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Comments on Draft Lachlan Alluvium Water Resource Plan

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 provide comments on the Draft Lachlan Alluvium Water Resource Plan (draft WRP).

We note that this draft WRP is a pilot for the roll out of the other nine alluvium WRPs to be developed in NSW.

Background

IRN submitted substantial comments to the Status and Issues Paper on the Lachlan Alluvium released in early 2017.

One of the key concerns we outlined was the permanent drawdown of the Lower and Upper Lachlan Alluvium over the 10 years of extraction under the current water sharing plan rules.

A permanent drop of over 24 metres in some areas of the Upper Lachlan and 6 metres in the Lower Lachlan is a significant issue that has not been addressed in the development of the WRP. This permanent loss of water in the aquifers is a reduction of planned environmental water that has not been addressed.

The decision that ‘groundwater levels can stabilise at a lower level under a new pumping equilibrium’¹ has not been explained in the draft WRP.

The draft WRP is based primarily on attempting to match water sharing plan rules with the requirements of the Basin Plan without recognising that groundwater levels have declined already from the pre-development levels.

The draft WRP states that ‘The long-term average annual extraction limits specified in the WSP represents a fraction of this water in these groundwater sources’.² However, this does not explain why there has been a permanent drawdown of the water levels in the aquifers caused by over-extraction.

The fact that the Sustainable Diversion Limit (SDL) in the Basin Plan for the Lachlan Alluvium is equal to the Long-term Annual Average Extraction Limit (LTAAEL) in the water sharing plan requires a strong set of management rules to prevent further permanent drawdown of the groundwater sources and loss of planned environmental water.

Proposed Rule Changes

1. Variable rule

IRN objects to the proposed variable rule for the Lower Lachlan. This locks in the 20% limit of change to the SDL as a right.

It also paves the way for further permanent drawdown of the aquifer.

The draft WRP claims that rules in the water sharing plan will manage high and medium risks in the Alluvium³. However, permanent drawdown of the water source is a direct reduction in planned environmental water.

This risk will not be managed through the implementation of the ‘variable’ rule in the Lower Lachlan Alluvium.

This rule change has major implications on the availability of planned environmental water to support Groundwater Dependent Ecosystems during dry times.

This proposed rule will not manage the risk of climate change. If there are an increasing number of dry years, the extraction of SDL plus 20% take will become more the norm than the exception.

It has been stated that there is low connectivity between the Lower Lachlan and surface water.

‘The greater depth to the regional water table in the Lower Lachlan Alluvium results in the Lachlan River and its tributaries being largely hydraulically disconnected from the groundwater for much of their reaches.’⁴

Therefore, the variation of pumping levels between wet years and dry years has no direct relationship to the impact of regular over-extraction of the Alluvium. The Alluvium is not likely to be well recharged during wet years because of its depth and hydraulic disconnect from surface flows.

¹ DPI Water February 2017 Lachlan Alluvium Water Resource Plan *Status and Issues Paper* p 19

² Lachlan Alluvium Water Resource Plan p30

³ Ibid p 28 Table 3-2

⁴ Ibid p 22

This rule relates entirely to irrigator behaviour between wet and dry years and has no role in managing risk or protecting planned environmental water in the Lower Lachlan Alluvium.

We note that the Water Quality Management Plan has an objective to limit seasonal drawdown in high risk areas.⁵ We do not support the risk assessment result that the Upper and Lower Lachlan Alluvium have a medium risk of poor water quality.

The application of the variable rule in the Lower Lachlan is likely to increase that risk.

The accompanying fact sheet on the relationship between water resource plan and water sharing plan states that for the Lower Lachlan *'The annual permitted take volume will not be more than 120% or less than 80% of the sustainable diversion limit.'*⁶

The fact sheet also states that: *'Non-compliance with the long-term average annual extraction limit occurs when this calculated average annual extraction exceeds the long-term average annual extraction limit by (either) 5% in the Lower Lachlan groundwater source.'*⁷

There is no apparent discussion in the draft WRP about the relationship between the SDL non-compliance and the LTAAEL non-compliance or how this may relate to the variable rule.

2. Removal of protection of recharge

IRN does not support the proposed rule change for the protection of planned environmental water. The protection of recharge inflows to alluvial aquifers was a subject of great importance when the first water sharing plans were being developed.

The fact that the Lower and Upper Lachlan Alluvium have both been impacted by a permanent drop in water levels heightens the importance of protecting recharge.

The actual volume of planned environmental water has already decreased in these groundwater systems. The timing of the availability of planned environmental water is critical during dry periods and the protection of a percentage of recharge is an important factor in protecting the integrity and water levels in alluvial aquifer systems.

3. Increase in time period for LTAAEL compliance

IRN does not support the proposal to increase the time period over which compliance to the LTAAEL is assessed from three years to five years in the Lower Lachlan to provide consistency across water sources.

This is particularly concerning in light of the proposed variable rule.

IRN considers that consistency of compliance to LTAAEL should be a three year rolling average across all water sources.

⁵ Ibid Table 6-1 p 53

⁶ Lachlan Alluvium Water Resource Plan Fact Sheet. *Relationship between the water resource plan and water sharing plan* p 2

⁷ Ibid

This will give much greater assurance that planned environmental water is protected.

We do not support the Department of Industry proposal that LTAAEL compliance be standardised to a five-year rolling average period in all Murray–Darling Basin water sharing plans.⁸

This should be standardised to a three-year rolling average period.

Conclusion

IRN does not consider that the draft WRP will meet the requirements of the Basin Plan.

The proposed changes to water sharing plan rules will not protect planned environmental water, achieve management of risk, or improve water quality.

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⁸ Frequently Asked Questions Fact Sheet p 2