



AUSTRALIAN FLOODPLAIN ASSOCIATION

Healthy Rivers - Healthy Communities

7th December, 2021

Dear Shagofta,

Thank you for the opportunity to comment on the communique, post our third Connectivity Stake Holder Reference Group Meeting.

GENERAL COMMENTS:

The AFA endorse Equity, Simplicity and Transparency.

We note upstream valleys have no equity in what flows downstream (consultation must occur with a majority of members who focus on downstream outcomes).

We acknowledge the Barwon Darling is an event river relying 97% on water from its tributaries; however:

- Event duration has decreased
- Frequency of flows has decreased
- Volume has decreased
- Water Quality has declined

Flows have been compromised to the detriment of the downstream environment and the communities the river supports. More water down this system must be the number one priority

We support whole scale reform to reinstate Northern Basin Connectivity (building on the reason for the MDBA's Establishment).

We support Strategic Downstream TARGETS to achieving meaningful connectivity:

1. Suspend upstream unregulated take including Queensland and all intersecting Streams until flow targets enshrined in legislation are met; or are confidently forecast to be met.
 - Forecasts need to be independently reviewed prior to their public disclosure
 - Each flow "event" to be reviewed for accuracy in forecasting
2. Set a realistic volume target at Menindee of 350 GL

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3. Implement the North-West Unregulated Flow Plan. Those that link to:
 - A. Riparian needs
 - B. Algae suppression
 - C. Fish Passage
 - D. Water Quality

ADDRESSING OPTIONS AS REQUESTED per the Communiqué:

1. Temporary water restriction

Yes - It is critical to establish “in-system” and “end of Basin Target”.

2. Using Environmental Water to meet targets)

Yes - Environmental water underpins Base Flows.

3. Changing End of Valley Flows to address the priorities of the Water Act

Yes - We need to get this right to give equity to environment and all communities.

4. Increase Dam reserves

Yes – But only with the caveat that all additional stored water will be for achieving connectivity to support the environment and downstream communities and that be a percentage linked to dam capacity.

5. Review Interim North-West Unregulated Flow Plan

Yes - All part of achieving a beneficial outcome.

6. Purchase licences

Agree that licences should be purchased from willing sellers.

7. Review B & C Class licences

Yes - Only if all upstream unregulated commence to take thresholds are reviewed.

8. Deliver flows to the Darling Anabranh

Yes - At every opportunity when water is available.

9. Climate Change

Yes - Downstream triggers will maximise equity and maintain critical environment.

10. Changing weirs

Fish passage is critical, as is town water supply; as is natural refuge. The re-establishment of all rock bars is critical also.

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11. A Regulated Darling

Active Management and rebuilding connectivity is in effect returning the northern system to; as much as possible, a pre-development scenario - in effect a regulated management regime.

12. Remove all unlicensed structures

Yes - Remove or modify to address "passive take".

KEY POINTS MISSED:

1. Water Quality Targets at key locations.
2. 120 Days of no flow at Wilcannia is far too long.
3. Dry land farmers, floodplain graziers and their communities are the forgotten stakeholders in this consultation.

POSITIVES:

1. The long-identified issue of decreased flows to the Lower Darling is now noted.
2. Lack of action on this issue has resulted in ecological catastrophe in the Darling.
3. Public awareness has given hope to those of us who depend on a healthy system that some equity will be returned.
4. The AFA applaud the actions to date to fix the issue of connectivity and return equal opportunity to all communities.

Yours sincerely,

Justin McClure
President
Australian Floodplain Association

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