

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

4 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

Thank you for giving our group the opportunity to provide feedback into our water sharing plan.

About our region

The valley's attached to our Water Sharing Plan are rich fertile Flood Plains and Alluvial Hills with predominately Dairy and Beef properties, Hay production, Pecan and Rice, Macadamia and Avocado farms.

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.

Under the Water Sharing Rules Terania Creek water source with our reference point being Coopers Creek, the Goolmangar Water Users Group still activated restrictions and cease to pumps and notified NSW Office of Water when low or no visible flow over the weir necessitated a cease to pump. There would be a record of these notifications over many years.

This group has been an integral part of water users taking responsibility for the environmental flows in our creek for many years.

Historically all licences 20 years ago were operational but this has not been evident for the past 10 years and begs the question where is all the water going?

Question 1

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

Very little or no difference to what our Water User Group were achieving before.

This plan has failed to recognise that our catchment contributes to the major floods that inundate towns and cities downstream of our community. 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.

Our group does not believe the health of our creek has been altered by this plan, Camphor Laurel and Cats Claw have increased their destruction and has not been addressed within the life of our plan.

Goolmangar Water User group still monitor the weir and notify users if we need to go onto restrictions the same as before the plan was enacted.

Sadly our interaction with NSW Office of Water and the support they offered has ceased, that lack of support from the department has meant no cohesion between the department and farmers. Historically NSW Office of Water would meet with Water User Groups on a regular basis, we were working in conjunction to get a cohesive outcome for both farmers and the environment.

Government would offer training and support to work with farmers to gain knowledge first hand of problems and offer up-skilling opportunities.

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. Where is the planning and why is it farmers that are the losers.

A study by Senior Irrigation Officer Chris Rolfe in August 1995 -Water storage requirements for gardens- recommendations for the Richmond Tweed stated back then we needed 181,000 mega litres annually for Nimbin. Add well over 300 additional lots just in the last 10 years that spells disaster for the environmental flows in our creek.

We have less water in our creek with less irrigators so where is the water going?

The plan has not addressed the environmental damage that additional Roads and Housing causes along the catchment.

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 to work together for the good of all.

Any support for farmers to gain information or guidance has been made extremely hard or non-existent. It has taken away the working relationship that farmers had with Office of Water (O of W) and caused conflict with Neighbour against Neighbour because nobody fully understands the plans. We are a voluntary group working together to support farmers as any other support is very limited.

Because there is very limited Town water and no planning to increase even with additional subdivisions, when restrictions are enacted residents do not understand when farmers are irrigating and do not understand the rules of our Licences. This increases the burden on inspectors and causes angst among the community.

The community believe they have a right to as much water that they want and take no responsibility to conserve water for their needs.

Question 3

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

This plan has done nothing to contribute to economic outcomes for farmers, there has been no planning undertaken on the impacts on farmers from additional extraction from residential allotments.

Farmers need reliable water for irrigation, the enormous cost of bought in feed was highlighted during the near catastrophic drought of 2019-2020. Water availability was highlighted as a major concern for businesses to continue to operate. Planning for the future must be addressed and food security must be a priority.

To enable our community to thrive and prosper we require water, **nowhere** in the plan does it address the economic cost to farmers from poor planning decisions to not address additional

housing burdens on our water source.

Farmers need the tools to drought proof their farms, a major rethink of regulations to allow greater flexibility needs to occur without placing environment flows at risk.

Climate change is increasing the risk of major weather events and this needs to be addressed as a matter of urgency. Farmers must have reliable water sources or the economic cost to their businesses will increase which is not sustainable into the future.

During Covid-19 food production was highlighted as an essential service and on this basis various government departments need to work together and not in isolation to protect Australian food security into the future.

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.

We do not agree.

Our plan for the past 10 years has been subject to Coopers Creek reference point, our WUG has followed these guidelines based on that plan. 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 we have voluntarily placed our stream on restrictions. Not your plan.

*** 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, landholders should be encouraged to drought proof their properties. In a catchment that could reduce the impacts of flooding downstream landowners must have support to build facilities and not penalised. The huge cost to society during these flood events in our region is insurmountable, the city centre of Lismore is one example it has not recovered from the weather event of 2017.

