

- in regard to changes to harvestable right dam capacity - the review and increase to 30% is welcomed, however it should be available to all water users, not just specific industries.
- excluding horticulture from the increase is a massive oversight. These industries are critical to the local economy up and down the coast and should be treated fairly and equitably- equitable access is a core goal of the strategy. Excluding one industry over another is not equitable.
- currently those who implement the 30% increase and construct additional HR dams are subject to a review within each water source, with the possibility of having to dismantle the structures upon an unfavourable review outcome. This is an unworkable situation. It is impossible to expect landowners to invest such significant amounts of capital and risk losing it due to a change in policy. The policy needs to be set in order to provide a certain investment environment so water users don't run this outrageous risk.
- framework for construction of storages on up to 3rd order streams which include a dam bypass for the stream around the dam. This would enable these structures to be used as storages for high flow entitlement, whilst mitigating pressure on these water courses by extraction. An in-stream dam combined with a "normal flow" dam bypass would allow all normal flows to continue downstream, regardless of whether extraction from the storage was occurring at the time.
- following on from above, more high flow entitlement could be made available if being stored in an off creek storage or an in stream storage configured with a dam bypass. This would remove pressure from extraction on streams, provide water for industry and also provide some flood mitigation for down stream areas.
- data model, statistical analysis, methodology and assumptions should be publicly available for review and analysis. Models are only as good as the assumptions contained within and small changes to these can have extensive impact upon the results produced. Given the output of this model is a large part of the framework for the strategy, the model should be public ally available.

Thank you

