



I N L A N D  
R I V E R S  
N E T W O R K

**Submission to the  
NSW Department of Environment, Climate Change & Water  
in response to the  
*Draft NSW Biodiversity Strategy 2010-2015***

---

*February 2011*

**Inland Rivers Network Incorporated**

Level 2, 5 Wilson Street, Newtown NSW 2042  
PO Box 1132, Newtown, NSW 2042  
Ph: 02 8580 6609 Fax: 02 9290 2525  
Email: [admin@irnsw.org.au](mailto:admin@irnsw.org.au)  
Web: [www.irnsw.org.au](http://www.irnsw.org.au)

## About Inland Rivers Network

The Inland Rivers Network (IRN) is a coalition of environment groups and individuals concerned about the degradation of the rivers, wetlands and groundwaters of the Murray-Darling Basin. Member groups of IRN include the Australian Conservation Foundation, the National Parks Association of New South Wales, the Nature Conservation Council of New South Wales, the Central West Environment Council, the Coast and Wetlands Society, Friends of the Earth and The Wilderness Society Sydney.

IRN has been advocating policies for healthy inland river and wetland systems since its formation twenty years ago. Recent submissions and other publications can be accessed through the IRN website.<sup>1</sup>

## Introduction

IRN notes that the *Draft New South Wales Biodiversity Strategy 2010-2015* ('draft Strategy'), prepared by the Department of Environment, Climate Change and Water (DECCW) and Industry and Investment NSW (I&I NSW), states that it aims to coordinate and guide investment and effort in biodiversity conservation in New South Wales for the next five years.

IRN welcomes this opportunity to comment on the proposed development of a Biodiversity Strategy for NSW, now set with a timeframe of 2010-2015, following on from the inaugural 1999 Strategy and an earlier draft replacement document.

## Overarching Statement

The *Draft NSW Biodiversity Strategy 2010-2015* document includes much useful supporting information in Section B and within the series of appendices. However, it is disappointing to IRN that the *Executive Summary* and *Framework for Action (Part A)* present the rationale behind the strategy more in terms of business as usual rather than pro-active investment in NSW's natural capital, despite the findings of the *NSW State of the Environment Report 2009*.

IRN has consistently argued for a holistic approach to biodiversity conservation, and therefore welcome the strategic elements that do incorporate interactive aspects affecting specific ecosystem types. Nowhere is this more obviously needed than with respect to migratory waterbird species. However, the *draft Strategy* (with a prime focus through Section B on a series of terrestrial ecosystems defined by vegetation

---

<sup>1</sup> See the Submissions & Articles section at: [www.irnsw.org.au](http://www.irnsw.org.au)

characteristics, apart from the four aquatic ones) lacks an overarching synthesis with strategic priorities identified across individual ecosystems.

The section on Threatened Species (including, in Appendix 1 the *Threatened Species Conservation Act 1995* (TS Act 1995) which has clear directives regarding the preparation of a *Biological Diversity Strategy*), does not seem to be fully carried through in this second iteration. Furthermore, IRN understands that the TS Act 1995 is currently under statutory review although the implications of this process do not seem to have been canvassed in the current draft.

## **Part A: Framework for Action**

### ***Objective 9: Protect and restore aquatic ecosystems***

IRN considers that the points made are valid, but that the programs in place, as per the Appendices, and the Actions, as per the table, are insufficient to ensure improvement or to prevent ongoing decline.

IRN has been profoundly disappointed with the *Water Sharing Plan* process, and has recently submitted detailed comment on the current roll-out of Macro Water Sharing Plans for inland water sources. IRN acknowledges and welcomes some real improvements that have occurred, for example through buy-back of over-allocated water, however, they fall far short of what is required.

#### ***9.4 in the Actions Table***

This section refers to finalization of the *Floodplain Harvesting Policy* (FHP) and development of valley-wide floodplain management plans. Adoption of the FHP has been dragging on for far too long and, as well, some of the floodplain management plans, already in place, fail to properly address biodiversity conservation. A target date for the FHP should be “yesterday” rather than 2015, and some of the Management Plans should be reviewed and replaced as a matter of urgency.

## **Part B: Freshwater Wetlands and Rivers**

IRN notes, and generally supports, with some qualifications, the points made in these sections (see also general comment on Water Sharing Plans as above).

IRN is delighted to note that the as yet relatively unmodified Paroo wetlands (a part of which are listed as of international significance under the Ramsar Convention) are included in the list of priority wetlands. All too often there has been insufficient focus on retaining the biodiversity that *is* currently in relatively good condition - this should

surely be a top priority for wise long-term investment.

IRN is also pleased to note the *draft Strategy's* acknowledgement of such issues as cold water pollution, barriers to movement of fish, and retention of connectivity.

IRN's experience with the "adaptive management" approach, as enshrined in the Environmental Flows Reference Group for the Macquarie-Cudgegong system, has been useful. It has provided IRN with good and positive support that has greatly improved understanding and knowledge of the system. At the same time, the adaptive management approach has clearly revealed that the proportional volumes allocated to the environment under the *Water Sharing Plan*, together with application of the rules, are insufficient to deliver healthy outcomes in the long term.

This experience has led IRN to raise the issues of compliance and the importance of adequate resourcing:

- (a) for compliance work, as well as;
- (b) the need to appreciate the constraints imposed on good water management by external decisions that, over historic times, have led to floodplain infrastructure development interfering with natural flow patterns; and
- (c) other issues.

One glaring omission in the strategy document is the issue of groundwater dependent ecosystems. The only reference in the *draft Strategy* appears to be in Appendix 5 (at point 6) wherein *by 2015 there is an improvement in the ability of groundwater systems to support groundwater-dependent ecosystems and designated beneficial uses.*

IRN considers this sole mention to be insufficient, especially as it relates to one of the thirteen state-wide targets for Natural Resource Management, and one of only five targets in the Water category.

IRN has long been concerned that water management practices, for example regulation, extraction and changes to water flow patterns in particular, have and continue to adversely affect biodiversity values, not only within river channels but also across the wider floodplains. This is to some extent acknowledged in the *Forested Wetlands* in Section B, but it is not clear how this response is to be carried through in terms of strategy.

To conclude, IRN reiterates that it is supportive of the development of a biodiversity strategy for NSW. However, IRN believes that there are ways in which the *draft Strategy* could be substantially strengthened. IRN would be happy to discuss any of the above points and other related issues in further detail.