

To whom it may concern,

This paper's main purpose is to examine the negative impacts of environmental water and its poor management on landholders in the Gingham and lower Gwydir water courses. Environmental water allocations, intended to maintain ecosystem health and restore the water dependent habitats for migratory bird breeding events always seem to come at a cost to the local landholder who are to in our view part of the environment and have been so well before water regulation began. We would like bring to light the socioeconomic and environmental challenges faced by landholders, land degradation, and conflicts over water allocations. The general outcome highlighted as a group is the need for improved water management strategies that balance environmental conservation with the socioeconomic wellbeing of landholders which very rarely seems to be given any thought let alone a mention in environmental papers.

The following will address:

- Community impacts

- Issues we face in the watercourse (water policy over practicality & reality within our landscape).
- Degrading roads and lack of public infrastructure to handle these water deliveries.
- Impact to services – many residents struggling to access basic services due to flooding including schooling, health services, freight of inputs and commodities etc.

- Environmental impacts

- Degradation of assets including soils/land, crops and again infrastructure.

- Economic and financial impacts

- Landholders have no way to protect themselves from inundation of environmental water.
- Being our primary industry any impact to agriculture in this area has a direct impact to our local economies and communities.
- Need for annual compensation for landholders losses, in order to achieve these environmental outcomes to society.

- Conflicts and challenges in water allocation Ramsar convention – international and intergovernmental policies to uphold their obligations.

## IDEAS TO BETTER IMPLEMENT THE MURRAY DARLING BASIN PLAN

We cannot accept the current “Reconnecting watercourse” programme delivered under the norther basin toolkit.

### THE ISSUES – THE WATERCOURSE

Since the regulation of the Gwydir River and subsequent overdevelopment of the flood plain, including the building of Copeton Dam, completed in 1976 , policy has preferenced one water user over another with no recognition of the environmental significance of the wetlands until relatively recent times (2007 )

Watering programs have been developed without proper perspective and in doing so the policy of ‘righting the wrong’s water buy backs by government have decimated local communities that have grown through the inception of the irrigation industry. we cannot afford any more water to be recovered from the Gwydir system for environmental use - it is nearly 50 years too late !!!

There is a very much changed landscape in the 220,000 ha that was the original watercourse. Most country having been altered to adapt to the change to broad acre cropping (a move away from livestock) as the wetlands were dried down and diminished.

Today, these very same landholders continue to wear the economic loss through third party inundation, from current water policy now allowing the return of water for the environment.

### DISRUPTION TO EMERGENCY AND CRITICAL SERVICES

Our roads are black soil with a critical shortage of gravel material or bitumen. When the watercourse is inundated with water , the Gingham ,watercourse and Morialta roads are cut for weeks and months at a time

- Emergency services are unable to traverse and navigate the roads leading to increase of an emergency of catastrophic making.
- Children are unable to catch the bus to school.
- Residents are unable to get to town for groceries and supplies , without adding in that in some cases ( if they can at all ) it involves thousands of accrued kilometres in excess travel .
- Farmers are prohibited from getting their commodities to market

### ON THE RECORD

The honourable Scott Macdonald mentioned our dilemma at a legislative council meeting in August 2013

Discussion was on **Report 37 ,Adequacy of water storages in NSW**

Recommendation number 9 states

**...“that the NSW government clarify with the commonwealth government the NSW government’s liability for environmental water releases made under the Murray Darling Basin plan that inundate private land, in time to feed into the process of developing the water sharing plan that must comply with the basin plan and be enacted by 2019”.**

This is still not clarified and private landholders still continue to wear the economic losses. As per historical hindsight there is no accountability from either state or commonwealth.

Both State and Federal stakeholders are both very quick to accept the praise for out comes received by deliveries of each of their water entitlements ,which added on to the already returned in stream natural flows through the WSP, and then add another rainfall event and landholders are yet again through water on water inundated !!

