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17 July 2018

Dear Sir/Madam

### **NSW updated factors for water recovery**

National Parks Association of NSW (NPA NSW) has had a long history of interest in water management in NSW, particularly in relation to the health of wetland systems and welcomes the opportunity to provide comment on the amended water recovery factors relating to the Murray-Darling Basin Plan.

NPA NSW has supported the development of the Murray-Darling Basin Plan and its objective to recover water from extractive use to benefit the environmental health of rivers and wetlands in the Basin.

We note that the *Water Act 2007* (Commonwealth) gives effect to relevant international treaties and agreements, including the Ramsar Convention 1971. The NSW Government, as manager of a number of Ramsar sites in the Basin, has a requirement to protect the health of these internationally significant environmental assets.

NPA NSW finds the information provided in the consultation paper on NSW updated factors for water recovery and the accompanying technical paper to be less than transparent. We cannot agree that the results are robust and reliable or that they provide an enhanced estimate of water recovery.

We strongly disagree with the proposition that too much water has been recovered to maintain the health of Ramsar listed Gwydir Wetlands and Macquarie Marshes. This is a perverse use of a modelling process that bears no relationship to the health of the wetland systems on the ground.

The planning assumptions used to develop the factors have ignored the volume of extraction through floodplain harvesting in the Macquarie and Gwydir catchments. The loss of medium and small floods through capture in floodplain harvesting structures has not been recognised as a loss to environmental health of the Ramsar listed wetland systems in these catchments.

Natural variability and seasonality of water access are essential elements for maintaining ecosystem function in complex wetland systems. The harvesting of overland flows from floodplains has a significant impact on groundwater recharge, nutrient replenishment and downstream water access.

It is imperative that floodplain harvesting extraction is included as historic use in all considerations of water use in inland NSW.

The updated factors for water recovery are inaccurate because of the failure to include volumes of floodplain harvesting in the Northern Basin catchments.

I may be contacted on 9299-0000 should you wish to discuss NPA's submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Goodwin', with a stylized flourish at the end.

Alix Goodwin  
**Chief Executive Officer**