



Healthy Rivers Dubbo

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Submission to Draft Border Rivers 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 Border Rivers Surface Water Resource Plan (WRP)

Establishment of an environmental water advisory group (EWAG)

Environmental Water Advisory Groups must be made a mandatory requirement of the Water Sharing Plan (WSP).

Stimulus flow extending below Frazers Creek

The proposed protection of the stimulus flow release from Pindari Dam should extend to the entire length of the Border Rivers system to enhance connectivity with the Barwon-Darling.

Stimulus flow—changing the timing to allow more flexibility

Healthy Rivers Dubbo supports more flexibility in the timing of the stimulus flow release, to enhance environmental outcomes.

Incorporation of floodplain harvesting (regulated river) access licences

The free capture of floodwater for irrigation use is a key issue in the Border Rivers. The cumulative environmental impacts of floodplain harvesting (FPH) must be assessed. It is critical that the volume of floodplain harvesting in the Border Rivers is calculated. This water sharing plan should not be on exhibition for comment with this information missing.

Healthy Rivers Dubbo is following the development of the NSW Floodplain Harvesting Policy, and will continue to attend public consultations on FPH, and make submissions outlining our many concerns. The serious concerns we have about FPH include but are not limited to –

- the lack of assessment of the historic cumulative environmental impact of FPH on downstream rivers and wetlands;
- a lack of evidence that FPH will be accurately capped to 93/94 levels of development;
- the disproportionate carryover provisions up to 500% for FPH that will allow large annual allowances to accrue, negatively impacting on Planned Environmental Water by reducing water available for downstream rivers and wetlands.

Connectivity

It is very important for native fish and all aquatic life in that our northern basin rivers connect to the Barwon Darling River. There must be a clause in the unregulated WSP that mandates connection.

The protection of only 25% of natural flows from extraction through supplementary licences should be increased, so that a higher volume of natural flows connect with the Barwon-Darling.

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).)

WRP Risk Assessment

The WRP risk assessment demonstrates that environmental assets and function are at high risk of not receiving enough environmental water. The water sharing plan needs to be improved.

The Government must be prepared to compensate irrigators if there needs to be a change in water shares as the result of an adjustment to protect important environmental assets, like internationally recognised wetlands.

Regards,

Melissa Gray

Founding Member

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