



**NAMOI UNLIMITED**  
Premier agricultural region in Australia

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## **SUBMISSION FROM NAMOI UNLIMITED ON THE DRAFT NAMOI REGIONAL WATER STRATEGY**

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### **BACKGROUND**

Namoi Unlimited is a Joint Organisation of Councils whose members; Walcha Council, Tamworth Regional Council, Liverpool Plains Shire Council, Gunnedah Shire Council and Gwydir Shire Council are parties to the Namoi Water Alliance, a collaboration of the Local Water Utilities (LWU) that incorporate the Namoi.

As part of the development of the draft strategy, members of Namoi Unlimited were consulted at a Board level and at the Alliance level.

In this submission Namoi Unlimited has attempted to provide advice on the draft which is aligned to the Submission Form available with the draft documents. These comments should be read in connection with specific information provided by any of the LWU members of the Namoi Water Alliance.

It needs to be acknowledged that this group of Councils has been focussed on water and the future of its communities since the organisation was proclaimed in 2018. Comments on the options have also been provided from the recommendations included in the '*Namoi Water for the Future*' Analysis and Strategy.

This submission is prepared from considering the content of the draft and the options proposed. Positions have been developed in consultation with the Namoi Water for the Future Analysis and Strategy, as well as the work of the Namoi Water Alliance.

Comments are provided around each of the options without consideration of the links between the options noted under *potential combinations*. Namoi Unlimited believes that the combination of options will be assessed in more detail under the next benefit and cost phase.

Namoi Unlimited in addition to providing this submission, provides its support to any submission made by Walcha Council, Tamworth Regional Council, Liverpool Plains Shire Council, Gunnedah Shire Council and Gwydir Shire Council as part of this process.

### **INTRODUCTION**

The development of 13 Regional Water Strategies across NSW, is to be commended.

The state-wide approach has been developed to ensure objectives such as;

- Water security, quality and flood management for cities, towns and communities with LWUs,
- Improve water access and reliability for regional industries to enable economic prosperity,
- Incorporate and recognise Aboriginal heritage and assets,
- Improve the health and integrity of environmental systems and assets, including quality – protecting and enhancing the environment, and
- Affordability by identifying the least cost policy and infrastructure options.

Namoi Unlimited recognises that the long list of options must also address one of these objectives, and it is on this basis that comments are made on the options.

#### RECOMMENDATIONS:

The wording of the Affordability objective and its application is not clear.

*“Affordability – identify least cost policy and infrastructure options.”*

*Affordability can be defined as ‘the ability to afford water’, and/or the ‘cost or price of water’.*

Namoi Unlimited believes that access to water and sanitation is a fundamental human right.

Annual charges from Council’s for sewer, water supply and waste are not restricted by rate pegging or land valuations. Councils would normally set prices and any increases of charges with consideration for; delivery from the source, repairs and/or replacement of existing infrastructure and/or services, the provision of new infrastructure and/or services, and any other impacts on operating costs.

Namoi Unlimited recognises that investment in infrastructure and application of policy maybe require the application of a costs and benefits analysis, however if the intent is to progress options that address one of the five objectives, an option deemed to be the ‘least cost’ may be pursued without consideration of the other four objectives.

Any affordability assessment needs to involve an analysis of the socio-economic factors impacting a council’s or a community’s ability to pay.

#### INFORMATION AND MODELLING

DPIE is to be congratulated on the information and modelling developed as part of the consultation with Councils on the draft Namoi Regional Water Strategy.

Namoi Unlimited supports the submissions prepared by the NSW Water Directorate and Local Government NSW (LGNSW) on the draft NSW Water Strategy, and Namoi Unlimited acknowledges that the Namoi document is expected to tackle the key challenges and opportunities.

It should be noted that the draft Namoi strategy was developed prior to the release of the draft NSW Water Strategy, and it is not clear how the documents, priorities and objectives will align and prioritised by the NSW Government.

There are seven priority areas identified in the draft NSW Water Strategy including;

1. Build community confidence and capacity through engagement, transparency and accountability.
2. Recognise Aboriginal rights and values and increase access to and ownership of water for cultural and economic purposes.
3. Improve river, floodplain and aquifer ecosystem health, and system connectivity.
4. Increase resilience to changes in water availability (variability and climate change).
5. Support economic growth within a capped system.
6. Support resilient, prosperous and liveable cities and towns.
7. Enable a future focussed, capable and innovative water sector.

