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To: [DPIE W Regional Water Strategies Mailbox](#)
Subject: Your submission for Namoi Regional Water Strategy
Date: [REDACTED]

1. Information on confidentiality and privacy

I give my permission for my submission to be publicly available on the NSW Department of Planning, Industry and Environment website.: Yes

I would like my personal details to be kept confidential.: Yes

2. Your details

Email address: [REDACTED]

Name: [REDACTED]

Address: [REDACTED]

Contact phone number: [REDACTED]

Do you identify as an Aboriginal person?: No

Are you an individual or representing an organisation?: Individual

3. Organisation or business details

Who do you represent?:

If you selected Government,

please
clarify.:

If you
selected Peak
representative
organisation,
please
clarify.:

4. Draft Regional Water Strategy objectives and vision

Do you
support this
vision for the
Namoi No
Regional
Water
Strategy? :

If no, please
outline your
vision for the
long term
management
of water
resources in
this region?:

The Namoi Valley is supported by a diverse range of surface and groundwater resources. Each of these different sources contribute to meeting a range of needs across our community including critical human needs, economic activities and environmental requirements. Water is managed through the use of Water Sharing Plans using water models over long term to assess rule options and access to ensure compliance with relevant state and federal limits. The rules in the initial plans were developed through an inclusive and iterative process of engagement with the community. These plans are recognised as not being designed to cope with extreme water shortages. The development of water infrastructure in the Namoi Valley largely occurred under different policy settings. The development of the regional water plan was done entirely without input from the community and the draft plan is presented with little detailed evidence regarding why options were considered and how the plan will prioritise water needs in extreme events, and the trade-offs required. The principle of balancing water sharing across all three elements of social, economic and environment is in line with the Water Management act 2000, however there is no context in how this is achieved in variable climate situations in this plan. Developing a “rule set” to cater for extreme events is impossible hence the focus on long term plans and drought management planning. The concept of augmenting resources to ensure the base needs of the community and environment are met in these circumstances is supported, however the cost benefit and value of these solutions has not yet been presented. It is difficult to have a strategy that does not have a clear decision-making matrix. The Regional Water strategy appears to have focussed its engagement on local government, whilst some meetings were held in regional towns these were poorly attended. That an option needs to address any one of the objectives can lead to adverse impacts on other sectors. How the options are considered in a matrix of decision making is not clear in the strategy. The vision itself is simple and generally sufficient, but lacks context and outcomes sought to evaluation of these in drought situations.

5. Information and modelling used to develop the Namoi Regional Water Strategy

Page 11. “The Namoi River plays a crucial role in providing water for critical human and environmental needs downstream, contributing on average 24% of

the flows into the Barwon-Darling River.” This statement lacks context, the Namoi contributes a significant volume of water in flood and high flow. It’s connectivity in low and medium flows is limited given the length of the system. Practical experience demonstrates the limits to being able to “recreate” or even “augment” flows to achieve connectivity when the system is naturally not connected. Page 13 “More than one quarter of all surface water used in the Lower and Upper Namoi comes from water diverted from floodplains and intercepted before it enters rivers and creeks.” Please provide the source of this statement given the model data has not been provided to the community to review, nor has the FPH Namoi model been peer reviewed. Page 14.

Do you have any comments about the information used to develop this strategy?:

“Environmental water releases on top of high-flow events can help to deliver water to important environmental assets along the river and contribute to end of system flows.” The volume of environmental water has significant limits on what can be achieved at end of system, any achievement of flow outcomes can only occur if done in conjunction with other users. It is impractical to make this statement as the volume held cannot contribute to end of system flows or create end of system flows. This statement should be removed. “While some industries can adapt to annual and seasonal variations in water availability, most regional towns do not have the same ability to adjust.” Again this statement is misleading, the towns of the Namoi, Gunnedah, Boggabri, Narrabri and Walgett all have access to Groundwater they have a significant advantage in the diversity of water resources available to them. The largest issue is the groundwater quality at Walgett which can be resolved with proper treatment processes or off river storage downstream. The river does not under natural conditions supply water to the end of the system during these periods. Water NSW in the lead up to managing the last remaining allocations committed to undertaking a survey of all stock and domestic users downstream of Wee Waa to determine their water needs. Namoi Water has done this work and understands the number of impacted residents is small and the government funding to provide alternative drought supplies provided opportunity to adjust to limited water availability. It is forgotten that in times past there was no adjustment when the river was dry, those pastoralists along the river destocked and left their properties when there was no water. Today we have the ability to access groundwater and cart water as necessary. Quantifying the number of households affected and assessing their capacity to access alternative supplies is an important component of drought preparedness for the next dry period. In terms of surface water impacts the Town of Tamworth with the augmented Chaffey and Dungowan dam

Please provide details if there is additional information you think we should consider?:

There is limited data from these studies. The use of this data until costed and properly assessed is again misleading.

