



AUSTRALIAN FLOODPLAIN ASSOCIATION

Healthy Rivers - Healthy Communities



To: regionalwater.strategies@dpie.nsw.gov.au



We wish it to be noted that we have made a very large number of submissions over the years advocating for healthy rivers supporting diverse and healthy communities. We are disappointed by seemingly endless submission processes and the glacial rate of positive change.

The Namoi Regional Water Strategy should be aimed at managing the future demand for water to within sustainable limits. The draft Strategy does not acknowledge that water in the Namoi Region has long been over-allocated and cannot always meet existing entitlements. This point is underscored in the draft Strategy which identifies poor river and native fish health. This is a damning indictment of the NSW Water Management Act 2004 which makes river health its highest priority. NSW is not meeting the legal requirements of its own legislation! Our frustration and disappointment are palpable and long standing.

We are concerned to see the proposed Dungowan Dam referred to as “a commitment” in the draft RWS. Dams such as Dungowan and associated supply-side infrastructure (ie pipelines) are 20th century strategies and part of the problem, not elements of a 21st century solution. Furthermore, the recent Productivity Commission report found the Dungowan Dam and Pipeline proposal does not meet the affordability criteria. In our view, this proposal should be subjected to the same prioritisation process as all other options presented in the draft strategy.

The AFA identifies some gaps in the Options and recommends the inclusion of options that improve First Nations access to water supply and cultural water; that improve indigenous peoples' capacity, engagement and employment in water management; and that recognise the real value of cultural knowledge and improved cultural outcomes.

The AFA has a particular interest in connectivity along the length of the Barwon-Darling. The Namoi contributes 24% of average inflows to the Barwon-Darling. We are surprised to find no reference to the 9.5GL still to be recovered for the environment from the Namoi to meet the in-valley recovery target set for the MDB Plan. This is of particular concern as more than 25% of surface water used in the Upper and Lower Namoi comes from floodplain harvesting. Water management rules within the valley MUST ensure connectivity with the Barwon-Darling system and it is critical that environmental water and first flush flows are protected.

We therefore support all options that will improve outcomes for river health, native fish, waterbirds and wetlands:

- Options 15, 17, 18 & 19 (which will benefit native fish populations)

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.

- Option 16 (Provision of incentives to landholders to protect & restore water dependent ecology)
- Option 20 (Removal of floodplain structures that cause adverse impacts)
- Option 21 (Restore water quality)
- Option 22 (Improved connectivity with Barwon-Darling). We strongly recommend the addition of improved connectivity & management of floodplain billabongs and lagoons to this option.
- Options 23,24,25 (Improved management of water for environmental outcomes)
- Options 26 – 29 & 43, 44: Research into groundwater health and sustainable access
- Option 30: More transparency on impacts of major development on water sources
- Options 46 - 56.

To this list we add the adoption of more efficient irrigation technologies.

In the urban context the AFA strongly supports all options that reduce water consumption in towns and industry (5,6,10,14,31,35 & 36.) More efficient use of a valuable and limited resource is critical to achieving sustainable communities in a drier water future.

The AFA strongly opposes all options that would undermine ecological and environmental outcomes *viz*:

- Option 2: Inter- regional pipelines including from Macleay or Barnard Rivers
- Option 4: Suspension of environmental water provisions in Peel River
- Option 7: Connect Peel River to Quipolly Dam
- Option 12: Desalination of groundwater for industry
- Option 13: Joint exploration for minerals and groundwater

On the issue of climate-related impacts to water availability the AFA urges extreme caution. We are already witnessing a shift in seasonal rainfall patterns with lower rainfall overall. In the absence of meaningful action to address climate change evaporation, average temperatures, the number of hot days and the frequency of extreme weather events will all increase. In our view, the predictions are likely accurate if not conservative. We need to be proactive about planning for and adapting to a future with less water.

Yours sincerely,