## PAID PASSAGE

Rather than funding through the WATER FOR THE ENVIRONMENT SPECIAL ACCOUNT (WESA) the on and off farm efficiency projects (so far \$4.52 billion has been spent on things such as lining irrigation channels or changing irrigation systems) that have clearly shown not to achieve the aim of a better nett environmental outcome. The opportunity exists through this funding to change the legislation and remunerate private landholders with a yearly sum for the purpose of “**PAID PASSAGE**“. An amount per acre of land that allows for flows to be delivered through to the Gwydir wetlands SCA, which include 4 internationally recognised Ramsar sites located both in the SCA and approx. 30 kms to the west.

Not only would this provide much better long-term connectivity and environmental outcomes, but by default more historic wetlands would be rejuvenated by allowing water managers to inundate for longer periods and greater depth when seasonal variability cues are triggered. this would allow full implementation of the current long term watering plans of both state and commonwealth, whilst lessening the risk of third party inundation. This would also help encompass the water principles of first nations people seasonal calendar and other cultural flows currently being developed by the Gomeroi/Kamilaroi people with the MDBA and other Government Depts. The Mungindi Aboriginal Lands Council own a parcel of land adjacent to the SCA.

For example

Land value \$4000/acre

Area benchmark – average return on asset value 15%

= \$600.00 acre per year index linked

This proposal and initial conversation of compensation was explored in the original constraints management strategy for the Murray Darling Basin Authority 2013/14.

This example of policy encourages landholders to change their enterprises through a designated flow path and to 'farm the environment' rather than continue traditional methods of cropping –course they were forced into through the drying of the watercourse. **Through modelled data it has shown that the Gwydir is one of the most flow altered rivers In Australia.**

## ENVIRONMENTAL ISSUES WITH CONTINUED INUNDATION- LIPPIA

Being able to deliver and inundate for sufficient periods of time and depth of water in this flow path could also help to remove Lippia from these areas. This in turn would help the water couch and other native grasses flourish.

Lippia has taken over the watercourse. It was promoted by NSW Agriculture as “although not native, a good hardy groundcover” for livestock during the time when the watercourse was dried down.

What was discovered by Rob McCosker (a Scientist who researched the watercourse in the late 1980's and 1990's). Rob was involved in the Ramsar sites listing. To try and gain some attention and hence some more water for the wetlands, it was noted that Lippia cannot survive constant inundation greater than 20 cms (water requirements of the Gwydir wetlands published April 1994) this would in turn support EWR codes such as:

WL 1-4

OB 1-3

WB1-5

OS1-OS4

## COMMUNITY COOPERATION AT AN ALL TIME LOW

It should at this point be noted that since 2007 landholder engagement - contrary to belief portrayed by media releases and at government meetings, is at an all-time low. With the inundation of water, and no acknowledgment of the changed landscape by water managers, landholders have become increasingly angered by not being heard regarding the impacts of third party water caused by the govt departments:

- implementation of the WSP for the Gwydir regulated and unregulated water source and compliance with water access licence conditions.
- Allocations of NSW planned environmental water.
- Allocation of both NSW and commonwealth 'held environmental water'.

We as landholders are finding that there is no duty of care from local, state and federal policy. There are too many layers of WATER AND ENVIRONMENT. All written with the aim of protecting each (local, state and federal) objective.

It has reached the point where government agencies only have access to the SCA's (approx. 35,000 acres) due to poor relationships with local landowners.

## TIMELINE

The first mdba constraints programme was announced in 2013 in response to our concerns consultations commenced in 2014 and we were told it was to all be implemented by 2024.

