



Healthy Rivers Dubbo

PO Box 216 Dubbo NSW 2830

healthyriversdubbo@gmail.com

ABN 80 950 142 324

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NSW Department of Climate Change, Energy, the Environment and Water

Submission re: Proposed Cease-to-Pump Rule Changes for Unregulated Water Sharing Plans

Healthy Rivers Dubbo (HRD) is a grass roots community group dedicated to providing a strong voice for our local rivers, aquifers and wetlands in the Murray-Darling Basin for the benefit of wildlife, plants and people. We pay our respects to Traditional Elders past and present and acknowledge that this land was never ceded.

Support for the Proposed Changes

Healthy Rivers Dubbo strongly supports the proposed gauge-based cease-to-pump (CTP) thresholds in the Gwydir, Lachlan, Macquarie/Wambuul Bogan, Namoi & Peel unregulated water sources This reform will:

- Improve transparency and consistency in pump regulation;
- Prevent arbitrary or variable interpretations of “no visible flow,” which currently leave ecosystems vulnerable during low-flow periods;
- Enhance ecological protection by ensuring threshold flows are reliably maintained to support refuge pools, connectivity, and habitat for aquatic biota.

Ecological and Community Evidence from the Ground

Healthy Rivers Dubbo offers direct observations and on-ground experience in support of stronger protections:

- During the 2017/2020 drought, several of our members camped at Gulgong to monitor degraded flow conditions and provide community presence in low flow periods.
- While on site, these volunteer members assisted Fisheries NSW staff in locating residual populations of Olive Perchlet — an endangered species whose persistence depends on remnant refugia and connectivity in low flow times.
- Our observations confirm that, under current “no visible flow” rules, many critical refuges shrink or disconnect, placing fish populations at high risk of local extinction.
- The fact that community volunteers and fisheries staff needed to search refugial habitat during drought illustrates how precarious these populations are under current rules.

This hands-on experience strengthens the scientific and ecological rationale for more precautionary, gauge-based CTP thresholds that preserve refuge habitats and maintain connectivity during dry spells.

Addressing Irrigator and Community Concerns

We recognise that there will be increased lost pump days for irrigators. However:

- Current modelling of additional lost pump days is misleading because it uses gauged flows already affected by extraction — i.e. flows are already depressed, so the modelling underestimates the true environmental need. The result is an exaggerated claim of negative impact on irrigators.
- In the long run, more reliable base flows will benefit downstream users by improving water security, reducing extreme fluctuations, and sustaining ecological function (which supports fisheries, recreation, tourism, and cultural values).

Recommendations:

- Revise consultation materials to correct for overstated irrigator impacts.
- Communicate clearly the downstream and community benefits of robust CTP rules.

Practical Gauging solutions needed

While the proposed changes are a welcome step forward, hundreds of unregulated water sources across inland NSW still lack adequate cease-to-pump protections. Progress has been stalled by an over-reliance on “gold standard” gauging, which is costly and slow to implement. Requiring up to a decade after installation before a gauge is deemed usable is unreasonable.

As stated in the DCCEEW fact sheets, the Water Management Act is explicit: water sources and the ecosystems that depend on them must be protected. With most Murray–Darling Basin rivers in poor, very poor and declining condition, urgent action is needed. A genuinely precautionary approach must be adopted, using affordable gauging methods so more cease to pump rules can be developed to deliver ecological protection now, rather than waiting decades for “perfect” data.

Recommendations:

To accelerate the strengthening of cease-to-pump rules in priority unregulated systems, Healthy Rivers Dubbo recommends:

- Prioritising new gauges in unregulated water sources and ensuring that unregulated systems are not treated inequitably compared to regulated ones.
- Adopting a precautionary approach that errs on the side of ecosystem protection where data are incomplete or limited.
- Continuing to investigate and deploy lower-cost gauging technologies to enable broader and faster application of cease-to-pump rules across unregulated water sources in inland NSW.

Summary & Conclusion

Healthy Rivers Dubbo wholeheartedly supports the proposed gauge-based cease-to-pump rules as proposed by DCCEEW. The change is necessary to protect remnant flow regimes, maintain connectivity and refuge habitats, and guard endangered species such as Olive Perchlet. Our volunteers' first-hand experience during drought and their assistance in locating remnant populations underscore the urgency of reform.

We urge the Department to ensure timely gauge solutions are installed and adopt the proposed CTP reforms across the more unregulated Water Sharing Plan areas.

Thank you for the opportunity to comment.

Yours sincerely,

Healthy Rivers Dubbo Committee