INLAND RIVERS NETWORK

Submission

Draft Murrumbidgee Regional Water Strategy

Introduction

The Inland Rivers Network (IRN) is a coalition of environment groups and individuals that has been advocating for healthy rivers, wetlands and groundwater in the Murray-Darling Basin since 1991.

IRN welcomes the opportunity to engage in the process of developing a Regional Water Strategy (draft RWS) for the Murrumbidgee River catchment.

The sustainable management of NSW water resources is the most important responsibility of the NSW and Federal Governments. Water is a scarce resource in Australia, more than any other inhabited continent on earth.

We note that new climate modelling and updated hydrological modelling for the Murrumbidgee catchment has not been completed and only indicative climate prediction information is provided in the draft RWS. It is critical that the community receives access to new modelling information before the strategy is finalised.

Water management in the Murrumbidgee is very complex with the Snowy Water Licence Review, Inter-Governmental Agreements for water sharing in the southern connected basin and with the ACT Government and the Snowy Mountain Scheme. It is unclear how these various commitments interact or how they provide for improved environmental outcomes in water management.

The objectives of the Regional Water Strategy process appear to be weighted towards fostering growth in water dependency rather than focussing on the sustainable use of limited available water resources.

The process appears to counter the objectives of the NSW *Water Management Act 2000* that prioritises environmental health of water sources.

The Murrumbidgee River supports 16 nationally significant wetlands, including the Lowbidgee and mid-Murrumbidgee wetlands and the Ramsar-listed Tuckerbil and Fivebough swamps and a range of water-dependent ecosystems and threatened and iconic species including the Murray Cod, Macquarie Perch, Australasian Bittern and the Southern Bell Frog.

A key recognised challenge for the region is the degradation of riverine and floodplain ecosystems, which has led to a loss of native vegetation and wetlands and a decline in the condition of fish communities and waterbird habitats.

There must be a stronger commitment from the NSW Government to protect and support these significant environmental values.

The Lower Murrumbidgee Deep Groundwater Source has the highest use of any groundwater source in NSW. Degradation of water quality and failure to assess or protect recharge opportunities in the context of climate change risk is a key issue. It is irresponsible to consider increasing reliance on groundwater sources for town water security during drought.

A key emphasis of the draft RWS must be demand management for both urban and rural water use. All water sources in the Murrumbidgee Region are already under stress. This will be exacerbated with predicted climate change risks of higher temperatures and evapotranspiration, prolonged drought, and lower rainfall.

Poor water quality is another key challenge in the Murrumbidgee Region including salinity, elevated nutrient levels, blue-green algae, hypoxic blackwater, cold-water pollution and discharge from abandoned and disused mines. This must be clearly addressed to mitigate impacts on the environment, human and stock use.

The priority of affordability in the draft RWS is a key issue that requires transparency through project business cases and wider community consultation if taxpayers of NSW are expected to fund ongoing environmental damage to rivers and groundwater sources.

Environmental Condition

The draft RWS recognises that heavy regulation in the Murrumbidgee Region has disrupted the natural flow regimes of many rivers, wetlands and floodplains and has caused the health of the catchment's environmental assets and native species populations to decline.

The overall decline in wetlands and floodplain health and wetland area has impacted water-dependent species, including the abundance and diversity of waterbirds, water-dependent frogs and native fish.

While some attention has been given to providing an allocation of licenced water for environmental use there are a large number of constraints limiting the use of held environmental water and environmental water allowances under water sharing plan rules.

The volume of held environmental water in the Murrumbidgee has not been fully used in any year to date (draft RWS Fig 31).

Significant improvements are needed in the management of water for improving environmental benefit and addressing serious ecological degradation.

SDLAM Projects

IRN considers that the SDLAM projects in the Murrumbidgee will not provide improved environmental benefits in the long term. They do not address the changes in natural flow regimes and many, in fact, continue to increase the negative impacts of regulation in the river system.

The implementation of the Reconnecting River Country Program (RRCP) fails to meet the flow target of 13 ML/day at Balranald as identified in the original Constraints Management Project factored into the SDLAM environmental equivalence test.

The focus of the RRCP is now on what is palatable to the local community rather than what will produce the optimum environmental outcomes. This is at odds with the objects of the *Water Act 2007*, the Murray-Darling Basin Plan and the NSW *Water Management Act 2000.*

The focus of the draft RWS options to increase regulating infrastructure and storage capacity will further exacerbate the degradation of environmental assets in the region.

Options

1. Improving water management for Aboriginal people

IRN strongly supports options 1 – 8 to improve the water management framework to meet the needs and aspirations of Aboriginal people.

2. Improving riverine and floodplain ecological health

IRN strongly supports options 23 – 32 with particular emphasis on option 25 to improve flows to important ecological sites. This option should also include flows to enhance native fish breeding opportunities.

3. Town water security

IRN strongly supports options 18 & 19 to encourage water recycling opportunities for all urban areas in the catchment.

Small, isolated rural communities should be encouraged to adopt SOURCE hydropanels[1] through funding assistance. Other options to improve demand management for urban water use need to be considered. Large water dependent industries relying on potable water use should be required to compete for water licences on the open market.

IRN strongly objects to the following options:

Option 21 aimed at reliance on groundwater sources for town water supply is not sustainable in the context of the current over-allocation and overuse of groundwater in the Murrumbidgee Region and the poor condition of groundwater sources.

Option 22 aimed at maintaining water-related amenity during droughts is in direct conflict with the needs of the natural environment and should not be a consideration in the draft RWS.

Option 43 proposes groundwater desalination for town water and industry that will drive an increase in groundwater use.

[1] https://www.source.co/

4. **Current water sharing arrangements**

IRN gives in principle support to options 9 – 13 to review current water sharing arrangements However, this must only be in the context of improved outcomes for environmental health.

Options 11 and 12 relating to groundwater extraction and sustainable use are strongly supported.

5. **Increases in water storage capacity and infrastructure**

IRN strongly opposes options to increase water storage capacity in the Murrumbidgee River. Options 33 – 43 are likely to cause increased degradation of the riverine and floodplain ecology and further loss of habitat for threatened and migratory species.

It is unlikely that any of these options will meet the requirements of the Basin Plan.

6. **Improved research and knowledge of regional water sources and climate risk**

IRN gives in principle support to options 44 – 53 excluding option 50.

We strongly oppose any expansion of cloud seeding in water catchments. A better option would be research and reporting into the efficacy & cost of the current cloud seeding program in the context of climate change predictions.

7. **Missing options**

IRN recommends that the following options be included in the draft RWS to improve water management in the Murrumbidgee Region:

- Improved channel sharing arrangements for environmental water releases
- Review of the Basin Plan pre-requisite planning measures rules and implementation
- Improved seasonality and size of environmental flows to enhance native fish breeding opportunities
- Demand management actions for urban and industry water use. This includes alternatives to flood irrigation practices in the agricultural industry
- Assessment of increased water capture and use through investment in on-farm and off- farm efficiency measures
- Opportunities for diversification away from water dependent industries in the Murrumbidgee Region.

Contact

For more information about this submission contact: