

Regional Water Strategies Public Exhibition 2



Submission Questionnaire

Border Rivers Water Strategy Challenges and shortlisted actions

The NSW Government is taking action to improve long-term water security for the Border Rivers. The Border Rivers Regional Water Strategy sets out a shortlist of proposed actions to help deliver healthy and resilient water resources for a liveable and prosperous region.

Your voice is important

This is your opportunity to let us know which actions you support and think should be implemented to help set the region up for the future.

This questionnaire will take approximately 15 minutes to complete, and your response can remain anonymous if you wish (see question 7).

Questions marked with an asterisk (*) require an answer.

If you have any questions about the questionnaire, please email: regionalwater.strategies@dpie.nsw.gov.au

You can also provide feedback via [our submission platform](#).

1. Your details

* Email address:

* Name:

* Address:

* Contact phone number:

* **Do you identify as an Aboriginal person?** (select one)

Yes No Choose not to answer

* **Are you making this submission as an individual or as a representative of an organisation?** (select one)

Individual Organisation

2. Organisation or business details

If making this submission as a representative of an organisation, who do you represent? (select one)

Government (select one)

- Commonwealth
 New South Wales
 State other
 Local
- Local Water Utility

Peak representative organisation (select one)

- Environment
 Industry
 Business group or business chamber
 Community

Aboriginal organisation (select one)

- Yes
 No

Other (select and provide details) _____

N/A

3. Regional water challenges

We have identified **five water challenges** that are an immediate priority. More detail about each regional challenge is available in the [Consultation Paper](#).

1 Increased surface water security risks for towns in the region

Less reliable flows in rivers and creeks will increase water security and water quality risks for towns and rural landholders that rely on these water sources.

2 Risk of reduced water availability will impact the regional economy

The region's main economy of agriculture relies on water accessed through general security licences which has low reliability. A drier future could increase the frequency and severity of droughts and further reduce the reliability of licences. This would have significant impacts on the regional economy.

3 Dismantling barriers to Aboriginal water rights

'We can't sing our song no more, we can't live on the river no more to look after her, for you all' (Gomerioi)

Yaama Nginda Gomerioi Wunnungulda. We are Gomerioi, we have our way of doing business. You have to be invited to sit around our fire. We share language and we engage together. You are asked to identify who you are and what you represent and be clear in your intent. Then, and only then can we do business together.

4 Sustaining the health and resilience of natural ecosystems

River regulation, extraction and water infrastructure operations have changed flow variability, water quantity and water quality. This has impacted the health of water-dependent ecosystems and assets in the region and connected valleys, affecting the resilience of water dependent ecosystems.

5 Improving connectivity to support downstream need

Extended cease-to-flow and low-flow periods create risks for towns, basic landholder rights and high priority environmental needs at the end of the Border Rivers system and further downstream. A drier future could increase their frequency and severity of cease-to-flow and low flow periods.

Do you agree that these are the priority water challenges for the Border Rivers region that we need to focus on? (select one)

Yes No

If no, please outline what you see as the priority water challenges in this region over the next 20 – 40 years?

4. Addressing the challenges

We have developed four regional priorities with actions under each. We want to know which of the actions you support.

The regional priorities are:

- 1 Address knowledge gaps and make information easily accessible
- 2 Do more with less water
- 3 Make the region more resilient to climate variability
- 4 Share water differently to address the critical needs of Border Rivers and downstream users

Priority 1: Address knowledge gaps and make information easily accessible

The actions shortlisted under this priority will:

- fill knowledge gaps
- make information more accessible so Aboriginal people, water managers and users have access to the right amount of information at the right time to help them make decisions.

Proposed action		Do you support this action?
1.1	Improve public access to climate information and water availability forecasts	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.2	Develop ongoing arrangements for participation of local Aboriginal people in water management	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.3	Improve understanding of river flows, water use and water quality at priority locations in the Border Rivers	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.4	Invest in continuous improvement in water modelling in the Border Rivers region	<input type="checkbox"/> Yes <input type="checkbox"/> No

A) Do you have any comments on the proposed actions identified?

Priority 2: Do more with less water

The actions shortlisted under this priority will:

- use water more efficiently
- achieve shared benefits from water delivery and maximise social, cultural, economic and environmental outcomes when water is used.

