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SUBMISSION

North-West Flow Plan Discussion Paper

Critical dry condition triggers to reduce risk to environmental and human water needs Discussion Paper

July 2022



NSW Irrigators' Council

The NSW Irrigators' Council (NSWIC) is the peak body representing irrigation farmers and the irrigation farming industry in NSW. NSWIC has member organisations in every inland valley of NSW, and several coastal valleys. Through our members, NSWIC represents over 12,000 water access licence holders in NSW who access regulated, unregulated and groundwater systems.

NSWIC members include valley water user associations, food and fibre groups, irrigation corporations and commodity groups from the rice, cotton and horticultural industries. NSWIC engages in advocacy and policy development on behalf of the irrigation farming sector. As an apolitical entity, the Council provides advice to all stakeholders and decision makers.

NSWIC welcomes this opportunity to provide a submission on the Discussion Papers as part of the public consultation on the Western Regional Water Strategy. This submission is made in addition to earlier submissions on Regional Water Strategies (for example, [[HERE](#)]).

This submission is also in addition to the submissions provided by our member organisations in the relevant valleys. NSWIC endorses submissions of our members on valley-specific issues.

Each member reserves the right to independent policy on issues that directly relate to their areas of operation, expertise or any other issues that they deem relevant.

Irrigation Farming

Irrigation provides more than 90% of Australia's fruit, nuts and grapes; more than 76% of vegetables; 100% of rice and more than 50% of dairy and sugar (2018-19).

Irrigation farmers in Australia are recognised as world leaders in water efficiency. For example, according to the Australian Government Department of Agriculture, Water and the Environment:

“Australian cotton growers are now recognised as the most water-use efficient in the world and three times more efficient than the global average”¹

“The Australian rice industry leads the world in water use efficiency. From paddock to plate, Australian grown rice uses 50% less water than the global average.”²

Our water management legislation prioritises all other users before agriculture (critical human needs, stock and domestic, and the environment with water to keep rivers flowing), meaning our industry only has water access when all other needs are satisfied. Our industry supports and respects this order of prioritisation. Many common crops we produce are annual/seasonal crops that can be grown in wet years, and not grown in dry periods, in tune with Australia's variable climate.

Irrigation farming in Australia is also subject to strict regulations to ensure sustainable and responsible water use. This includes all extractions being capped at a sustainable level, a hierarchy of water access priorities, and strict measurement requirements.

¹ <https://www.agriculture.gov.au/ag-farm-food/crops/cotton>

² <https://www.agriculture.gov.au/ag-farm-food/crops/rice>



Executive Summary

- The NSW irrigation industry **respects the prioritisation of water**, as outlined in legislation (even though this places irrigated agriculture last in line), and therefore supports (in-principle) measures designed to ensure priorities are fairly and reasonably prioritised.
- Any measures **must be able to be operated in-practice** (i.e. supported by the appropriate gauging and forecasting capabilities). Failure to do so not only risks the effectiveness of the rules, but poses significant risk of undue perverse outcomes on water users.
- Government should be seeking to ensure the water management framework (i.e. Water Sharing Plans) is able to operate effectively in a broad range of circumstances/scenarios, rather than on normalising the practice of suspending the regulatory framework (i.e. S324s). The critically dry periods which are the subject of this work are reasonably foreseeable, and therefore the management of these events must be **incorporated into the water management framework**.
- Connectivity measures must necessarily respect to the **ephemeral nature of these river systems**, including recognising the ecological importance of dry phases.
- Any proposed additional measures must demonstrate a **material benefit** in addressing critical needs. NSWIC has concerns about implementing measures with significant impact on water users, if they don't serve to improve critical needs.
- NSWIC is of the position that preference should be for **Held Environmental Water** to be used to achieve outcomes, wherever possible. NSWIC also seeks greater accountability and transparency for the release strategies of HEW, to ensure that sufficient water is available at times of water scarcity (i.e. that it isn't released too early, leaving insufficient supplies during critical periods).
- NSWIC has significant concerns regarding the **feasibility of a target at Menindee Lakes**, given the volume of water held in Menindee Lakes is subject to decision-making by multiple agencies and governments, with ongoing uncertainty over its operations and infrastructure. NSWIC is of the position that a target at the final river gauge of the northern Basin (Wilcannia) would achieve the same objectives, without setting upstream access targets subject to discretion of Menindee outflow management decisions. If such a target is to be adopted at Menindee Lakes, there needs to be significant improvements in the transparency and accountability of release strategies of water exiting Menindee Lakes.
- NSWIC is of the position that the proposed restrictions must be accompanied by **additional (non-regulatory) measures** to seek to improve critical needs (such as upgraded or new town water supplies and/or fishways). NSWIC notes that the Discussion Paper is clear that whilst there could be benefits in implementing these flow targets at certain times, overall, they will not solve all connectivity issues.
- Any additional proposed restrictions must be considered in the **context of existing, and other new proposed, rules** to ensure they interact appropriately. NSWIC also seeks for the NSW Government to recognise this work as part of the state's climate change response, to be prepared for 'Basin Plan 2.0', and avoid a double-dip in 2026.