The priorities and actions of the draft NSW Water Strategy: Toward 2050 Priority 1 look to increase the amount and quality of publicly available data, enhance modelling capacity, making more models and data available.

#### RECOMMENDATIONS:

Namoi Unlimited is an advocate for the delivery of transparency and accountability, and access to information and modelling is critical to achieving community confidence. The objectives of the draft Namoi Regional Water Strategy should align with the those included in the draft NSW Strategy.

The priority in the draft NSW Water Strategy for greater engagement, transparency and accountability does not appear to have been addressed in the draft Namoi Regional Strategy.

Namoi Unlimited advocates for consistency in the definitions for water security and reliability across DPIE and specifically between Regional Water Strategies and Integrated Water Cycle Management application.

Namoi Unlimited advocates for further work to be completed to better understand groundwater sources in the region, and connectivity between sources including surface water and alluvial water.

On page 13 of the draft Namoi strategy, the document sets out the key NSW Strategies and common planning assumptions for population, demography, housing, employment, climate, fiscal and economic forecasts. Access to this data and information when developing specific Council and regional plans would enhance alignment. There is also an efficiency dividend to be obtained as well, for example the development of the Namoi Regional Town Water Supply Strategy to complete yield and drought impact assessments as prelude to developing IWCMs for the five Councils, requires the capture and analysis of additional set of population data which appears to be readily available.

The 2019 NSW 2040 Economic Blueprint provides reference to the need to develop a clear position on investment in water recycling and desalination<sup>1</sup>.

#### **Stochastic Modelling**

DPIE are to be congratulated on the development of the stochastic modelling for this plan, and Namoi Unlimited acknowledges that the climate is more variable, the rainfall is changing, higher evaporation and temperature, fire and drought are highly probable and possibly more frequent.

#### **OPPORTUNITIES AND CHALLENGES**

##### **Climate**

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<sup>1</sup> 2019 NSW 2040 Economic Blueprint Recommendation 6.4 p73

Namoi Unlimited recognises the need for diversification and the contribution that diversified industries can make to more resilient communities, and this is recognised as both an opportunity and a challenge.

Industries and businesses are strong supporters of efficiencies. However, Namoi Unlimited cautions that even the promotion of the availability of water or lack thereof, and the challenges for any region can be detrimental to investment and growth.

Government has a role to play in leading any industry transformation and can support diversification. Confidence and investment in the region flows from government investment support particularly in the regions.

#### RECOMMENDATIONS:

State-wide programs and incentives for water saving need to be supported by the NSW Government. Programs to provide Councils and businesses with funding or incentives to assist with the implementation of water saving measures.

#### **Town Water Supplies**

It is noted from the report that in most parts of NSW including the Namoi, the available water is fully committed, and the market is the primary way to secure water that is needed, and it is noted that during normal operations the environment has the highest priority. It is only in extreme and prolonged events does critical human need and essential town water services become the highest priority. The trigger for this change is when the water sharing plan or part thereof is suspended by the Minister.

It is the experience of our members that it is time that these triggers are reviewed.

Councils in the Namoi have for some time been working with the community on reducing demand for water and conserving supplies. As a group of Councils, they have applied a consistent set of restrictions and descriptions, and Councils retain decision making regarding application of restrictions. The members of Namoi Unlimited subscribe to marketing and information resources of Smart Watermark to drive water saving initiatives. Noted is the significant work and investment Tamworth Regional Council, specifically around water use auditing with major users, and the whole of community response to water savings. This is not recognised in the system of allocations, and not until a critical event is declared.

Councils need to be recognised for their investment and management of supplies. Businesses and residents need to be rewarded with incentives aligned to water saving and adoption of new technologies.

#### RECOMMENDATIONS:

The draft Namoi plan includes three objectives relating to the provision of water and support for LWU, the provision of water for regional industry, and the provision of water to recognise Aboriginal heritage and assets, this needs to be recognised in the priorities for water sharing.

#### **Water Security and Reliability**

If it is accepted that the water system is a capped system, addressing the priorities of the draft NSW Strategy and the draft Namoi strategy, the opportunities for the use of recycled water, and having the systems, policy and regulation in place for the safe handling of recycling water needs to be an objective.

The draft NSW Water Strategy will provide support to water utilities to diversify sources of water<sup>2</sup>.