Proposed action		Do you support this action?
2.1	Support adoption of on-farm water use efficiency measures	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.2	Coordinate the management of irrigation water releases and water for the environment to improve ecological outcomes	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.3	Identify and address physical barriers to the delivery of water for the environment	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.4	Provide clarity and certainty for environmental needs during drought operations	<input type="checkbox"/> Yes <input type="checkbox"/> No

A) Do you have any comments on the proposed actions identified?

Priority 3: Make the region more resilient to climate variability

The actions shortlisted under this priority will:

- encourage agricultural diversification through investigating increasing the availability of high security licences
- explore opportunities to make sure the water entitlement and access framework can cater to the development of emerging industries
- support Aboriginal people to be more involved in water management, by both sharing their traditional knowledge and contributing to decision making
- reduce the impact of infrastructure and land management on fish and water dependent ecosystems.

Proposed action		Do you support this action?
3.1	Increase the availability of high security water access licences	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.2	Ensure the water management framework can support sustainable economic diversification	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.3	Support place-based initiatives to deliver cultural outcomes for Aboriginal people	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.4	Support Aboriginal business opportunities in the Border Rivers region	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.5	Mitigate the impact of water infrastructure on native fish	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6	Fully implement the NSW Floodplain Harvesting Policy	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.7	Remediate unapproved floodplain structures	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.8	Identify significant riparian, wetland or floodplain reaches to protect or rehabilitate	<input type="checkbox"/> Yes <input type="checkbox"/> No

A) Do you have any comments on the proposed actions identified?

Priority 4: Share water differently to address critical water needs of Border Rivers and downstream users

The actions shortlisted under this priority will:

- build knowledge of the critical needs of the region
- secure water sources for towns
- make water policy and water determinations adaptable in response to changing climate conditions
- investigate ways to improve connectivity through the system and with the Barwon–Darling River.

Proposed action		Do you support this action?
4.1	Map critical drought refugia	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.2	Support towns to understand if groundwater can provide a reliable water supply when surface water availability is limited	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.3	Investigate innovative projects to support bushfire efforts	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.4	Investigate sustainable levels of groundwater extraction in the Border Rivers Alluvium and the Great Artesian Basin aquifers	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.5	Investigate ways to improve connectivity with the Barwon-Darling on a multi-valley scale	<input type="checkbox"/> Yes <input type="checkbox"/> No

A) Do you have any comments on the proposed actions identified?

5. Other comments

A) Should any proposed actions in this consultation paper not be shortlisted and why?

B) Should any other options in Attachment 1 of the Consultation Paper be shortlisted and why?

6. Implementation of the Border Rivers Regional Water Strategy

An Implementation Plan will be included in the final Border Rivers Regional Water Strategy.

A) Which actions should be implemented first and why?

Making your submission public

To promote transparency and open government, we intend to make all submissions publicly available on our website, or in reports. Your name or your organisation's name may appear in these reports with your feedback attributed.

If you would like your submission and/or feedback to be kept confidential, please let us know when making your submission.

If you request that your submission is to be kept confidential, it will not be published on our website or included in any relevant reports; however, it will still be subject to the *Government Information Public Access Act 2009*.

Your submission will be stored securely, consistent with the department's Records Management Policy and you have the right to request access to, and correction of, your personal information held by the department.

Further details can be found in our privacy statement available on our website.
www.industry.nsw.gov.au/privacy

7. Information on confidentiality and privacy *

I give permission for my submission to be publicly available on the NSW Department of Planning and Environment website.

Yes No

I would like my personal details to be kept confidential.

Yes No

8. Would you like to be kept updated on progress on the development and implementation of the Border Rivers Regional Water Strategy?

Yes No

If yes, please provide your details below.

* Email address:

* Name:

* Address:

* Contact phone number:

9. How did you hear about the Public Exhibition of this strategy?

We are interested to know how you heard about the opportunity to make a submission. Please indicate the communication methods below:

- Newspaper
- Radio
- Department of Planning and Environment website
- Direct email
- Social media
- Have your say NSW Government website
- Communication from peak body
- Word of mouth
- Other (select and provide details) _____

10. Additional Information

If you would like to provide any supporting documents to help us understand your feedback, please email these from the same email you provided in this form or attach supporting documents to this form if you are returning your submission by mail.

All submissions on the draft Border Rivers Regional Water Strategy will be reviewed following the public exhibition period.

