

Water New South Wales
Department of Planning, Industry and Environment
regionalwater.strategies@dpie.nsw.gov.au



Submission on the Border Rivers Draft Regional Water Strategy

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 *Border Rivers Draft Regional Water Strategy*.

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 assessment of climate change suggests that this situation will only be exacerbated by the transition to lower, increasingly erratic rainfall patterns with higher evaporation rates.

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.

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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.

Detailed comments

NPA supports the following initiatives in the draft Border Rivers strategy:

- Option 9, 14, 35, 36, 37, 40- 41: managing groundwater systems
- Option 10: fish passage strategy
- Option 11: screening pumps to protect fish
- Option 12: address cold water pollution
- Option 13: restore water quality
- Option 15: manage structures on floodplains
- Option 16- 17: private land incentives and riparian restoration
- Option 19: protect environmental flows
- Option 20: improve benefits of Planned Environmental Water
- Option 21: active management to protect environmental water
- Option 22: improve management of unregulated rivers
- Option 23: improve connectivity with Barwon- Darling
- Option 24: protect groundwater dependent ecosystems
- Options 42 - 51: Recognition of cultural knowledge, water rights and interests, Secure flows for cultural sites, Aboriginal River Ranger program.

NPA **objects** to the raising of the Pindari Dam. The proposed raising of the Pindari Dam will inundate and destroy a significant portion of the Severn River Nature Reserve. NPA notes that such action is not permissible under the *National Parks and Wildlife Act (NPW Act)* and the proposal is open to legal challenge on this basis.

NPA **objects** to the proposal (Option 4) to pipe the natural, unregulated portion of the Boomi River that runs through and adjacent to Budelah Nature Reserve. Such action will have adverse impacts on the nature reserve and may also be subject to legal challenge on the basis of inconsistency with the NPW Act.

NPA **objects** to the proposed raising of the Mungindi Weir on the basis that it is likely to impede or block flows into numerous, high conservation value water dependant ecosystems across the Macintyre River floodplain.

NPA **objects** to the omission of the Mole River dam proposal from the analysis in the draft strategy. The proposal has not received final approval and should therefore be treated as part of the dynamic system under evaluation in this strategy rather than as an outcome that has been definitively determined.

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