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29th September 2010

Dear Michelle,

Inland Rivers Network thanks you for the opportunity to participate in the development of the State Water Corporation (SWC) Environmental Management Planning (EMP) process for the 2011-2016 plan.

We would like to contribute the following comments on the objectives in the current EMP:

1. Objective 1 – Improve instream and riparian environment:

SWC has control over a large proportion of the planned environmental water in regulated river water sharing plans. The release and use of this water should be delivered in a manner that is appropriate to environmental needs within the river system, with the aim of re-establishing a more natural environmental flow regime.

A reporting mechanism is needed to identify how planned environmental water has been released and the ecological benefits achieved during the water year.

2. Objective 2 – Monitor water quality in storages

This objective should be modified to include the management of water quality in storages. See comments on Objectives 3 & 8

3. Objective 3 – Manage storage releases to optimize water quality

There is concern that projects to mitigate cold water pollution in rivers are very slow in their development, eg the pilot proposal to test a curtain in Burrendong Dam. SWC needs to give priority to these projects by setting target deadlines for achievement in the EMP.

4. Objective 4 – Improve fish passage at weirs

The management and mitigation of fish barriers needs a prioritized, well-costed and targeted program that improves the outcomes for native fish and their habitat in all river systems. Impacts of climate change may reduce the frequency of drown-outs, thereby reducing fish migration capacity.

State Water should commission the Fisheries section of Industry and Investment to update the detailed reviews of weirs in all Catchment Management Authorities published in 2006 (see <http://www.dpi.nsw.gov.au/fisheries/habitat/publications/passage/assessing-the-impacts-of-weirs-on-fish-passage>). It will then be in a position to prioritize weir remediation activities using fish migration as the prime parameter.

As not all weirs in regulated rivers are owned by State Water, it must develop a policy to improve fish passage through private weirs by encouraging weir removal and remediation with the co-operation of private owners.

5. Objective 8 – Manage and improve the foreshore land environment

IRN does not support proposals to privatise foreshore land. Any new leases or other occupancies must include stringent environmental management plans as part of their conditions, and existing leases should have EMPs developed as soon as opportunity arises. Intensive grazing of stock on foreshore areas should be minimized, and restricted to ‘crash grazing’ for weed and fire management purposes. The reintroduction of native species on foreshore land and restriction of grazing activities will assist in achieving improved water quality, particularly blue-green algae.

A comprehensive survey of biodiversity and cultural heritage values should be conducted on foreshore lands.

6. Objective 10 – undertake effective stakeholder engagement and communication.

IRN proposes that all SWC customer services committees (CSC) include a representative from the catchment Environmental Water Advisory Group, as well as a representative from Department of Environment Climate Change and Water.

This structure has been working well in the Cudgegong-Macquarie CSC and helps to improve communication relating to SWC responsibilities in establishing improved environmental water flow regimes.

IRN would appreciate follow up discussions on the issues raised.

Yours sincerely,



Anne Reeves, B.Sc., OAM
President

INLAND RIVERS NETWORK

Working for river and wetland health since 1991