



NATIONAL PARKS ASSOCIATION OF NSW  
*protecting nature through community action*

ARMIDALE BRANCH  
armidale@npansw.org.au

13 July 2022

Regional Water Strategies team  
NSW Department of Planning and Environment – Water  
[regionalwater.strategies@dpie.nsw.gov.au](mailto:regionalwater.strategies@dpie.nsw.gov.au)

### **Draft Western Regional Water Strategy**

Dear submission readers,

The National Parks Association of NSW (NPA) is a community organisation with a long history of standing up for nature – advocating for conservation in national parks, nature reserves, other public reserves, and private lands and advocating for ecologically sustainable management of catchments, rivers, floodplains and oceans. The Armidale Branch of NPA takes a particular interest in issues affecting nature and ecological sustainability in the northern tablelands, northwest slopes and floodplains of NSW to our west. Armidale NPA's membership is drawn from this wider region, including members on living on lands in the Border Rivers, Gwydir and Namoi catchments from which runoff flows towards the Barwon and Darling/Baaka Rivers.

Thank you for your efforts in planning for the wide range of water needs in the enormous, often dry Western Region of NSW, and for this opportunity provide our response to this Draft Strategy.

We note that most but not all of the proposed options and contentious water issues in this region relate to the great ancient river that transverses the region from its northeast corner and Queensland border to its junction with the Murray floodplain, carrying runoff from wetter catchments to the relatively dry outback, including to the Lower Murray. This river was long known in its upper reach by the Ngemba people by a name roughly spellable as Parwon, now Barwon, and in its lower reach known to the Barkinji people as Baaka, now Darling/Baaka, is so old that it has shaped a vast tract of landscape to which and through which it has delivered water, energy, sediments and nutrients since long before many rivers in the east of our continent changed their direction<sup>1</sup>. A vast floodplain, innumerable billabongs, Talyawalka Anabranche and its lakes including Wongalara and Poopelloe, the Great Darling Anabranche and its lakes like Nearie and Travellers, many other flood channels, many evident or buried relics of ancient channels, all of the floodplain woodlands of river redgum, coolabah and other species are all parts of this river that stand out from the surrounding semi-arid landscape on satellite imagery. Molluscs endemic to this river, ancient fish species like Catfish and Murray Cod and the myriad of other species in the aquatic and wetland ecosystems are also part of the river but these are recognised as an endangered ecological community. Just as the First Nations depended on and enjoyed this river's bounty, now the current residents of the region and their visitors do as well. All depend on its continued productivity and on the water that brings this.

The rest of the west also has waterways of great value, whether they bring water from small catchments or Queensland, they need to be cherished – managed sustainably for a long future.

---

<sup>1</sup> Mary E White (2000) *Running Down: Water In A Changing Land*. Kangaroo Press, Pymble, Australia

It is now evident that many aspects of past and current management of water in this region has been far from sustainable. With the climate changing rapidly towards the “worst case” of the future possibilities presented it is water management needs to change rapidly.

Armidale NPA is therefore pleased to see so many options that will contribute towards sustainable management, but disappointed that the current NSW Government has not yet accepted the need to propose bigger changes to enable more water to reach this region from the Baaka’s eastern and southern catchments. We do appreciate that many departmental officers have endeavoured to diligently develop and present a set of options that relate to the values and future wishes of diverse interests in the community, but the lack of photos of the region when it was severely drought affected suggest the apparent good intentions could be just spin. We very are concerned that the approach taken to developing some options, such as the connectivity proposals, does not comply with the priorities set in the Water Management Act 2000.

We **object** to the following options and do not believe they should be shortlisted:

- Option 48. This would be a gross waste of money. The construction of so many weirs has done enough damage to the Barwon Darling. The only reason that some species have survived is that the river retains some of its natural variability especially in between the weir pools, although it has lost much of its natural consistency of low to vary low flows. More inflow from the tributaries and changes to water access rules are needed to address this, not regulatory structures that require management. Who would pay for the management if that management is not giving priority to big extractive users, contrary to legislation?
- The part of the Better Baaka program that involves grossly changing Menindee Lakes should be dropped as it would reduce the ecological value that these shallow lakes have. Their inundation pattern is partly artificial but they are of great value now for birds and fish, noticeably so in contrast to so many other wetlands across NSW affected by reduction in inundation frequency.

**Option 11 should be greatly changed.** Town weirs need to be partly replaced with off-stream storages and reduced in capacity to limit water quality and ecological problems, as discussed above regarding other weirs. They should not be “renewed” at or larger than their current capacity and length of weirpool. We would be happy to see new smaller weirs with fish passage in their place along with off-stream storages.

