

**Submission
No 208**

INQUIRY INTO FLOODPLAIN HARVESTING

Name: Mrs Justine Bucknell

Date Received: 10 August 2021

To whom it may concern,

As per the Terms of Reference:

a) The legality of FPH practices is doubtful to say the least. Govt lawyers provided advice suggesting it would be unlawful to FPH without a licence and unlawful to construct on farm storages without approval to do so.

It doesn't fit within the 1994 CAP on extractions.

It doesn't comply with the Water Act which states that the environment must come first.

b) Water regulations published on 30.04.21

- Rainfall runoff over 10% harvestable right must be licenced.

- FPH works must be fitted with compliant metering but there should be NO Ministerial discretion over this.

- FPH should not be licensed at all. The modelling is flawed, however downstream flow targets must be introduced based on environmental, cultural and basic landholder needs if there is no other choice to do so.

c) Downstream flows must be protected before anything else.

- All illegal FP works must be removed

- The SDL in the Macquarie Valley must be assessed to make sure it reflects the environmentally sustainable level of take. History of take in the Macquarie Valley has been an open cheque book and must not be taken into account.

- FPH licencing volumes must not be compensable.

- 500% carry over rules I object to. This will be devastating and rule out any chance of future bird breeding events in the Macquarie Marshes.

- No permanent trades.

d) Other points -

- There needs to be a socio-economic study done on downstream effects in the Macquarie Valley downstream from Warren.

The Macquarie River should never have to owe irrigators due to the 500% carryover rules.

The Macquarie river is over allocated and over extracted and the gross wealth transfer upstream devastating.

The data on FPH take is completely inaccurate.