

# SUBMISSION BORDER RIVERS REGIONAL WATER STRATEGY

The following are my comments on the draft Regional Water Strategy for the Border Rivers.  
Thank you for the opportunity to provide comments on this important Region.

## GENERAL COMMENTS

### OBJECTIVE

- The first and overarching objective for the Border Rivers Regional Water Strategy should be "To use available water in an ecologically sustainable manner".
- The second objective should be: "To protect and enhance the environment by improving the health and integrity of environmental systems and assets, and by improving water quality."

### CURRENT CONDITION OF WATER SOURCES AND CATCHMENTS

- The draft Strategy identifies that river health is under threat but does not provide a description of the current condition of the water sources and their catchments to sustain ecosystems, including flow regime and water quality. This is a fundamental requirement for this Regional Strategy.

### SDL, OVER-ALLOCATION AND DEMAND MANAGEMENT

- The draft Strategy recognises that the Sustainable Diversion Limit in the Border Rivers has not been met. Available water in the Border Rivers Region is still over-allocated and cannot stretch to existing commitments, let alone any growth in demand.
- A substantial change in water management strategy is needed, and it should be implemented as a matter of urgency.
- Floodplain harvesting in the Border Rivers captures 30% of natural surface water flows in the catchment. This has a significant impact on the environment and connectivity to the Barwon-Darling. This volume must be substantially reduced through regulation, and replaced by water savings through better management of evaporation rates and by demand reduction.

## COMMENTS ON OPTIONS

### OPTIONS SUPPORTED

I strongly support the options in the Regional Water Strategy which will achieve improved outcomes for river ecosystem health, native fish, waterbirds and wetlands. These include:

- Option 10 : Fish passage strategy

- Option 11: Installation of screening pumps to prevent fish from being sucked out of the river
- Option 12: Fixing cold water pollution
- Option 13: Restore water quality
- Options 9, 14, 35, 36, 37, 40, 41: Groundwater - managing salinity, monitoring, sustainable access, research, cross-border management, fractured rock aquifers
- Option 15: Managing structures on floodplains
- Options 16 and 17: Private land incentives and riparian restoration
- Option 19: Protecting environmental flows. This should be identified as a commitment under the Northern Basin toolkit measures.
- Option 20: Improving the benefits of Planned Environmental Water
- Option 21: Active management to protect environmental water – this should be identified as a commitment under the Northern Basin toolkit measures
- Option 22: Improved management of unregulated rivers
- Option 23: Improved connectivity with Barwon-Darling
- Option 24: Protecting and conserving groundwater-dependent ecosystems

All options which improve First Nations capacity, engagement and employment in water management, and recognise the significance of cultural knowledge and improve cultural outcomes are strongly supported. These include:

- Options 42 - 51: Recognition of cultural knowledge, water rights and interests; Secure flows for cultural sites; Aboriginal River Ranger program.

Demand management options: all options which reduce water consumption in towns and industry are strongly supported. More efficient use of water is critical to achieve sustainable communities which face a future with less water. These options include:

- Option 18: Impacts of land use change are evaluated before proposed changes occur.
- Option 26: Reuse, recycling and harvesting of urban and industrial site stormwater.
- Option 27: Creating and promoting water efficiency opportunities – this option must include managing high evaporation rates from on-farm storage.
- Option 30: Review drought of record and the water allocation process in water sharing plan.
- Option 38, 39: extend the bores program for cap and pipe, manage Great Artesian Basin

## OPTIONS NOT SUPPORTED

I strongly object to the following options, which would degrade environmental values and further alter the natural flow regime of rivers, impacting native species and ecosystems:

- Option 2: raising Pindari Dam

- Option 3: raising Mungindi Weir
- Option 8: Inland diversions from the east. This option should not be a consideration and is untenable from an ecological perspective and for many other reasons. This option is raised from time to time and has always been rejected for a wide range of reasons related to ecosystem health, biosecurity (transfer of alien organisms from coastal catchments to inland catchments), coastal fishing industries, and the energy costs which would be entailed. This is an unsustainable and ridiculous option, which in the past has been promoted by shock jocks and other uninformed people.

## ADDITIONAL OPTION REQUIRED

- Prevention of evaporation from farm storages should be included as an OPTION in the strategy.
- High evaporation rates from on-farm storages is a critical source of system water loss; there are Australian products available to cover water surfaces (or floating solar farms which provide a double benefit) which are highly efficient.
- A subsidy, tax relief or other innovative incentives might be considered to encourage landholders to achieve evaporation reduction.

## MOLE RIVER DAM

- The strategy should not present the proposed Mole River Dam as a firm government commitment. At this stage the required reporting and approval processes are incomplete and this dam is merely an OPTION.
- The Mole River Dam would damage aquatic ecosystems of high conservation significance, and it would capture natural flows which are needed provide ecological connectivity to wetlands and to the Barwon-Darling.
- Rather than the budget cost of the Mole River Dam, public funding could be better invested in options that reduce the demand for water, and increase the environmental health of rivers.

## CLIMATE CHANGE – REVIEW AND STRATEGY UPDATING

- The draft notes that the Climate Change predictions used for the Border Rivers region are a worst case scenario. But predictions indicate that rainfall runoff in the region could reduce by up to 40%; winter and spring rainfall will decrease; autumn and summer rainfall will increase; while evaporation, average temperatures and the number of hot days will increase.
- Reducing water demand must be a primary target for the Border Rivers Regional Water Strategy.
- Regional water strategies should draw on the best and latest climate evidence to manage the future water needs of NSW.

- Climate change modelling is advancing rapidly in accuracy of predictions, and the Strategy should include a review and updating process which assesses the implications of changed climate change predictions, and modifies the strategy accordingly.