Storage facilities that can only be build on first and second order streams is too restrictive if we are going to meet this objective. Penalising landowners by reducing irrigation licences to meet this objective is not viable. Factoring the evaporation rate into the cost of these facilities needs to be recognised.

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

We agree some plans that would be the case but not in our catchment. The vast majority of flooding that leaves our catchment causes 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. This is man made and no planning for these additional requirements has been made in our plan.

*** 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. As reiterated above the additional subdivisions, houses, infrastructure and roads has not been addressed in the plan 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.

As a lot of the comments above, additionally 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. Honey Locust that is a new and emerging threat to the banks of our creek and will cause major damage if it is allowed to spread.

Please see Annexure A and B.

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

Agree

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

We 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.

Nimbin Town water supply comes from the upper reaches of our creek and is captured at the Mulgum Weir Dam. Where is the management when water cartage was allowed out of the Mulgum Weir dam in the middle of a drought. Where is the environmental flows from this Weir with the escalating number of housing allotments drawing from this structure.

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

Absolutely 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**

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We would like consultation with Natural Resources Commission and for them to explain to our members what actions have been undertaken and how these benefits have attributed to the health of our creek through our Water Sharing Plan.

In our eyes our plan has only addressed the regulation on irrigators which has only impacted the viability of farmers in our region.

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

The Camphor Laurel trees explosion along our creek has not been addressed, they are not deep rooted to stabilise the river banks.

Cats Claw is strangling all the native trees along the bank, this has not been addressed by this plan and any efforts by farmers to control is hardly making a dint in the spread.

Question 5

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

Recognition that various catchments have their own unique circumstances and plans must address these issues in isolation.

Consultation with water groups to obtain more cohesive outcomes, in turn ownership of plans by the communities involved. The Department working with WUG to manage cease to pumps.

Education and Training in the following

–log books

–understanding Plans

–best irrigation management practices etc

Our report Card for the Terania Creek Water Source (NSW Office of Water October 2009)noted

Risk to Instream value (from extraction) ---High--- Instream values are at high risk of being impacted by extractions within the water source.

Considering the subdivisions that have been approved in our catchment how has this been mitigated accept for penalising irrigators who have reduced over the term of the plan.

NSW Office of Water, December 2010 (updated February 2011)

Water Sharing Rules Terania Creek Source

Amendment Provisions ---In the event that it is considered that the very low flow class implemented after year 5 of the plan is having a significant economic impact on water users, the very low flow class will be amended.

This group is unaware of the implications of the new gauge on Goolmangar Creek and the implications on our cease to pump. The impact of Stock and Domestic Licences and the additional residential allotments along Goolmangar creek needs consultation.

What our group believes would be beneficial to achieve our River Flow Objectives

- 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 additional water storage for communities to allow for usage in dry times to improve stream reliability and ecosystems.
- Licence all Stock and Domestic extractions from creeks and streams and build in a fair and equitable ratio of reduction in dry times.
- Planning for Residential allotments should include future water requirements and infrastructure.
- Trading---Should not be allowed into areas that cannot sustain the additional extraction.
- Licence volumes that have been surrendered should be retained in the system for agricultural purposes.
- Address the weed and pest encroaching problems as a matter of urgency
- All departments within Government need to work with the agriculture community to address Food security into the future.
- Strategies to safeguard agriculture on our creek needs to be a priority to build a strong resilient region.

Reduction in Cease to Pump

It should be noted if there are any reductions in the cease to pump, this would significantly impact the viability of businesses along our creek and limit those businesses to make any forward planning or expansion.

Whilst it is difficult to model the full impacts the new plan will have on businesses, if it cannot safeguard water to our users it will certainly have dire implication for our future long term viability.

We live in a high rainfall region and innovative ways to protect the ecosystems on our creek and at the same time ensuring water for irrigation should be a priority for future food sustainability. Each water system has different attributes and we would like the opportunity to discuss the challenges that face landholders along our creek.

Our group requests a meeting with Natural Resource Commission to identify changes that could be made to the new plan to benefit all stakeholders.

Yours Faithfully
 Leigh Shearman
 Chairperson
 Goolmangar Water Users Group

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