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Submission
Proposed actions in Northern Basin Connectivity Program

Introduction

The Inland Rivers Network (IRN) welcomes the further opportunity to make comment on the Northern Basin Connectivity Program and follow up to the Connectivity Expert Panel report. We emphasise the urgent need for action, including previously suggested low cost monitoring options to improve connectivity.

IRN, as an advocate for healthy inland rivers since 1991, has been arguing for improved connectivity to be incorporated into water management regimes as essential if our river and wetland systems are to flourish into the future.

We note that despite advances and public investment in water legislation and management, the ongoing and alarming overall decline in river health demonstrates the failures to establish and implement sufficiently robust control measures, as is made clear in the July 2024 Connectivity Expert Panel Report.

Background

IRN has followed the various iterations of the water reform process since 1994 and are concerned that during this time a significant volume of new water entitlement in the form of Supplementary and Floodplain Harvesting (FPH) licences has been granted in the Northern Basin of NSW.

The downstream environmental, social and economic impacts of that water extraction have not been fully assessed. The failure to include rainfall runoff capture within the FPH water

licencing system is a failure to meet the legal requirements of both the Water Management Act 2000 (WMA) and the Murray-Darling Basin Plan (Basin Plan).

The ecological collapse of the Darling-Baaka has been triggered by the high levels of extraction in northern tributaries.

The recommendations of the Connectivity Expert Panel are aimed at addressing the key problems inhibiting critical water flows connecting through the Darling-Baaka to the Southern Basin to improve ecosystem function and community health and well-being.

IRN notes the analyses published by Department of Climate Change, Energy, Environment and Water (DCCEEW) Northern Basin Connectivity Program for comment, and the statements made in consultation, that the independent recommendations are not Government policy and this current analysis is not the Government's formal response.

The DCCEEW analysis concentrates on improving connectivity during dry times with rule changes to improve connectivity from Northern Basin regulated tributaries:

- End of system flow targets,
- Extended Resumption of Flow (first flush rule) and
- Connectivity Environmental Water Allowance.

These were modelled in September 2025 as a combination which recognises best outcomes by implementing all three rule changes.

However, there are some key gaps in this DCCEEW analysis, including considering rules to restrict access to supplementary and FPH access during non-dry times to achieve small and large freshes.

IRN is very concerned that the Connectivity Expert Panel recommendation to better manage connectivity flows from unregulated water sources at the same time as regulated water sources is not being implemented. The rationale for this decision is based on very poor reasons such as the lack of state-of-the-art gauging systems. IRN has provided advice on alternative, more cost-effective gauging methodologies in submissions to draft Unregulated Water Sharing Plans that will allow for changes away from rules allowing all visible flow to be extracted.

IRN is also concerned that the economic analysis is very limited and does not provide the detailed consideration necessary for this process, as outlined in the attached Appendix.

Landscape management should provide for, and where possible recreate, as much connectivity as possible. This is why IRN supports the full set of 24 recommendations of the Connectivity Expert Panel. These are based on scientific evidence-based research that provides a holistic approach to solving the most immediate ecological challenges for the Darling-Baaka. We strongly support that these recommendations be adopted in full as Government policy.

IRN applauds the NSW Government commitment to improving the hydrological connectivity of northern inland NSW rivers by the deadline of 31 December 2026. It is critical that the adopted water sharing plan rule changes achieve all environmental water requirements in each reach of the Barwon-Darling River.

Improvements needed in Northern Basin Connectivity Program approach

1. Unregulated Water Sharing Plan rule changes

It is imperative that all necessary rule changes to water sharing plans in associated unregulated water sources are expedited, especially those with direct connection.

The Connectivity Expert Panel made five recommendations relating to unregulated water sources and particularly those with direct connectivity to the Barwon-Darling River. None of these have been included in the current analysis. Rule changes should include raising of cease-to-pump levels and restricting when overland flow can be harvested.

The current process of continuing to lock in water extraction until there is no visible flow does not meet the objects of the WMA. It also does not provide fair or just water rights to downstream users, including the environment.

The excuse that many unregulated streams have no flow gauges is unacceptable. There are numerous cost-effective methods of implementing and managing cease-to-pump rules across all water sources. An adaptive management approach has been recommended and should be adopted rapidly in all unregulated streams. An understanding of ecosystem connectivity across the landscape must underpin biodiversity management rather than a limit to gauging technology.

