



## Healthy Rivers Dubbo

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### Submission to Proposed Active Management Policy

To: NSW Government

Department of Industry

By e-mail: [water.relations@dpi.nsw.gov.au](mailto:water.relations@dpi.nsw.gov.au)

#### Introduction

Healthy Rivers Dubbo is a community grass roots group dedicated to providing a strong voice for our local rivers, aquifers, 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 proposed Active Management Policy.

#### Active Management Policy

All environmental water in the Barwon-Darling should be protected all the way to Menindee Lakes.

Transmission losses should be socialised, it is not acceptable that all transmission losses are worn by the environment.

The procedure manual that will contain much of the detail for the implementation of the policy won't be in draft form until the first quarter of next year. It would have been preferable to have

that important document ready for review with the proposed policy. It isn't clear if the procedure manual will be available for public comment, or targeted consultation.

Total Daily Extraction Limits (TDEs) and Individual Daily Extraction Limits (IDELs) should be implemented in Barwon-Darling immediately with no tradable rights attached to IDELs.

Flow gauges need to be installed at all necessary locations as a high priority. Other new technology should also be used to forecast flows.

Water Sharing Plans should provide basic rights (BLR), stock & domestic (S&D) and town water supply, this is not the purpose of environmental water. Better management of all water in the system would be possible if BLR and S&D take was metered.

Environmental water arriving from Queensland must be immediately protected from extraction.

First flush flows should be protected throughout inland rivers when the drought breaks.

A need for more transparency was identified by Ken Matthews in 2017, and as a part of the Water Resource Action Plan (WRAP), a project for improving transparency was initiated. No update on this element of the WRAP has been published since a report in February 2019. Certainly, from a community stakeholder perspective, there has been minimal improvement in transparency. From our perspective, it still seems as though the whole picture of what's going on is not clear to us.

HRD does not support the bias towards protecting water users. There will be 'third party impacts', as water that can currently be accessed will no longer be able to be accessed. This should be made clear.

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