Submission
NSW Department of Industry - Water
NSW updated factors for water recovery

Introduction

My name is Melissa Gray, I was raised on an irrigated vegetable farm on the Clarence River. I have lived in Kakadu NT and Griffith NSW before relocating to Dubbo NSW building my bookkeeping practice.

I am one of the Healthy Rivers Ambassadors for the Macquarie and Castlereagh Rivers. Healthy River Ambassadors are a grassroots community network of people who support the restoration of our rivers to health. Since June 2017 in Dubbo we have organised:

- a full day workshop with 13 attendees on river health in the Macquarie Valley
- run a local petition supporting the Murray Darling Basin Plan in full 3,200 GL which has added 1,300 signatures to a basin wide petition of over 24,000 signatures
- held a very successful town hall meeting on river health and issues with over 100 attendees, some travelling 400km plus to attend.
- a bus trip to Canberra for a Water Week Summit for 2 days of learning, where we delivered our petitions to Malcom Turnbull and held a full day of meetings with our elected representatives.
- a Healthy Rivers Rally with over 70 people marching down the main street of Dubbo protesting the loss of water for our environment.

As Healthy Rivers Ambassadors we have shown local and federal political representatives that the groundswell of public opinion is strongly in favour of healthy resilient rivers and wetlands. In the Murray Darling Basin rivers are our lifeblood, and they need adequate water to remain healthy.

Position

Healthy Rivers Ambassadors for the Macquarie and Castlereagh Rivers are strongly opposed to the proposed changes to cap factors.
Key Points

1. The impacts of floodplain harvesting

The volume of floodplain harvesting extraction in the Border Rivers, Gwydir, Namoi, Macquarie and Barwon-Darling is not included in the planning assumptions, therefore the history of all water take has been incorrectly calculated in the Northern Basin.

There has been no allowance made within the 2004 Macquarie Water Sharing Plan of the considerable volumes of water taken from the environment through the illegal practice of floodplain harvesting, and if the NSW floodplain harvesting policy goes ahead there will be significant reductions to the volumes of planned environmental water that can be delivered to the Macquarie Marshes.

The conclusion that too much water has been recovered for the environment in the Gwydir and Macquarie is not based on correct modelling because the volume of floodplain harvesting is not included.

2. Data inconsistencies

The updated set of factors do not reflect the use of best available information. We are in strong disagreement with the raising of the general security water CAP factor from 0.42% in 2011 to 0.56% while the actual reliability of a water entitlement in the Macquarie has reduced and struggling to be higher than 30%.

Figures for the Macquarie Valley of 42% and higher do not include the years of the millennial drought, which would put the figure under 30%. Also, what reliability was back in the 80’s and 90’s is irrelevant to what it is today. We know there is less water now because the climate is drying.

A different set of reliability factors are used for extractive licences than those used to calculate environmental recovery for general security and supplementary allocations.

3. Water Security

The reliability of stock & domestic and town water supply has decreased under the new factors. Water is life, and no section of an industry should have its needs prioritised over the needs of other agricultural sectors or the water supplies of communities.

4. Science

The Sustainable Diversion Limit for each catchment should be based on ecological outcomes not on incorrect models, particularly for the management of Ramsar listed wetlands. Australia has the benefit of highly trained and dedicated ecologists and hydrologists, and the public expects that decisions made regarding the management of our ecological assets be made in line with the best of this available science. Science is not a special interest group, it is fundamental to determining what our rivers need. The MDBA and Basin State Governments are required by the Commonwealth Water Act to ‘act on the basis of the best available scientific knowledge.’