



Healthy Rivers Dubbo

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Submission to Draft Murrumbidgee Surface Water Resource Plan

To: NSW Government

Department of Industry

By e-mail: murrumbidgee.sw.wrp@dpi.nsw.gov.au

Introduction

Healthy Rivers Dubbo is a community grass roots group dedicated to providing a strong voice for our local rivers and wetlands, and for the Murray-Darling Basin as a whole. As ambassadors for healthy rivers, wetlands and groundwater, we have been active in our community calling for transparency and accountability in all aspects of water management.

Healthy Rivers Dubbo pays our respects to the Traditional Owners, past, present and future, of the land we live in. We acknowledge that the land in which we live was never ceded.

Healthy Rivers Dubbo welcomes the opportunity to make a submission to the draft Murrumbidgee Water Resource Plan.

Pre-requisite Policy Measures (PPMs)

The proposed rules to protect environmental flow reuse and piggy-backing (PPMs) are biased towards protection of the extractive industry.

The NSW PPM Implementation Plan¹ sets out that PPMs will be implemented only 'to the extent that impacts on third party licenced access rights can be mitigated or offset, whilst aiming to optimise environmental outcomes.' The NSW PPM Implementation Plan links the implementation of PPMs to Section 7.15 (1) (d) of the Basin Plan, which "represents a fundamental

¹ https://www.water.nsw.gov.au/_data/assets/pdf_file/0004/723334/Pre-requisite-Policy-Measure-Implementation-Plan.pdf

misunderstanding of the relevant provisions of the Basin Plan” according to the South Australian Murray Darling Basin Royal Commission Report.²

Floodplain Harvesting (FPH)

Healthy Rivers Dubbo believes there should be no provisions to allow FPH activities in the Murrumbidgee WR area.

Progress implementing FPH policy in NSW so far has been widely criticised. We refer to the findings of the Alluvium Independent Review of NSW Floodplain Harvesting Policy Implementation³ which points out the serious deficiencies in the modelling used “Overall, we find that there is a lack of transparency in the steps undertaken to develop the numerical models used in the implementation process, largely because of a lack of coherent, complete and up to date documentation outlining the methodologies, calibration, verification and assessment of scenarios.”

There is currently a push to have the volumes of FPH take added to the Sustainable Diversion Limit (SDL). There is no link between the Baseline Diversion Limit (BDL) and the SDL. “ The establishment of the BDLs are part of, and relevant only to, the risk assignment provisions under the Basin Plan. The BDLs are not relevant for the purposes of establishing the ESLT or SDLs.”
*South Australian Murray Darling Basin Royal Commission Report.*⁴

Healthy Rivers Dubbo is strongly opposed to implementation of FPH rules in the Murrumbidgee WRP area, and calls for the practice to be illegal in this river valley.

Inter Valley Trades (IVT)

All IVTs should be assessed for environmental impacts. The nature of markets means that water from a source that has higher supply (lower cost) would be traded to sources with lower supply (higher value). This is how markets work. However, the natural world is not the same as a market, and applying the principles of markets to the natural world will inevitably damage it.

Rivers with less water are less able to maintain resilience and environmental integrity when water is extracted and diverted.

Tagged trades (using water from a different water source) should be prohibited.

² <https://www.mdbrc.sa.gov.au/sites/default/files/murray-darling-basin-royal-commission-report.pdf?v=1548898371>

³ https://www.industry.nsw.gov.au/_data/assets/pdf_file/0019/210772/nsw-fph-policy-implementation-review.pdf

⁴ <https://www.mdbrc.sa.gov.au/sites/default/files/murray-darling-basin-royal-commission-report.pdf?v=1548898371>

Conversion Licences

Healthy Rivers Dubbo objects very strongly to the conversion of any regulated entitlements, high security or general security from downstream water sources to connected upstream unregulated water sources under any circumstances.

Transferring a high security licence to a creek in the unregulated upper catchment has the potential to seriously degrade the environment and negatively impact on communities in the area.

The proposal to convert regulated (high security) licences to upstream unregulated licences should be removed.

Protection of held environmental water (HEW)

Held environmental water must be protected within and between valleys, including over state borders (as per recommendation 10 and 11 of the MDBA's Murray-Darling Basin Water Compliance Review, Recommendation 10 of the independent Review Panel's report (Nov 2017), and Chapter 5 of the Independent Investigation into NSW Water Management and Compliance interim report (Ken Matthews, Sept 2017).)

Water purchased by the public to stay in rivers and wetlands, must actually stay in the rivers and wetlands. We expect to see clauses included in all water sharing plans that act as surrogates for protection of environmental water, as mechanisms such as ministerial embargoes are vulnerable to political influence and do not always provide the level of protection required. The legal protection of all publicly owned environmental water must be a rule within all the Water Sharing Plans in the Murray-Darling Basin, along with adjustments to licence conditions that completely embargo the extraction of environmental water.

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