

Submission from [REDACTED] on draft Border Rivers Regional Water Strategy

I care about the rivers, people and ecosystems of the Border Rivers catchment, which I have enjoyed exploring, learning about and living in, and about where the rain on this catchment goes, including about the Barwon, Darling and Murray rivers.

I was pleased to hear that DPIE is undertaking a strategic water planning process that seemed to have potential to enable further improvements to river management in conjunction with and beyond the Water Resource Plans under the Basin Plan. While there are many good proposals in the draft Strategy, overall I am quite disappointed.

Unfortunately the draft Strategies for the Macquarie, Gwydir and Border Rivers were prepared before those for the Barwon and Darling/Baaka Rivers, including the lower Darling. Once again, the Darling seems to be left to last. Strategies for the upstream tributaries should have been drafted with some objectives and appropriate options focused on better-meeting needs of the Barwon-Darling/Baaka. This extremely important river is clearly suffering from having been treated for much of the last 100 years as inconsequential – its people and ecosystems were either not considered or considered less important than maximizing economic production in agricultural areas upstream. This appears to be the case again. Some redrafting of the Border Rivers Strategy is needed to overcome this.

In the early 1990s, after there was a 1000 km long blue-green algal bloom along the Barwon and Darling, there were efforts to understand and provide for the hydrological needs of this river including its geomorphology and ecology and work out how to better manage the tributary flows to meet the most basic needs of this river. I was a [REDACTED] with irrigation representatives from the Macintyre, Namoi, Barwon-Darling, a second Barwon-Darling representative, a NSW Fisheries representative and a Queensland representative. We discussed the management of flow events during drought and development of the Interim Unregulated Flow Management Policy for the North West – which was a compromise document not exactly what the Barwon and Darling needed. While much has been done in the intervening period, it now seems that too many decisions have further compromised the Barwon and Darling Rivers. The failure to consistently implement that Interim Policy or an improved version of it, failure to prevent the increase in floodplain harvesting despite the 1994 cap on diversions, and failure to buy back sufficient access licences to meet environmental needs are examples relevant to the Border Rivers.

I support options 19, 20, 21 and 23, and acknowledge that they go some way to addressing the needs of the Barwon and Darling as well as Border Rivers needs. I just don't think they go far enough and that options such as damming Mole River and raising Pindari dam are contrary to the needs of the Barwon and Darling

Vision

Now, despite the horrific situation in the Barwon-Darling throughout 2019, I am alarmed to find that the draft Border Rivers Regional Water Strategy proposes nothing that is clearly focused on improving environmental flows from the "end of system" into the river downstream. Why not? Because the draft Strategy's 'Vision' is too narrowly focused on a 'livable and prosperous Border Rivers region' as though not only ecosystems downstream but livability and prosperity in downstream communities still don't matter. The prosperity of some limited sections of the Border Rivers community, and of those irrigated agricultural companies that take profits elsewhere, has come at the expense of people and ecosystems downstream. Some reduction in prosperity of those who are taking the most water may be necessary although even greater emphasis on efficiency improvements or new thinking about how best to use limited available water can minimise economic impacts. Please change the vision, and the Strategy, so that it aims for healthy, resilient rivers in and downstream from the Border Rivers Regions through ecologically and socially sustainable water resource management. Drop the second sentence

of the draft vision which gives a ridiculous expectation that it might be possible to manage water or infrastructure to have the "right" amount of water for everything all the time. The Strategy should instead help people throughout the region to accept and live with the increasingly high variability of inflows while reducing diversions so that all riverine ecosystems have a chance of surviving climate change.

Greatly reduce the amount of floodplain harvesting: meet ecological needs

I do not accept the view that floodplain harvesting only needs to be reduced a few percent to get it back to the 1994 cap level. I think the amount of water harvested has increased far more than that. Climate change should not result in further avoidable reductions in downstream flows, for example when increased evaporation reduces stored volumes so more can be diverted to refill storages at the expense of people and ecosystems downstream. The proposed 500% 'carryover' will enable this if it is introduced. Harvesting should be reduced to whatever extent is needed to care for the river and wetlands downstream.

One aspect of this should be removing some floodplain obstructions entirely e.g. so more water gets to Boobera Lagoon both from flows out of the Macintyre via the Whalan Creek and from Ottleys Creek.

