

From: [DPIE W Regional Water Strategies Mailbox](#)
To: [REDACTED]
Subject: RE: MMELA SUBMISSION
Date: Tuesday, 22 November 2022 4:31:00 PM

From: [REDACTED]
Sent: Saturday, 19 November 2022 9:16 PM
To: DPIE W Regional Water Strategies Mailbox <regionalwater.strategies@dpiensw.gov.au>
Subject: MMELA SUBMISSION

Hi please accept our late submission to the **draft regional water strategy Macquarie-Castlereagh shortlisted actions.**

Can the RWS team please accept our submission as we have been held up due to flooding . This is extremely important to our community and we are asking for good faith to accept our submission.

[REDACTED]



MACQUARIE MARSHES ENVIRONMENTAL LANDHOLDERS ASSOCIATION

Introduction:

The Macquarie Marshes Environmental Landholders Association (MMELA) was formed in 1995 when there was increasing pressure to further reduce water flows to the Macquarie Marshes. Its members are local landholders, many of whom are third and fourth generation landholders in the area, and all are dedicated to ensuring a healthy and productive marsh for future generations.

The aim of MMELA is:

The Macquarie Marshes Environmental Landholders Association (MMELA) aims to ensure the social, economic and environmental sustainability of the internationally recognised Macquarie Marshes.

The Macquarie Marshes is a large semi-permanent, **flow through** wetland on the lower end of the Macquarie River in central western NSW. It covers an area of approximately 200,000ha of which 12% is a Nature Reserve managed by the NSW National Parks & Wildlife Service (NPWS). The remaining 88% is privately owned freehold land which supports an extensive agricultural industry. Much of the land has been held in families for generations and the property owners have an extraordinary knowledge and understanding of all aspects of the Marshes and its management.

The Macquarie Marshes Nature Reserve, “Wilgara” Wetland and U Block are listed on the Ramsar Convention of Wetlands of International Importance. The Nature Reserve is also listed on the Japan - Australia Migratory Bird Agreement (JAMBA) and the China - Australia Migratory Bird Agreement (CAMBA) along with several other agreements. It is the responsibility of the whole community, including State and Federal Governments, to ensure management of the wetland does not compromise values and/or obligations set out in the above mentioned agreements.

The Macquarie Marshes is unique both environmentally and economically. Research indicates it is the most important colonial nesting waterbird breeding site in Australia for species diversity and nesting density (*Kingsford and Thomas 1995*). The majority of the breeding colonies are situated on privately owned land where landholders have managed and protected them since settlement. The Marshes also support an extensive cattle grazing industry which is its main economic focus. Sustainable grazing is encouraged by MMELA and the majority of landholders are acutely aware of the environmental needs of the wetland and undertake congruent management practices.

Government policy and decision making relating to natural resource management has in the past had devastating impacts on the Marshes, particularly water management, which has severely reduced water flows through river regulation and other such legislation.

When Burrendong Dam was completed and irrigation was established throughout the Macquarie Valley scientific research showed flows to the internationally recognised Macquarie Marshes were greatly decreased. MMELA brought this to the attention of many governments and fought for water to be recovered for this diverse and unique wetland and its associated floodplain. As a result both the NSW and Federal Governments introduced ‘buy back’ programs and improved efficiency schemes in an effort to halt the ongoing destruction of the Macquarie Marshes. It must be remembered that these programs only returned a small portion of the water originally taken from the Macquarie Marshes and the landholders who depend on its health and vitality to make their living.

The Macquarie Marshes ecological community.

Supports one of three extensive river red gum woodlands (6000ha) in the Murray Darling basin.

Supports the Largest common reed beds in the Northern basin.

Is one of only two locations with extensive water couch marsh (> 6000ha) in the Murray darling basin?

Provides habitat for numerous threatened species listed at a state and national level.

Is recognised as one of the most important wetlands in Australia for waterbird and provides habitat for some 72 species of waterbirds including 43 species which breed in the Marshes.

Is the most important colonial nesting waterbird breeding site in Australia for both species diversity and density.

Supports one of the largest breeding colonies of intermediate egrets in southern Australia.

