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Monday 6<sup>th</sup> April 2020

## **Submission**

### **Draft NSW Great Artesian Basin groundwater water sources water sharing plan 2020**

The Inland Rivers Network (“IRN”) is a coalition of environment groups and individuals who have been advocating for the conservation of rivers, wetlands and groundwater in inland NSW since 1991.

Member groups include the Australian Conservation Foundation; the Nature Conservation Council of NSW; the National Parks Association of NSW; Friends of the Earth; Central West Environment Council; Healthy Rivers Dubbo; the Coast and Wetlands Society and the Wilderness Society, Sydney.

IRN welcomes the opportunity to comment on the Draft NSW Great Artesian Basin groundwater water sources water sharing plan (Plan) 2020.

The drafting of a new Plan is an opportunity for NSW to strengthen the current rules around water take from the Great Artesian Basin (GAB). Some work has been done to improve rules in the draft Plan based on a significant body of work published by the CSIRO in 2012 on groundwater. Bore and spring surveys have begun, and important data collected, collated and incorporated into the draft Plan.

However, there are some rules being brought forward into this draft Plan which will encourage higher extraction in the recharge zones, while ignoring the no meter no pump policy direction of the NSW

Government. There are rules that would facilitate the development of Coal Seam Gas, a highly contested issue in the community.

Events in 2009, when new entitlements were offered at auction from the Surat, Warrego and Central artesian zones, were indicative of enormous public objection to the sale. And yet, this new Plan drags the past along with it.

Approximately 1,000 springs have become extinct in the NSW GAB due to overdevelopment. Remaining spring complexes in the GAB provide critical habitat in the harsh conditions of far western NSW. They are listed as supporting endangered ecological communities under the *Commonwealth Environment Protection and Biodiversity conservation Act 1999*. Springs are listed as critically endangered ecological communities under the *Biodiversity Conservation Act 2016*, and some are listed as sites of significance under the *Ramsar Convention*.

Making the protection and restoration of these springs the highest priority is the legal and moral responsibility of this draft Plan, which in its current form, is not reflected.

## **Part 1 Introduction**

### **4 Application of Plan**

IRN objects to the boundaries of the Warrego groundwater source (GWS) remaining the same in the new Plan as they were in the 2008 Plan. The current boundaries of the GAB groundwater sources have been defined using knowledge that was available in the 1990s. There have been significant improvements in the understanding of the interaction and connectivity of groundwater sources in the decades since. IRN considers that it is important that the relatively shallow, better quality Warrego water source is managed separately to the Surat and Central GWS.

IRN supports the shifting of the boundary of the Warrego GWS 150km west, and 50km east of where it is currently defined. Some sub-artesian bores may require reclassification after this adjustment is made. This is a recommendation of the Natural Resources Commission review of the WSP and should be adopted.

IRN supports the merging of the NSW GAB Shallow and NSW GAB Plans. Because of work done when the GAB Shallow and GAB Groundwater Plans were amended in 2011, the connectivity between these two water sources is much better understood now, justifying the merging of the two plans. The current method of determining the boundary between the two groundwater sources, the depth of 60m, does not accurately reflect the actual geological non-uniform thickness of the unconsolidated sediments. In areas of the Lower Namoi Alluvium the artesian contribution to alluvium groundwater sources is as high as 70%, with a continuum of exchange between the alluvial aquifer and the GAB<sup>1</sup>

In acknowledging that the merging of these two plans will require changes to the Murray Darling Basin Plan, IRN supports the development of a reasonable but refined timeline to enable the changes required.

An amendment provision should be included in both WSPs to allow this to occur during the next 10 year lifespan of the plans.

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<sup>1</sup> Ransley et al. (2015). Hydrogeological Atlas of the Great Artesian Basin. Geoscience Australia, Canberra and Kellet et al (2012). Water Resource Assessment for the Surat region. A report to the Australian Government from the CSIRO Great Artesian Basin Water Resource Assessment. CSIRO Water for a Health Country Flagship, Australia.

## **Part 2 Vision, objectives, strategies and performance indicators**

### **6 Acknowledgement**

IRN would consider it respectful to fully name The Barkindji, Bigambul, Budjiti, Euahlayi, Kambuwal, Guwamu/Kooma, Kamilaroi/Gomeroi, Kwiambul, Maljangapa, Murrawarri, Ngarabal, Ngemba, Wailwan and Wiradjuri people in the Acknowledgement.

