

ADDITIONAL COMMENTS CONCERNING FLOOD PLAIN HARVESTING

- FPH licences are brand new private property rights that can be sold, mortgaged and can attract compensation. This significant financial windfall should not be handed out to irrigators until the years of environmental impact to downstream environments has been assessed, and rights to water for First Nations Communities in the Basin has been assured.
- The Gwydir River system supports the Ramsar listed Gwydir Wetlands. It is essential that natural flood flows are restored through improved management of FPH.
- It is proposed to licence 97 GL (billion litres). DPIE has stated that the proposed licences will be within the 1993/94 Cap limit, but has not provided any evidence to support that claim.
- On top of the issue of licences for 97 GL, it is proposed that a further 30 GL of water classified as rainfall runoff can be kept and used. This is unacceptable – all diverted water above the 10% harvestable right must be licenced.
- The model developed to assess volumes of FPH in the Gwydir has insufficient data to provide confidence in the results.
- Climate models used only go up to 2009 climate records. They look backwards at past flood patterns, which were smaller more frequent events with only very rare spikes. Climate models looking forward show there will be larger less frequent floods in the future.
- One year accounting with no carry over will mean volumes of take will be limited to one years' entitlement. Five year accounting with carryover up to 500% would mean a very large portion of a large flood event could be harvested. Five year accounting with carryover is not acceptable given a future with larger less frequent flood events.
- FPH licences must not be compensable until such time as metering is in place and all relevant data brought up to date and available.
- Environmental outcomes and downstream connectivity will not be sufficiently improved to compensate for the cumulative environmental impact of FPH.
- Restricting access to FPH until end of system flow targets are met must be a critical management rule to ensure the provisions of the NSW Water Management Act 2000 (WMA 2000), the Water Act 2007 and Murray-Darling Basin Plan are met.
- New FPH licences should be temporary until such time as all metering is in place and new modelling data and results are available