It is noted that two members of the Joint Organisation, Gunnedah and Liverpool Plains are reliant on groundwater.

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<sup>2</sup> Draft NSW Water Strategy Action 6.6 Proactive support for water utilities to diversify sources of water

## RECOMMENDATIONS:

Namoi Unlimited advocates for an objective that supports the exploration and development of recycled water. Whilst it is recognised that the acceptance of recycled water for drinking water requires community acceptance a 'Recycled Water on Gravel Roads' project conducted by Namoi Unlimited explored community sentiment for using recycled water for municipal and other users (where it is deemed no threat to human health or the environment) was acceptable.

Recycled water initiatives and desalination is noted as an opportunity for Sydney, however perhaps the greatest opportunity for safe recycled water use can occur in regional areas.

There needs to be significant investment in further developing our understanding of the groundwater systems, and making this information publicly available.

### **Connectivity to the Barwon-Darling system**

It is noted in the plan that end of system connectivity specifically during dry times, is difficult, modelling suggests there may be no end of system flows 40% of the time – and yet we persevere with it, maintaining substantial releases from the top of the catchment, and pray they continue to make it to the end.

### **Environmental Needs**

It is noted from the draft plan, that the overall ecosystem of the Namoi is poor, and whilst there is a focus on floodplain harvesting regulation in the system, the current environmental practices occurring in the system need in-depth analysis. Current practice to support the environment have been occurring since 2008

## OPTIONS

It is noted that the list of options in the draft strategy is significant, and any future analysis of these options will be based on assessing;

- How each option will achieve the objectives of;
  - Water security, quality and flood management for cities, towns and communities with LWUs,
  - Improve water access and reliability for regional industries to enable economic prosperity,
  - Incorporate and recognise Aboriginal heritage and assets,
  - Improve the health and integrity of environmental systems and assets, including quality – protecting and enhancing the environment, and
  - Affordability by identifying the least cost policy and infrastructure options.
- A risk assessment; and a
- Feasibility, costs and benefit analysis

Namoi Unlimited acknowledges that this long list of options, makes this consultation process complex however alignment between the options and the objectives of the draft Namoi Strategy is not presented highly, and that if this is the first part of assessing the options it needs to be clearly stated.

'Support' indicated means that the option is fully supported by the members of Namoi Unlimited. 'Part-support' means that the option may sound feasible however, further consultation with members of Namoi Unlimited is required. 'No support' means that Namoi Unlimited believes the option is not a priority.

## RECOMMENDATIONS:

The options are identified primarily to the delivery of objectives of the Strategy.

#### SUPPORT GOVERNMENT COMMITMENT 1: NEW DUNGOWAN DAM

New Dungowan Namoi Unlimited supports the development of Dungowan Dam and intra-regional pipelines to manage water security and quality for town water, regional industry and economic prosperity.

#### SUPPORT OPTION 2: INTER-REGIONAL PIPELINES, INCLUDING INLAND DIVERSION OF WATER FROM THE MACLEAY OR BRANARD RIVERS TO THE NAMOI REGION

Investigate options to develop large scale pipelines that could connect water supplier from different catchments, such as the Macleay to the Namoi, and the Manning to the Peel or a pipeline the Great Artesian Basin.

#### SUPPORT OPTION 3: INTRA-REGIONAL PIPELINES

Increase connections between water supplies to provide access to more than one source to increase security and reliability for towns and industry.

#### SUPPORT OPTION 4: SUSPENSION OF WATER SHARING PLAN PROVISIONS FOR PLANNED ENVIRONMENTAL WATER FOR CRITICAL NEEDS IN THE PEEL RIVER

There are complexities within the water sharing plans and these water sharing plans are the rules, open and constructive discussions with local government on the impact of water sharing rules in an extreme event are difficult.

Case in point is the Water Sharing Plan for the Peel Regulated River which requires a minimum release of 3ML per day from Chaffey Dam for the environment, and Tamworth Regional Council has been advocating that these daily minimum release rules should be suspended in extreme events. This was done in December 2019 and remained in place until June 2020.

However, the process and advocacy required for this action was significant on Tamworth Regional Council, and the impacts of the extreme event for the residents of Tamworth and the business community. Critical human needs to be equitable to that of the environment.

