





Northern Basin First Flush Assessment

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About NSW Farmers

A profitable and sustainable New South Wales farming sector

The NSW Farmers' Association (NSW Farmers) is Australia's largest State farming organisation, representing the interests of more than 8,000 of its farmer members.

Farmers across New South Wales produce more than \$13 billion worth of food and fibre every year, around one quarter of Australia's total agricultural output. Our state's unique geography means a wide variety of crops and livestock can be cultivated and nurtured. NSW Farmers is Australia's only state-based farming organisation to represent the interests of farmers of all agricultural commodities – from avocados and tomatoes, apples, bananas and berries, through grains, pulses and lentils to oysters, cattle, dairy, goats, sheep, pigs and chickens.

Our focus is not just on issues affecting particular crops or animals – it extends to the environment, biosecurity, water, economics, trade and rural and regional affairs. We also have an eye on the future of agriculture; we are advocates for innovation in agriculture, striving to give our members access to the latest and greatest innovations in research, development and extension opportunities. Our industrial relations section provides highly specialised advice about labour and workplace matters.

Our regional branch network ensures local voices guide and shape our positions on issues which affect real people in real communities. As a grass-roots organisation, NSW Farmers' members are the final arbiters of the policies of the Association. Through our Annual Conference and elected forums such as Executive Council, members can lobby for the issues which matter to them and their community to become Association policy. Our issue- and commodity-specific Advisory Committees are elected by members to provide specialist, practical advice to decision makers on issues affecting industry sectors. We are proudly apolitical – we put our members' needs first.

In addition, NSW Farmers has partnerships and alliances with like-minded organisations, universities, government agencies and commercial businesses across Australia. We are a proud founding member of the National Farmers' Federation.

Introduction

NSW Farmers welcomes the opportunity to provide comment to the Northern Basin First Flush Assessment. The protection of first flush flows in streams and on floodplains is important to restart the Darling River to facilitate fair access to downstream users and to allow distribution of beneficial sediments. NSW Farmers seeks a Murray Darling Basin watershed that is managed as a connected system, which maximises the benefits for the majority of producers and the environmental outcomes the Murray Darling Basin Plan is intended to achieve.

NSW Farmers has long standing policy seeking the highest level of security of access to water for all sectors of agriculture, and in times of drought prioritising access for stock (extensive) and domestic water (excluding garden use). We also support comprehensive real-time metering and monitoring for both water quantity and water quality. Consistent, regulated and enforced metering across the Basin must be implemented to ensure the integrity of water sharing arrangements, maintain the value of water rights and provide the data about water use that is essential for adaptive responses to water management and water sharing, protecting in-stream flows and floodplain first flows and making systems more resilient to drought and floods.

The management of floodplain first flush events is required to meet critical human and environmental needs and restore connectivity of the Murray Darling Basin system following prolonged periods of drought. However, the communication, transparency of management decisions and preparedness of water agencies for the management of the January/February 2020 first flush event was poor and must be improved for future first flush events. Overall, the Government needs to ensure there is a clear framework to manage first flush events with established objectives, flow targets and clear communication.

Communication

Overall communication throughout the Northern Basin first flush event was poor. This includes the notice of the embargo provided to landholders and the communication of the objectives of the first flush event and associated flow targets. Feedback from our members is that the communication of the floodplain harvesting embargo was terrible and sufficient notice of the temporary restriction was not provided to landholders. The main form of communication to landholders was via a text message sent in the late afternoon on the Friday prior to the rainfall event. This late notice resulted in landholders being unable to contact WaterNSW and Department staff to clarify the restrictions due to the weekend.

Additionally, no consultation was held with stakeholders throughout the Murray Darling Basin, including downstream water users in the Southern Connected System, regarding the Government's plan to implement the embargo and the objectives government intended to be achieved through the embargo. Consultation with a broad group of stakeholders well before the first flush event would have provided valuable input to develop flow targets and objectives for the temporary water restriction and provide transparency.

Planning for the management and communication of embargoes on first flush events must be improved to ensure transparency and compliance. Clear communications strategies must be developed that ensure sufficient notice to landholders of embargoes, provide clear explanation of objectives and the reasons for temporary restrictions, and the intended flow targets for the first flush event.

