



AUSTRALIAN FLOODPLAIN ASSOCIATION

Healthy Rivers - Healthy Communities



By email to: regionalwater.strategies@dpie.nsw.gov.au

29th June 2022

Response to Draft Border Rivers Regional Water Strategy

The Australian Floodplain Association takes this opportunity to advise we cannot support any Water Sharing Plan, Water Resource Plan nor Regional Water Strategy that aims to lock-in unsustainable levels of additional floodplain harvesting take.

As a Peak Body comprised of floodplain and wetland landowners, indigenous groups, shire councils, local businesses and members of rural and remote communities dependent on healthy rivers, floodplains and wetlands, the AFA represents a far wider range of interests than the irrigation sector.

This Regional Water Strategy for the Border Rivers talks in glossy terms about stakeholder engagement and yet here we are again in a place where our concerns have NOT been listened to. The fact that the Department refuses to answer questions at their own “consultation sessions” and actively designs engagement to avoid answering any questions continues to break down any level of trust in the process.

We have been making “no additional licences to extract” points for more than a decade yet once again the demands of irrigators are put ahead of all others in the river ecosystem.

The fact that the NSW government refuses to comply with its own legislation by upholding the hierarchy of water management principles as set out in s5(3) of the NSW Water Management Act 2000 is difficult to understand and is consistently ignored in stakeholder engagements.

The AFA strenuously opposes action actions 3.1 (Increase the availability of high security licences) and 3.6 (Fully implement the NSW Floodplain Harvesting Policy); and any increase in the Groundwater SDL.

This is such an egregious strategy we cannot support any element of the Border Rivers Regional Water Strategy without meaningful flow targets that meet community and environmental requirements across the board.

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 RWS for the Border Rivers valley will exceed valley extraction limits and this will worsen as climate extremes intensify. DPIE's own work to improve modelling and data indicates that under the climate change predictions for the Border Rivers valley, there could be 15% to 25% more cease-to-flow events and fewer overbank flows in the region; as well as a decline in inflows from this valley alone into the Barwon-Darling of up to 40%. We find this utterly unacceptable and inequitable.

What is required are meaningful and measured strategies to ensure connectivity along the Barwon-Darling and overall system health rather than vague statements of intent while extraction increases once again.

We reiterate our strong and consistently held view that to be Cap, SDL and Basin Plan compliant there can be no additional FPH licences and no increase in FPH take *anywhere* in the northern Basin.

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

Yours sincerely,

