



I N L A N D  
R I V E R S  
N E T W O R K

---

PO Box 528, PYRMONT NSW 2009  
ph 0428 817 282  
email [inlandriversnetwork@gmail.com](mailto:inlandriversnetwork@gmail.com)  
web [inlandriversnetwork.org](http://inlandriversnetwork.org)  
ABN 34 373 750 383

Gwydir Valley FMP amendments  
Department of Planning and Environment – Water  
PO Box 189, Queanbeyan NSW 2620

[floodplain.planning@dpie.nsw.gov.au](mailto:floodplain.planning@dpie.nsw.gov.au)

Friday 28 October 2022

## **Submission to Gwydir Valley FMP amendments**

### **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 has taken an interest in water management in the Gwydir River system over many years, in particular because it supports the internationally significant Gwydir Wetlands. It is IRN's view that the wetlands meeting the criteria for international significance are more extensive than the areas that are currently listed under the Ramsar Convention. There are also additional parts of this wetland system that may not currently rate as internationally important but have potential to regenerate if appropriately managed and have regional significance. The NSW and Federal Governments have obligations under the Ramsar Convention, international agreements for protection of migratory birds and the *Water Act 2007* to support and maintain the ecological character of this valuable environmental asset.

IRN welcomes an opportunity for public comment on the proposed amendments to the Gwydir Valley FMP an important floodplain within the northern Murray-Darling Basin.

While IRN supports some aspects of the proposed amendments to the Gwydir Valley FMP we consider that some aspects are a step backwards that will cause an increase in disruption to natural flood flows.

The justification that retrograde amendments to the FMP are important to ensure consistency between all FMPs is a poor reflection on the six subsequent FMPs gazetted in the NSW Northern Basin. The key purpose of these amendments is to increase flexibility for landholders and are likely to cause increased ecological damage to the Gwydir floodplain.

It is critical that all identified flood work 'hotspots' be removed and new hydraulic modelling conducted to identify improvements in floodway flows to better inform the FMP.

IRN engaged with the review of the Gwydir Valley FMP conducted by the Natural Resources Commission (NRC) and notes the recommendations from that process.

### **Supported amendments**

IRN supports the following proposed amendments:

1. The increased area of Management Zone D and designation of a new Management Zone D1 to include the Mallowa wetlands. Management Zone D1 must also be extended to include all functioning Gingham and Lower Gwydir wetlands, not just Ramsar sites and lagoons, as these are significant ecological assets in the catchment that carry obligations under the Ramsar Treaty. This was a recommendation of the NRC review.
2. Provision for ecological, cultural and heritage works in Management Zones A and D, as recommended by the NRC review, with the proviso that implementation guidelines include rigorous assessment criteria and genuine engagement with local First Nations communities. Cultural and heritage assets will be better identified under the plan.
3. Decrease in area of Management Zones A, B and C.
4. Local hydraulic and ecological refinement of Management Zone A. This must include new hydraulic modelling to allow for the removal or modification of 'hotspot' flood works.
5. Refinement of Management Zones B and C to reflect the alignment of works in a flood work approval. This must also take into account the removal or modification of 'hotspot' flood works.
6. The revised objectives and strategies of the plan will better inform assessment about any proposed flood works. The increased clarity of performance indicators in the plan will allow for better monitoring of plan outcomes, as recommended by the NRC. The inclusion of climate trends and land use change in evaluation of the effectiveness of the plan is welcomed.
7. Inclusion of a revised Floodway Network Map which labels the watercourses for easier reference and improved identification of the floodway network in the Gwydir Valley.
8. Inclusion of waterbird species and colonial nesting waterbirds in the Schedule 1 listing of ecological assets and values. The plan should provide for automatic update should any new flood-dependent species be observed within the Gwydir Valley Floodplain.

### **Unsupported amendments**

IRN does not support the proposed amendments to align with subsequent FMPs in other valleys. These allow for higher flood works in the landscape than those gazetted under the Gwydir Valley FMP. This is a retrograde step and demonstrates that subsequent FMPs have allowed for greater impacts on flood flow paths. The proposed retrograde amendments were not recommended by the NRC. No other FMP has yet undergone a review process. It is not in the interest of ecological sustainable development to make these retrograde changes to floodplain management in the Gwydir catchment.

IRN does not support the following proposed amendments:

1. Removal of the restriction in Management Zone A to construction of only below ground supply channels. This change will allow for the approval of above ground supply channels that are likely impact on important flood flow paths in this management zone.

2. Increasing the height threshold of primary access roads by 50 cm in Management Zone A. This will likely impact on important flood flow paths and needs a full analysis of the ecological impact before the proposed change can be considered.
3. Changes to assessment criteria to allow for management of localised increases in flood velocity in Management Zones B and C. This proposed amendment is not clear in regard to allowing changes to flood works and flood work approvals. The cause of localised increase in flood velocity could be caused by new or existing flood works. This matter needs more investigation before any amendment to assessment criteria.
4. The addition of assessment criteria in Management Zones B and C to allow for increased flood protection for 'high value infrastructure.' There is no clarity around the how the results of this change in flood work assessment criteria will impact on flood paths.

## **Conclusion**

IRN is supportive of the proposed amendments that achieve the recommendations of the NRC review process. We do not support proposed amendments that will have likely adverse impacts on the health of the Gwydir floodplain and its dependent ecosystems.

The current flood situation in the Gwydir Valley appears to be tracking similarly to the 2012 flood which has informed the Peak Flood Flow Distribution (2012) Map. It would be useful to undertake comparative studies of the 2012 and 2022 floods to check the validity and reliability of the map underpinning the plan.

For more information on this submission please contact:

Bev Smiles

[inlanddriversnetwork@gmail.com](mailto:inlanddriversnetwork@gmail.com)