### **7 Vision Statement**

IRN recommends reorganising the order of the statements to better reflect the priority hierarchy of this draft Plan:

*The vision for this Plan is to provide for the following:*

- a) The protection and enhancement of the condition of groundwater sources and their dependent ecosystems,*
- b) the spiritual, social, customary and economic benefits of groundwater to Aboriginal communities,*
- c) the social and cultural benefits to urban and rural communities that result from groundwater extraction*
- d) the continuing productive extraction of groundwater for economic benefit*

### **8 Environmental Objectives**

IRN recommends that the re wording of the broad environmental objective of the Plan to include ‘protect *and improve* the condition of the groundwater source and their groundwater-dependent ecosystems over the term of this Plan.’

IRN recommends that in the targeted environmental objectives of this Plan, that the legal instruments that are relevant, i.e. *the Commonwealth Water Act 2007, The Environmental Protection and Biodiversity Conservation Act 1999, the Biodiversity Conservation Act 2016, the NSW Water Management Act 2000, Fisheries Management Act 1994, and the Ramsar Convention* be listed.

### **9 Economic Objectives**

IRN is concerned that figures commissioned by the Australian Government and Great Artesian Basin jurisdictions based on advice from the Great Artesian Basin Coordinating Committee on the estimated economic value of sectors dependent on GAB water sources, show a significantly inflated estimate for the value of irrigated agriculture.<sup>2</sup> The value of agricultural production in the NSW GAB should be based on the actual extraction volumes in the water sources, not the total of aquifer access entitlement.

Information driving decision and policies should be grounded in fact and be determined in the same way as values given for other activities in the GAB.

### **10 Aboriginal cultural objectives**

IRN strongly objects to an absence of strategies that would encourage the granting of access licences for Aboriginal cultural and community purposes. There were no Aboriginal cultural or Aboriginal community licences registered over the period of operation of the previous Plan.

It is possible that relatively recent events in the history of colonised Australia are creating barriers that could be stopping Aboriginal People from trusting the NSW Government. As a suggestion, an

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<sup>2</sup> Frontier Economics. Economic Output of groundwater dependent sectors in the Great Artesian Basin. 2016

acknowledgement from the NSW Government of atrocities bestowed on Aboriginal People in the GAB areas in the relatively recent period since colonisation could be an important step towards building a genuine trust between First Nation groups and Department staff.

IRN strongly supports serious and genuine strategies from the NSW Government that will lead to a strengthened relationship with First Nation Communities. We suggest, that a significant first step toward that aim is up to the NSW Government.

## **Part 5 Requirements for water**

### **Division 2 Requirements for water for basic landholder rights**

#### **18 Domestic and Stock rights**

IRN is supportive of the methods used to better estimate the current take of water for basic landholder rights (BLR). We note historic climate data was used in the determination, not the predicted impact of expected warming temperatures. Provisions to reassess the estimates as new knowledge is acquired in regard to the expected impact of a warming climate would strengthen the Plan.

#### **19 Native Title rights**

IRN is supportive of this clause, and the inclusion of the legal instrument, *Native Title Act 1993* in the clause.

### **Division 3 Requirements for water under access licences**

#### **20 Share components of domestic and stock access licences**

IRN is supportive of the 32 ML/year share component in the Eastern Recharge zone and zero elsewhere.

#### **21 Share components of domestic and stock (conveyance) access licences**

IRN supports the inclusion of provision for conveyance access licences that will cover inefficient water distribution, noting the licencing of this water wastage will come with the delivery of policy work on ‘water tight bores’.

These licences must not be tradeable.

By 1960 it was estimated that the over development of the GAB resulted in approximately 1,000 springs becoming extinct. Efforts to reduce this impact by continuing capping and piping efforts are very important.

#### **22 Share component of local water utility access licences**

Supportive of share components of local water utility access licences as shown in draft Plan.

#### **23 Share component of aquifer access licences**

IRN supports share components quoted for aquifer access licences as shown in draft Plan. However, we consider that the share components in the Eastern and Southern Recharge GWS have been able to accrue to unsustainable levels due to carry over rules, and due to the per unit share of the access licence share component being set at 1.3 ML per unit. These issues are discussed further.