Submission

Irrigation industry in-principle supports measures to provide for critical needs

The NSW irrigation industry respects the prioritisation of water, as outlined in legislation, even though this places irrigated agriculture last in line.

We support (in-principle) evidence-based measures reasonably designed to ensure the priorities are prioritised at times of water scarcity.

The industry is not seeking access to water when that water is required to meet critical needs in the system. However, once sufficient water does become available, the industry requires certainty and predictability of rules to promptly and fairly provide productive water access, to kick-start drought recovery in our regional communities.

As additional key principles, NSWIC is of the position that measures:

- Must be able to be operated in practice (i.e. supported by the appropriate gauging and forecasting capabilities);
- Must be incorporated into the water management regulatory framework (i.e. not rely on S324s) to remove political discretion;
- Must be able to demonstrate they will make a meaningful contribution to critical needs;
- Must be supported by additional measures that seek to improve critical water needs (such as investments in town water supplies, fish passageways, etc), and not rely on a regulatory approach alone.

Preference for a rules-based approach (not S324s)

The NSW Government should be seeking to ensure the water management framework (i.e. Water Sharing Plans) are able to operate effectively in a broad range of circumstances/scenarios, rather than on normalising the practice of suspending the regulatory framework (i.e. S324s).

Clear rules in WSPs give confidence to downstream communities regarding flow assessment and priority of access, and enable water users upstream to understand the rules - with certainty, predictability and transparency - under which their businesses need to operate when a drought does break.

Rules-based approaches move decisions away from politics (i.e. ministerial discretion), which has been known to cause uncertainty, anxiety, and contestation – and only fuel concerns over water management, particularly at times of water scarcity.

Rules-based approaches ensure the integrity of the water management framework, and maintain confidence. S324s should only be used as a last-resort measure, beyond any foreseeable circumstances of the WSP. S324s were never designed as a ‘business as usual’ instrument.

For these reasons, NSWIC does not support that “*these triggers will initiate temporary water restrictions under section 324 (s324) of the Water Management Act 2000*”. The conditions in which these triggers are designed to operate in are sufficiently foreseeable that the water management framework should be designed to deal with them under a rules-based approach, rather than relying on 324s.



The NSW Government should develop a regulation that codifies the application of S324s to ensure a clear and transparent framework to guide Government on finding a balance between addressing emergency situations and protecting the integrity of the water management framework.

However, for measures of this kind, which are to address a foreseeable and inevitable scenario/circumstance (i.e. drought) – the water management framework must be designed to operate effectively, and not rely on suspending the framework.

NSWIC notes that the Discussion Paper raises “*we need to look at ways to adjust the timing of access to take water so that less access at one time is offset by more access at another time*”. A simple way to do this would be by incorporating rules into WSPs, so they are modelled accordingly. This would mean greater access can be permitted in times of greater water availability, as a result of less access at times of water scarcity.

Connectivity measures must respect ephemeral systems

NSWIC supports river connectivity, defined as: flows to meet critical human, environmental and cultural needs, within the physical, hydrological and climate limits on rainfall, inflows and flow rates.

