

Thank you for putting together a review committee to further engage in a more equitable management of the “first flush rule” or Section 324 embargo.

I do not have a problem with an embargo for critical human needs, which will also provide for environmental & cultural needs along on the way.

A blanket embargo within the whole Northern Basin or a whole valley is not necessary and needs to be looked at for refinement.

reasons being; -

- (i) not all sections in the valley have connectivity to the Barwon, direct or indirect
- (ii) constraints need to be accounted for eg. In the Gwydir, overbank flows are caused as active management isn't practised. If excess water that cannot pass through the narrow sections of the Carole Creek and Mehi River can be operated under normal water sharing rule then more than half of that water can be diverted to the wetland and the remainder to community via supplementary flows and the Barwon still receive the same amount as under present activity.
- (iii) transparency of intentions such as targets, objectives and triggers to be more timely
- (iv) reduce third party impacts eg. risks of flooding of crops and closing of public and private roads reduced.

In the recent event the addition of FPH to the embargo and introduced in such draconic way at the last minute, as storms started running water everywhere, created shock and confusion to irrigators and floodplain residents who have been managing their storm events for the last 30-40 years and were at a loss of what to do and still remain compliant.

Some issues shown up that need to be addressed, if this is going to be continued include:

- (i) better and more timely communication with floodplain harvesters before and during the event.
- (ii) better knowledge by Department of each floodway across the valley.
ie. not all floodway's run into a stream for downstream connectivity
- (iii) Quicker response by Department to rainfall and gauge readings. Rainfall and floods can happen any day of the week!

- (iv) Update models as more current information becomes available
- (v) More transparency over the objectives and the target and what triggers might be looked for.
- (vi) have a hotline available for landholders to report storm events.

If you require further clarification please don't hesitate to contact me.

Yours sincerely



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