We also object to **floodplain harvesting** reforms being “fully implemented” although we do want this practice regulated in ways that enable achievement of environmental water requirements, as set out in our earlier submission on this.

**We strongly support options that are likely to improve the health of riverine ecosystems:** commitments 3 and 4, and options 23 to 29.

Option 44, removing unnecessary weirs, should be recognised as essential to enable the recovery of populations of fish species that require flowing lentic habitats to feed in, as well as being a means to reduce risks of blue-green algae and reduce the amount of evaporation needed to keep water cool enough for life (narrower pools and riffle zones have a smaller surface area so less evaporates). Removal should be cheaper than adding fishways and maintaining weirs. Some of our Branch members visited Calmundi Weir which has a weir pool adjoining Barwon State Conservation Area and reported that it has one of the old style fishways that don’t work because they were not designed for local fish species. They could only see one small pipe, presumably supplying water for stock and domestic needs, so it shouldn’t be hard to enable these people to meet their water needs without a weir. Given that this is the next weir up from the recently raised Walgett Weir that now inundates an extra 60 km that had been lentic flowing habitats, removal of Calmundi Weir should be among the priorities.

Another group of key actions needed to improve river health are those that **improve connectivity longitudinally and laterally**. We support options options 44 to 47 and 49 to 52, however In

relation to all options to improve connectivity, NPA requests that improving achievement of the Environmental Water Requirements (EWRs) listed in Long Term Water Plans be a primary objective.

The review of the North West Plan rules (Commitment 5) should aim to achieve as many of the EWRs in the Barwon Darling Long Term Water Plan as possible through implementation in all years - the objectives currently proposed are too limited. Slight revision of the existing riparian targets for each river reach could meet some EWRs concurrently with needs of basic rights holders and limiting risks of blue-green algal blooms, whereas the totally unacceptable proposal to replace them with a simplistic target of 195 GL in Menindee Lakes will not protect basic rights let alone environmental values. EWRs requiring higher flow levels should be met to what ever extent is possible, rather than not protecting any flow for, for example to enable fish to disperse, spawn or migrate, just because the high targets needed in one reach of the river or for some species cannot be fully achieved.

In relation to targets for flow protection in critical dry conditions, it is very important that enough flow be protected to avoid further endangering the flow-dependent ecosystems and species of both the Barwon and entire Darling/Baaka. Triggers for imposing restrictions should include lack of flow in any reach of these rivers or Menindee Lakes being below 450 GL or drought or lack of flows in tributaries. Triggers for lifting restrictions should require both 450GL to be stored in Menindee Lakes and that a set of targets based on several EWRs being met in each reach of the Barwon-Darling.

We particularly appreciate the proposal in Option 45 to make more of the streams that cross from Queensland into NSW free flowing by buying back 15 GL of water licences to improve connectivity and secure environmental flows. Wetland, aquatic and floodplain ecosystems in many protected areas, including national parks, depend on near-natural flows from one or more of the intersecting streams or from these and other Barwon-Darling tributaries.

We hope that more water licences can be bought from other parts of the Barwon catchment to enable more Environmental Water Requirements in the Barwon and Darling/Baaka to be met.

Poor **water quality** is too often an issue in various parts of the region. Salinity and blue green algal blooms can kill or stop growth of many native species as well as causing serious problems for people. Both these issues in the Barwon-Darling could be reduced by implementing the North West Flow Plan rules to protect sufficient inflow to meet riparian targets from extraction by low priority licence holders in the tributaries, and replacing these rules with improved rules as discussed **below**. The new weir proposed for Wilcannia may make it slightly easier to limit salinity problems there but won't fix it there let alone in the hundreds of kilometres affected. Managing the salinity issues experienced all the way from near Louth to Menindee lakes may require more water than this. We also strongly support options 30 to 35.

Armidale NPA also supports options that enable **Aboriginal people** to become active participants in river management, whether in practical ways like applying cultural practices, managing their own water licences or being employed implementing Strategy options, or through being more effective in their engagement in the issues of vital importance to them. Commitment 1 and Options 16-22 are most relevant, but they could be involved in other options such as 24 and 44.

We support options to **improve the efficiency of water use**. This should be a much higher priority for towns than increasing supply.

The following options should be added

- Buying back more general security licences and possibly other licences to increase held environmental water

- Improve connectivity to and within the Lower Darling and to the Murray River. Restricting water diversions by low priority licence holders in the tributaries whenever Menindee Lakes are below 450 GL would enable this.
- Achieve the Lower Darling's range of environmental water requirements (adopting our 450 GL suggestion could assist in this)
- More frequent flows to the Darling Anabranch (but not to make it regularly flowing)

Thank you for considering this submission.

██████████

██████████████████

On behalf of Armidale NPA