Key to this, is respecting the ephemeral nature of these river systems.

NSWIC notes the recommendations from the *Independent Assessment of the Management of the 2020 Northern Basin First flush Event*, which included:

*“Connectivity must be a primary objective of first flush management in the Northern Basin if insufficient water is available to meet tributary and downstream critical water needs. However, the arrangements to meet downstream critical water needs, of necessity, also have to be **reflective of and responsive to the ephemeral and intermittent flow nature of the rivers in the Northern Basin.**”*

The NSW DPE – Water says:

*“It’s normal for the river to stop flowing sometimes. **A constantly flowing river is not normal for the Barwon-Darling region.** The river stopped flowing for extended periods even before there were large dams and significant agricultural water use upstream. There is a relationship between the river drying and dry climatic periods.”*

Much of the public understanding of rivers has been shaped by American or European rivers. However, those rivers have a vastly different hydrology and hydrogeomorphology, compared to inland Australian rivers, which are unique. A key point of difference (alongside colder climates, steeper landscapes, and different soils) is that European/American rivers typically have a snow-pact in the headwaters (subject to seasonal melting, and thus acting like a large reservoir), enabling the river to be less dependent on rainfall, and flow consistently. Many inland Australian rivers, such as the Barwon-Darling, have a ‘boom and bust’ hydrology; with flat, hot, and dry landscapes making for a slowly moving river; and headwaters more characteristic of a desert (than snowy-alps); meaning the river flows are highly-dependent on rainfall, and are thus ephemeral or intermittent.

The uniqueness of these different systems is seldom understood – however – such understanding is critically important to appropriately managing these systems.



In fact, amongst both academic literature and local perspectives, the dry-phase is valued for significant ecological importance.

For example, Gawne and Scholz (2006)³ state:

“It is generally agreed that both wet and dry periods are important for maintaining ecosystem integrity in ephemeral wetlands.”

“The loss of a dry phase also has been recognized as a major degrading force for lakes (Briggs 1988)”.

“In many ephemeral systems, the loss of a dry phase has led to significant changes often perceived as deleterious. Bird density and diversity, for example, are known to decline with the removal of a dry phase (Briggs et al. 1994; Kingsford et al. 2002; 2004), as the original community composition shifts towards a composition with a greater proportion of piscivorous species (Kingsford et al. 2002). Invertebrate productivity (Brinson et al. 1981; Maher & Carpenter 1984; Briggs & Maher 1985) and diversity (Leslie et al. 1997; Boulton & Jenkins 1998) also have been shown to decline in response to the loss of wetland drying. The loss of a dry phase has been associated with an increased abundance of introduced fish species such as carp (Cyprinus carpio) (Gehrke et al. 1995; Boulton & Jenkins 1998; Gehrke et al. 1999). The vegetation community also undergoes significant changes, including the loss of lignum (Muehlenbeckia cunninghamii) and red gums (Eucalyptus camaldulensis) (Walker & Thoms 1993; Thornton & Briggs 1994), as well as changes to the macrophytic community structure (Brock & Casanova 1991; Poiani & Johnson 1993; Walker et al. 1994). While much less is known about changes to ecological processes, it would appear that the loss of a dry phase leads to an increased importance in anaerobic decomposition of organic matter (Brinson et al. 1981; Boon et al. 1996).”

Similarly, Jenkins, Boulton and Ryder (2005)⁴ state:

“Preservation of this variability is the key to successful management of these “boom and bust” systems but diametrically opposes the desire for regulated, reliable water supplies for human use.”

“Wetlands in arid and semi-arid areas face intensifying pressure for their water resources yet harbour unique biota and ecological processes that rely on the “boom and bust” regime of alternating flood and drought. Recent research in Australia has revealed that models of ecosystem processes derived from northern temperate zone wetlands are often inapplicable to arid zone wetlands, confounding efforts to manage or protect these threatened habitats.”

“Of the 88 570 ha of wetlands that make up the lakes and floodplain of Menindee Lakes, over 99% is degraded by too much flooding (39 244 ha) or too little flooding (45 298 ha) (Kingsford et al., 2002).”

