



Nature Conservation Council

The voice for nature in NSW

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Via email: regionalwater.strategies@dpie.nsw.gov.au

Dear [REDACTED]

Border Rivers Regional Water Strategy

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 160 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

NCC, together with the NCC Water Working Group, welcomes the opportunity to participate in developing the Regional Water Strategy (the Strategy) for the Border River catchments.

Water is a scarce resource in Australia. Climate modelling indicates that water resources will diminish further in the future. Climate Change predictions for the Border Rivers region indicate that rainfall runoff in the region could reduce by up to 40 per cent. Rain patterns will change and evaporation, average temperatures and the number of hot days will increase.

Management of our water resources is a critical responsibility of the NSW and federal governments. Sustainable management of water demand under predicted circumstances must be the main objective of the Border Rivers Regional Water Strategy.

The draft Strategy recognises that the Sustainable Diversion Limit in the Border Rivers has not been met. Available water in the Border Rivers Region is over-allocated and unsustainable. It is with this knowledge that the Strategy must propose to manage demand and sustainability in the years to come.

NCC provides the following feedback specific to the Border Rivers strategy:

- It is inappropriate that the Mole River Dam has been presented as a government commitment rather than an option. Public funding could be better invested in options that reduce the demand for water and increase the environmental health of rivers. Mole River Dam will damage high conservation value aquatic ecosystems and capture natural flows that provide connectivity to wetlands and to the Barwon-Darling.



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- There are options available that would contribute to better management of evaporation rates from on-farm storages. These are not explored.
- Floodplain harvesting in the Border Rivers captures 30% of natural surface water flows in the catchment. This has a significant impact on the environment and connectivity to the Barwon-Darling. This volume must be substantially reduced through regulation and can be replaced by water savings through better management of evaporation rates.

Options supported by NCC

NCC supports options that recognise the significance of cultural knowledge. Water sharing plans must meaningfully engage with First Nations sovereignty, knowledge, and expertise in water management. Such options in this draft include options 42 - 51: recognition of cultural knowledge, water rights and interests, secure flows for cultural sites and the proposed Aboriginal River Ranger program.

The final Regional Water Strategy can achieve improved outcomes for river health, native fish, waterbirds and wetlands through the following options:

- Option 10: fish passage strategy
- Option 11: screening pumps to protect fish from being sucked out of the river
- Option 12: fixing cold water pollution
- Option 13: restore water quality
- Option 9, 14, 35, 36, 37, 40, 41: groundwater - managing salinity, monitoring, sustainable access, research, cross-border management, fractured rock aquifers
- Option 15: managing structures on floodplains
- Option 16 & 17: private land incentives and riparian restoration
- Option 19: protecting environmental flows; this project is a Northern Basin toolkit measure and should be identified as a commitment.
- Option 20: improve benefits of Planned Environmental Water
- Option 21: active management to protect environmental water - should be identified as a commitment under the Northern Basin toolkit measures
- Option 22: improved management of unregulated rivers
- Option 23: improve connectivity with Barwon-Darling
- Option 24: protecting groundwater dependent ecosystems

Options that reduce water consumption in towns and industry. More efficient use of water is critical to achieve sustainable communities into a future with less water. These include:

- Option 18: impacts of land use change
- Option 26: reuse, recycle and stormwater harvesting
- Option 27: water efficiency opportunities, including managing on-farm high evaporation rates
- Option 30: review drought of record and allocation process in water sharing plan
- Option 38, 39: extend cap and pipe the bores program, manage Great Artesian Basin

Options opposed by NCC



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The following options are counter to environmental outcomes because they will further regulate and alter the natural flow regime of rivers in the valley.

- Option 2: raising Pindari Dam
- Option 3: raising Mungindi Weir
- Option 8: inland diversions from the east are untenable from an ecological perspective and should not be a consideration.

NCC and our Water Working Group welcome further discussion on these draft rules. Your key contact point for correspondence is [REDACTED]

[REDACTED] available at [REDACTED] and on [REDACTED]

Sincerely,

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