6. Stochastic modelling method

“Environmental water licences are used to supplement environmental water set aside by the rules in the water sharing plans.” Please clarify which

Do you have any comments about the modelling method used to develop this strategy?:

“environmental water” the RWS is referring to? There is only the minimum daily flow rules in July that is “environmental water” and to date the CEWH have rarely used their water to augment this flow. It has largely been about maintaining habitat in the upper reaches or adding onto the September irrigation flow to create greater flow and refugia during 2018 season. “Many of the rivers throughout the Namoi region and associated Barwon-Darling system already experience periods of no flow;” add under natural conditions. Page 90 It would have been better in the plan to provide how the CEWH have used their water to compare entitlement to allocation, to use. Perhaps this can be added in the final draft as this is important context so as to understand the role this water can plan in environmental outcomes. First flush – “Rivers and waterways were reconnected. • By the end of June more than 583 GL of inflows reached Menindee Lakes, which enabled the Lower Darling River to restart flows” Lets reflect and in the interest of transparency, note that the original target for critical human need was 165gl. Further that the flow forecast was out by some 180gl during the event and failed to take into account Qld inflows. The Namoi Water excel spreadsheet provided greater accuracy of flow forecast than those from official channels, why? Because of regional knowledge, because of an understanding of how water moves in and around different systems, the management of extreme events is hampered when managed from Sydney without sufficient engagement and listening to the advice given on the ground. Further to correct the record on farm storages increased because of rainfall, the embargo on FPH was poorly managed, create distress and whilst the protocols may now be in place to improve this process in another 10 years when it occurs again those same staff will have moved on. However the farmers will still be here, with the knowledge. Page 103 Please advise where the 150gl of high security unregulated water is situated. Page 104 again where is the context? Of the 1% held by the Mines how much water have they accessed annually over the life of the water sharing plan? What percentage was this water of the overall water for that year used? Namoi Water has a graph that demonstrates that this source of water is a high percentage of take during low water years and the delivery cost through the constriction at the gap is high, the conveyance has 100% losses in a dry system. This report lacks sufficient detail and understanding of the nuances of water management during drought and the lack of engagement with water users is a cause for concern in terms of the options developed. Groundwater.

Page 108 “This is more than twice the number of entitlements as the neighbouring Macquarie-Castlereagh alluvial system.” Why would the RWS compare the Namoi Groundwater a large paleochannel system to the Macquarie which has a very limited groundwater resource? This is bizarre and should be removed. The Namoi Alluvial Groundwater system is large deep system and the geology has no reference to the Macquarie, was this comment included to be divisive to the uninformed reader? Again Figure 38 appears to have been written by someone that is not informed in terms of how the overall management of the Namoi Groundwater resource occurred. Using zone 3 as an example where there was a small breach (180 meg) which given the circumstances was minor over a significantly dry period (unlike other groundwater areas such as Murrumbidgee or GAB in Moree area). The zone was restricted as per the rules, however what your strategy fails to mention is the work the farmers undertook the three years prior to proactively manage

Is there any additional information that you believe could help us assess the benefits and disadvantages of draft options?:

