 cap
- SDLs must not be increased to cover historic take
- FPH licencing must address illegal FPH works (removal, modification)
- ***All Licenced FPH works must have a provision to reject passive take***
- Modelling must be updated with the most recent climate record and be fit for water planning purposes for the next 10 years
- Downstream flow targets must be introduced based on environmental, cultural and basic landholder needs
- strict compliance with the priority of water use principles as set out in the NSW *Water Management Act 2000*.
- All FPH licences issued must be subject to review for at least 20 years where they can be adjusted to allow for new science and data with no compensation .
- FPH works must be fitted with compliant metering
- FPH must be included in upstream WRPs

- FPH must only occur when end-of-valley flow targets have been met
- FPH licences cannot include provisions for tradeable rights
- FPH licences cannot be compensate able

Floodplain Harvesting allows irrigators to substitute their take and save their regulated entitlement for use at a later date.

The key issue in water management, we believe, has been the change in flow regimes, and is why Flood Plain Harvesting is very concerning. Active management should be the process by which management occurs for FPH.

We include this chart compiled by Mr Geoff Wise as a reminder of how important it is that flows are not further eroded by introduction of FPH licencing. The MDB covers a large area and more often than not drought is experienced somewhere in the basin at any one time.

ANALYSIS of WILCANNIA FLOWS July 1920 to May 2016					
	JULY 1920 TO JUNE 1994		JULY 1994 to MAY 2016		DECREASE IN RELIABILITY
	NO. OF YEARS	% OF YEARS	NO. OF YEARS	% OF YEARS	
<i># Financial Years</i>	74		22		
TOTAL FINANCIAL YEARS RECORDING ZERO FLOWS IN AT LEAST ONE MONTH	7	9.4%	10	45.4%	480%
	NO. OF MONTHS	% OF YEARS	NO. OF MONTHS	% OF YEARS	
<i>Total Months</i>	888		264		
<i>Months with No recorded Data</i>	16		0		
<i>TOTAL MONTHS WITH RECORDED DATA</i>	872	100%	264	100%	
TOTAL DECEMBERS WITH ZERO FLOWS	2	2.7%	6	27%	1000%
TOTAL OCTOBER, NOVEMBER, DECEMBER WITH LESS THAN 33.3ML/Day	12	5.5%	29	44%	800%
TOTAL MONTHS WITH MONTHLY TOTAL LESS THAN 30ML (less than average daily flow rate of 1 ML)	15	1.7%	36	13.6%	800%
TOTAL MONTHS with MONTHLY TOTALS LESS THAN 1000ML (Average Daily flows of less than 33.3ML/day)	30	3.4%	65	24.6%	720%
TOTAL NOVEMBER, DECEMBER, JANUARY & FEBRUARY WITH ZERO FLOWS	11	3.7%	18	20.5%	550%

Connectivity of the system must be a first priority for all water users. First Flows in the upper reaches must not be diverted but allowed to run their full course. The government and water managers should concerted their efforts in attaining end-of-valley flows. If licenced, Floodplain harvesting will have an enormous impact on that.

The river, people, towns and livestock must always have priority. Healthy rivers – Healthy communities!

Yours sincerely,

Justin & Julie McClure