## **Part 6 Limits to the availability of water**

### **Division 1 Limits**

#### **24 Long-term average annual extraction limits (LTAAEL)**

1) The LTAAEL of the Central GWS:

- a) Supportive of 5,193 ML/year\*
- b) Supportive of the volume of conveyance water through inefficient water distribution
- c) Strongly object to 30% of water savings made under the new Plan being included in the LTAAEL. \*\*

2) The LTAAEL of the Eastern Recharge GWS:

Strongly object to the 16,200 ML/year LTAAEL.

We are supportive of 60% of the revised recharge volume estimate being reserved for throughflow.

Of the 40% remaining net recharge, we strongly object to 70% being committed to the LTAAEL.

IRN strongly recommends the LTAAEL remain at 13,300 ML/year for the following reasons:

- The Eastern Recharge GWS is a very over allocated system.
- There is no scientific basis for the figure of 70% of net recharge being used to determine LTAAEL, instead it appears to be simply a bringing forward of the current figure.
- Hydrographs of bores GW093552, GW093554 and GW093558 in the Eastern recharge GWS in an area where there is intensive groundwater irrigation activity show that the groundwater levels drop down about 25m during irrigation season, and while they recover after irrigation season, there is a clear declining trend over five years.<sup>3</sup>
- Bore GW036691 is underlying the Eastern Recharge GWS. Its hydrograph shows a steady decline of artesian head in pipe 2 over time due to significant groundwater extraction in the Eastern GWS.<sup>4</sup>
- Extraction in the Eastern GWS has exceeded the current LTAAEL 3 years out of the last 5, even with AWD reduced.<sup>5</sup>
- Perpetual carry over allowance of 0.6 ML/unit means extraction can reach to 1.3 ML/unit. Since 2017 the water accounts and account water available in the Eastern Recharge GWS are both diminishing as AWDs reduce and take increases.
- There are many anecdotal reports of springs drying up in the Eastern Recharge GWS. The recent springs survey is to be commended, however because it has only recently been done, there is a danger that the current condition of and number of springs will become the standard their condition is measured against.
- Reliance on groundwater increases in drier years and when there is reduced access to surface water. The rivers of the Murray Darling Basin have been

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<sup>3</sup> WATER SHARING PLAN FOR THE NSW GREAT ARTESIAN BASIN GROUNDWATER SOURCES Groundwater Resource Description NSW Great Artesian Basin February 2020

<sup>4</sup> Ibid. See footnote 3

<sup>5</sup> Ibid. See footnote 3

under extreme stress due to over allocation, over extraction and unprecedented drought.

- The impacts of climate change are exceeding many forecasts. Climate change modelling (OEH, 2014) projects the maximum temperatures to increase in the near future (2020-2039) by 0.3-1.0°C and 1.8-2.7°C in the far future (2060-2079). These forecasts will have serious impacts on all water sources.<sup>6</sup>

3) The LTAAEL of the Southern Recharge GWS:

Strongly object to 38,700 ML/year LTAAEL.

We are supportive of 60% of the revised recharge volume estimate being reserved for throughflow.

Of the 40% remaining net recharge, we strongly disagree to 70% being committed to the LTAAEL. IRN strongly recommends the LTAAEL remain at 29,680 ML/year for the following reasons:

- The current LTAAEL is already high enough to cover water extraction in the Southern Recharge GWS, there is no logical reason to raise the LTAAEL simply because the annual recharge volume has been re estimated.
- There is no scientific basis for the figure of 70% of net recharge being used to determine LTAAEL, instead it appears to be simply a bringing forward of the current figure.
- There are a lot of anecdotal reports of springs drying up in the Southern Recharge GWS. The recent springs survey is to be commended, however because it has only recently been done, there is a danger that the current status of springs will become the standard their health is measured against.
- Reliance on groundwater increases in drier years and when there is reduced access to surface water. The rivers of the Murray Darling Basin have been under extreme stress due to over allocation, over extraction and unprecedented drought.
- The impacts of climate change are exceeding many forecasts. Climate change modelling (OEH, 2014) projects the maximum temperatures to increase in the near future (2020-2039) by 0.3-1.0°C and 1.8-2.7°C in the far future (2060-2079). These forecasts will have serious impacts on all water sources.<sup>7</sup>
- Coal Seam Gas (CSG) expansion in the Southern Recharge GWS is highly contended in the community. Increasing the extraction limit would facilitate CSG expansion.
- The Pilliga Sandstone Aquifer has also been found recently to contain rare species of Stygofauna. A survey of 22 sites within the Pilliga Sandstone aquifer conducted in 2016-17 reported a total of eleven taxa of invertebrates were recorded which included ten families from five orders of stygofauna. The results showed stygofauna exist across the entire area. The presence of stygofauna and other GDE's within the Pilliga should be nominated as High Conservation Value GDE's and High Priority GDE's under NSW Office of Water GDE valuation process and given the appropriate protections and management regimes of this grading. The sites that registered stygofauna were assessed as having high ecological value due to importance of the fauna and the high water quality and consistent water levels within the aquifer. They are also classified as of High Ecological Value (HEV) as the area is

