



# AUSTRALIAN FLOODPLAIN ASSOCIATION

*Healthy Rivers - Healthy Communities*

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The AFA welcomes the opportunity to comment on the draft Regional Water Strategy for the Gwydir valley. There is nothing in our submission that is confidential and we consent to any part of it being made public.

1. We are bemused that RWS are being progressed in the absence of an overarching state-wide strategy.
2. The AFA is concerned to note that WaterNSW's '20 Year Infrastructure Options Study Rural Valleys Summary Report' outlines options for the Gwydir valley which are highly problematic. Three are for new dams, four are for new underground dams and 2 are for modifications to existing regulators. We also question where a 250GL off stream storage could be located in the valley and why such infrastructure proposals are contemplated given the predicted increases in evaporation.
3. AFA is also deeply concerned by the persistence of the mindset that created our current ecological crisis. The loss of connectivity between rivers and floodplains, increasingly frequent fishkills, prolonged periods of no-flow in some catchments, poor water quality and river communities running out of fit-for-purpose water are clear signs of a river system under enormous stress.
4. An additional concern is the apparent lack of coordination and communication between NSW government agencies such as WaterNSW and DPIE which both appear to be considering new water-related projects from within departmental 'silos'.
5. In our view the key issue underpinning the RWS is the accuracy of climate data and inclusion of the recent (ie. last 20 years) climate record. The predictions are that rainfall in the region will reduce by up to 13% with winter rainfall to decrease and autumn rainfall to increase. With longer periods of sustained temperatures over 35 degrees C in summer, evaporation losses will soar. We conclude that managing the demand for water MUST be the primary objective of the Gwydir Regional Water Strategy.
6. The Gwydir Regional Water Strategy should aim to use available water in a sustainable manner. We urge a comprehensive review of the record of drought and allocation process in water sharing plans in order that this can be achieved.
7. The AFA is concerned that the draft RWS does not acknowledge that in spite of water recovery of some 136GL the Gwydir remains over-allocated. It is unlikely that current irrigation commitments will be met under a future, drier climate, so it is even less likely that any projected growth in demand can be satisfied. More water needs to be recovered and some irrigators are going to have to give up (sell) some of their water entitlements.
8. The AFA notes that the draft Strategy identifies river health as being under threat but does not provide a description of the current condition of all water sources, especially groundwater. This is important from a connectivity perspective.

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.

9. Of particular concern to AFA and its members is that floodplain harvesting in the Gwydir captures 30% of natural surface water flows in the catchment. This has a significant impact on the environment, connectivity within the system and connectivity with other river systems. Fundamentally the Gwydir valley must work with other northern valley water strategies to deliver connectivity to the Barwon-Darling as per the Basin plan and Commonwealth Water Act. We understand that historically the Gwydir contributed about 2% of inflows to the Barwon-Darling. Given the dramatic reduction in end of valley flows in the other northern tributaries (largely due to the growth in floodplain harvesting), this is a significant volume that must be restored to ensure low flows (and thus connectivity) is maintained in the upper reaches of the Barwon-Darling system. The total volume taken via floodplain harvesting must be substantially reduced through regulation and the new licencing framework for legal floodplain harvesting works.
10. Furthermore, the Gwydir RWS should ensure that safe and secure water supplies are available for all downstream landholders and communities. In our view it is unacceptable for upstream catchments to develop to the extent that critical human needs cannot be met downstream. There exists a real problem with adherence to the legal water management hierarchy set out in s5(3) of the *NSW Water Management Act 2000*.
11. The AFA notes that there is no option listed to minimise evaporation losses from on-farm storages. We understand this a significant total volume which will increase with longer, hotter summers. Products and techniques such as polymer membranes already exist that can reduce these losses. Floating solar farms offer the potential for new income streams and reduced greenhouse emissions, a win-win scenario that should be carefully investigated.
12. The AFA strongly supports the removal of constraints to the delivery of environmental water in the Gwydir Wetlands. This project was identified in the Constraints Management Strategy and is one of the 2016 Toolkit measures identified during the Northern Basin Review process. A clear commitment needs to be made to address this issue as a matter of urgency.
13. The AFA also strongly supports other options that will improve outcomes for river health, native fish, waterbirds and wetlands. i.e. improved fish passage; addressing cold water pollution from Copeton Dam, the provision of pump screens to protect native fish; active management to protect (held and planned) environmental water, and management of infrastructure on floodplains (including the removal of illegal structures).
14. We strongly support all options that improve First Nations peoples' capacity, engagement and employment in water management; which recognise the significance of cultural knowledge; and that improve cultural outcomes. We are particularly in favour of Indigenous Ranger programs and achieving secure flows to optimise management of important cultural sites.
15. Sustainable water use and restoring river health is everyone's business, including the urban water-use sector. Opportunities lie in embracing water use efficiency in all towns and all non-irrigation industries. There are employment opportunities in retro-fitting water saving devices in many urban settings. Significant advances are also being made in reuse and recycling techniques as well as storm water harvesting.
16. The AFA definitely does not support the first 2 options in the RWS viz enlarging the Tareelaroil reregulating weir in the mid-Gwydir; and the construction of a new dam at Gravesend. Both would have negative environmental outcomes and downstream connectivity at a time when positive steps are required to restore river health and demonstrate a commitment to reversing decades of ecological damage.
17. Our water woes will not be solved by the thinking that created them, ie that building dams is the solution to our demand for new water supplies. New, visionary solutions that consider all parts of the water cycle must be adopted for the 21<sup>st</sup> century.

Thank you for the opportunity to comment.

Yours sincerely,



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