Further, an information paper prepared as part of The Living Murray⁵, states:

³ Ben Gawne and Oliver Scholz (2006) “Synthesis of a new conceptual model to facilitate management of ephemeral deflation basin lakes”, *Lakes & Reservoirs: Research and Management* (11) 177-188. Murray-Darling Freshwater Research Centre, Lower Basin Laboratory, CRC for Freshwater Ecology.

⁴ Kim M Jenkins, Andrew J Boulton, Darren S Ryder (2005) “A common parched future? Research and management of Australian arid-zone floodplain wetlands”, *Hydrobiologia* (552) 57-73. Ecosystem Management, University of New England.

⁵ Murray-Darling Basin Commission, The Living Murray, Information Paper No. 10 “Health of the River Murray – Menindee Lakes, the Lower Darling River and Darling Anabranch”. Available here:

https://www.mdba.gov.au/sites/default/files/archived/mdbc-tlm-reports/525_menindeelakesdarling.pdf



*“It may appear that variable flows have largely negative effects, when considered in the context of agricultural production and that ‘permanent is better’. However, **river systems with highly variable flow regimes are different and call for a different approach to their management** (Boulton et al. 2000).”*

“The combination of weir pools and the stock and domestic release along the Darling Anabranch has substantially changed the localised environment by preventing long sections of the channel from drying for months to years between floods. Permanent inundation of the Menindee Lakes significantly reduced the frequency of drying in the main lakes. Permanent inundation favours different vegetation communities, leads to sedimentation and channel incision and promotes favourable conditions for carp. It alters the relationship between surface water and groundwater and can lead to increased salinity in surface waters. Permanent inundation disrupts the pattern of flooding and drying in dryland rivers and associated boom and bust cycles in waterbirds (Kingsford et al. 2002) and fish.”

Capon, James and Reid (2016)⁶ also say:

“In some places in Australia, increased flooding has dramatically affected riverine vegetation through the permanent inundation of wetlands and river channels, by re-regulating storages or because low flows constantly connect them to the river. Riparian trees, while dependent on periodic flooding, die under conditions of permanent inundation as demonstrated by the many dead trees present in lakes of regulated rivers (e.g. Menindee Lakes, Lake Victoria, Lake Mokoan, Know swamp). River red gums die when their base is submerged for 2-4 years (Briggs and Maher 1983; Chesterfield 1986; Bren 1987) while black box flooded for 12-18 months usually die (Shepherd 1992; Briggs and Townsend 1993; Roberts and Marston 2000).”

The literature presented above, is, of course, not to diminish the real and significant challenges facing these regions during drought times. It is, however, to ensure shared understanding on what the ‘natural’ state of these systems are, and the need to respect that natural variability, and the ecosystems which have developed based on the ‘boom and bust’ systems.

The environmental impacts of attempts to make these ephemeral river systems flow constantly must be properly understood. Specifically, management for ecological outcomes is a lot more nuanced than a ‘more water, more often, is better’ approach.

The crux of the problems surrounding connectivity derive from our human desires for a constantly flowing river system, and human needs for critical water supplies – being diametrically opposed to the natural state of the ephemeral river system.

Whilst NSWIC supports connectivity (as defined above) – this must be done with respect to the ephemeral nature of these river systems. Any measures must also respect this ephemeral nature.

Measures must have operational feasibility

NSWIC has significant concerns relating to the operational feasibility of the proposals.

A lack of operational feasibility will lead to additional perverse impacts on water users, as well as undermine public confidence in water management if measures cannot be operationalised effectively.

⁶ Samantha Capon, Cassandra James and Michael Reid (2016), “Vegetation of Australian Riverine Landscapes: Biology, Ecology and Management” (CSIRO Publishing).



As a general principle: measures should only be implemented if they can be operationalised.

NSWIC agree with the statement in the Discussion Paper:

“If the draft targets are to be introduced, then improvements will first need to be made to the operational flow forecasting capability which will require a significant amount of investment over a long time period. Without upgrading forecasting capability, implementing the draft connectivity targets will either result in unnecessary impacts on outcomes or missed opportunities to improve connectivity at important times.”