I also request that the times when floodplain harvesting is permitted be limited to times when ecosystems all the way down the Darling have really had as much water as they need. I suspect that the current situation is indicative of the problem: the Barwon and Darling have stopped flowing, probably partly as a result of the river banks only getting brief not prolonged high flows at the beginning of this year when floodplain harvesting was permitted as well as some extraction from the Barwon-Darling – if the banks had absorbed more water low flows could have been sustained a bit longer. If no floodplain harvesting had been allowed this year more ecosystems downstream would certainly have had a better chance to make a greater recovery from the extreme droughts, e.g. if more of the lakes off the Darling were inundated and staked connected to the Darling for longer.

Catchment management, regenerative land management and stream flow:

The Strategy should start by encouraging improved management of lands throughout the catchment to increase soil carbon, absorb more of the rain that falls then release more gradually to sustain streamflow as well as enabling better production from those soils. This will be increasingly important with climate change. More landholder education and support focused on this is greatly needed.

The amounts of water trapped in farm dams should be more tightly controlled. It is good that a limit of 10% was introduced some years ago but I suspect that compliance is not well enough regulated.

Option 22 will be useful so I support it.

Improve management of existing dams

Pindari and Glen Lyon Dams should be managed to keep more water for droughts, particularly for town water supplies and stock and stock, domestic and basic environmental needs (as well as providing for flows through the dams at other times for environmental needs i.e. options 29, 30 and 19).

Demand Management not more supply

Helping people reduce their demand for water should be a major focus of the strategy. This should include increased recycling, reuse and efficiency of use (options 26 and 27), plus reducing evaporation from on-farm storages (a missed option) notably those used for storage of flood water and high flows.

I object options 1, 2 and 3 - to the proposals to build a dam on the Mole River and to raise Pindari Dam and to store more water behind an enlarged Mungindi Weir. These will all reduce the length of flowing river habitats that are needed by endangered fish species such as Murray Cod.

Improving fish passage is necessary but should neither be at the expense of flowing habitat, as in the case of raising Mungindi weir, nor be done as an offset for obstructing fish passage elsewhere such as by damming Mole River. Fish passage past Mungindi can be achieved without raising the weir and if necessary the security of supply for Mungindi people can be improved in alternative ways.

The Government has produced no information at all that indicates any benefits for riverine ecosystems in the Border Rivers or Barwon-Darling or communities down the Barwon-Darling, from any of these projects. By trapping the first high flows after dam levels are reduced in dry weather, notably in droughts, the dams will extend the period that the rivers miss out on high flows – extending droughts – as all the little dams in the headwaters and the existing large dams have done this year, to the detriment of rivers downstream both within the Border Rivers region and the Barwon and Darling. This is also detrimental to groundwater recharge and to the people who use groundwater. The existing problem should not be exacerbated by increasing storage space.

Options 1 to 3 appear to be aimed at enabling the larger irrigation businesses, mostly those with licences to access water from the Macintyre and the top of the Barwon near Mungindi, to keep taking the maximum permitted volumes when climate change reduces inflows, to the detriment of ecosystems that depend on high flows that will be trapped. At least in the case of the Mole dam, smaller irrigation enterprises that will not be able to afford an increase in water charges associated with management of the dam will be worse off.

I am concerned that both the Mole dam and further enlarging Pindari dam would have a cumulative adverse impact on Boobera Lagoon and other wetlands because they would further decrease the frequency of flows into Morella Watercourse, other flood-runners, and across the floodplain into the groundwater. Look up Boobera Lagoon on your Department's website to see how important this Aboriginal site is, then consider how inappropriate it is to put it at any more risk.

Rather than spending more money on investigating the Mole dam idea and completing a final business case, Option 1 should be dropped now. Money could be much better spent on options 6 and 9-51.

There should be no attempt to combine it with other projects to make it look economic.

Protecting and enhancing Natural Systems

I strongly support all these options.

Improving the recognition of Aboriginal people's water rights, interests and access to water

I strongly support all these options.

Inland diversions and intra- or Inter-regional piping projects

I strongly object to both options 7 and 8. They would be a waste of money at great cost to ecosystems. We need to learn how to live better with less water diversions using limited amounts where the water is rather than trying to move it to where we'd like it to be.

Yours faithfully

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