



I N L A N D
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Natural Resources Commission
GPO Box 5342
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Dear Commissioner

Re: Draft Review Report on Barwon-Darling Water Sharing 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 appreciates the opportunity to provide comment on the Commission's draft review report on the *Water Sharing Plan for the Barwon-Darling Unregulated and Alluvial Water Sources 2012* (WSP).

IRN wishes to congratulate the Commission on the thorough process undertaken to review this WSP. We are aware that it was rushed through for adoption just prior to the gazettal of the Murray-Darling Basin Plan in November 2012 with the aim of locking in water sharing rules that favoured extractive industries above the requirements of river health.

The last seven years of implementation of these rules has caused a major deterioration in the health of the Darling River that the Commission rightly describes as 'an ecosystem in crisis.'

IRN commends the Commission for the proactive recommendations made in the draft report.

We particularly support Recommendation 1a) for immediate amendments to the WSP in the process of developing the Water Resource Plan (WRP). This document must be lodged with the Murray Darling Basin Authority by 30 December 2019.

IRN fully supports the recommendations to protect all environmental water through the system and to protect low flows by raising the commence-to-pump thresholds.

We also submit the following proposals to strengthen the draft recommendations:

1. Recommendations 10 b) and 10 c) should also be immediately implemented in the revised WSP 2020.

Reducing the allowable annual take to a rolling average of 450 percent over three consecutive years must be implemented immediately to reduce the impacts of water extraction.

2. Recommendation 16 should be implemented earlier than the 2023 remake of the WSP. The revised versions of WSPs developed for the WRP process include a provision for considering Climate variability.

For example, the draft Darling Alluvium Groundwater Sources WSP (currently on exhibition) has CI 13 Climate variability that links the management of the water source to the long-term average annual extraction limit (LTAAEL) and also refers to temporary water restrictions under section 324 of the NSW Water Management Act.

IRN considers that the Barwon-Darling water source is already impacted by climate change with the Millenium Drought and now a new drought of record in NSW.

It is imperative that any modelling for the WSP takes this new drought of record into account so that LTAAEL reflects a realistic volume of water availability.

3. Recommendation 17 has been partially covered by the processes of developing the Darling Alluvium WRP and can be used in the WSP.

Groundwater dependent ecosystems, including base flows and riparian vegetation and instream ecological values have been recognised in the groundwater WSP objectives, targets and strategies.

The hydraulic connectivity with the Darling River is significant and must be recognised in the surface water plan.

The salinity issues are significant with a major salt interception scheme with groundwater licences operating south of Bourke. However, the loss of flushing flows and flow variability in the Darling River has substantially increased the salt incursions from the alluvial aquifer system.

We note that Recommendation 4 includes the need for water quality targets. This is a key consideration that requires a stand-alone recommendation.

4. The impacts of floodplain harvesting that captures low and medium size flood flows in the Barwon-Darling tributaries and within the river catchment itself is a key issue that has not been closely considered by the Commission.

The cumulative impacts of floodplain harvesting on inflows to the Barwon-Darling system need to be fully assessed prior to the resolution of the final volumes for licensing in each catchment.

IRN proposes a recommendation from the Commission that requires a rigorous cumulative impact assessment of the environmental and social impacts of floodplain harvesting prior to the granting of new licenses that have compensable private property rights.

This is essential to better understand water availability for the improvement of the ecological health of the Barwon-Darling system and social well-being.

5. An additional recommendation is needed to protect the first substantial new flows to the Darling after this prolonged, artificial drought sequence. This protection will facilitate the re-establishment of ecosystem function and enable fish passage across all barriers.

For more information on this submission please contact inlanddriversnetwork@gmail.com

Yours sincerely



Bev Smiles
President