Please email your completed submission and any supporting documents to:

regionalwater.strategies@dpie.nsw.gov.au

Or post to:

Regional Water Strategies
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Submissions close Wednesday 29 June 2022, 11.59pm

Further details on all regional water strategies can be found on our website
www.dpie.nsw.gov.au/regional-water-strategies



Thank you for your submission.



Introduction

Thank you for the opportunity to this second stage public exhibition on the Border Rivers Regional Water Strategy. Border Rivers Food and Fibre (BRFF) and a number of our members were able to attend the public and targeted sessions in Inverell, Goondiwindi, and Tenterfield in addition to the online public session. This written response is in addition to these public and targeted feedback sessions.

BRFF acknowledges the efforts of government to ensure water security for a range of purposes. The draft strategy makes some useful suggestions; proposes some actions which are potentially high-risk; and misses a significant opportunity to properly explore infrastructure options which would potentially deliver a range of positive outcomes. Many of these issues will require further analysis and consultation before successful implementation.

BRFF notes that the climate change models used for this process may not incorporate the latest data and that some prominence was given to worst case scenarios in the public presentations. For the lay-person it might be useful to better understand what some of the underpinning assumptions are for this worst-case scenario to better understand its likelihood. It might also be useful to understand what these models predict in terms of weather volatility. More extreme wet periods as well as more extreme dry periods are possible and any impacts on volatility should be reflected in the regional water strategy process in association the overall drying trend.

Given that the Basin Plan itself is scheduled for a significant review process it would be useful for government to articulate how actions undertaken under this strategy will interact with this future process.

A broad comment raised in the Goondiwindi Public session was that perhaps this strategy also provides an opportunity for water users and the broader community to better understand how fee payments are used by government to deliver water management activities, such as planning and compliance.

We particularly note that the Borders Rivers are part of a catchment which includes Queensland as well as NSW, as BRFF represents members on both sides of the river and indeed many members who operate themselves on both. It is a matter of ongoing concern that while discussions are held at

officer level across the jurisdictions that we are not developing a whole of catchment response in either state. The Glenlyon Dam and the Border Rivers Commission are testament to how states have worked together for the benefit of all previously. We seek commitment from the NSW Government to recognise this value and reenergise these mechanisms as part of the Border Rivers Regional Strategy.

This response falls largely into two categories; strategies for the Border Rivers specifically and the strategies related to connectivity with the Western Regional Strategy which will have a consequent impact in the Border Rivers.

Border Rivers Regional Strategy

Infrastructure

BRFF was particularly disappointed that in screening out potential inland diversion schemes the assumptions used were not made public, and in as much as it was possible to discover some of these assumptions during the public sessions it became apparent that opportunities had not been fully considered.

Consequently, we request that the department do further analysis to look at the value of these potential schemes for: flood mitigation on the Eastern fall and Murray Darling Basin; hydro power and pumped hydro power, particularly in the context of the likely future electricity market and the recently upgraded sub-station and approved solar power farms near Bonshaw; the value to connectivity with the Western Region and Murray Darling system beyond; township community access to water; in addition to the potential value for agriculture. Such a scheme has potential to solve a number of issues and this broader lens should be applied with a whole-of-government approach.

The NSW Government announced that it would not proceed with the Mole River dam in concert with the public exhibition of this draft of the regional water strategy, which did not include progressing any other infrastructure projects either. Many BRFF members are of the view that the assessment process for the Mole River Dam proposal was not rigorous or consultative enough with potential irrigator beneficiaries.

BRFF strongly objects to the detail of the Mole River Dam analysis and associated business case being made cabinet-in-confidence and therefore unavailable to the stakeholders for a number of decades. When undertaking further analysis of any proposals including infrastructure such as inland diversion schemes, BRFF would welcome an open and collaborative approach so government can make the most informed decisions and stakeholders can understand them.

BRFF believes that the Border Rivers Regional Strategy could also be improved by better considering infrastructure such as gages for flood mitigation in light of the potentially more extreme wet periods into the future. This is particularly important in the Border Rivers and acutely so in the upper reaches where rainfall events can cause rivers to flood rapidly, having significant impacts on an individual and regional scale with the loss of stock and equipment which might otherwise have been saved. As discussed in the Tenterfield public session, BRFF seeks that the impact of better gaging in places like Bluff River for local flood mitigation, as well as water management further down the system, be properly considered as part of the analysis.

