

**Submission
No 14**

**INQUIRY INTO IMPACT AND IMPLEMENTATION OF
THE WATER MANAGEMENT (GENERAL) AMENDMENT
(EXEMPTIONS FOR FLOODPLAIN HARVESTING)
REGULATION 2020**

Organisation: National Parks Association of NSW

Date Received: 29 May 2020

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What is your view on the way the Water Management (General) Amendment (Exemptions for Floodplain Harvesting) Regulation 2020 was implemented?

Development of a clear floodplain harvesting policy has become increasingly urgent in the face of changing weather patterns, declining health of the Murray Darling river system, and expanding demand for water, in keeping with the provisions of the NSW water legislation and the requirements of the Commonwealth Water Act. However, NPA NSW was taken aback by the way this Regulation was implemented in the absence of prior notice, consultation or explanation. While the announcement to restrict flood plain harvesting, thereby enabling flood plain waters to spread across floodplains and flow on downstream through the system following heavy rains after long protracted drying out welcome, the sudden reversal and later re-imposition was confusing. Furthermore, it seemed to be contradictory to overall commitments, as a significant volume was captured at the top of the system, denying much needed wetting and volume downstream, adding to confusion as to government's intentions.

What is your view on the impact of the Water Management (General) Amendment (Exemptions for Floodplain Harvesting) Regulation 2020?

The Murray Darling is a complex and interconnected natural system, albeit significantly affected by the action of people. This amendment has considerable implications not only locally – both as a result of the reduced flows downstream in the northern basin but also through current management and trading rules has implications for the southern basin, environmentally, socially and economically. The environmental health of the system as a whole, which underpins long term social wellbeing and economic viability, is put at risk. The trust in a regulatory system that allows for retrospective authorisation of un-approved floodplain structures designed to channel and capture upstream flows in the absence of an agreed, capped, measured and monitored Licencing regime is undermined.

Do you have any other comments on this regulation?

The Association has over many years advocated for water reform management that sustains natural processes, in accordance with best scientific information, through equitable rules and regulations. The specified natural assets of the Murray Darling basin, as represented in wetlands listed under the Ramsar agreement are a component of these natural processes: failure to protect the water regime that sustains them can only be seen as a failure to deliver goes beyond state responsibilities to its citizens; it is a failure to all Australians. As a member of the Inland Rivers Network we also comment and support their comments to the Senate Inquiry.