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<sup>6</sup> Ibid. See footnote 3

<sup>7</sup> Ibid. See footnote 3

covered by the Lowland Darling Aquatic Endangered Ecological Community (EEC) listed under the Fisheries Management Act 1994.<sup>8</sup>

4) The LTAAEL of the Surat GWS:

- a) Supportive of 43,446 ML/year\*
- b) Supportive of the volume of conveyance water through inefficient water distribution
- c) Strongly object to 30% of water savings made under the new Plan being included in the LTAAEL. \*\*

5) The LTAAEL of the Warrego GWS:

- a) Supportive of 8,816 ML/year\*
- b) Supportive of the volume of conveyance water through inefficient water distribution
- c) Strongly object to 30% of water savings made under the new Plan being included in the LTAAEL. \*\*

\* IRN supportive of the formula used to determine the initial volumes for the artesian ground water sources: The volume of basic landholder rights requirements taken through water efficient distribution systems, plus the licenced entitlements in 2008, plus water savings accounted for under the 2008 Plan.

\*\* IRN strongly objects to 30% of savings achieved from capping and piping efforts from after the commencement of this new Plan being made available for extraction. This water is critical for restoring the health of endangered springs in the GAB area.

Capping and piping efforts will be undermined by allowing 30% of savings to be extracted.

About 1,000 springs have become extinct in the GAB due to its overdevelopment. The rehabilitation of all of these habitats is not possible, however working towards the restoration of as many as possible of them should be the priority of this plan, not further development.

The Australian and NSW Governments have a legal imperative to protect Ramsar listed wetlands fed by springs. GAB springs are a matter of national environmental significance as they support endangered ecological communities which are protected under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999. The *Artesian Springs Ecological Community in the Great Artesian Basin* is listed as a critically endangered ecological community under the *NSW Biodiversity Conservation Act 2016*. Further development of the GAB would be a serious neglect of these legal obligations.

Stygofauna are any fauna that live in groundwater systems or aquifers. Most stygofauna in Australia are crustaceans, but they also include worms, gastropods, beetles, mites and fish.

Never seeing the sun, they have no circadian rhythms. They grow slowly, don't have many young, live long lives and stay close to home.

"Some are from extremely old lineages, with ancestors dating back to Gondwana and Pangaea or the Tethys Ocean, 200 million years ago. Some display a close relationship with species from other continents which indicates that their ancestors came from a time before the break-up of the supercontinents."<sup>9</sup>

It is because of their characteristics born of their low-energy environment, and their incredible age, a lot of stygofauna species are extremely rare and localised.

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<sup>8</sup> An Investigation of the Stygofauna Community in the Pilliga Area 2016-17. Dr Peter Serov

<sup>9</sup> <https://www.smh.com.au/entertainment/the-creatures-that-time-forgot-20120616-20g5n.html>

Stygofauna contribute important ecosystem services by creating a nutrient cycle, and have been recognised as indicators of groundwater health.

“What the hyporheic stygofauna and other bugs do is break down the organic matter and free up carbon and other nutrients for the biofilms of microbes that coat the sediment particles within the aquifer. These microbial biofilms are crucial because they biologically filter the groundwater, functioning like a sandbed filter in a fish tank. The hyporheic stygofauna feed on the biofilms and this grazing activity stimulates growth and production of new biofilms which, in turn, soak up more nutrients. In fine sediments, stygofauna burrow and wriggle through the spaces as they feed. They produce mucus-coated faecal pellets and this, plus the burrows, can increase the porosity and permeability of the streambed aquifer.” Professor Andrew Boulton from The University of New England<sup>10</sup>

Stygofauna are vulnerable to extinction from environmental changes and human impacts. They are also classified as of High Ecological Value (HEV) as the area is covered by the Lowland Darling Aquatic Endangered Ecological Community (EEC) listed under the Fisheries Management Act 1994.<sup>11</sup>

IRN strongly objects to the issuing of any new aquifer access licences in any part of the NSW GAB, whether they be from water saved by capping and piping or not.

