

**Submission
No 60**

INQUIRY INTO FLOODPLAIN HARVESTING

Organisation: Namoi Water
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namoi water

Securing our water future

SUBMISSION

Inquiry into Floodplain Harvesting

13/08/21

Introduction

Namoi Water is the peak industry group for irrigated agriculture in the Upper Namoi and Lower Namoi Valleys in the North West of NSW. We are a not-for-profit, non-political organisation supporting our members to achieve a sustainable irrigation industry that meets the environmental, economic and social needs of our local communities. Namoi Water makes this submission on behalf of our membership collectively, however each member reserves the right to independent view and submission on any issues they deem relevant.

Firstly it should be noted that we are a member of The NSW Irrigator's Council and we support the detailed submission provided to you by NSWIC. However we would like to provide the following additional comments.

The process of licencing Floodplain Harvesting has been a path Northern Irrigators have been on for many years. Our members have long supported the Governments plan to licence this historical form of water take. We agree that Floodplain Harvesting should be metered and measured in accordance with the standards as other forms of water are. We agree that it should be within the 1993/1994 Cap. These are all basic principles of good water management. The intention of Water Management (General) Amendment (Floodplain Harvesting Measurement) Regulation 2020 to give effect to floodplain harvesting measurement policy. The measurement policy is fair in following the framework of the NSW Non-urban water metering policy and necessary to bring this measurement policy forward.

We are aware of technical reports produced by DPIE-Water, looking into the environmental benefits, downstream outcomes as well as independent reviews of the modelling. These reports show the reform will limit how much floodwater can be stored, meaning more water will stay on floodplains or flow back into creeks and rivers. The science shows the reform will have positive outcomes for floodplain environments, including waterbirds, native vegetation and native fish. It is disappointing that this political game has stopped the policy from moving forward, so these benefits could begin being realised.

For these reasons, we recommend to the Committee:

- *Floodplain harvesting must be reduced to the 1993/94 Cap through licensing requirements (like all other forms of water take), which will return additional volumes to floodplain environments;*
- *Floodplain harvesting must be metered and measured (like all other forms of water take) for accountability, transparency and to ensure compliance.*

- *There is urgency to this reform, given the La Nina (wet) period, and the current third-party impacts where supplementary licence holders are seeing their water access cut back to keep total take within Cap limits because the Government currently has no mechanism to limit FPH, and the industry still has no requirement to meter FPH take.*
- *That the Rainfall Runoff exemption presented last year for comment become policy. To ensure farmers can continue operating their farms as they always have (to meet environmental obligations to prevent potentially contaminated water running off their fields from entering waterways, and to recycle water on-farm).*

Connectivity (when hydrologically possible) is of paramount importance, but we see this reform as part of efforts to improve connectivity. A drought management reform is already occurring concurrently as a broader work program of DPIE-Water, to improve river flows when droughts first break, and during dry seasons.

Importantly, the reform does not decide what the limit is, we already have limits under NSW law and the Murray-Darling Basin Plan; this reform will just make FPH have to comply with those existing limits. Licensing and metering is the only way forward, to give Government a mechanism to manage this form of water take. This process is not new, and has already occurred for other forms of water.

This is a unique opportunity for NSW Parliament to regulate an industry that is not only accepting of, but actually calling for, regulation. This reform must progress without delay.

Submission end