NSWIC seeks full implementation of the recommendations from the *Independent Assessment into the management of the First Flush Event*, such as to improve flow forecasting ability. It is critical that learnings from that event can inform future events.

NSWIC recommend a similar evaluation after each event, to ensure continual learning and improvement on the management of these events.

NSWIC also note concerns with approaches that rely on decision-making by individuals, due to the high staff turn-over rates within government water agencies, which means corporate knowledge is often lost between events of this kind.

Need to demonstrate measures will have material benefit

NSWIC is of a position that there remains a lack of clarity on the core questions:

- What are we trying to achieve?
- Can that be achieved, such as through the proposed measures?

In the northern Basin, with ephemeral rivers and very limited public infrastructure to regulate flows – there are instances (such as severe drought), when no degree of regulation can address water scarcity problems. This is because it is a water supply or distribution issue – not a water sharing issue (as no one has water during these times). Without significant regulating or distributional infrastructure – there is very little that can be done through rules and regulations, when the water simply isn't there. As we often say – it's hard to manage water, when there's no water to manage.

NSWIC also emphasises that the water sharing framework is designed to be highly responsive to water availability, with consumptive water users (i.e. irrigators) at the bottom of the hierarchy. This means that the irrigated agriculture sector has developed based on that hydrology - i.e. irrigation in wet years, and little to none in dry years. Given the little to no irrigation in dry years – there is only marginal scope to address connectivity by further restricting water access at these times (but significant potential impact, given it's this water that starts drought recovery, or is needed to finish crops).

This is confirmed by the Discussion Paper:

“During drought years when there is no water available, or in very wet years the targeted restrictions are not required because there is either plenty of water or no water.”

NSWIC is concerned by a possibility of significant loss of access to water for agriculture, for little material difference. For example, as the Discussion Paper says:

“Figure 2 indicates that if the restrictions were imposed only when the Menindee Lakes were below 195 GL, this would increase the time the lakes were above the target by 3%. In other words, the restrictions keep storage volumes above 195 GL over 97% of the time, compared to around 94% of the time with the current conditions.”



NSWIC thus agree with the Discussion Paper points:

“We need to be confident that the benefits of implementing the triggers outweigh the impacts and that the triggers can be effectively implemented and operated. Even with perfect forecasting, this initial analysis suggests there could be benefits in implementing these targets at certain times, but overall, they will not solve all connectivity issues. The benefits are likely to be marginal and they come with impacts on water users.”

NSWIC notes the Discussion Paper states, in the context of connectivity measures now already in place, that *“these changes mean the current riparian targets are now satisfied most of the time”* [P6].

NSWIC respects the hierarchy of water users - which prioritises critical human and environmental needs above irrigation - and in turn, respects measures designed to ensure those prioritises are reasonably and fairly prioritised. However, there needs to be demonstration that restrictions will in fact materially serve those needs – and not simply serve an ill-informed public perception, and not actually fix the problem.

NSWIC support targeting the times of restrictions to when it can best actually meet targets, and do not support restrictions which will provide little additional benefit at large detriment.

Additional measures are needed, restrictions alone won't resolve issues

The proposed regulatory measures must be accompanied by significant further programs to offer any hope of meaningfully addressing some of the critical water supply challenges in regional NSW. In largely unregulated systems, with limited public water storages, there is little that can be achieved with a regulatory approach alone.

This is acknowledged in the Discussion Paper, saying:

“Even with perfect forecasting, this initial analysis suggests there could be benefits in implementing these targets at certain times, but overall, they will not solve all connectivity issues.”

For example, the Discussion Paper notes the importance of the Better Baaka Program, including to install fishways on weirs.

NSWIC is of the position that significant investment in town water supply for these rural towns is needed, such as off-river storages.

Concerns over impact on ability to reach SDL

NSWIC note, and agree, with the principle in the Discussion Paper of *“do not reduce the overall amount of water being taken out of rivers, consistent with the sustainable diversion limits set by the Basin Plan without compensatory or offsetting actions”*.

