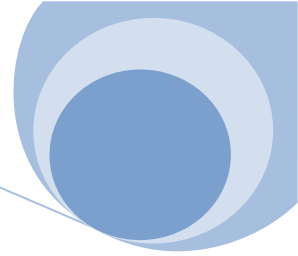


# NSW South-West Water Users Association

## Submission to the Productivity Commission Review of the Implementation of the Basin Plan.

July 2023

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## **NSW South-West Water Users Association (SWWU)**

Represents water users on the Murray River downstream of the Murrumbidgee River to the SA border and the Lower Darling River (Baaka) downstream of, and including, the Menindee Lakes.

Our members divert water for stock and domestic needs and for irrigation of permanent horticultural plantings and annual crops.

We use both NSW high security and general security licences as well as stock and domestic entitlements. Our security of water supply for both consumptive use and the river environment depends on water coming from upstream.

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## **Background**

Our submission will focus on The Lower Darling due to the extent of the dysfunction in the management of this river and the lack of interest to date in any improvement in this as part of The Basin Plan.

It remains an unfortunate reality that The Basin Plan as formulated ignored The Lower Darling, other than viewing it as a delivery channel to resolve issues elsewhere.

As part of preparing this submission, we reviewed our submission to the 2018 Productivity Commission Review and also the Recommendations which came out of that Review.

It is our melancholy duty to note that progress in implementing The Basin Plan is somewhere between limited and non-existent.

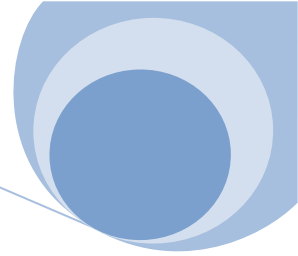
We would acknowledge the removal of Permanent Planting Horticulture from The Lower Darling.

However, our issues from 2018 remain. The following is a verbatim quote from our 2018 submission.

### **Key Issues:**

- The Water Sharing Plan (WSP) / Water Resource Plan (WRP) process in The Darling System
- The approach to date on The Menindee Lakes Project as a supply measure
- The lack of any serious approach to managing water quality issues in The Darling system.
- Impacts of The Basin Plan on water reliability on The Lower Darling.”

**Our comments on these issues are similar to those submitted in 2018. From a Lower Darling perspective, The Basin Plan remains dysfunctional.**

**(1) Water Sharing Plans (WSP) / Water Resource Plans (WRP)**

- We note that the MDBA has rejected and/ or NSW has withdrawn the previous attempts at many of NSWs WSP's.
- We have no knowledge of what is in the proposed updates of the Lower Darling WSP as NSW has refused to release it.
- We would describe incorporation of concepts of River Connectivity into Upstream WSP's as tokenistic at best.
- The WRP's are supposedly key components in the implementation of The Basin Plan.
- In The Lower Darling, the process to date is farcical and ignores all local environmental, indigenous, community and business interests.
- The Basin Plan views River Connectivity as a "Have Regards To" issue so literally it can be ignored.

**(2) The SDLAM Projects – with Particular Attention to The Menindee Project.**

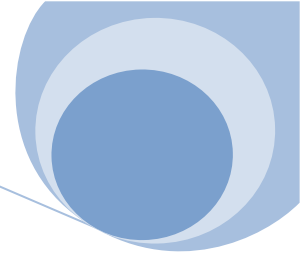
- Menindee was intended to provide 106 of the 605 Offset Total
- The project has been abandoned and rightly so.
- NSW attempts to 'reimagine' the project have been ridiculous with no consultation.
- The SDLAM Projects are key components of The Basin Plan. Our experience would suggest they are generally scams.

**(3) Water Quality in The Lower Darling**

- Neither State nor Federal administrations have made any commitment to attempt to manage water quality in The Lower Darling.
- This is despite 2 major fish kill events and extensive issues around impacts on human health – particularly children.
- The Basin Plan views water quality as a "Have Regards To" issue so literally it can be ignored.

**(4) Basin Plan Impacts on Reliability of Supply From Menindee.** The following is taken from our 2018 Submission.

- Over 90 % of the Lower Darling water use licences are now environmentally owned licences (principally, TLM ex Anabranh Pipeline and CEWH ex Websters/Tandou)
- In both cases historical physical water use was from Lake Cawndilla which, in the dry years, was invariably disconnected storage – and noting that Cawndilla is the deepest and hence the most efficient lake at Menindee. These licences are now expected to be supplied from the top lakes – Wetherall and Pamamaroo.
- This is a 4 fold increase in the supply obligations from the top lakes in dry years – and it is the top lakes which are the reserve for the Lower Darling.
- These licences have no connection with the historical use characteristics of the 'source' water and are now a direct threat to supply reliability on The Lower Darling.
- The Basin Plan intends to draw water from Menindee more rapidly than previously. This inherently reduces supply reliability to The Lower Darling.



**Conclusion**

The Menindee lakes system will see less water coming in and more water being drawn out equalling death to the Menindee Lakes, Lower Darling and Anabranch.

SWWU believes it important that flow triggers in the Northern Tributaries, Barwon-Darling and Lower Darling, and storage volumes in the Menindee Lakes be determined to ensure that protecting the health of the river is made a priority. These triggers urgently need to be a major part of all Water Sharing Plans for both inflows into Menindee and draw down orders out of Menindee. Targets cannot be tokenistic; targets need to be scientifically backed, demonstrating benefits for whole of river health. The recognition that all WSPs are connected and have repercussions in other valleys urgently needs addressing.

The South Western Water Users Association appreciates the opportunity to provide a submission to the Productivity Commission Review of the Implementation of The Basin Plan and would welcome further consultation.

Yours sincerely,

Rachel Strachan  
South Western Water Users Assoc Vice Chair

Howard Jones  
Chairman

Rachel Strachan  
Vice Chair

Alan Whyte  
Executive Member