

Water New South Wales
Department of Planning, Industry and Environment
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Submission on the Gwydir, Lachlan and Macquarie Draft Regional Water Strategies

Dear Sir/Madam,

The National Parks Association of NSW (NPA) was formed in 1957 and sixty-three years later we have 15 branches, 4,000 members and over 20,000 supporters. NPA's mission is to protect nature through community action. Our strengths include state-wide reach, deep local knowledge, evidence-based approach to conservation advocacy and commitment to the creation and professional management of protected areas in NSW.

NPA believes that healthy and resilient river systems are vital for our collective wellbeing. We have consistently advocated for sound environmental and community outcomes through participation in government processes and collaborative projects with other environmental groups and academic bodies.

NPA welcomes the opportunity to comment upon the Gwydir, Lachlan and Macquarie Draft Regional Water Strategies. We begin with overarching comments that apply to all three strategies then move to more detailed comments on the three individual strategies.

General comments

The primary objective for the water strategies should be to provide for the sustainable allocation of water. In NPA's view sustainability must include the provision of water flows to sustain the condition of water dependant ecosystems within each of the catchment areas. Of particular importance are water dependent ecosystems of national and international significance, including wetlands listed under the Ramsar convention.

The strategies describe a range of threats and challenges for each catchment, including tailored climate change predictions, but fail to provide an adequate assessment of the current condition of surface and ground waters. This omission contributes to a major problem with all three strategies, the failure to acknowledge the existing systematic over-allocation of water. That over-allocation, beyond the bounds of genuine sustainability, cannot be resolved by the introduction of yet more infrastructure to divert and capture water flows. Moreover, the reports' own assessments of climate change suggests that this situation will only be exacerbated by the transition to lower, increasingly erratic rainfall patterns with higher evaporation rates.

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In short, 'business as usual' is not an option and the final strategies must confront the dual realities of declining inputs into an already over-allocated system of water management, and water dependant ecosystems that are approaching the point of collapse.

Notwithstanding the above comments there are specific proposals in the strategies which NPA supports as offering improved environmental outcomes for water dependant ecosystems and species. These are described below.

Gwydir Regional Water Strategy

NPA supports the following initiatives in the Gwyder strategy. We are particularly supportive of those measures that will directly improve the quality, quantity and frequency of waters entering the Ramsar listed Gwydir wetlands

- Option 9: removal of constraints to delivery of environmental water.
- Option 10: improved fish passage
- Option 11: directing supplementary environmental flows
- Option 12: fixing cold water pollution
- Option 13: screening pumps to protect fish from being sucked out of the river
- Option 14, 15 & 16: research into groundwater health and sustainable access
- Option 17: active management to protect environmental water
- Option 18: managing structures on floodplains
- Option 19: Aboriginal River Ranger program
- Option 20: restore water quality
- Option 21: Secure flows for cultural sites
- Option 24: improve connectivity with Barwon-Darling
- Options 33-40: Recognition of cultural knowledge, water rights and interests

NPA strongly **objects** to the enlargement of the Tareelaroï weir and the construction of a new dam at Gravesend.

Macquarie Regional Water Strategy

This strategy will be critical for the survival of the internationally significant Macquarie Marshes. NPA supports the following measures to improve water flows into the marshes:

- Option 14. Address channel constraints to environmental flows to the Macquarie Marshes.
- Option 20. Implement the Native Fish Restoration program.
- Option 24. Relieve flow restraints on the Cudgegong River at Rocky Waterhole Bridge.
- Option 29. River Ranger Program
- Option 30. Secure flows for Beemunnel Aboriginal Place.
- Option 31. Connectivity with downstream systems

This strategy includes a number of proposals that NPA regards as having a high probability of reducing environmental health across the catchment. NPA strongly **objects** to the following proposals:

- A re-regulating weir at Gin Gin. This structure will have significant negative impacts on threatened wetland dependant species, migratory birds and Ramsar wetlands. It risks the maintenance of connectivity between the Macquarie and Barwon.
- The introduction of new drought operational rules for the Macquarie River, especially the proposal to shorten the river in drought rather than addressing over-allocation.

Lachlan Regional Water Strategy

The Lachlan catchment includes several Wetlands of National Significance notably the Great Cumbung and Lake Cowal, as well as water dependant reserves such as Kalyarr National Park. NPA supports the following initiatives in the strategy on the basis of net environmental benefit:

- Option 11: fixing cold water pollution from Wyangala Dam
- Option 14: installing more fishways
- Option 15: active management to protect environmental water
- Option 16: restore water quality
- Option 17: managing structures on floodplains
- Option 18: screening pumps to protect fish from being sucked out of the river
- Option 19: Aboriginal River Ranger program
- Option 20: Secure flows for cultural sites
- Option 21, 22 & 23: research into groundwater health and sustainable access
- Options 41-48: Recognition of cultural knowledge, water rights and interests

This strategy includes a number of proposals that NPA regards as having a high probability of reducing environmental health across the catchment. NPA strongly **objects** to the following proposals:

- Raising of Wyangala Dam wall (see below)
- Option 3: increasing the size of Lake Rowlands Dam
- Option 27: Changes to Lake Cargellico
- Option 31: removing a natural lake above Lake Cargellico
- Option 39: more weirs in Lower Lachlan

The proposed raising of the Wyangala dam would have significant environmental impacts including the reduction of flows into Mt Davis Nature Reserve, and potentially adverse implications for other reserves further downstream along the Lachlan River, especially at low flow times.

Conclusion

NPA is concerned that the strategies embed the myth that dams and diversions are the most appropriate way of providing water security, community wellbeing and environmental health. NSW must make a fundamental shift from excessive interventions and over extraction of water to an approach that recognises that healthy river systems retain water in

natural landscapes and support biodiversity, our quality of life and natural sequestration of carbon.

NPA can be contacted at [REDACTED] or on [REDACTED]

Yours sincerely,

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National Parks Association of NSW

protecting nature through community action