NSWIC do not see how the proposed measures can occur without impacting on the ability of water users to reach the SDL, as it does result in cuts to access.

NSWIC is of the position that if the NSW Government is seeking to change the amount of water accessed by water users, they must follow the proper due-process as agreed by Basin states – that is, the 2026 review. NSWIC considers it premature for NSW to be further cutting water users water access outside of the Basin Plan framework and processes.



Simply saying ‘the SDL won’t change’ is inadequate, if in practice, water users will be shifted further away from reaching that SDL. Any reductions in access must be transparent, accounted for, follow proper process and be appropriately compensated.

NSWIC notes there are considerable concerns with the forecast impacts – an average of 2.5% - which falls just below the compensatory provision thresholds. Many water users are concerned by policy creep (i.e. ‘death by a thousand cuts’) in which each policy has a small impact, but cumulatively and over time, they result in a significant – but non-compensated – impact.

NSWIC note concerns with the statement: *“In reality, the impacts to licence holders are likely to be larger, as the 2.5% average impact assumes there is perfect forecasting knowledge, which is not possible, and there will be times when upstream water entitlements may be restricted but downstream flow targets are not met”*. NSWIC is of the position that there must be transparency on the *likely* impacts. Given the Discussion Paper acknowledges that perfect forecasting is not possible, it should be investigated what the likely impacts would be based on *current* forecasting ability.

NSWIC also seek clarification of whether this is the long-term average impact, and what the extent of the impact would be on a particular dry (or first flush) year.

Economic Impact Assessment

NSWIC note that the Discussion Papers provide some indication of the percentage impacts on water users. However, NSWIC is of the position that further economic impact assessment is required, that takes into consideration that this water at critical times is most highly valued – such as to begin drought recovery, or to finish crops.

This assessment needs to look beyond the farm gate, to restoring economic activity in communities, and the flow-on benefits from increased employment / economic activity – such as improved health and wellbeing, lower crime rates, and less drug/alcohol and domestic violence problems.