In 2009, 24 brand new access licences in the Central, Warrego and Surat groundwater sources were offered to the market at auction. These access licences were granted on the basis of water savings gained from the ‘Cap & Pipe the Bores Program’. Landholder communities were strongly opposed to the sale, and there was significant media coverage that lasted from 14<sup>th</sup> May to 27<sup>th</sup> July 2009. On the morning of the auction (21<sup>st</sup> July 2009), a rally of approximately 150 concerned people including State and Federal politicians took place.

The gathered community only allowed the auction to go ahead on the condition that the NSW government monitor the impacts on pressure recovery and guarantee that the proceeds of the sale would be reinvested into capping and piping of free-flowing bores.

The community has demonstrated its strong objection to the sale of new access licences in the GAB.

## **26 Assessment of compliance with LTAAEL**

IRN strongly objects to compliance with LTAAEL if the average of annual extraction for the preceding five water years exceeds the LTAAEL by 10% or more in the Eastern and Southern groundwater sources. The Natural Resources Commission recommended that this trigger be reviewed.

We strongly recommend compliance be assessed every three years. This is especially important in the over-allocated Eastern and Southern groundwater sources, where the risk of significant sleeper licences being activated is not transparent.

## **Part 8 Operation of water allocation accounts**

### **34 Water allocation account debiting**

(3) (a) IRN strongly objects to 1.3 ML per unit share of the access licence share component. We recommend changing the per unit share to 1.0 ML.

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<sup>10</sup> Ibid. See footnote 9

<sup>11</sup> Ibid. See footnote 8

### **35 Limits on carryover**

(2) IRN strongly objects to aquifer access licences having carry over allowance up to a maximum of 0.6 ML per unit share of share component. IRN recommends zero carry over for groundwater access licences. Carryover allowances, and a maximum water account debit in any water year great than 1 ML per unit, has allowed extraction in the Eastern Recharge GWS to exceed the annual extraction limit for four of the last six years.

Continuing with these two rules in the new Plan would allow extraction in the Southern Recharge GWS to expand significantly should the proposed coal seam gas (CSG) expansion go ahead.

The impact of over extraction in the two recharge GWS's is detailed above in the notes about *Part 6 Limits to the availability of water*.

### **Part 9 Rules for water supply works approvals**

#### **39 rules for water supply works located near high priority groundwater dependent ecosystems**

IRN understands that while some scientific evidence was adopted when establishing setback distances for new works from high priority groundwater dependent ecosystems, and there is some scope for assessing each new work, the department focused on making all set back distance rules uniform rather than expressly based on best science.

IRN recommends the continued development of set-back distance rules that are based wholly on the best available science, not on achieving uniformity of rules.

IRN strongly objects to any provision in the Plan to consider granting approvals of shorter setback distance if demonstrated to have 'minimum impacts on groundwater dependent ecosystems'. Also objects to any clause that allows location restrictions to not be applied to new or amended works that are for BLR or replacement groundwater work.

Strongly objects to the absence of an approach in the draft Plan to rehabilitate works that pre-date set back distance rules.

Spring complexes in the GAB provide critical habitat. Some are listed as critically endangered ecological communities under the *NSW Biodiversity Conservation Act 2016*, and must be protected from drawdown.

*The Environmental Protection and Biodiversity Conservation Act 1999* listed species associated with GAB discharge spring wetlands ecological community (CE critically endangered, E endangered, V vulnerable).<sup>12</sup> See Table below.