Provides an important habitat for 17 species of migratory bird species covered under international agreements for the protection of migratory birds and there habitat

Our community has adapted with the challenges that have been placed in front of us for over 55 years of river regulation, unlike other farming community's that adapt and evolve with improvements to technology and scientific knowledge, we have structured our business to make the best with the removal of large volumes of water from our grazing systems.

This ability to adapt has gone un-noticed by the wider population and we are constantly criticised about our management systems.

The major bird breeding colonies are all located on or immediately adjacent to privately managed land in the marshes.

We encourage the NSW government to complete a grazing study into the practices used and the environmental benefits before proceeding with many of the priority's included in the RWS ..

MMELA thanks the Department of Planning and environment for the opportunity to comment on the Draft Regional Water Strategy and trust that the content of our submission will be acknowledged in the final document

Our members feel that the NSW government has failed to acknowledge the real opportunity that the regional water strategy should have included as the number **1 Priority** to review the water accounting process that is currently used in the Macquarie .The accounting method that is legislated by the NSW government known as the **Drought of record (DOR)** has failed and is no longer applicable.

It is unacceptable that the Regional water strategy (RWS) has missed the opportunity to address this real issue that effects all community's along the river from Bathurst to the Barwon.

Burrendong Dam is being used as a credit Dam, this means that the historical inflow data from the year of 1937 (DOR) Is used when allocating water. It would seem extremely unusual that this practice continue to be accepted when we all are faced with the enormous challenge of adapting with the predicted climate variations.

The fact that the Macquarie general security entitlement is around 898gl (original yield of water was assessed at 406gl,then revised to 475gl) and that maximum capacity of Burrendong is 1200 gl means that if every entitlement holder called on all their water every year the Dam would be empty the majority of the time. The RWS fails to address this very real issue and our community really struggle to take the document seriously when over allocation and poor resource settings are the issue that really needs addressing.

Priority 1

While our community has no concerns about the actions 1 to 5, we do have issues with action 5 as any proposed new infrastructure will have impacts on our end of the river. We must be included in the impacts of any developments or rule changes to the upper catchment.

Priority 2

The use of the wording lower Macquarie by the developers of the RWS displays the poor knowledge of the full length of the river.

The lower Macquarie is the section of the river below the marshes to the Macquarie's junction with the Barwon. Please refer to the management zones that exist in the NSW own document /plan the unregulated water sharing plan.

The section between Dubbo and Warren is known as the mid Macquarie.

Action 2.2 create water savings through changed operation of regulated effluent creeks.

While our members have and always have had concerns that this section (Effluent creeks) of the regulated reach has been given priority over the river channel itself, we have real concerns in the way that this action is worded.

Quote **save water that could be used for improved water supply reliability and flows into the Macquarie marshes**. This sentence clearly shows a lack of understanding. This is not how it works at all .If there was water savings then we would expect that the environmental demands of the effluent creeks would be considered when the environmental water managers are assessing the demands.

While we may agree that a more natural regime with occasional periods of no flow (like the main Macquarie river channel currently experiences) we do however strongly disagree with the way that the RWS has addressed the topic, this has harmed our community and should be totally removed from the RWS.

Proposed action 2.3

Use some of the flood mitigation storage in Burrendong dam for water supply works.

Our community completely reject the action and this once again shows a complete lack of understanding about the role a dam spill plays in the wider landscape.

The total volume of environmental water in the Macquarie is close to 330gl, this water is managed by the local environmental water advisory group. While this water plays a vital role in large bodied native fish movement and some breeding, there is a well understood inability of the environmental water to complete weir drown outs needed for fish dispersal and recruitment.

Goldern perch also require a flow rate that is impossible to achieve with environmental water from the dams release valve. Ill-informed suggestions like (action 2.3) this with a complete lack of understanding of the huge impact to both the environment and the downstream communities who require a healthy functioning river.