#### SUPPORT OPTION 5: INVESTIGATE THE USE OF ADVANCED WATER TREATMENT TECHNOLOGIES FOR TOWNS

This option would investigate opportunities for the installation of advanced water treatment technologies. The Tamworth and Baiada case has been investigated and any further investigation should incorporate the work undertaken to date.

There are no incentives for a community to implement significant programs and investment in water saving, whilst the water saved is being provided to another user.

#### SUPPORT OPTION 6: REUSE, RECYCLING AND STORMWATER PROJECTS

The capture and reuse of stormwater, runoff and wastewater in urban areas and non-potable water is being released into local waterways, Tamworth Regional Council and Gunnedah Shire Council are using recycled water for farming.

The option includes working with Local Water Utilities to identify opportunities. Namoi Unlimited is currently conducting a project to test the use of recycled water on gravel roads, the regulatory process to undertake such a project has been difficult.

It should also be noted that the regulatory process and action is also a priority of the new Town Water Risk Reduction Program.

There are no incentives for a community to implement significant programs and investment in water saving, and the water saved is being sold and provided to other users.

#### NO SUPPORT OPTION 7: CONNECT THE PEEL REGULATED RIVER SYSTEM TO QUIPOLLY DAM

Namoi Unlimited has commenced a regional project with the Councils to assess the level of security and reliability for all towns across the Namoi region, and to complete secure yield analyses for all Councils.

This option doesn't consider the impacts of an expanding agricultural, mining, freight and logistics sector in the Liverpool Plains Shire Council, and the demands currently on the Peel River System.

#### NO SUPPORT OPTION 8: MANAGED AQUIFER RECHARGE INVESTIGATIONS AND POLICY

Managed aquifer recharge involves the reintroduction of surface water and runoff water into aquifers to more efficiently store and access available water in aquifers. As well as investigations this option would also include the development or associated policy and frameworks for such to occur.

This is not a preferred or supported option from Namoi Unlimited as the options and considerations are significant.

Namoi Unlimited supports the ongoing investment into understanding aquifer system, and providing that information to Councils as an initial step to any exploration of managed aquifer recharge, as described in Option 9.

#### SUPPORT OPTION 9: RELIABLE ACCESS TO GROUNDWATER BY TOWNS

Support is provided to develop options to provide reliable access to groundwater.

The provision of and access to ongoing research, data and modelling to predict the impacts on groundwater appears to be an omission in this option.

Consultation for the Water for the Future strategy and the Namoi Regional Water strategy identified high concerns for groundwater, including the deteriorating sources.

This is needed to facilitate the strategic approach to the future provision of groundwater for towns.

Groundwater resources are also recognised as the major source of water for agricultural activities.

As noted above, Councils in the Namoi are preparing secure yield analysis as part of the Namoi Regional Town Water Supply Strategy.

Namoi Unlimited also sees that this option should address a number of other objectives not mentioned including; affordability, protecting and enhancing the environment specifically around understanding system connectivity, and the availability of water for Aboriginal water rights.

#### SUPPORT OPTION 10: INVESTIGATE OPPORTUNITIES FOR DUAL WATER SYSTEMS

Support is provided for recycling options, however current considerations and costs associated with this consideration are a deterrent even for the larger regional centres. Namoi Unlimited also supports investment in treatment and regulation processes, so that opportunities are cost effective, learnings are transferable.

#### PART SUPPORT OPTION 11: INVESTIGATE THE DEVELOPMENT OF A WATER ACCESS LICENCE FOR CRITICAL HUMAN NEEDS

This option was not discussed with the Councils, and would appear on the surface to prioritise human need which occurs in the current framework under Extreme Events. If the proposal is to lift the recognition of critical human need in normal circumstances, and as a measure to better prepare for Extreme Events, Namoi Unlimited would support this option for further careful consideration and investigation.



#### NO SUPPORT OPTION 12: INVESTIGATE GROUNDWATER DESALINATION FOR INDUSTRY

The considerations in this option proposed by DPIE – Water would appear to be a lower priority to those options proposed by Councils.

#### PART SUPPORT OPTION 13: JOINT EXPLORATION FOR MINERALS AND GROUNDWATER WITH THE NSW GEOLOGICAL SURVEY

Any option that provides for the further assessment and understanding of potential sources is encouraged.

#### PART SUPPORT OPTION 14: WATER SECURITY FOR SMALL COMMUNITIES

During consultation between Councils and DPIE Water for the development of this draft, water security for small communities was discussed in the context of affordability. This option seeks to explore the future development of connected water supplies to reticulated systems, with the outcome being that during periods of drought water carting would be limited.

