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Dear Dan

Review of NSW Gwydir Valley Model Build, Scenarios and Environmental Outcomes reports relevant to Floodplain Harvesting Policy implementation

Thanks again for the opportunity to review the ongoing progress with addressing the recommendations from our Independent Review into the implementation of the Floodplain Harvesting Policy. The Gwydir Valley reports sent to us for review are a significant progression in that process and we commend the efforts by the Healthy Floodplains team and others to bring them to this point.

The Gwydir Valley reports build on the approaches documented in the Border Rivers reports and do show that the ongoing improvements in modelling, documentation and management are being appropriately progressed. We also note that the documents highlight where further work is required to fully address our recommendations.

We have both reviewed all reports and offer the following overview comments below. We note that these are summaries of emails outlining specific comments and annotated reports sent on 31st January 2021.

Gwydir Valley Model Build Report

We are of the view that the draft final version of this document reads very well and is an excellent documentation of the modelling process with sufficient justification and transparency. We believe this version is suitable for finalising and publication. There were at least 25 specific recommendations of the Independent Review which focused on documentation of the model build process and we believe that the majority of these have been satisfied with the exception of quantifying return flows and explicitly identifying any climate change impacts. We understand that this is considered beyond the current scope of works for this modelling and we are also aware that the Department is considering the approaches to be used in some detail. It is therefore a matter beyond the draft final report we reviewed, and we look forward to the Department's continued work in this area.

Gwydir Valley Model Scenarios Report

We reviewed version 4 of the Gwydir FPH Model Scenarios Report provided to us and consider that version satisfies our independent review requirements and recommendations. Our only significant comment related to further documentation and clarifications around the application of the 500% carryover in this report and the 300% allowance for water use in the Model Build Report. We note the results as reported in the Scenarios Report and their significance to water users within and downstream of the Gwydir Valley and commend the Department on providing well documented reports outlining these.

Gwydir Valley FPH Environmental Outcomes Report

We have reviewed the final version of the Gwydir FPH Environmental Outcomes Report provided to us and consider that this version satisfies our independent review requirements and recommendations. We have made some mostly relatively minor suggestions and comments for further clarity as previously provided.

As in our other reviews, this latest review has not included perusing the references used nor have we been provided with the detailed modelling data for the two modelled scenarios (the current situation without implementation of the FPH policy and the situation that would/will apply with implementation of the FPH policy). Consequently, we have taken the results listed in the report and comments/conclusions about them at “face value”. Having said that, as we have previously advised, we have no reason not to take the results at “face value”.

While the underlying limitations in the report with respect to, for example, knowledge of change in hydrology/change in ecology relationships, available floodplain hydrological data and what modelling can be done with the available data and understandings, continue to exist, (as identified in the report), the report enables a relatively clear narrative to be presented of the potential environmental benefits of implementing the FPH policy.

In conclusion, we believe the Gwydir FPH Environmental Outcomes Report is a helpful one, recognising it is making use of available EWR information within the constraints and limitations of the available hydrological data and modelling.

Further assistance

We note that both Tony and Greg have been asked to continue in their reviewer role for other valleys across the Northern MDB. In addition, Tony Weber has been asked to support the Floodplain Harvesting Review Committee with regards to Technical Support for the Committee’s deliberations. As such, we look forward to continuing to assist the Department in addressing our review recommendations and in the ongoing process of implementing the Floodplain Harvesting Policy.

We hope that the above summary review comments are helpful and confirm our views about how our Independent Review recommendations regarding proper documentation have been met for the NSW Gwydir Valley. As always, we are more than willing to assist in the interpretation of these comments and/or expansion of them should it be required.

Yours sincerely

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