



Tweed Landcare Inc |

RE: Water Sharing Plan: Tweed River Area Unregulated and Alluvial Water Sources 2010

Tweed Landcare Inc is a not for profit group of up to 200 members based in the Northern Rivers of NSW. Our role is to support people caring for the environment and natural resources of the Tweed region. We help landholders and 30 local volunteer groups across the Tweed and run significant ecological restoration and sustainable agriculture projects of our own. We aim to improve environmental outcomes for our region and support and preserve its valuable biodiversity.

We would like to comment on the upcoming review of the Tweed Water Sharing Plan (WSP), in particular addressing the questions:

- *To what extent do you feel the plan has contributed to environmental outcomes?*
- *What changes do you feel are needed to the Water Sharing Plan to improve outcomes?*

Environmental Outcomes

Byrrill Ck Dam (clause 48(1))

We are strongly supportive of the current prohibition of a dam within the Byrrill Ck Water Source. This clause in the Water Sharing Plan is the result of a decision by Tweed Shire Council to place a moratorium on any dam proposal at Byrrill Ck until 2032. We believe this moratorium should exist in perpetuity. This catchment is one of the highest value riparian conservation areas in the Tweed region. It is of considerable environmental benefit to the biodiversity of the region (& to biodiversity in general). The Byrrill Ck area supports numerous threatened species; over 42 priority flora species and 37 priority fauna species. It also supports 3 Endangered Ecological Communities and encompasses 21 ha of Mebbin National Park.

All of this stands to be lost to flooding if the river is dammed. The topography is such that a dam would flood a very wide area of highly valuable environmental land. Furthermore, the Mt Warning and Mebbin National Parks, as well as 26 Aboriginal heritage sites, are currently linked by a wildlife and Climate Change corridor that runs through the Byrrill Ck valley.

Over the past decade Tweed Landcare has supported the Byrrill Ck Landcare group who have contributed thousands of volunteer hours to weed and erosion control and have planted nearly 3000 plants. The option of raising the Clarrie Hall Dam is a far better proposal for additional water augmentation if this is required under future WSPs. Tweed council has already adopted this as their preferred option.

Environmental Water Flows

We strongly support the release of such flows from Clarrie Hall Dam to feed Doon Doon Ck and Tweed River. These flows must remain. They provide important aquatic refuges in times of drought. This was especially evident in the severe drought to January 2020 in which the majority of creeks and the upper reaches of the Tweed River ran dry.

We also support the release of flows for the Fish Ladder at Bray Park Weir. Such flows allow migration of fish both up and down-stream and was seen to be of significant benefit in the recent drought.

Changes needed to improve outcomes of the WSP

Water extraction accountability

An independent audit of the Tweeds WSP was commissioned by the responsible minister. Alluvium Consulting Australia (*Audit Report - Oct 2019*) found severe shortfalls in WSP outcomes due to substandard management of water for extraction on a long-term basis. It noted that the volume of water taken from unregulated surface water was not being calculated against Long Term Annual Extraction Limits (LTAAEL). To be compliant with the WSP - calculations of current extraction levels as well as calculations of previous years extraction levels are required - however this has not occurred. The data is simply not available. There is no metering of surface water extractions – users are only asked to keep a log book. There is no documented procedure for monitoring volume limits. There is no monitoring of carryover of water volumes (which are always set at 100% regardless of usage). There are no resources being directed to this task.

The auditors recommend that conditions need to be placed on Water Access Licenses if compliance with the objectives of the WSP are to be achieved.

The auditors recommend that oversight needs to be significantly improved by proactively monitoring license holders for compliance.

These findings have been borne out by the experiences of the past 10 years. Compliance breaches have occurred but have generally not been dealt with in a timely or effective manner. Further inquiry is urgently needed to determine effective systems of accountability, compliance, monitoring and timeliness of outcome.

WSP adaptability to climate change

Any revision of the WSP needs to incorporate the impacts of Climate Change (CC). The Tweed region has seen the extreme weather events predicted by CC models in successive years. In 2017 cyclone Debbie caused the worst flooding in over 100 years. Then in 2019 the region experienced one of the worst droughts on record. River flows fell by 20% and the low flows allowed salt water inundation into Tweeds town water supply at Bray Park weir.

CC models predict these events to become more frequent and more extreme. It is imperative that contingencies are in place to deal with the impacts. The town of Tyalgum showed up some glaring shortfalls. In 2019 no flows into the weir caused high pollution levels and the Council had to truck water into the village. Suggested measures include increasing the village's allocation, projects to harvest storm water or recycled water etc.

Clause 14 of the existing WSP has provisions to manage the sharing of water based on long-term averages, however a lot more work is required to ascertain long term averages. This is even more imperative with the increasing impacts of CC on river flows – particularly low flows.

Outcomes

The WSP aims to balance social outcomes, economic outcomes and environmental outcomes. Our comments focus on the importance of river flows for the natural environment. However, we hope that a healthy river system and a thriving natural biodiversity is seen to provide positive social and economic outcomes for the region and its inhabitants.

Yours sincerely,

Tweed Landcare Inc. Committee
1 July 2020