



Healthy Rivers Dubbo

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Submission to Draft Lachlan Surface Water Resource Plan

To: NSW Government

Department of Industry

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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 Lachlan River Surface Water Resource Plan (WRP)

Protection of Environmental Water

There must be clear rules to protect environmental water from extraction. It is unacceptable that the water sharing plan was placed on exhibition for public comment without the finalisation of rules to protect environmental water.

All environmental water ('planned' and 'held' under entitlement) 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).)

Healthy Rivers Dubbo expects clauses be inserted into every WSP that legally protect public environmental water from extraction. All licence conditions must be reviewed and updated so that no loop holes allowing the legal extraction of public water exist.

No net reduction in 'planned' environmental water (as per Basin Plan 10.28 "No net reduction in the protection of planned environmental water") must be allowed in any WSP, however environmental water can be legally extracted under licence. If the environment truly comes first, as per the Water Act 2007 and the Murray-Darling Basin Plan, this must change.

Environment First

We are concerned that the rules in the draft WSPs for the Lachlan are too weak to protect important environmental assets like Booligal wetlands, near Hay.

The decline in health of the Booligal wetlands since the early 1990's has been dramatic. 10 large dams and 323 weirs in the system mean that there has been a 50% decrease in flow reaching Booligal, and major changes in timing of flows (the seasonality, frequency and duration). 85% of the River Redgums in the Booligal Swamp have died in the past 12 years. With 50% less water, the vegetation of the Swamp has lost its resilience to drought. Source: Armstrong, Kingsford & Jenkins (2009).

The government must be willing to compensate irrigators when water shares need to be reallocated to provide water for protecting important environmental assets.

Calculations made without using inflow figures before 2004

We do not support that decisions on water allocations are made using the worst drought before 2004. Available Water Determinations need to be more conservative to allow for servicing of instream assets through provision of reliable operational baseflow. WaterNSW need to be directed to ensure that there are sufficient amounts of water held in reserve to protect the environmental assets and townships when water sharing plans are suspended.

There is growing concern in towns west of the Great Divide as rivers dry up, dams empty and fish die. We are concerned that we will run out of water if the current extreme drought continues into 2019 winter. Given the reality of man-made climate change, this is an acute possibility, and the thought of what reality awaits us this time next year if the drought continues for winter 2019 is of the highest concern.

Wording Change re compliance with extraction limits

There has been an unannounced change made in the draft unregulated WSP in the clause that relates to compliance to the Long Term Average Annual Extraction Limit (LTAAEL), Part 6, division 1, point 31 (2). We note that the word 'may' now replaces the intention of this clause in the

existing WSP, which was the Minister 'will' reduce allocations in the following year, proceeding a year where the LTAAEL has been exceeded.

Healthy Rivers Dubbo is extremely concerned that this wording change could have negative impacts on planned environmental water over time.

We are also extremely concerned that such a change be made in a plan and the change not be advertised, meaning we have to compare the draft plan to the original to find these changes. This lack of transparency fosters mistrust of the NSW Government in matters of water management.

Connectivity

It is very important for native fish and all aquatic life in that our northern basin rivers connect to the rest of the Basin. Healthy Rivers Dubbo recognised that the Lachlan's ability to connect to the rest of the basin has deteriorated, due to over extraction, over the last few decades, and that is why we think it is particularly important that there must be a clause in the unregulated WSP that mandates connection.

Compliance assessment advisory committees (CAGs)

Healthy Rivers Dubbo objects to CAGs being given the responsibility for providing advice to the minister on the plan's assessment and compliance clauses. The CAGs do not represent the broad interests of the valley and are skewed to license-holders only.

Environmental water advisory groups (EWAGs)

Environmental Water Advisory Groups need to be maintained as mandatory and included and specifically required in Water Sharing Plans clauses.

Regards,

Melissa Gray

Founding Member

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