- We were then informed there was no funding, and the programme was being pulled.
- April 1970: Beale visited Moree (April 1970) to announce the general plan - he stated that the Lower Gwydir would be included in the plan and the water would be taken as far as the end of the defined channel approx. half a mile below the “Wandoona “water hole, **he assured the Gingham landholders that although there was to be no scheme initiated to put irrigation into the Gingham ,they would continue to receive 80% of their pre copeton flows prior to the commencement of Copeton .**
- August 2022: Minster Plibersek’s media announcement (included) that the original \$200 million along with \$1.57 billion for on and off farm efficiency programmes was sitting in WESA since 2014 – during which time all the landholders continued to suffer economic losses to their cropping enterprises and the environment still did not obtain required outcomes.
- 2010: One particular case of lower Gingham landholders (west of Gingham Bridge), who in the winter - in verbal consultation with OEH Water Manager [Daryl Albertsen ], in an effort to stop third party inundation on their cropping country (**a total of 143,000 mg/litres was delivered through the winter months enabled under policy**) erected levees running continuously east west, at least 400 metres off the channel, to deliver water to the Ramsar sites “Crinolyn” and “Wyndella”.
- 2019: These stayed there until 2019 when NRAR were asked to investigate, and eventually deemed them unlawful under the GVFP 2016. Even though in the initial MDBA constraints programme consultations 2014 these were mentioned and shown to officials on a site visit, landholders were assured they would be able to be licensed and included in the programme.
- Landholders explored every avenue available, including paying SMK Consultancy to visit and report on any perceived problems with the bank (document enclosed) SMK found that with the bank in place it required 2/3rds less water to deliver to Ramsar sites than with the bank removed. This is water purchased with taxpayers’ money, and with poorly managed policy did not have environmental outcomes reached.
- Beale’s Water Report – **Water Resources of the Gwydir Valley. survey of thirty NSW river valleys, Report number 5** -logged the Gwydir in September 1966 the average annual discharge at Pallamallawa was assessed at an average 665,000 acre feet (approx. 820,000 mg/litres) over a 46 year period of complete records available
- 1994: after the inception of Copeton Dam, it was logged at Yarraman at just 116,000 mg/litres (water requirements of the Gwydir wetlands, April 1994 ). In 1994 the annual flow in to Copeton Dam was 400,000 mg/litres, yet the licences issued for allocated water totalled 530,000 mg/litres.
  - This however did not consider the flow from the Horton tributary (now known as the three tributaries low flow rule) which Beale had logged in 1966 as being 180,000-acre feet (approx. 222,000 mg/litres and being a very reliable flow). This water was provided to

make up the shortfall by an unwritten DWR policy declaring off allocation water available under the 'interim unregulated flow management plan for the north west'.

- Please find attached one of many letters to our local MP asking for his support.

## WE DO NOT ACCEPT THE PROPOSED RECONNECTING WATERCOURSE PROGRAM

It should now be obvious why landholders have a huge mistrust of Government.

We do not accept the proposed reconnecting water course programme delivered under the northern basin toolkit.

There has been no acknowledgement by Government (local, state or federal) to what landholders have lost through water policy, until that time, and a serious undertaking to put a monetary value on what we are now expected to provide in environmental outcomes for society, through the return of water to what is now a predominately changed landscape to broadacre cropping.

Government has never taken responsibility for destruction of the watercourse (see notes re Beale visit to Moree in April 1970).

## EXPLORE REAL ENVIRONMENTAL OUTCOMES

We invite government to explore the following concepts, so we get real environmental outcomes throughout a designated main flow path, alongside cultural flow deliveries, commonwealth govt can uphold their international intergovernmental obligation under the Ramsar convention to maintain and improve the ecological state of these listed sites. and above all landholders are guaranteed surety in their modern-day businesses, and properly remunerated for the environmental outcomes they provide for society, thus creating strong resilient and yet again adaptive communities, which in turn contribute to the greater economy.

This whole of watercourse project would encompass the watercourse.

- area of 102,000 hectares.
- paid passage approx. 15,000 ha but could be more if funded properly.
- SCA - approx 14,000
- Balance 73,000 ha watercourse cropping - covered by an agricultural conservation risk insurance scheme for environmentally sensitive areas underwritten by government.
- What we propose in designated flow path.
- Annual 'paid passage' per acre in designated mapped flow path
- By the return of water to the environment and the long-term water plans of both CEWO and state (modelling in present reconnecting watercourse allows max passage of 450 mg/litres ) it cannot however mitigate the risk of water still not entering cropping country;