This option would need detailed investigation and require substantial funding from the State and Commonwealth Government, as well as consideration of the community's capacity to provide ongoing funding. Small communities will logically have a declining population and therefore the capacity of the residents to pay for a reticulated system post development would need to be explored.

#### PART SUPPORT OPTIONS 15-19 AND 23

Namoi Unlimited supports considering these options together.

Namoi Unlimited recognises the role that native fish, flora and other fauna play in the health of the river systems, and acknowledges that the findings of this draft report are that the river system needs assistance.

Fish also contribute to the natural and tourism amenity of the region.

Namoi Unlimited supports this proposal as a partnership with communities and specifically Aboriginal communities.

#### PART SUPPORT OPTION 20: MODIFICATION AND OR REMOVAL OF FLOODWORK STRUCTURES CAUSING ADVERSE IMPACTS

Part support is provided acknowledging that the modification or removal of existing floodwork structures may present considerable cost and risk. Any option that potentially will cause permanent loss of production capacity needs to be carefully considered, and stakeholder consultation a necessity.

#### NO SUPPORT OPTION 22: IMPROVE CONNECTIVITY WITH DOWNSTREAM SYSTEMS

The suggested intent of this option is to enable critical human and environmental needs to meet downstream during extreme and dry periods, understanding that the Peel catchment provides approximately 50% of the inflows to the Namoi River. The Namoi River provides approximately 25% of the inflows into the Barwon-Darling over the long term.

Some of the potential options include;

- Establishing additional end of system flow targets
- Using environmental water to achieve connectivity
- Using temporary water restrictions more frequently

Namoi Unlimited supports the provision of water for the environment, however during extreme and dry periods the impacts of water restrictions on our communities have been significant.

Further investigation of this option is required, specifically around equity across all users, Namoi Unlimited supports the position of Tamworth Regional Council that the impact of long periods of restrictions is considerable. And where communities invest and undertake programs to support restrictions, the water saved can not be sold to other users to maintain their access.

The assessment of other contributories in the system and the overall outcomes need to be equitable.

#### SUPPORT OPTION 23: REVISE WATER SHARING PLAN PROVISIONS FOR PLANNED ENVIRONMENTAL WATER

Namoi Unlimited supports the position of Tamworth Regional Council to assess options for review and identify any provisions for the Peel Regulated River Water Source and the broader review of the Water Sharing Plan.

Namoi Unlimited also believes that this option also addresses other objectives.

#### PART SUPPORT OPTION 24: IMPROVE UNDERSTANDING OF WATER USE IN THE UNREGULATED WATER SOURCES

Namoi Unlimited supports improving our understanding of any water sources, and particularly their role in connecting regulated systems. However, the costs and benefits need to be carefully investigated and analysed, before any new process is imposed.

#### NO SUPPORT OPTION 25: ABILITY TO REDIRECT SUPPLEMENTARY FLOWS THAT ARE IN EXCESS OF NEEDS

No support is provided until the extent to which the socio-economic impacts are thoroughly investigated.

#### SUPPORT OPTIONS 26, 27, 28 AND 29: IMPROVED UNDERSTANDING OF GROUNDWATER PROCESSES, THE IMPLEMENTATION OF A GROUNDWATER QUALITY MONITORING PROGRAM, REDUCING RISK OF SEDIMENT COMPACTION DUE TO OVER-EXTRACTION AND PROTECTING ECOSYSTEMS THAT DEPEND ON GROUNDWATER RESOURCES

Any options to improve our scientific understanding of groundwater is supported, especially where it is addressed with transparency (option 44).

#### SUPPORT OPTION 30: IMPROVING INFORMATION ABOUT IMPACTS OF STATE SIGNIFICANT DEVELOPMENT AND STATES SIGNIFICANT INFRASTRUCTURE PROJECTS ON WATER

Namoi Unlimited supports improving information about the impacts of SSD and SSI projects on water, however any additional regulation should enable development rather than impede development.

The access to information about water also applies to Council strategic planning and its planning and development functions.

#### SUPPORT OPTION 31: WATER EFFICIENCY PROJECTS (TOWNS AND INDUSTRIES)

The considerations around Councils and the development of IWCMs will provide information to assess the viability of opportunities. Programs and funding support for Councils would be necessary, and Namoi Unlimited also supports the development of incentives to improve water efficiency.