We also note that departmental analysis of options only comprised a Cost Benefit Analysis. BRFF requests that an Economic Impact Assessment of infrastructure options also be undertaken in addition, which is usual for infrastructure proposals, and is usefully occurring with the concurrent Queensland regional water assessment being undertaken for the Southern and Darling Downs.

Security Conversion and Tenure

BRFF notes the strategy proposition of converting up to 7% of general security entitlement to high security as a mechanism to promote high value agricultural and horticultural crops. This concept is well worthy of further consideration, but BRFF requests that the Department undertakes further analysis of the potential market impacts before implementation. It should be acknowledged that even high security entitlements are not guaranteed entitlements and in dire weather patterns it could be that permanent tree crops, for example, may still not have access to the water required although being established with high security entitlements.

By conversion to high security and consequently decreasing the quantity of remaining general security water, it is also likely to also significantly affect its reliability and therefore market value. Proper consideration of potential market impacts should occur before this option is progressed, particularly given that many irrigators have borrowed against their general security entitlement at currently understood levels of risk.

An interesting concept raised in the Goondiwindi targeted session was that government could consider enabling water users to have a capacity share in water storages rather than an entitlement. This method has some use in Queensland and elsewhere, but would require some considerable further analysis and consultation before implementation.

Strategy Timeframe and Other Options

In the Inverell public session we were informed that options such as recycled water and managed aquifer recharge for community needs are likely to be trialled elsewhere before being examined further in the Border Rivers context.

Given that the Regional Strategy sets a very long-term horizon, BRFF submits that the strategy itself should acknowledge that rapidly changing technology and circumstances would require that the strategy be reviewed and amended appropriately on a much shorter time-frame, such as five years. The strategy could usefully propose a work-plan of investigation, with associated resourcing, to be completed before the strategy is next reviewed within this shorter timeframe.

As was raised in the Tenterfield public session, there are also other options not making the previous long list which could also be usefully considered into the future. Specifically, long-time residents at the top end of the catchment where a large proportion of the rainfall occurs have recognised significant thickening of native vegetation on surrounding crown land over the course of decades. These changes may be because of reduced burning subsequent to European settlement. It is possible that higher historical water yields to the river system could be achieved again through historically consistent management of crown land. An appropriate scientific investigation should be undertaken into the proposition for example.

Western Regional Strategy

By the departments own concession at the Inverell public session, it was not in a position to properly consult them on this Western strategy at that time and it was not immediately clear that stakeholders in the Border Rivers would in fact need to read both strategies to understand the implications for them. BRFF seeks clarification about when Government will seek further input from our region on the Western Strategy.

BRFF recognises and supports the need for flows to meet community and environmental needs.

However, BRFF wishes to see any triggers within a rules based system which enables a degree of certainty rather than normalising discretionary use of Section 324 Regulations. This will enable industry to make better informed decisions as seasonal weather patterns progress.

BRFF is of the position that preference should be for Held Environmental Water to be used to achieve connectivity outcomes, wherever possible. BRFF also seeks greater accountability and transparency for the release strategies of HEW, to ensure that sufficient water is available at times of water scarcity.

In the context of proposed targets at Menindee Lakes, we note issues which also need to be addressed before implementation. As the Border Rivers are at the top of the catchment, we have concerns about the Department's ability to accurately determine whether flows from a particular rainfall event will be required to meet the target before it has already flowed past.

This target therefore requires appropriate gauging and forecasting capabilities which we are not currently confident of. There would also need to be significant improvements in the transparency and accountability of release strategies of water exiting Menindee Lakes and how HEW release interacts with the target. This has significant potential impacts for irrigators and our communities.

We also have significant concerns about the analysis presented on the impact of first-flows to achieve environmental outcomes. The modelling presented showed an overall reduction of 1% on total water availability. However, this percentage does not appropriately identify the likely economic value of this water in a first flush event given, for example, it may be used to finish crops which might otherwise perish or meet the needs of a crop at the beginning of the planting window which may otherwise be missed.

BRFF seeks an economic impact assessment be completed for this proposal which appropriately identifies, models and values this water by government. Irrigation users should then be able to realise this value at another time potentially as a carry-over bonus.

Similarly, BRFF believes that government should do more work within the strategy to recognise other ways in which water in the system operates. For example, the naturally ephemeral nature of these streams should be recognised and that low or no flows also deliver an environmental value which should be considered. Similarly, water which is in the system for use by irrigators which would not be there naturally in a dry period may also have an environmental dividend which should be valued appropriately.