



# Murray Darling Association Inc.

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NSW Department of Industry  
Water Renewal Task Force  
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## Submission to the NSW Water Reform Community Consultation

Thank you for the opportunity for the Murray Darling Association to provide this submission to the Water Reform Action Plan.

The Murray Darling Association is the peak body for local government in the Murray-Darling Basin. There are 167 councils that sit within the Basin and whose communities rely upon water from within the catchment. The management of water is a matter that is of significant interest to local government.

### BETTER MANAGEMENT OF ENVIRONMENTAL WATER

There must be effective regulation of the Barwon-Darling River System, but the focus should be on a standardised state-wide solution. The Water Sharing Plan areas may need to be redefined in order to better align with and meet the objectives required under the Water Resource Plans and the long-term environmental watering plans.

The MDA agrees with the stated mix of environmental outcomes but maintains that more outcomes should be defined, including:

- Integrated management of environmental water and accountability around flows.
- Integration with defined social and economic impact targets.
- Enhancement of multiple uses of environmental flows.
- Greater reliance on local knowledge and cultural knowledge.
- Greater synergies between environmental benefits and cultural flows.
- Mitigation of adverse impacts by pulsing flows, and finding a solution to bank degradation caused by these pulses.
- Mitigation of cold water pollution.

The MDA supports the following additional measures to better manage environmental water:

- Review of flow classes to better align with state and interstate standards.
- Review of changes to licence pumping heights and pump sizes.
- Adequate restrictions in periods of low flow.
- Consideration of salinity issues in weir pools.
- Better use of local government knowledge.
- All measures must aim to balance environmental, social and economic impacts.

## **TRANSPARENCY MEASURES**

Significant non-compliance has been reported in some areas, which claims of a lack of effective monitoring and reporting mechanisms, as well as a lack of prosecution and other action in response non-compliance.

A transparent system for identifying and reporting on licence conditions, pumping rules and pump installations is required.

On the matter of what information should be included in a public register, the MDA believes:

- There needs to be a single point of access register that provides easily accessible information.
- Information about when pumping is and isn't allowed needs to be articulated in common language.
- There needs to be a greater alignment between interstate and interagency nomenclature.
- The MDA has been advocating for investment in enhanced water literacy across the Basin and has prepared several project proposals.

On what information should not be made public, the MDA believes:

- Commercial information that may risk the commercial competitiveness of a business should not be made public, however this would have to be stridently administered in order for commercial sensitivity not to provide a blanket avoidance of disclosure.
- Sensitive information should still be reported to and monitored by the relevant agencies in live time.

On how the public register should be structured, the MDA believes:

- The register needs to be a single point of access for all data across the state, readily accessible through Google-search type tools
- There needs to be a function to search for information by location, council, region, entity, industry.

On how to improve information on when water can be taken, the MDA believes:

- The MDA supports a single point of access website. In areas with limited internet coverage, existing alternative means of access to this information should be maintained.

## **IMPLEMENTING THE NSW FLOODPLAIN HARVESTING POLICY**

The MDA is concerned about the impact of diversions from the floodplain on the greater river system, the environment and other water users.

It doesn't seem clear who is responsible for policing this take, and regulating works on the floodplain. The MDA believes such works should be subject to clearly stated and commonly understood rules, rigorous permission processes and should go through a community consultation process.

The MDA believes rainfall collected in floodplain diversions should be included in the licensing framework and measured in entitlements, with the same provisions applying to all licence holders.

## **WATER TAKE MEASUREMENT AND METERING**

MDA members emphatically support a no meter, no pump policy. This is required to restore accountability and confidence and trust in the Basin Plan. MDA members recognise the limitations of an absolute policy and agree that a metering target of 95 per cent of water take would be sufficient. All large irrigators should be metered completely, with no exceptions.

On what additional objectives should be considered, the MDA believes:

- There needs to be more interaction with local government, which can see and hear what is happening and is trusted to act with independence concerning pecuniary interests and conflicts of interest
- Local government could be resourced to assist with inspection, detection and prosecution.
- There must be appropriate penalty and prosecution frameworks in place.
- Action must be taken to inspect and remove illegal river diversions or blockages.
- The Barwon-Darling Water Sharing Plan needs to be independently reviewed.
- Changes such as the increase in pump sizes for A Class licenses need to be reviewed and previous pump sizes reinstated to protect environmental water and permit a more even flow of water to downstream irrigators.
- Licences should remain with the property they were issued to and not be transferrable;
- Greater independence and oversight of the relationship between Government and irrigators.
- Accurate and standardised metering is paramount. Meters must be maintained.

## **CONCLUSION**

The MDA would like to commend the NSW Government for its work in developing the Water Reform Action Plan, and for its transparent and comprehensive approach to consultation. The consultation papers cut to the heart of the many issues that have been revealed in water management and compliance and propose reasonable and measured ways forward.

We warmly encourage the NSW Government to pay close attention to all feedback and submissions from local governments across the state. Local government is deeply attuned to the issues with water management and has much of value to add.

We will also welcome an opportunity to work with the NSW Government to develop a program to standardize the language of water and policy, and to enhance water literacy for stakeholders across the Basin.

**Yours sincerely,**



**Emma Bradbury**  
Chief Executive Officer  
Murray Darling Association