



R.M.I. Pty Limited

A.B.N 88 000 616 964

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NSW First Flush Assessment
C/- Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124
Email: independentpanel.firstflush@dpie.nsw.gov.au

FEEDBACK ON INDEPENDENT PANEL ASSESSMENT INTO THE MANAGEMENT OF THE 2020 NSW NORTHERN MURRAY-DARLING BASIN FIRST FLUSH EVENT

To the Independent Panel

RMI Pty Ltd is a family owned business based in Goondiwindi operating along the border of NSW and QLD, we predominantly grow irrigated cotton as well as process it in our family owned cotton gin. We also grow non-irrigated cereals and pulses, operate a feedlot and produce beef cattle on non-irrigated land. In a normal year at the peak of the season we employ over 100 staff and rely heavily on local family owned businesses for almost all of our agricultural inputs and other services. Due to the severe drought staff numbers have reduced by over 60% and expenditure for cropping inputs and use of services has reduced by an even greater percentage.

Access to regulated water entitlements through a transparent, reliable and accountable system is crucial to the survival and success of rural and regional communities. The strength and viability of regional communities and all of the goods and services provided within them must be maintained, without them there is no Regional Australia.

Key Findings and Recommendations of Independent Panel Assessment

Through our participation in the Webinar and perusal of the Draft Report, it appears the Independent Panel conducted a very detailed assessment, many of the “key findings” mirrored the concerns that we also had, for example:

- “Take steps to ensure evidence base and methodology for first flush management is quantified, science-based and made publicly available.”
- “The extent of connectivity being sought in the river system was not always clear”
- “some decisions lacked the requisite local knowledge or expertise, which was of concern to the community”
- “Ultimately though, insufficient planning and preparation was undertaken for the 2020 Northern Basin First Flush event – most significantly, in regard to not informing and engaging water users and the community when preparing the objectives, targets and principles, not preparing water users and the community for the first flush event and not developing adequate incident management arrangements”

We are relieved and appreciate that the assessment highlighted such issues and recommends that they are corrected in a quantitative, evidence based manner including extensive consultation with stakeholders on the objectives, principles and targets.



Ongoing concerns and Feedback

- **Shifting of the Goal Posts**

It was concerning that during the Webinar presenters referred to the targets being able to be changed ie: increase the volume of water required at a particular point downstream part way through an event, this is a blatant contradiction of the whole concept trying to be achieved, ie. transparency surrounding the targets to meet critical needs in a severe drought. This is once again a shifting of the goal posts.

- **Were water users adequately consulted in the assessment process?**

There appears to be an imbalance in the consultation process, there was a significant amount of consultation with Government departments and other user bodies but very little consultation with water users and local river operators nor an understanding of the physical attributes of the various irrigation areas.

During the Webinar it was suggested that water users may have to block floodplain harvesting take points – this highlights a deficiency in knowledge that if greater water user and local river operator consultation had been undertaken the impracticality and in some cases impossibility of such a suggestion would have been highlighted.

- **What would have happened if the S.324 restrictions were not activated?**

Measurement is an important part of all water management matters, the only way that the management of the 2020 Northern Basin first flush event or if S.324 embargoes are actually needed can properly be assessed is by measuring what would have occurred if the mechanisms within the existing Water Sharing Plan were instigated.

- **Define the extent of “Connectivity”**

One of the assessments draft recommendations is “Ensure water management provides for and promotes connectivity between water sources”, this is concerning wording as it makes the wider public believe that all rivers should be running and the entire system always connected, the Darling and its tributaries are not historically always connected and can remain healthy when not permanently connected.

“Connectivity in an Ephemeral System” is already addressed in the Water Sharing Plan’s with access thresholds and rules to achieve long-term flow targets.

- **First Flush Rules – only in severe droughts**

Should First Flush Rules be deemed necessary, water users and all stakeholders must be assured that they are only to occur when the set requirements are met for example, declaration of a certain drought level, or if certain critical needs levels are not being met in the system, the triggers and volumes must be transparent and fixed, also making it much easier to manage.

- **First Flush Water – Which water account is debited?**

Whose entitlement does this First Flush Water come from, is it debited from the water account of the Environmental Water holder?

- **Possible Payback Mechanism**

If water users are unable to take their supplementary water entitlement to contribute to critical needs being met, which is essentially giving it to the environment, then maybe their accounts should be credited for that water and the environmental water holders account debited.

Similarly to the “drought sub-account” there could be a “critical needs sub-account” created so water entitlement holders can hold it in reserve until a supplementary event occurs in which they are able to participate in. The sub account should not expire nor have a limit.



The Australian Government is aiming to Grow Australian Agriculture to be a \$100 Billion industry by 2030, fair, transparent and well-managed water will be a crucial factor to achieving this of which we fully support.

A healthy environment and river system is equally as important as being able to sustain and grow Regional communities, the severe drought that we are still enduring has and is going to take a significant toll on all regional communities, one of the most important factors for the survival of the regional communities that we live in is reliable water.

Yours sincerely

C M MCCOSKER

