



By email to: regionalwater.strategies@dpie.nsw.gov.au

8 November 2022

Response to Draft Macquarie Regional Water Strategy (RWS)

The Australian Floodplain Association takes this opportunity to advise we cannot support any Water Sharing Plan, Water Resource Plan nor Regional Water Strategy that aims to lock-in unsustainable levels of additional floodplain harvesting take.

As a Peak Body comprised of floodplain and wetland landowners, indigenous groups, shire councils, local businesses and members of rural and remote communities dependent on healthy rivers, floodplains and wetlands, the AFA represents a far wider range of interests than the irrigation sector.

The fact that the NSW government refuses to comply with its own legislation by not upholding the hierarchy of water management principles as set out in s5(3) of the NSW Water Management Act 2000 is difficult to understand; but it is clear that this is consistently ignored.

We have been advocating for healthy rivers and floodplains and making "no increase in take / additional licences to extract " points for more than a decade yet the demands of irrigators continue to be put ahead of all others in the river ecosystem. We are getting very tired of consultation processes that ignore our concerns.

The AFA strenuously opposes actions to fully implement the NSW Floodplain Harvesting Policy. It will lock in an environmentally unsustainable level of water diversion from floodplains and downstream environments. An assessment of the damage caused by existing FPH developments should be undertaken before any new ones are even considered.

The AFA reiterates its strong concern regarding the omission of the past ~20 years of climate data from models underpinning the RWS and WSPs. In our view, this wilful ignorance of crucial information will have disasterous consequences. Together these policies will ensure valley extraction limits, the SDL and MDB Plan limits are all exceeded. In turn, this will worsen downstream social, environmental and ecological outcomes as climate extremes intensify.

The Australian Floodplain Association (AFA) is a non-government organisation, established in 2006. It represents floodplain and wetland landowners and their communities who depend on healthy rivers, floodplains and wetlands. Its membership resides predominantly within the Northern Murray-Darling Basin and includes floodplain graziers, community groups and shire councils.

We need to take resilience-building seriously, not invest in more of the same, nor new instream structures (Gin Gin weir) designed to squeeze even more from a river system in peril. Water managers can and must improve operational efficiences.

The AFA wants to see meaningful flow targets that meet community and environmental requirements across the board.

What is required are meaningful and measured strategies to ensure floodplain connectivity along the Macquarie; a realistic connectivity target at its junction with the Barwon-Darling and overall system health targets. We reject vague statements of intent while extraction is allowed to increase once again.

Finally, there is nothing confidential in our submission and we consent to any part of it being made public.

Yours sincerely,