#### PART SUPPORT OPTION 32: IMPROVE WATER SUPPLY RELIABILITY

This option seems to consider a number of supply options for communities beyond the boundary of the Namoi region. Part support is provided as long as the options will reduce the difficulties in delivering water at the end of the system, and any benefits to be progressed will also benefit communities in the Namoi region.

#### SUPPORT OPTION 33: REVIEW OF WATER MARKETS IN THE NAMOI

The Water for the Future report notes a number of water market distortions from the implementation of a water trading system, noting that a significant portion of licences are not used or traded on an annual basis, and that this limits the liquidity in the market and increases trading costs, and diminishes the availability and security of water.

Whilst support is provided for a review, it is not clear in the development of the draft strategy about how the Commonwealth Government will respect or align its considerations and responsibilities around the new set of State Water Strategies.

#### SUPPORT OPTION 34: REVIEW URBAN WATER RESTRICTION POLICY

Namoi Unlimited supports the development of a consistent policy on water use standards and temporary restrictions triggers and levels, to the extent that, there are consistent standards and triggers in place across the five member Councils involved with the Joint Organisation.

Namoi Unlimited also believes that Joint Organisations could play a role in facilitating and negotiating this option across regional Councils.

Namoi Unlimited has no additional commentary on the following options.

- SUPPORT OPTION 21: IMPLEMENTATION OF SURFACE WATER QUALITY MITIGATION MEASURES
- SUPPORT OPTION 35: IMPLEMENTING THE GREAT ARTESIAN BASIN STRATEGIC MANAGEMENT PLAN
- SUPPORT OPTION 36: NEW DROUGHT OPERATIONAL RULES (NAMOI AND PEEL RIVER)
- SUPPORT OPTION 37: REVIEW OF SURFACE WATER ACCOUNTING AND ALLOCATION PROCESS
- SUPPORT OPTION 38: INVESTIGATION OF LICENCE CONVERSIONS
- SUPPORT OPTION 39: IMPROVED DATA COLLECTION
- SUPPORT OPTION 40: TRAINING AND INFORMATION SHARING PROGRAMS
- SUPPORT OPTION 41: MAINTAIN AMENITY FOR REGIONAL TOWNS DURING DROUGHT
- SUPPORT OPTION 42: IMPROVING UNDERSTANDING OF LOW WATER AVAILABILITY ON WATER DEPENDENT INDUSTRIES
- SUPPORT OPTION 43: SUSTAINABLE ACCESS TO GROUNDWATER BY ALL USERS
- SUPPORT OPTION 44: IMPROVED TRANSPARENCY IN MANAGING GROUNDWATER RESOURCES SUSTAINABILITY
- SUPPORT OPTION 45: LAND USE CHANGE AND POPULATION GROWTH IMPACTS ON WATER RESOURCES

In relation to the content and options for improving Aboriginal people's access to water and cultural water rights, engagement and consultation with Aboriginal people is essential to determine, amend or replace options provided in the draft document.

#### SUMMARY

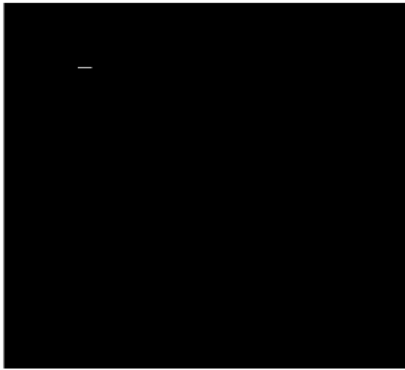
Namoi Unlimited congratulates the NSW Government on the development of this draft for consultation and believes further consultation on this draft is required.

Namoi Unlimited acknowledges that Local Water Utilities are an important part of managing and delivering water to the communities in the Namoi region, however consultation on water across the Namoi needs to be broad enabling all stakeholders to contribute to this strategic document, and its long-term intent.

Our sincere thanks to Shagofta Ali Acting Director Regional Water Strategies – Northern and staff within the NSW Department of Planning, Industry and Environment for collaborating with the Joint Organisation and Local Water Utilities during the development of the draft.

If you have any questions in relation to this submission, please contact [REDACTED] our Executive Officer on [REDACTED] or by email to [REDACTED].

Yours sincerely

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