



AUSTRALIAN FLOODPLAIN ASSOCIATION

Healthy Rivers - Healthy Communities

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The Australian Floodplain Association wishes to thank the Natural Resources Commission for the opportunity to comment on the NSW Murray & Lower Darling Water Sharing Plan.

This submission is focused on the question “What changes do you think are needed to the water sharing plan to improve outcomes?”

We have provided brief comments here but would welcome an opportunity to discuss with you in further detail at a mutually convenient time.

An overarching issue is the need for NSW government to comply with its own legislation. Strict compliance is required with the Priority of Use hierarchy.

The first point we would make regarding the WSP is that the Barwon Darling should be managed under a single water resource plan and not broken at Menindee. This is essential to achieving connectivity between the northern and southern basins; the northern tributaries and the main stem of the Barwon-Darling-Baaka; and along the entire length of the Barwon-Darling-Baaka; to the confluence at Wentworth.

The Barwon-Darling-Baaka requires minimum inflow targets from all the northern tributaries to ensure that the river remains connected along its entire length. The river also needs HEW to be fully protected.

Operating arrangements for the Menindee Lakes System are in urgent need of review as they clearly do not currently work to deliver a healthy river downstream of Menindee.

We have written many submissions stating that the 195GL volume in MLS as an up-stream water harvesting trigger is woefully inadequate. In our view 390GL is the bare minimum required to ensure downstream water supplies can be met for at least 12 months?? Anything less than this volume is an insult to downstream communities.

Related to this trigger volume are the provisions of s324 of the *Water Management Act 2000*. Rather than water harvesting access being a given *unless* the Minister imposes an embargo, saving the river requires a complete reversal for the foreseeable future. That is, there is no upstream water harvesting *unless* specifically and publicly authorised by the Minister.

The Australian Floodplain Association (AFA) is a non-government organisation, established in 2006. It represents floodplain and wetland landowners and their communities who depend on healthy rivers, floodplains and wetlands. Its membership resides predominantly within the Northern Murray-Darling Basin and includes floodplain graziers, community groups and shire councils.

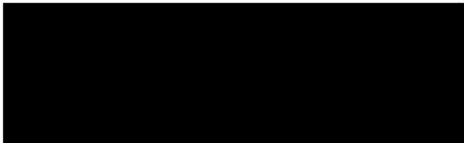
Furthermore, the WSP needs to be crystal clear that the Minister “must” ensure all downstream needs are met before issuing a statement allowing waterharvesting upstream.

We support the introduction of a translucency measure under which a given percentage (we suggest 30% as a starting point for discussion) of all inflows to the MLS be allowed to pass through and re-enter the Lower Darling. This would go a long way towards improving connectivity in the Barwon Darling and water quality below the MLS – both of which are of crucial importance for native fish populations. Note that there is similar (3 Tributaries) rule in the Gwydir Regulated WSP which ensures 30% of flows at Tyreel pass through to the Gwydir Wetlands.

We have been using IQQM for several decades now and in our view it is well passed time that water quality objectives be included or embedded in WSPs. The on-going fishkills in the Darling from Weir 32 at Menindee and downstream provide compelling evidence of an unfolding ecological disaster that must be averted.

We thank you for the opportunity to provide these brief comments and look forward to a more fulsome discussion online and/or face to face.

Yours sincerely,

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