Restrictions on harvesting overland flows in unregulated water sources should be reviewed and changed to greatly improve connectivity by 31 December 2026 at the same time as changes in regulated rivers. Both cease-to-pump levels and overland flow harvesting from unregulated sources between regulated rivers and the Barwon and Darling-Baaka, such as the Lower Macquarie, should be changed this year. This is to ensure that no water protected from upstream use to improve connectivity is taken before it reaches the Barwon and Darling-Baaka, and for equity reasons. It would also be inequitable and economically inefficient, as well as environmentally harmful, to delay restrictions on harvesting from anabranches, distributary channels and streams that flow directly to the Barwon such as the Whalan, Croppa Creek and Thalaba Ck water sources in view of the large volumes harvested.

2. Economic analysis

It is imperative that the NSW Government recognises that the current ecosystem services of the Barwon Darling River and tributaries are valued at \$7.6 billion - \$17.4 billion (Marsden Jacobs 2026) and that improved connectivity will add to this value. Failure to improve connectivity by sufficiently restricting upstream take is likely to result in reduction of this value due to irretrievable loss of ecosystem services. This must be avoided to maintain intergenerational equity.

IRN has obtained an independent analysis of the Marsden Jacobs Report commissioned by the DCCEW Northern Basin Connectivity Program that outlines key failings of their work: see attached Appendix.

3. Failure to consider improvements to small and large freshes **during wetter times**

The Connectivity Expert Panel recommended a small fresh or freshes for 14 days between September and April every year, and a large fresh for 15 days every 2 years. This can be best achieved by restricting supplementary access and flood harvesting access at appropriate times in all non-dry years.

Both these types of water extraction are opportunistic and access the most important natural flows available below regulated water storages. These flows could assist in meeting a variety of targets without impacting storage levels.

In some years this might change the timing of extraction more than it changes the total volumes extracted or economic value of production. Farmers will make business decisions on the best use of their land, water, capital and other inputs in relation to other current factors like international prices. They could in some years increase extraction after freshes are protected and may propose larger works to achieve this if doing so makes business sense.

IRN is appalled by the failure of the Department to publish any modelling or analysis of implementation of the Panel's recommendations to restrict supplementary and overland flow access, even in non-dry times, to protect this minimum frequency and duration of freshes.

Filling regulated river water orders from tributary inflows (Tributary Utilisation) is another form of access to natural inflows to regulated river systems. These flows must first be assessed for the provision of small and large downstream freshes, end of system flow targets and first flush flows before granting access to fill water orders. There needs to be a greater emphasis on protecting tributary inflows for improved connectivity outcomes. This should be included in Operational Rules for northern regulated river tributaries.

4. Focus on modelling options for storage access to achieve connectivity

As discussed in above point, the current analysis of the Connectivity Expert Panel recommendations focusses entirely on modelling outcomes for recommended End of system flow targets, Extended Resumption of Flow (first flush rule) and Connectivity Environmental Water Allowance based on water releases from upstream storages on the Border Rivers, Gwydir and Namoi Regulated Rivers. The consideration of better management of flows within and from unregulated rivers, including rules to restrict opportunistic supplementary water and FPH access, will lessen the reliance on stored water to achieve connectivity outcomes.

5. Menindee Lakes issues

IRN recognises that that the MDBA is running a process to review current jurisdictional arrangements in the management of the Menindee Lakes. Changes to jurisdictional arrangements must not further compromise accountability for actions. The current framework, although possibly past its use by date, ensures some transparency in decision making. Improved transparency must be an outcome of any changes made to Menindee Lakes management.

IRN supports all the Connectivity Expert Panel recommendations relating to Menindee Lakes management.

It is very evident that the NSW Government is now investing a large amount of public money and departmental officer time in day-to-day management decisions and actions to prevent more large losses of native fish populations due to poor water quality in the Lower Darling-Baaka.

This process highlights the ongoing need for improved connectivity inflows from Northern Basin tributaries to reduce periods of poor water quality and provide essential water availability to better manage poor water quality. The effort being put in is just trying to make up for the lack of adequate inflows into Menindee Lakes.

6. Addressing past failings

The crisis in the Northern Basin management which is being addressed by this connectivity program has its genesis in the NSW Water Agencies failure to implement Water Resource Plans and the failure to address the SDL extraction requirements as part of the Basin Plan. This is despite the extensive good will and intent of many. This failure being driven by vested interests within and beyond the public service thus hampering establishment and ongoing integrity of any action plans such as this. There is the need for independent NSW legislative and administrative oversight to ensure on going accountability; effective and efficient use of the considerable public funds invested.

This is why we support the Connectivity Expert Panel recommendation to have an ongoing independent review of the implementation of connectivity outcomes.

