The Towamba flow plan notwithstanding best intentions falls short in some regards. In the Towamba river in periods of low or no flow users exceed the flow and draw down pools. The only effective way to manage the resource is to have a plan owned and accepted by community that includes all users, as most extraction is by small pumps Not irrigation. We had that but have lost community control, disenfranchised by the legislated plan. We need to be involved in changes imposed on us.

Before there was a legislated Towamba water sharing plan, a subcommittee of the Towamba Landcare Group wrote a sharing plan with community consultation that received unanimous support at all the meetings at which we presented it. Its aim was to maximize availability and equitably share water so that some remained for environmental health. It dealt with riparian use and set guidelines for limited extraction in the periods when licensed extraction had stopped. Once the irrigation has stopped the other riparian and town users become the only users. That plan is outlined below.

Above 10 megalitres daily. No restrictions on use

Below 10 meg. Please don't fill dams or have free running pipes out of streams or river.

Below 3 meg. No irrigation (In tributaries irrigation must not stop the flow of a stream)

Below 1 meg. All users to limit extractions to 1500 litres daily

Noflow. Hand held hoses only

Extraction for firefighting and stock drinking from trough systems is acceptable at all flows as well as domestic use

We encourage the construction of water storages/dams as these are seen to have negligible effect on our coastal river flows and help hydrate the landscape in drier times. Stored water in dams can be used for any purpose.

## Bores are seen to be part of the river system so managed according to above plan

Since then a plan that unfortunately leaves out most users and is far more restrictive to licensed users has been imposed by the government. For example, according to one sharing plan published, extraction for stock water became restricted just when most farms were out of other sources. It seems now that that is only for licensed users at half a meg cutoff.

Stock owners need some access to water at ultra-low flows.

In general, most users follow our plan as the legislated plan seems untenable. So, any data is from our rules, but because it is not the legislated plan it is now hard for us to encourage responsible use by all users. When the bushfires threatened it was beginning to become a "whoever can get it" pumping. This period demonstrated the need for a plan that belongs to the river users so they self-regulate. It should be noted that there were very long periods when licensed water extraction was not allowed under the legislated plan. Basically, the only permitted irrigation was when you don't need to or from your storages.

Water storage is restricted by maximum harvestable right and as most, if not all, dams leak, the amount stored can be a significant contributor to baseline flows. Our peak flows are excessive. We need increased harvestable rights in non-permanently flowing waterways and landholders should be encouraged to store more water in our catchments.

According to the government plan the amount of time when there is no licensed pumping in the last growing year was nearly 50% so there was no chance of irrigation even when good flows were making it to the sea.

There are a few new factors influencing water flows that make a community plan even more important. These include the proliferation of poplars and willows that are enormous water users and affect the water data.

There is also a proliferation of solar pumps. This adds to the number of gravity feeds that need to be part of our plan.

Wyndham town water supply has an exemption to the cease pumping rule and provides an extremely useful service including to fire-fighting tankers and valley residents who are out of water. But the lower reaches of the Myrtle creek stopped flowing and went underground despite constant flow at Wyndham's pump site. Mataganah creek had the same thing happen in the lower reaches, with large pools being significantly drawn down by riparian users.

BVSC continues to extract water for Eden town from the Towamba River despite having other available sources, further devaluing any community water plan and increasing disenfranchisement and non compliance.

Submissiom from the Towamba valley landcare group put together by the committee and critiqued by our members (60) 2/07/20

Contact derek lewis former chair of the towamba water management committee

thankyou