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<sup>12</sup> *Recovery plan for the community of native species dependent on natural discharge of groundwater from the Great Artesian Basin 2010*

Scientific name	Common name	EPBC Act	NCA (Qld)	TSCA (NSW)	NPWA (SA)
<b>Animals</b>					
Scaturiginichthys vermeilipinnis	red-finned blue-eye	E	E	-	-
Chlamydogobius micropterus	Elizabeth Springs goby	E	E	-	-
Chlamydogobius squamigenus	Edgbaston goby	V	E	-	-
Adclarkia dawsonensis	Boggomoss snail	CE			
<b>Plants</b>					
Eriocaulon carsonii	salt pipewort	E	E	E	E
Eryngium fontanum		E	E	-	-

NCA (Qld) – Nature Conservation Act 1992

TSCA (NSW) - Threatened Species Conservation Act 1995 NPWA (SA) – National Parks and Wildlife Act 1972

#### **40 Rules for water supply works located near groundwater-dependent culturally significant areas**

IRN strongly objects to the lack of strategy presented in this Plan to genuinely engage with the Aboriginal Communities of the GAB, and identify groundwater sites of spiritual and cultural value.

There is no clear direction in the Plan on how efforts to identify specific values and locations of sites that are intended to be protected. Engagement with the Aboriginal Community is essential - IRN refers the reader to our previous comments under *Part 2 Vision, objectives, strategies and performance indicators 10 Aboriginal cultural objectives*.

The rules proposed for set-back distances to culturally significant areas are the same as the set-back rules to groundwater dependent ecosystems. As Aboriginal artefacts are abundant at nearly all spring areas west of Bourke, it seems the best the department can do is assume culturally significant sites are predominately found at spring sites.

### **Part 11 Mandatory conditions**

#### **Division 2 Access licences**

##### **51 Record keeping conditions**

IRN very strongly objects to the recording of extraction by access licence holder by way of a logbook. Policies developed under the Water Reform Action Plan (WRAP) around the measuring of water take surely must also apply in the NSW GAB. It is not acceptable for the GAB to be exempted in the absence of scientifically backed evidence to the contrary.

Without accurate metering and monitoring of all access licence extraction bores in the GAB, the community will fail to have any faith that extraction limits are being adhered to. The Ken Matthews Report in 2017 found a no meter no pump policy was required in NSW. The NSW GAB water sources should not be an exception to that rule, it is critical that the WRAP metering policy been implemented in the NSW GAB without delay.

## **Part 12 Amendment of the Plan**

### **61 Amendments relating to compliance with limits and the operation of water allocation accounts**

IRN recommends that carryover provisions be completely removed from this Plan, which would render this clause unnecessary.

### **66 Other amendments (general)**

IRN strongly objects to the provision that new aquifer interference approvals can be granted.

IRN objects to a lack of measures included in the Plan that allow for water allocated for aquifer interference to be distinguished from water that is extracted from the system.

IRN supports the inclusion of an amendment that this WSP be combined with the GAB Shallow WSP

### **Schedule 2 High priority groundwater-dependent ecosystems**

IRN supports the work undertaken by the department to initiate and continue a survey of the artesian springs with the intention of ground-truthing and nominating GDE to be protected under the new Plan. The listing as critically endangered ecological communities should require all springs to be given high priority under Schedule 2.

## **Conclusion**

This draft Plan represents a missed opportunity to significantly improve on the practices of the past.

Old thinking prioritises extraction as a priority, and the order of the elements of the vision statement reflect that. The absolute lack of any strategy to engage with First Nation Groups is critical omission in this Plan.

Key recommendations of the NRC review of the 2008 Plan of redrawing the borders of the Warrego GWS in line with new knowledge, and the combining of the GAB Shallow and GAB Groundwater Plans, had they been implemented, would have improved water management in the GAB in the decades to come.

Lifting the LTAAELs in the Eastern and Southern Recharge areas, allowing the continued use of log books for record keeping, while maintaining carry over allowances and a 130% account limit will mean even more water can be extracted from systems already feeling the impacts of high extraction. The social licence of water extraction industries in NSW will further erode.

Rules in this draft Plan will facilitate the expansion of Coal Seam Gas in the NSW GAB. Overwhelmingly the public object to this activity in the GAB.

The legal and moral obligations under the *Commonwealth Water Act 2006*, *Commonwealth Environment Protection and Biodiversity conservation Act 1999*, the *NSW Biodiversity Conservation Act 2016*, *Fisheries Management Act 1994*, and *The Ramsar Convention*, compel this Plan to make the protection of artesian springs, including critically endangered ecological communities, its highest priority. The draft Plan presented fails to meet those legal and moral obligations.

For more information please contact:

A handwritten signature in black ink, appearing to read "Anne Reeves". The letters are cursive and somewhat stylized.

Anne Reeves,

Hon. Sec.

Inland Rivers Network

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