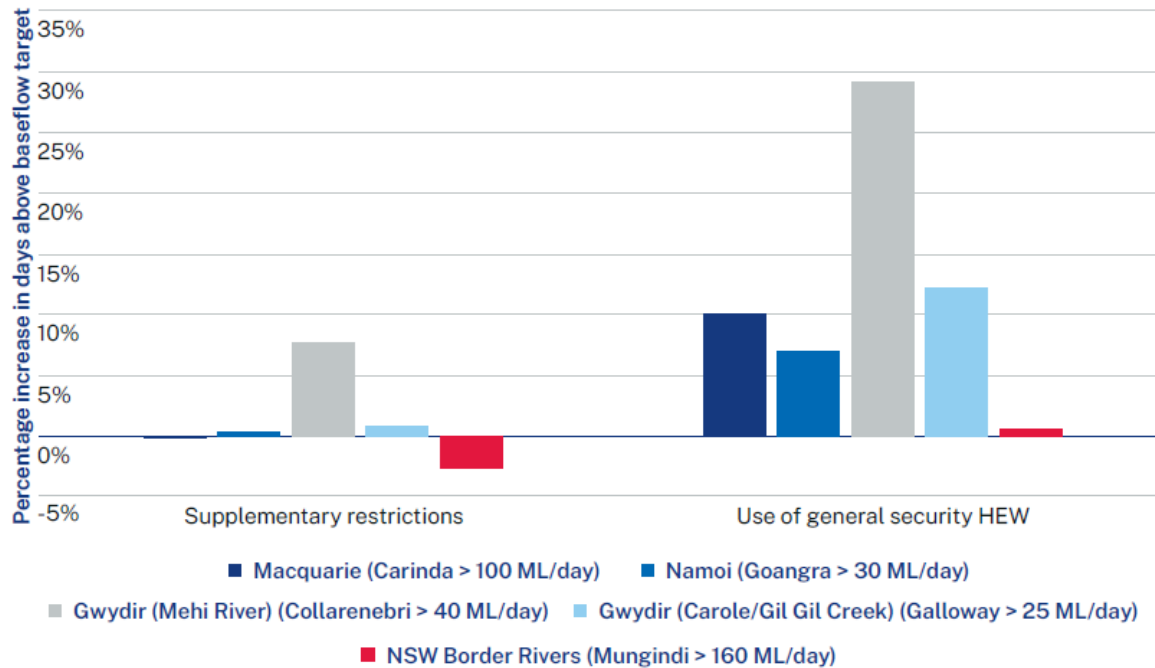
Role of environmental water holders

NSWIC notes that the 2019 *Stocktake of Northern Basin Connectivity Rules – Analysis of Implementation and Effectiveness report* concluded that given the challenges associated with implementing the North-West Flow Plan connectivity rules, initiatives to improve connectivity in the Barwon–Darling River should focus on the use of regulated Held Environmental Water (HEW) releases.

NSWIC notes the research in the Discussion Paper, comparing the use of HEW to restrictions on productive licences.



Figure 7. Increase in the proportion of days that flows are above low flow targets at the end of each northern tributary valley based on completely restricting supplementary licences or using all of the general security held environmental portfolio



NSWIC is of the position that preference should be for HEW to be used to achieve these outcomes, wherever possible, and particularly when it would achieve greater outcomes.

NSWIC also seeks greater accountability and transparency for the release strategies of HEW, to ensure that sufficient water is available at times of water scarcity (i.e. that it isn't released too early, leaving insufficient supplies during critical periods).

Uncertainty over ongoing Menindee Lakes management

NSWIC has significant concerns regarding the feasibility of a target at Menindee Lakes, given the volume of water held in Menindee Lakes is subject to decision-making, by multiple agencies and governments, with ongoing uncertainty over its operations and infrastructure.

If such a target is to be adopted, there needs to be significant improvements in the transparency and accountability of release strategies of water exiting Menindee Lakes.

NSWIC is of the position that a target at the final river gauge of the northern Basin (Wilcannia) would achieve the same objectives, without setting access targets that are subject to discretion of management decisions.

NSWIC notes that Discussion Paper states: *“Cease-to-flow periods greater than 120 days at Wilcannia also correlate with the periods when the Menindee Lakes start to drop below 195 GL”*.

Integration with other new and existing rules

NSWIC notes that it will be important that any new rules are designed with consideration to existing rules, or other newly proposed rules. Given there are already a broad suite of



connectivity rules, DPE should demonstrate how the rules will interact, and ensure the rules work together consistently and coherently, and not result in duplication or confusion.

Integration with Commonwealth-led programs, such as the Basin Plan

NSWIC consider this work by the NSW Government as part of the broader water reform discussion on responding to a changing climate.

If NSW progresses measures of this kind, they should seek recognition by the Commonwealth Government as climate change adaptation or response measures.

The concern of NSWIC is that there has been significant focus on needing further water reforms (i.e. Basin Plan 2.0) to focus on climate change - as suggested in the recent Productivity Commission Review of National Water Reform, and Basin Plan Evaluation.

NSWIC is concerned that come 2026, and considerations of Basin Plan 2.0 – additional measures will be required of Basin States, without considering what NSW has/is already doing – leading to a ‘double dip’ scenario.

NSWIC thus is of the position NSW must either:

- Wait until the 2026 Basin Plan review to progress measures of this kind (not recommended);
- Progress these measures, with written prior endorsement by the MDBA / Commonwealth Government that these measures will be recognised in future Basin water planning (recommended).

Consultation

NSWIC note that the proposed measures will have impacts for water users outside of the Western RWS area to which this consultation is targeted at. It will be important that water users in all impacted areas are made aware of these proposals, and have adequate opportunity to provide feedback.

NSWIC refer to our member organisations in the relevant valleys for their feedback on the specific measures in their valleys.

Conclusion

NSWIC is available to further discuss any of the issues or recommendations raised in this submission.

This submission – specific to the Discussion Papers - is made in addition to a number of submissions made on state-wide issues concerning Regional Water Strategies.

NSWIC also refers to our submissions made as part of the *Independent Assessment into the management of the First Flush Event*, and maintains the positions and recommendations provided from that first flush period.

Kind regards,

NSWIC.