Submission to Water Sharing Plan Review Richmond River

https://legislation.nsw.gov.au/~/pdf/view/regulation/2010/702/whole

Stakeholder, resident, landholder and water access licence holder of the Upper Richmomd Catchment

I have observed over 30 years living on this Gulibul/Gitubul land as a farmer, water license holder and steward of the land that this upper catchment has been pumped dry every year by industrial farming and it's irrigation of winter crops and general high volume water usage. I have not witnessed much care for the environmental flow upstream at all from irrigators downstream. I have witnessed rapid drop of water levels in pools each time the irrigation starts up. It seems that there is no regard for environmental flows. General local knowledge states "a license to pump is a license to pump until there's no water". It is obvious that there has been an overallocation of water on a catchment that does not have sufficient flow to accommodate. I'd like to see more protection of the environmental flow.

During the drought of 2019/20, residents tried to save wildlife in the creeks by transferring them from pool to pool as the water dropped. Platypus, fish, eels and yabbi among a few were helped. Koalas and other forest wildlife left with no pools to drink from. Meanwhile industrial farming went on as normal with water being pumped from bores and creek. There was no water for firefighting purposes but still water for dairying.

Today, 27th May 2020, going into winter, the **creek not flowing** in the upper reaches but the irrigation downstream is pumping most days ……

Rainfall after the drought has not been enough to replenish the groundwater.

What is going on ?

I will attempt to address specific questions suggested by Natural Resources Commision:

1) **To what extent do you feel the Plan has contributed to environmental outcomes?**
   I don't believe the Plan has contributed to positive environmental outcomes in the Upper Richmond Catchment. With climate change in mind and the NSW Government well aware of the need to act https://climatechange.environment.nsw.gov.au/About-climate-change-in-NSW/NSW-Government-action-on-climate-change I believe things really need to change in regard this over allocation of water. Certain agricultural practices which require high volume water usage have no place in the upper catchments of the Richmond Valley. With residential small holdings on the increase and the desire to have less of a carbon footprint whilst taking care of the environment comes more awareness of the water availability.
   People need water! To drink, grow food, to water livestock and for the wildlife.

2) **To what extent do you feel the Plan has contributed to social outcomes?**
   The Plan has contributed to negative social outcomes with a clear division of have's and have not's ! Some stakeholders have water and some have not !
   The land holders here have been here long enough to witness climate change and have seen no change in farming practice.

This is playing out in rural areas with emotions running high at times over the issue of water sharing. Fear of confrontation is causing stress and anxiety in our valleys. This was heightened during the drought and bushfires with many stakeholders brought to tears over the death of the creek while watching water being extracted from bores for large scale farming practices. I heard it repeatedly that "**The Creek has a Right to Life".** The thing is, people do care about the environment. Water is an **"Essential Element"** and we want this Plan reviewed with this in mind.

3) **To what extent do you feel has the plan contributed to economic outcomes ?**
I am unsure of what the economic outcomes are as there are many considerations.
For example : some have gained by having access to water(dairying, cropping) and some have lost income due to lack of environmental flows ie; subsistence (domestic) farming and perhaps (tourism).

4) **To what extent do you feel the Plan has contributed to meeting it's objectives ?**

The objectives of this Plan are to:

(a) protect, preserve, maintain and enhance the important river flow dependent and high priority groundwater dependent ecosystems of these water sources,……..**I don't believe this objective is being met. The loss of wildlife has been enormous. The drying up of pools has contributed to the death of many koalas and other animals including platypus.**

(b) protect, preserve, maintain and enhance the Aboriginal, cultural and heritage values of these water sources,…….**I don't believe this objective is being met. The creeks are our heritage and an integral necessity of our lives.**

(c) protect basic landholder rights,…. **I don't believe this objective is being met either as many landholders are being left without water flow.**

(d) manage these water sources to ensure equitable sharing between users,….. **I don't believe this objective is being met. There are more allocations than there is water available**. Equitable sharing does not exist !

(e) provide opportunities for market based trading of access licences and water allocations within sustainability and system constraints**,… certainly not sustainable within the water system**

(f) provide water allocation account management rules which allow sufficient flexibility to encourage responsible use of available water**,…..certainly not seeing responsible usage of available water. In many cases there are no meters. Licence holders are not accountable. There is no transparency. I would like to see the public being informed of the amount of water pumped. Perhaps on a digital board on the roadside…litres pumped today … Or at the very least on a website for public scrutiny.**

(g) contribute to the maintenance of water quality**, This current plan is not contributing to the maintenance of water quality. There is algae, erosion, loss of vegetation, pollution and invasive weeds which are a direct result of lack of maintenance to the system which results in poor water quality. This**

plan needs to consider the fencing off of creek banks, revegetation of waterways and weed control.

(h) provide recognition of the connectivity between surface water and groundwater**, I don't believe there has been a clear recognition or acknowledgement of the connection between the surface water and groundwater. Education and awareness campaigns could be a part of the new plan.**

(i) adaptively manage these water sources, and **Adaptation is sorely needed to preserve and protect our water in these changing times.** The new plan should be taking into consideration the changing climate. There is not enough water to continue with large scale irrigation in the upper catchment.

(j) contribute to the environmental and other public benefit outcomes identified under the Water Access Entitlements and Planning Framework in the Intergovernmental Agreement on a National Water Initiative (2004) (NWI)protect, preserve, maintain and enhance the important river flow dependent and high priority groundwater dependent ecosystems of these water sources. **Creek health as a priority would be an essential change to contribute to environmental and public benefits.**

5) What changes are needed to the Plan to improve outcomes ?

I would suggest giving more consideration to how much environmental flow is needed for a healthy water system first and foremost before considering what can be pumped out and keeping in mind climate change.

Surely it is clear that the upper catchments of this river cannot sustain large scale dairying anymore. Things have to change. The creek, the wildlife and the people of the upper catchments have a need and a right to survive. **The Creek has a Right to Life** .
When there is no environmental flow due to too much pumping, what happens is that upstream residents start to panic and in go the new dams, extra tanks and pumps which only makes matters worse for the creek as less water reaches it. The wildlife suffers and disappears.

I think that more education is needed across the board about water and it's value to us all.
I think selling of water should stop and a deep clean of the plan should take place. Let's look at the future survival of the environment and reconsider the amount of allocation given out.
Reconsider the state of affairs in the upper catchment specifically.
We need to look at rehydration of the landscape, education, resiliency in the system ,flood resiliency, more transparency with water pumping being metered and audited and a full and clear look forward to what we can do to assist the catchment towards better health.

Perhaps a monitoring system that looks at the levels in the pools upstream from irrigators designed to inform and advise of safe (for the environment) times to extract water. There could be a cut off point where it is no longer sustainable. This could have a positive impact on river health.
Thank you for the opportunity to have a say. I hope for a healthier catchment for generations to come.