



R.M.I. Pty Limited

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June 3, 2020

NSW First Flush Assessment
c/- Department of Planning, Industry and Environment
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PARRAMATTA NSW 2124

FEEDBACK – MANAGEMENT OF THE NORTHERN BASIN ‘FIRST FLUSH EVENT’

To the Independent Panel

In response to the email received from EWN of Water NSW received on May 13, 2020, we detail below our feedback including a range of concerns that we have regarding the management of the event and other issues regarding such an event.

Whilst we fully support and expect critical human and environmental needs to be a priority of the management of the river system, we do not believe that the February flow event was managed at all well. In addition to the following points it appears that in this case “knee-jerk” decisions were made based on what was popular politically, or activist and media driven, without any consideration for those who know the system, live within it and survive from it.

Trigger Points and Volumetric thresholds – We appreciate and support that high flow pumping may be restricted until the documented trigger points and volumetric thresholds are met to ensure delivery of critical needs requirements. Such trigger points and thresholds must be set with significant input from the locally based, NSW Government employees, stakeholders and local community members with significant historical knowledge of the river and be adequately substantiated, transparent and unambiguous. The NSW Government river operators should be trusted to operate to such conditions and water entitlement holders must be able to trust that the “goal posts” are not going to be continually shifted.

Flow Forecasting and Volume Assessments – Had the NSW Government adequately communicated and cooperated with the relevant bodies of the Queensland Government and factored in the in-flows from the Weir, Moonie and Lower Balonne rivers out of South Western Queensland, thresholds would have been met allowing access in the mainstream considerably earlier.

The knowledge and experience of locally based river operators is extremely valuable, these people have a history of successfully operating this part of the system all year round and in many cases have done so for a large number of years.

Had their knowledge been adequately considered by the NSW Government the resulting disastrous losses of the February event would have been averted, it was predicted that the volume of water in the system, if not reduced, would break the banks, reach levels high enough to flow into flood-runners and pool in low lying stagnant pools, never to be returned to the system.



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Communication – We were advised by our industry group (Border Rivers Food and Fibre (BRFF)) that embargoes were likely to be put in place to ensure sufficient water made its way to critical areas.

We registered with the EWN from which little communication was received. We received sporadic emails with ambiguous wording from multiple other sources, had it not been for the BRFF we would have received less than 10% of the communication surrounding this event.

The head of the flows move relatively quickly until the land plateaus on the plains near Boomi, due to the topography of the land and the confluence of other streams, the height of the river exceeds its average for a considerable length of time. The NSW Government were slow to make determinations and by the time they were finalised, a large amount of water had gone past many pumps. The announced pumping windows were very short considering how long the water was present. Once again indicating the importance of clear, set guidelines to assist quicker decision making and acknowledgment and understanding of local knowledge.

Terminology – We have an issue with the term “First Flush”. The Oxford Dictionary meaning of “flush” is to “*cleanse causing large quantities of water to pass through it*”. We don’t believe it was the intention of the NSW Government to cleanse the system or to just pass large quantities of water through it. We would hope that such terminology is retired and meaningful terminology adopted, for eg. Flow for critical human needs in severely drought affected regions.

Local communities in this area continue to suffer from the on-going severe drought and due to the mismanagement of the February flow and the implementation of embargoes, there is little to no water in storages to successfully grow any crops, this will be for the second year in a row and never seen before in over 40 years. The flow on effects to communities is so significant that many industry supporting businesses are reducing staff, in some cases by over 80%.

Due to the embargoes and to the detriment of the Northern areas, water entitlement holders and communities further South have benefited significantly, had the management of the flow been successful critical needs would have been met, volumetric thresholds reached and more regional communities throughout the system would have a better outlook for their futures than they currently do.

We trust and expect that all feedback will be carefully considered and hope that local knowledge, historical facts, stakeholders points of view and the seriousness of the devastating impacts on regional communities will be taken into account to construct a measured, transparent and ground truthed approach to reasonable trigger points and volumes of future flows.

Yours sincerely

C M MCCOSKER