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Friday 1 February 2019

### **Submission to Draft Macquarie-Castlereagh Surface Water Resource Plan**

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.

We thank you for the opportunity to submit comments on the draft Water Resource Plan (WRP) for the Macquarie-Castlereagh surface water resource, as required under the Murray-Darling Basin Plan.

This WRP area contains a range of important environmental assets including the internationally significant Macquarie Marshes.

CWEC is greatly concerned that the health and resilience of the Macquarie Marshes has continued to decline over time and that the water sharing arrangements under current water sharing plans (WSP) have not improved the health of this significant wetland of the Murray-Darling Basin.

CWEC members are particularly concerned about the decline in area of healthy marsh ecosystems and the decline in water bird breeding events. We consider that this has been caused by the over extraction of water for irrigation purposes.

We are concerned that the risk assessment in the draft WRP identifies a high risk of meeting environmental watering requirements of the Macquarie Marshes and the impact of climate change will not be mitigated.

The proposed changes to water sharing arrangements included in the draft WRP will not prevent further decline of essential ecological assets and function in the Macquarie River system.

We note that the recent catastrophic fish kills in the Darling River have been caused by a reduction in flow from connected river systems over time. The Macquarie-Castlereagh surface water flows are highly connected to the Barwon-Darling River system.

Also, the over-extraction of natural flows through supplementary license access and the unregulated harvesting of overland flood flows plus the lack of protection of environmental water releases and lack of protection of low unregulated flows has caused additional loss of connectivity between the Macquarie-Castlereagh and the Darling River systems.

This connectivity is critical for movement of native fish populations.

CWEC recommends the following rules in the Macquarie-Cudgegong WSP:

1. We support the proposed Cudgegong environmental water allowance. This volume of water must be protected as environmental water once it reaches Burrendong Dam holdings.
2. The Macquarie environmental water allowance must be managed as 100% active water with no timing restrictions on release.
3. Floodplain Harvest extraction must be subject to a full cumulative environmental impact assessment before this activity is formally licensed. The final volume of licensed floodplain harvest must be shared across the current volume of long term annual average extraction limit so that the limit does not increase.
4. Releases of held environmental water must be protected from pumping by a strong set of rules in the unregulated WSP.
5. An end of system flow target for the Macquarie regulated river that is protected through to the Barwon-Darling
6. Available water determinations must be based on the most recent worst period of inflows on record.
7. The Macquarie-Cudgegong Environmental Flows Reference Group has been an effective collaboration between government and community representatives. This group must remain in the rules of the WSP as currently mandated.
8. Low flows in the Castlereagh River must be protected through cease-to-pump rules based on appropriate installation of gauges throughout

the river system. This will ensure the maintenance of low flow connectivity with the Barwon-Darling

CWEC is concerned about the number of information gaps and unfinished rule development identified in the draft WRP.

The incomplete consultation with indigenous nations is another failing of the process.

We consider that the draft WRP as currently exhibited is highly compromised and represents a failure in providing a fair and transparent consultation process.

CWEC considers that the draft WRP will not meet the clear environmental objectives of the Murray-Darling Basin Plan.

Yours sincerely

A handwritten signature in black ink, reading "Cilla Kinross", is centered on a light gray rectangular background.

Cilla Kinross  
President