Conclusion

IRN fully supports the detailed submissions lodged by the Nature Conservation Council of NSW and the National Parks Association of NSW.

The NSW Government must adopt the 24 recommendations of the Connectivity Expert Panel that were released nearly 2 years ago. Any further delay in improving water sharing plan and river operation rules to ensure critical connectivity outcomes in the NSW Northern Basin is irresponsible. Improved resilience in the Darling-Baaka is essential in the face of increasing climate change challenges.

The process undertaken and released for discussion by the Northern Basin Connectivity Program is very limited with a poor and biased economic analysis of the outcomes. The ongoing focus on irrigation versus the environment is not an appropriate approach for Government planning. A range of mechanisms need to be considered to increase economic outcomes from leaving natural inflows in rivers, to assist more efficient use of water (e.g. at all times in relation to use of regulated supplies) and to achieve better distributed, diversified economic outcomes.

Ecological collapse of river systems will have a much greater, long-lasting impact on society and the economy.

For more information on this submission contact:

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Appendix attached

APPENDIX

Inland Rivers Network submission on Analysis of Connectivity Expert Panel Recommendations published by NSW DCCEEW including “Economic impact on water users”

Comments on Economic assessment of changes to extraction rules as they affect irrigators.

1. No context to assess significance of changes reported.

The \$ values presented as to the cost of proposed plan changes are presented as economic loss, estimated as \$value in total. The percentage change is not provided. Without these figures being included the magnitude of the change cannot be properly assessed.

This is also true for the estimated job losses. No reference is made to the total estimated agricultural employment. Without this, it is not possible to assess the significance or otherwise of the reported job losses.

The decline in employment in rural communities has been investigated by a number of researchers over the past years with consensus that there is not any single driver (i.e. impact of policy changes) responsible for job loss across the irrigation sector.

Studies by Witter (2011) identifying that the impacts of drought had a 12 times greater impact on job losses than that of buyback policy in the MDB.

Ref: Wittwer, Glyn, 2011. "[Water buybacks and drought in the Murray-Darling Basin of Australia: confusing policy and catastrophe,](#)" [Conference papers](#) 332169, Purdue University, Centre for Global Trade Analysis, Global Trade Analysis Project.

Similarly, the Australian Bureau of Statistics (ABS) has reported that there is an ongoing sector wide decline in Agricultural jobs. In the ABS Labour Force Survey (ABS 2025), the Australian agricultural sector employed 247,000 people on average over the four quarters to November 2025, down 10.3% from the previous year and 11.6% from a decade earlier.

Ref: <https://www.agriculture.gov.au/abares/products/insights/snapshot-of-australian-agriculture#employment-on-australian-farms-is-significant-and-varies-throughout-the-year>

2. Non-Reporting of ecosystem services values of proposed changes

The Marsden Jacobs (2025 Report) page 12, identifies that the proposed rule changes will result in a 1.3 - 4% improvement in ecosystem condition (depending on option chosen). Marsden Jacobs identify the current ecosystem services value of the Barwon Darling River and tributaries at \$7.6 billion - \$17.4 billion. Using this lower value estimate these proposed changes could yield \$100 million outcome.

Ref: www.water.dcceew.nsw.gov.au/sites/default/files/2026-02/NBC-analysis-of-CEP-recommendations-assessment-of-non-market-value-of-changes-in-river-condition.pdf

3. No Counter factual provided

The Economic Report will be enhanced with an estimated cost of the “do nothing” scenario.

A robust economic analysis of any proposed change will also include assessment of the counter factual or the do nothing impacts. No estimates of the economic cost of the worst case “do nothing” or no plan change scenario are presented. The Barwon Darling River is in crisis. “Water extractions and reallocation policies need to be urgently revised to protect the Darling River”. Ref <https://policybrief.anu.edu.au/darling-river-excessive-water-extractions/>.

The counter factual assessment should be provided to better assess the urgency of this proposed policy change. Quantifiable costs that will be incurred include (but not limited to) - those listed below. These need to be assessed, collated and reported to support the informed and robust discussion of changes to these water sharing plans for the NSW Darling River catchments.

“Non action” costs to be assessed and reported include:

- **NSW reputational damage**
- **Loss in Tourism Income (the critical supporting industry to address vagaries in agricultural sector production)**
- **Decline in ecosystem services**
- **Cost of maintaining supply potable water (human consumptive use) to western communities**
- **Government department expenses managing avoidable crisis e.g. fish kills; algal blooms; public concern**

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