Bird breeding will also stop totally as the flood mitigation section is used. While environmental water holdings play a vital role in preparing the Marshes to an event ready condition for colonial nesting birds to consider a large scale event, it fails to provide the actual trigger that both Ibis and Egrets require. The section of the flood mitigation zone referred to in proposed action 2.3 is the exact trigger that these birds need to trigger an event. This proposal if adopted will be the final death sentence for the marshes and the ability to breed large scale bird events.

This proposal (action 2.3) when combined with the failure of the RWS to address the failed water allocation method by continuing to use the out dated DOR would have devastating results to the Macquarie marshes Ramsar site as well as connectivity to the Barwon.

The impact from changing the flow timing, duration and frequency by proposing to raise the supply full level for native fish, large scale colonial bird breeding as well as the loss to our grazing business would far outweigh the benefits gained by the use of extra water captured. Currently the water in this section is known

as planned environmental water (PEW) and the removal of this water will have catastrophic impact to the water dependent eco system.

Any reduction to the flood mitigation capacity of Burrendong dam is completely unacceptable.

Increased risk to human safety (lives will be lost), with the increased variability in floods as a result of the impact of climate change, the suggestion to raise the supply full level of Burrendong is unacceptable .It must be noted that our community has been promised many things by the NSW government under the promise of operating protocols, we no longer have any trust that the promises will be fulfilled and have no confidence that the so called protocols will provide any benefits to us. The authors of the RWS should be left to carry the risk when the proposal causes massive personal hardship as a result of the poor planning.

The flood mitigation section of Burrendong is effectively a levy bank for the cities of Wellington,& Dubbo and the major centre of Narromine. The reduction of the flood mit section would put these community's at risk .

Action, the proposed action 2.3 must be removed from the regional water strategy.

Replacement of the Gin Gin weir.

We have long fought hard against this proposal, the NSW government has failed to show the historical use figures of the tributary flows and until such time when the government can be fully transparent on what water has been allocated to water orders from the tribs we cannot trust that there will not be an increased usage of these flows .

MMELA have been asking for a detailed grazing study to be undertaken in relation to the Gin Gin weir proposal for many years. A detailed floodplain grazing study was undertaken by Phil Townsend (MDBA northern basin review) and we expect that a similar study be completed before any further works be carried out in the Macquarie. Our landholders who run beef cattle grazing business in the Macquarie Marshes are all willing to be a part of a grazing study if and when the proponents of the Gin Gin weir upgrade chose. We do however think that it is necessary to proceed with suitable fish passage for the existing structure but no increase in height or holding capacity of the weir.

Proposed action 2.4

MMELA support the option to investigate any improvements to connectivity to the Barwon /Darling, this must include consultation with all the stakeholders in the lower Macquarie (downstream of the Marshes) as well as the unregulated irrigators in the Lower Macquarie.

Priority 3

MMELA supports actions 3.6 and Action 3.9 as there is opportunities for improving visitor experiences to the Marshes, this action should include improvements to local roads and must include input from our local community. In the past projects have included people claiming to be locals who do not live or make a living from the Marshes.

Converting general security to high security, this topic has been suggested in previous options and MMELA have concerns that it will have third party impacts. If any options around this topic are included it must be industry that carry the risk not the environment as has happened in the past.

Priority 4

MMELA have been involved in the decision making process for environmental watering, we feel like the process is under threat by the wording of Best Use of existing water. This is a poor choice of heading ,we do support action 4.1 ,4.2 and Action 4.3 should include a multi-level offtake from Burrendong. We strongly agree with action 4.4 especially in the hot spot areas identified in the flood plain management plan that has largely gone un noticed.

We do not agree with action 4.7 as there is no reduction in floodplain harvesting take in the Macquarie and the extremely generous carryover provisions of the licences mean that the total volume licenced means nothing. The end of system flow targets for the Macquarie must be at the confluence of the Barwon and not at Marebone, the inclusion of floodplain harvesting programme as a positive in unacceptable as the policy favours extra take over the CAP.

MMELA has great concerns about how and when the draft has been open for comment as our community is under extreme stress due the current flood conditions. Our members are fighting for their survival and have found the timeline for submissions to be difficult. We encourage the RWS team to visit the Macquarie Marshes to better understand our concerns about the short list of options.

