

environmentally concerned citizens of orange

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To whom it may concern

RE: Response to the Gwydir Floodplain Harvesting Rules from the Environmentally Concerned Citizens of Orange,

I am writing this response on behalf of the Environmentally Concerned Citizens of Orange (ECCO). We are a local group that advocates for the environment on a range of issues including that of water and water management. Orange is not within the Gwydir catchment, but the issue of floodplain harvesting is also of concern in the Macquarie River catchment with which Orange is connected, so we have concerns about the practice which is also occurring in the Macquarie catchment.

ECCO is also a member of the Central West Environment Council which is an umbrella group consisting of representatives of local environment groups throughout the Central West of New South Wales. All of these groups are similarly involved and have great concerns about the practice of floodplain harvesting, which the NSW Government is attempting to regulate through the draft rules currently under discussion

Over the past thirty years some operators in New South Wales has been involved in large scale water theft in the form of floodplain harvesting. Successive governments have ignored this activity resulting in unregulated capture of overland flows through the unauthorised construction of dams, levee banks, channels and pumps.

The rules upon which we are invited to comment represent the NSW Government's attempt to address the issue through a policy of regulation, the aim of which is to reduce the volume of water stolen from the environment through floodplain harvesting.

Although ECCO sees this response as legitimising water theft, we do recognise that a licensing system and management rules, if properly enforced ,could help to restore the health of wetlands, native fish and water bird habitat in the Gwydir, as well as improving flows to the Barwon-Darling river.

Any proposed rule for floodplain harvesting must be in the best interests of maintaining natural environmental flows. This is why ECCO cannot support the 5 year account management rules, as they are just another form of the 500% carryover rule, giving higher access to water over time. This rule is obviously in the best interest of the irrigators to the detriment of the environment.

We do, however, support the 1ML unit share. Access to a licensed entitlement restricted to this volume can allow for flood events to occur that are critical for drought recovery, flood dependent ecosystems, downstream communities and groundwater recharge.

Climate change modelling predicts more extreme weather events which will affect river flows and will require a more adaptive approach to water management. We support the variation of the Available Water Determinations being used as a method of adaptive management. We have to

rely on this method as there is currently no means of accurately measuring the volume of water extracted through floodplain harvesting.

Trading zones and prohibition of trade between zones is to be supported if this leads to greater regulation of extraction and more surety when it comes to provision of water for the environment. It is essential that areas of high environmental value are protected from over extraction. This includes protecting Held Environmental water from extraction.

We cannot, however support the proposed replication of unregulated river account management rules (3 year rolling average.) Access to floodplain harvesting in unregulated rivers should be restricted to annual access rules to maintain consistency with rules across all river systems in the Gwydir catchment,

As stated above, ECCO supports these rules in part with some serious reservations. We still object to the fact that Government has seen fit to control floodplain harvesting by allowing it to continue. We feel that the main thrust of the rules are for the benefit of those who seek to exploit and control water which should be for the environmental health of the river system. We are also concerned that the rules appear to promote water as a commodity that can be traded, bought and sold, rather than a scarce resource that belongs to us all. We also ask that there should be an embargo on all floodplain harvesting until proper infrastructure to monitor and measure the amount of water extracted from the practice is installed.

Yours sincerely Nick King Secretary, ECCO