

Mr Bryce Wilde
The Executive Director
Natural Resource Commission
6/52 Martin Place
SYDNEY NSW 2000

7 July 2020

Re: Submission to the Review of the Water Sharing Plan for the Richmond River Area Unregulated, Regulated and Alluvial Water Sources 2010 (The Plan).

Terania Creek Water Source

My Farm

Is on a rich fertile flood plain with alluvial hill and has been a dairy farm for over 80 years

History

Goolmangar Water Users Group has been functional since 1997 and for the duration of this group a consensus of when our catchment should bring in restrictions and cease to pump was based on the water flow over the weir on Boyle road.

I have been Chairperson of Goolmangar Water User Group since 2009.

Under the Water Sharing Rules Terania Creek water source with our reference point being Coopers Creek, the Goolmangar Water Users Group I still activated restrictions and cease to pumps and notified NSW Office of Water.

Question 1

To What extent do you feel the Plan has contributed to environmental outcomes?

No difference to what Goolmangar Water Users Group was achieving before the plan was enacted. This plan has failed to recognise that our catchment contributes to the major floods that inundate towns and cities downstream of our community.

The flood of 2017 saw major flooding on my farm with no rights to capture lessening the impacts downstream and then in 2019-2020 with no water in the creek and most dams dry I was struggling to water my stock and have sufficient water for the dairy washout.

The plan does not address or offer solutions that make it viable for farmers to store water in rain events for use in dry times when our creek is under pressure.

The health of our creek has deteriorated immensely over the past 10 years, The Cats Claw and Camphor Laurel have totally taken over my stretch of creek from Goolmangar to Nimbin. I have spend many thousands of dollars trying to control the spread to no avail.

Government hasn't prepared for water usage of domestic and small allotments along the creek and centralised around the head of our creek at Nimbin. Over 300 small allotments have been granted approval around Nimbin in the last 10 years.

Question 2

To what extent do you feel the Plan has contributed to social outcomes?

The plan did not recognise the benefits of Water User Groups and managed to eliminating the good relationship that was built up over many years.

Because there is very limited Town water and no planning to increase even with additional subdivisions, when restrictions are enacted town residents do not understand farmers licence conditions.

Question 3

To what extent do you feel the Plan has contributed to economic outcomes:

It has not.

I need need reliable water for irrigation, the enormous cost to me of bought in feed was highlighted during the near catastrophic drought of 2019-2020.

We need an economical way of storing water in rain events so that it can be released in dry times.

Farmers that were on Toonumbar water source had reliable irrigation throughout the drought, the economic advantage for that group was enormous.

The plan does not address the economic cost to farmers from poor planning decisions of additional housing burdens on our water source.

Question 4

To What extent do you feel the Plan has contributed to meeting its objectives?

The River Flow Objectives are to

•Protect natural water levels in pools of creeks and rivers and wetlands during periods of no flow.

I do not agree.

When dry times have prevailed a close eye on the Boyles road weir has also been part of our stewardship. On the Office of Water records it will be noted the times and dates I have voluntarily placed our stream on restrictions.

*** Protect natural low flows**

We do not agree

Our WUG has contributed to the protection of low flows irrespective of the 'Plan'

*** Protect or restore a proportion of moderate flows, "freshes" and high flows**

We do not agree

Our plan does include Low to High flow conversion but the 1:5 conversion is uneconomical. The enormous cost of building storage facilities for high flows is not factored into this conversion. In a catchment that could reduce the impacts of flooding downstream landowners must have support to build facilities and not penalised.

Storage facilities that can only be build on first and second order streams is too restrictive if we are going to meet this objective.

*** Maintain or restore the natural inundation patterns and distribution of floodwaters supporting natural wetland and floodplain ecosystems.**

Do not agree. The enormous impact of flooding that leaves our catchment causing destruction of farmland and communities and Cities (Lismore).

*** Mimic the natural frequency, duration and seasonal nature of drying periods in naturally temporary waterways.**

We do not agree.

The plan has not addressed the additional subdivision lot in our upper catchments, this is not naturally temporary waterways.

*** Maintain or mimic natural flow variability in all rivers**

We can only comment on our own stream and do not agree the plan has enabled that for our catchment.

*** Maintain rates of rise and fall of river heights within natural bounds**

Do not agree.

Our plan does not address these issues, our creek in rain events causes destruction not only to the banks of creeks and surrounds but farmland and businesses.

*** Maintain groundwaters with natural levels, and variability, critical to surface flows or ecosystems.**

Do not agree.

The biggest threat to our ecosystem is the encroaching weeds along our creeks. From Camphor Laurels which are poisoning creeks with berries and are not deep rooted like native species so destruction of banks occurs in weather events. Cats Claw that is strangling Native trees and causing unnatural amounts of debris to fall into creek. Carp that is causing unknown damage to creeks.

*** Minimise the impact of in-stream structures**

Agree

*** Minimise downstream water quality impacts of storage releases**

I can only comment on our plan and advise there is no structures that help to regulate the water quality along our creek.

*** Ensure river flow management provides for contingencies**

Do not agree.

The only contingency in our plan is to take water off farmers to balance the huge increasing demand on our catchment with additional settlement.

*** Maintain or rehabilitate estuarine processes and habitats**

Do Not agree

The only rehabilitation that has occurred is when private landholders remove Camphor or Cats Claw to improve creek health. Our Plan does not address this enormous issue.

The statement “ The purpose of the river flow objectives is to produce specific environmental benefits such as

- Improved survival of ecosystems and aquatic biodiversity**
- Improved water quality**
- healthier wetlands**
- Improved habitat quality and increased variability of habitat for native fish, frogs, waterbirds and other native fauna, including invertebrates**
- More successful breeding of native birds, fish and other native fauna, which only breed in response to specific environmental triggers, for example, rising or falling water levels in the natural seasons**
- more natural inundation of flood plains and wetlands, leading to better health and productivity (such as grazing), protection of endangered species, biodiversity and water quality**
- discouragement of alien pest species, such as carp, which favour regulated conditions**

- **improved health of in-stream and riparian vegetation, leading to greater bank stability, improved efficiency of buffer strips in protecting water quality and reduced erosion and turbidity**
- **reduced frequency of algal blooms**

It has not addressed the weeds affecting the ecosystems along our creek

It has not improved the erosion and turbidity

It has not addressed biodiversity and water quality

Question 5

What changes do you feel are needed to the Plan to improve outcomes.

Ascertain water requirements for the additional housing allotments and how that can be accomplished.

Recognise agriculture as an essential service and that food security needs to be a priority and how we can work together to achieve this outcome whilst protecting the ecosystems along our creek.

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- Permitting storage facilities on flood plains up to fourth order streams.
- No reduction to irrigation Licences if Low to High Flow conversions is to be viable.
- Increase the Harvestable Right of farmers to 40%
- Build water storage for farmers for usage in dry times and to improve stream ecosystems.
- Planning for Residential allotments should include future water requirements and infrastructure.
- Trading---Should not be allowed into areas that cannot sustain the additional extraction.
- As a matter of priority address the weed and pest invasion along our water source
- Strategies to safeguard agriculture on our creek needs to be a priority.

Yours Faithfully

Leigh Shearman

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