



Department of Industry  
GPO Box 5477  
Sydney NSW 2001

Monday 16 July 2018

## **SUBMISSION**

### **NSW updated factors for Water Recovery Discussion Paper**

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

CWEC does not support the proposed changes to calculating environmental water recovery under the Basin Plan.

The methodology used to justify these changes is not based on best available information or historic use of water in the Macquarie River system.

At no time, in any water planning process, including the development of Water Sharing Plans (WSP) under the *NSW Water Management Act 2000*, has there been recognition or estimation of the volume of floodplain harvesting take in the Macquarie.

The outcome of the 2018 cap factor calculations that the Macquarie is 19,947 ML over recovered is incorrect because the annual average volume of floodplain harvesting take is likely to be far higher than this.

The Macquarie-Cudgegong WSP has no estimation of floodplain harvesting take. This water must therefore be included in the volume of planned environmental water calculated for that WSP.

The current development of Water Resource Plans (WRP) under Basin Plan requirements has a commitment of no net reduction of planned environmental water.

For this commitment to be met in the Macquarie, any future license allocations for floodplain harvesting must be met through a reduction in the current share.

CWEC is concerned that none of these considerations have been flagged in the discussion paper on NSW updated water recovery factors.

The Macquarie Marshes are an internationally significant environmental asset. The aim of developing Sustainable Diversion Limits (SDLs) under the Basin Plan is to prevent further degradation and loss of resilience of wetland and river health across the Murray-Darling Basin.

The current volume of environmental water available through the WSP, Riverbank and Commonwealth purchases is barely enough to keep 10% of the core Marshes in a healthy condition.

The loss of small and medium sized floods through floodplain harvesting activities has not been recognized as a key environmental problem.

The proposed loss of over 19 GL of held environmental water, based on highly questionable modelling assumptions, is not supported.

The WRP being developed for the Macquarie region must recognize and account for the level of floodplain harvesting take in the catchment.

Yours sincerely,

A handwritten signature in black ink on a light-colored background. The signature is written in a cursive style and reads "Cilla Kinross".

Cilla Kinross  
President  
Central West Environment Council