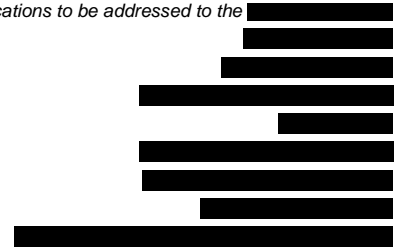


# BREWARRINA SHIRE COUNCIL



All communications to be addressed to the



Thursday, 21 July 2022

## SUBMISSION

### Western Regional Water Strategy

July 2022

**Submission to:**

Department of Planning and Environment – Water  
[regionalwater.strategies@dpie.nsw.gov.au](mailto:regionalwater.strategies@dpie.nsw.gov.au).

**Submission from:**

Brewarrina Shire Council  
[breshire@brewarrina.nsw.gov.au](mailto:breshire@brewarrina.nsw.gov.au)

# Western Regional Water Strategy

## Submission from Brewarrina Shire Council:

### 1. Introduction;

The Barwon Darling River system is one of the most fragile ecosystems in eastern Australia. Due to its ephemeral nature, rainfall runoff in the northern basin is critical to the health of this system.

Brewarrina Shire and its communities understand the impacts better than most and the development of the Regional Water Strategy gives communities the opportunity to consider future management holistically.

Its important to point out that water management legislation in Australia prioritises all other users before agriculture (critical human needs, stock and domestic, and the environment), meaning industry only have water access when all other needs are satisfied. It goes without saying this triple bottom line approach is the safest means of management to reach sustainability.

On of the major issues prior to the recent Barwon Darling Water Sharing Plan review was the protection of low flows through restricting larger licence extraction. This continued to cause water quality incidents in both the upper and lower sections of the tributaries. It's important to note that the current strategy takes this into consideration by continually reviewing the hydraulic modelling in the coming years.

Council cannot reiterate enough that quantity alone should not dictate this modelling, as quality needs as just as much emphasis holistically. The algal blooms and extremely high salinity places ever increasing demands on local water utilities and comes at a high community health risk. The North West Flow Plan data considering the impacts around Algal and Fish Migration should be protected when making any final determination of flow targets. We can't stress enough how important these components of the strategy when it comes to local water utilities.

Section 324 triggers introduced, are a positive start at trying to elevate some stress on the low flow activity. Council encourages these triggers be constantly reviewed and scrutinised through times of drought, and should be viewed in a positive outlook for both critical town water needs and industry as well. If there is an opportunity for Industry to access water surplus to critical needs in a drought, it is hoped this would be considered without bias.

Irrigation farming in New South Wales is also subject to strict regulations to ensure sustainable and responsible water use. The strategy clearly shows the works that been done to assist in all extractions being capped at a sustainable level, a hierarchy of water access priorities, and strict measurement requirements

### 2. Floodplain Harvesting;

The NSW Government has proposed a framework for licencing floodplain harvesting (FPH) in northern Murray-Darling Basin valleys to bring take in line with the Basin Plan's Sustainable Diversion Limits, the Water Sharing Plan limits and the 1993/94 Cap on diversions. While we broadly support bringing floodplain

harvesting extractions within a licencing framework, conferring permanent property rights to industry is a windfall transfer of public wealth that should be considered only once public good outcomes can be guaranteed, including for Aboriginal Nations who are disproportionately disadvantaged under the current and proposed policy settings.

The Barwon Darling Water Sharing Plan is an example of safeguards that can work when applying the rules to protect the floodplains, which includes a 'resumption of flow' rule and provides for the use of 'Individual Daily Extraction Limits' (IDECs). These safeguards should be looked at right across the Northern Basin, as they are not a foreign concept.

In Councils view, it would not be difficult to incorporate return flow and other functions into the hydrological models to better estimate the contribution of floodplain flows to the river system through either surface or groundwater. We recommend applying a conservative estimate based on modelling, observations, scientific literature and expert consultation, which would provide the best available scientific estimates to allow for an estimation of the impact of the access rules. Given the need for assumptions, we also recommend an adaptive approach to allow for model improvements and adjustment of downstream flow targets to achieve policy objectives

We acknowledge the work that is being done to monitor this new licencing concept of harvesting the floodplains and note that there is still a lot of work that is required in this space moving forward to find a happy median for all three indicators of the Triple Bottom Line.

### 3. Connectivity;

Council's LGA includes smaller tributaries that flow from QLD including the Bokhara, Birrie, Narran and Culgoa which are more fragile than that of the larger channel the Barwon Darling river. The management issues around connectivity and the legislation that governs it between state borders have seen the health of these rivers deteriorate. Council would like to see a better collaboration between both NSW and QLD governments that consider in detail the needs of these rivers and communities that rely heavily on them including First Nations people and landowners, predominately graziers.

By highlighting the importance of the connectivity between state borders in the WRWS means it will continue to remain a critical part of the conversation moving forward. Rural people know better than most that water is borderless, and should be seen as such when it comes to both economic and environmental management. It is hoped the strategy will continue to highlight the importance of ensuring water is managed by valleys and not state borders.

### 4. Water Quality;

In extended droughts, periods and lack of adequate flows from releases from state dams had seen water quality parameters such as salinity and the metals iron and manganese at record highs. The terminology record high refers not just to the

levels but also the duration of the poor water quality, which became an urgent matter.

With Councils conventional treatment system set up for Flocculation, Clarification and Disinfection, the present of high sodium levels poses a significant drinking water palatability risk. Without the resources to remove the sodium content, drinking water becomes harder to consume due to the taste and with the level of Sodium sitting above 300mg/l for much of 2019, this leaves Council as a utility with a heavy reliance on forecast rain due to empty storage dams.

Council is of the view this can be avoided if environmental flows released by the Commonwealth Environmental Holder has connectivity into the lower lakes systems at Menindee. What we found in 2019 with an environ flow, was that because the flow was only enough to fill the Brewarrina Weir Pool, the water received was every drop of stagnant effluent type water in every dry river in the whole northern basin. This ended up in our weir pool and was recorded as the worst quality water every experienced by the Brewarrina Shire Council as a local water utility.

In order to stem similar events form happening in the future for not only Brewarrina but local water utilities right along the system, the strategy should clearly point out a particular emphasis that needed to be placed on flow connectivity, in times of drought from environmental water.

## 5. Overall Strategy;

The concept of the WRWS is a positive outlook for rural communities depending on our lifeblood, the rivers. The idea of a non-statutory long-term planning document that has the capability of triggering live changes to water sharing plans is critical to future water management across the state.

Heavy regulatory changes in recent years has seen all aspect of users impacted in one way or another. Brewarrina Shire Council will be one Council moving forward that will insist on using the WRWS as mechanism to highlights things that may need reviewing. This strategy clearly points towards reform that is starting to work and will progress over time. We sincerely hope the issues of water quality and connectivity are considered as matter of importance moving forward, and look forward to working with the department to ensure this occurs.

Yours Faithfully

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