Decision Making Processes

Throughout the first flush event it was apparent that the Government did not have a planned decision making process for managing the Northern Basin first flush event. A number of decisions made throughout first flush event provided evidence that there was not a developed plan to manage the event, this included: delayed disclosure of flow targets, the decision to change the method of measuring flow targets (duration converted to volumetric flow targets) and the increase of flow targets as inflows continued/increased. The lack of transparency regarding the management of the first flush event and the changes in flow targets resulted in confusion of the objectives of the temporary restriction.

Views from throughout the Murray Darling Basin must be incorporated in the objectives and decision making framework for first flush events. Our members from the northern basin provided feedback that the increase of flow targets mid-way through the first flush event created inequity of water access to landholders throughout the northern basin. We also heard that members from the Southern Connected System would like to see first flush event managed in a way that provides maximum opportunity for connectivity of the Murray Darling Basin through connecting flows to the Lower Darling River and Murray River. There needs to be a transparent framework for understanding

and reconciling competing interests in first flush events, to ensure that all users have an equal opportunity to be heard through the decision making process.

Similarly, the decision and reasons to lift the embargo for three days in some regions early in the first flush event was not communicated effectively to all stakeholders throughout the Murray Darling Basin. This decision and lack of communication caused significant concerns about the likely extent of impact on the connectivity of flows to Darling River. Also of significant concern was that this decision occurred without any calculation of the water that could be extracted throughout the short-term lifting of the embargo and the impact this would have on the objectives of the first flush event.

NSW Farmers urges the Government to work with communities throughout the Murray Darling Basin to develop a transparent decision making framework. This will allow the Government to make informed decisions and build community confidence that first flush events will be properly managed to meet clear objectives that maximise benefits for all water users.

Preparation of Water Agencies

Water agencies including the Department of Primary Industries and the Environment, Water, WaterNSW and the Natural Resources Access Regulator were not prepared to manage the northern basin first flush event that occurred during January/February 2020. Despite forecasts from the Bureau of Meteorology that a flood event was imminent following the prolonged drought period, the agencies did not undertake the necessary preparation to develop a plan for managing the first flush event.

Comprehensive real-time metering and monitoring across the Basin and water accounting that takes into consideration the inflows from neighbouring states (i.e. Queensland) should be implemented. Feedback from NSW Farmers' northern basin members is that the water accounting for the first flush event did not account for the inflows from Queensland, which were significant and overshot the original flow targets. Our Association believes that water measurement and accounting must include inflows across the Queensland border when planning for and developing flow targets for first flush events.

Consistent, regulated and enforced metering across the Basin must be implemented to ensure the integrity of water sharing arrangements, maintain the value of water property rights and provide the water use data that is essential for adaptive responses to water management and water sharing, protecting in-stream flows and floodplain first flows and making systems more resilient to drought and floods. The Government's slow progress toward full metering of the NSW watershed is significantly undermining our members' efforts to develop support for irrigated agriculture and the myriad of benefits that farming brings to the NSW economy and communities.

Conclusion

NSW Farmers appreciates the opportunity to provide feedback to the Northern Basin First Flush Assessment. NSW Farmers supports maximising the benefits of the first flush flow event to provide connectivity of the Murray Darling Basin system and to meet critical needs and we are disappointed that Government was not adequately prepared to manage this important first flush event. Certainly the long (and in some areas continuing) drought provided ample time for government to prepare for this event, and to understand the critical importance of the event to farmers throughout the Murray Darling Basin System who had gone without water for so long. For future events we think that it is absolutely critical that government develops objectives with input from all users and clearly identifies these objectives well ahead of time. Adequate notice of any proposed embargo and the terms on which such an embargo will operate is essential. These were key failures in the management of the recent event, and they should not be repeated.

NSW Farmers urges the Government to develop a first flush management framework in consultation with stakeholders from across the Murray Darling Basin. This first flush management framework should also be written into the water sharing plans and cover a range of potential first flush event scenarios.