- It must be remembered it is **historical water policy** that forced landholders to crop where they do.
  - Historic flow path of “paid passage”;
  - rejuvenating through better flow and inundation.
  - it will increase the native flora of core wetland, such as lignum , Marsh club-rush , water couch and cumbungi , which is exactly what is a required outcome in the LTWP being an increase in vegetation and foraging habitat for birds, but will result approx. once every 2-3 years
  - Working on local landholder knowledge of flows within the watercourse - of water moving out of this passage, where there has been a build-up of these aquatic plants – that trap sediment and therefore slow the flow. Gingham from Tillaloo, through to the Morialta Road and on the lower Gwydir from “Allambie” through to the Morilta Road.
  - We ask the Government to appoint an independent Agronomist to monitor the crops throughout the growing season, so in the event of a loss, costs can be calculated correctly.
  - That the economic cost and the degradation of soil on cropping country where water will and does now sit for much longer at much higher levels of saturation. Farmers now after inundation, need to mechanically work the soil to aerate it, which does not embrace the scientifically researched principles of modern conservation tillage they follow, this practise helps to maintain soil structure, and fertility by preserving organic matter, it promotes biological activity and increases water holding abilities storing moisture efficiently, whilst helping sequester carbon.
  - Environmental Water managers in the past have claimed how croppers would grow much better crops after being flooded. This as shown is totally untrue and compromises landholders’ ability to commit to sound environmental outcomes within their cropping enterprises, but by default they have subsidised huge environmental outcomes for govt depts.
  
- We challenge water managers with their modelling of required flows and outcomes from LTWP’s to guarantee that other than the designed flow path we would not get inundated by off target water.... the reality being, we farm in the watercourse, which as one environmental water manager once said when he took over the job in 2007 ‘I have inherited a dry watercourse and I intend to change that’ ...commendable words, and policy was on his side, but he did not understand landholders had had 32 years of policy allowing a dry watercourse and had adapted their businesses to maintain financial viability. They had climate change forced on them nearly 50 years ago!!
- Today’s policy rightly values the environment, but landholders need to be remunerated both through both a “paid flow passage’ and an undertaking from Government to underwrite insurance for when cropping land outside this flow path is inundated. Government in supporting this proposal, it would be supporting an “on and off farm efficiency programme’ to deliver water to the

Watercourse, whilst allowing landholders financial surety of a return on money invested in their businesses.

- It would take a great deal of work to model the different scenarios through increase of water delivery into the landscape without as many limiting constraints, and we are aware the time frame on the funding to complete this has been pushed back 2 years to explore more ideas.
- The Gingham and Lower Gwydir landholders continue to invite Minister Plibersek to visit and see for herself the problems associated with return of water through the implementation of current water sharing plan and delivery of held environmental water by CEWH and state.
- Landholders with cropping country within the designated flow path would undertake to not farm it, in the hope that it would slowly return to a more typical watercourse habitat, this as landholders know would take monitoring and evaluating, and they would work with the scientist Rob McCosker (who has already done a lot of published research in both Gingham and lower Gwydir watercourses) to get best possible outcomes. with reviews done annually through the entire flow path.
- Moisture probes and depth gages should be installed along the whole of system, to enable real time monitoring and data collection, this combined with better utilisation by water managers of BOM's forecasts, would lessen unintended inundation on cropping country.
- Landholders with remnant wetland grazing of which there is very little left, would undertake to remove stock in the 6 weeks spring into summer to allow native grasses and plants to seed. And would also work with Rob McCosker on monitoring and evaluating.
- EWR Outcomes through this, as mentioned earlier are significant, there is a chance to get both longitudinal, and latitudinal connectivity as close to natural as is possible within a regulated wetland landscape.

## DIALOGUE

We ask that you, the MDBA ,DEECCW ,meets with our group to discuss the above. We as landholders and stakeholders wish to find a middle ground where both environmental outcomes and our agricultural outcomes can be recognised. We need an opportunity to have face to face dialogue about this area of Northwest New South Wales going forward to drive change with positive outcomes for all resulting in Triple bottom line outcomes.

- **Environment** (The water savings through low level banks, enhance out comes under; lwp's)
- **Economic** : (Agricultural conservation risk insurance ,gives surety of business operations impacted by the above , flows onto wider economy )
- **Socio and cultural** outcomes

Please find attached

Please don't hesitate to contact me with further information regarding this matter.

Lou Doran