



AUSTRALIAN FLOODPLAIN ASSOCIATION

Healthy Rivers - Healthy Communities

Sarah Moles,
Secretary AFA,



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By email to: nrc@nrc.nsw.gov.au

The Australian Floodplain Association makes the following comments on the NSW Border Rivers Unregulated and Alluvial Water Sources WRP 2012.

In Alluvium's review of the BR Unregulated WRP, "the audit team found that during the audit period the following provisions of the WSP for the NSW Border Rivers Unregulated and Alluvial Water Sources 2012 were **not being given effect to**:"

- *Part 2 Vision, objectives, strategies and performance indicators, cl. 11 used to measure the WSP success of the strategies to reach the objective of the WSP" (p6)*

The Alluvium audit team also found that Parts 6 and 11 of the Plan were only given partial effect by its provisions.

The AFA concurs.

Q1 To what extent do you feel the plan has contributed to environmental outcomes?

Until the modelling underpinning the BR Unregulated WRP incorporates recent climate data the Plan will not contribute to improved environmental outcomes.

Q2 To what extent do you feel the plan has contributed to social outcomes?

Until the modelling underpinning the BR Unregulated WRP incorporates recent climate data the Plan will not contribute to improved social outcomes nor equality downstream.

Q3 To what extent do you feel the plan has contributed to economic outcomes?

The Plan has prioritised economic outcomes for the irrigation sector and its dependent communities at the expense of all other downstream communities.

Q4 To what extent do you feel the plan has contributed to meeting its objectives?

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.

The Plan lacks critical connectivity / EOS flow targets.

All flows from the Border Rivers are critical to guarantee 'fit for purpose' town water supplies for all downstream communities in the Border Rivers Regulated system and all downstream WRP areas. These are clearly a higher priority than irrigation access.

Q5 What changes do you feel are needed to the water sharing plan to improve outcomes?

The current Plan is underpinned by modelling based on significantly outdated extraction information; and a long term data set that does not include the recent climate record.

The model behind the Plan MUST be revised to include the recent climate record.

Furthermore, the AFA understands that as NRAR undertakes its audit of all licences in NSW, they are finding that works approvals often bear no relationship to what is actually written on water licences.

In our view, the Plan MUST be reviewed again once NRAR has completed its audit and accurately determined current extraction levels.

The Plan also needs an EOS and connectivity target and reduced levels of floodplain harvesting take.

Blind Freddy can see no new floodplain harvesting can be licenced in the Border Rivers if the Plan's vision, objectives, strategies and performance indicators are to be met.

There is nothing confidential in this submission and we consent to any part of it being made public.

Yours sincerely,