their water access to minimise the impact on the resource. It is a missed opportunity to reflect on the voluntary and cohesive nature of the farmers actions to protect the resource. Further your report fails to mention their voluntary embargoing during a flow event in this period even before the department acted. This shows the lack of engagement with all stakeholder on the RWS creates significant gaps in how a regional water strategy represents data and considers future management actions. The strategy is about people, it is the people of the Namoi that have shouldered the drought management on a day to day basis and this report should reflect that, it should generate inclusiveness and support from the ground for the strategy by recognising the good work done in the recent drought. The table further demonstrates that even in the worst drought there was minimal breach of LTAAEL and given the timing of this report it could have shown that zone 3 had already returned to compliance in the next year. "The Namoi region has a number of unregulated rivers and creeks where streamflow gauges are not installed and water extraction is not measured." Given the context of the Water reform process and requirement for metering this statement is now obsolete in relation to metering. The issue of gauging is a very live issue because farmers cannot be compliant without working gauges, "Water Live" the tool available to check current gauging stations is referred to was "Water Dead" by farmers in the region for it's constant failure to read water flow in a timely manner and report this to be useful. The fact that the department have the work approvals for all of the unregulated systems, you have the pump limits and data it would not be hard to assess access. A more detailed response will be provided following a review of modelling used, which to date has not been provided in sufficient detail.

7. Opportunities and challenges for water management in the Namoi region

Do you have any comments on the opportunities, risks and challenges identified?:

Connectivity is not defined, how can you have as a significant option to improve connectivity when the context of connectivity has not been provided? How can the Namoi contribute to improved connectivity in periods of low flow when our system is already improved in terms of low flows in catchment outside natural periods? "While considering a range of options to maintain and improve the resilience of the region's water resources, we have also included options that take the next step in identifying innovative solutions that will add value to existing industries, support emerging industries and generate greater benefits that extend across the community." The strategy clearly states the focus of the engagement was with councils, how then can the objective above be met when the diverse range of stakeholders have had one brief presentation and limited detailed information on the modelling presented. The aims of this strategy come at a cost, where increased connectivity is sought the report appears to take steps to identify the impracticality of supply water through to the end of the system in extreme drought but not in real terms of impact. Thus the solutions around off river storage have not even been contemplated, nor has the historical barriers to increasing river storage for these communities. The report fails to consider cost benefit, the Namoi irrigators already have the highest price water in the Murray Darling Basin, we cannot and do not support additional weirs, they are financially unfeasible for the irrigation community. They provide no real benefit in terms of supply and they require fish passage that is already gold plated. Option 22 has no detail in terms of how it is relevant to the Namoi System, surely given the report on fish deaths which is

primarily a function of MDBA management of the lakes, the lack of fish passage for fish trapped in the weir 32 pool and an environmental circumstance (inversion) that lead to fish deaths in the worst drought on record for many communities. It is beyond belief that this option could wholly recommend a report that has not been fully costed or assessed as to the practicality of the solutions proposed.

Are there any additional opportunities, risks and challenges that we should consider and what options could address these?:

Too many given lack at context in this report.

8. Draft Namoi Regional Water Strategy options

Which five (5) options do you think are most important?:

Support Option (5) Support Option (6) Support Option (18) Support Option (30) Support option (31)

Please comment on why you think these options are most important? :

Off stream storage should be considered for Walgett not a weir. Carp virus should be considered (interesting that invasive pest management not included in the strategy?) Support Option (18) + insurance scheme for fencing (most landholders will not participate because once installed the fences are often flood impacted). There could be an appropriate scheme to ensure the replacement of the fencing material with the farmer providing labour as a solution.

Which five (5) options do you think are least important? (If any):

Option 23 Option 25 Option 29 Option 32 Option 38 Option 41 Option 44

Please

Option 23 – There is limited capacity in this report to consider review of WSP rules, this report is written without context or the level of detail required. This is a general statement made without supporting evidence as to the impact of the changes, the consequences to towns like wee waa Narrabri etc. Option 25 – This has serious and significant impacts and has been removed from the Water Resource Plans in all major inland river plans. It is concerning it has been included in this report as a genuine option when it changes the legal rights of supplementary access in the Namoi. There are better ways to achieve environmental outcomes, that don't involve changing water rights. Option 29 – refer to comments the GDE are not validated via groundtruthed data and the department stated clearly these maps can only be used recognising that they are possible GDE not proven. Option 32 – Bluehole where is the data for this project? Who funds it and what volume of water is anticipated to come as a

comment on why you think these options are least important? :

result of it. Irrigators will not support augmentation projects because we already pay the highest water charges in NSW MDB. We do not want Mollie weir to be raised we can't afford it, we do not support re-reg north of Boggabri as it is in an area of heavy groundwater loss and would only be used to supporting mining it has no relevance to the downstream town requirements it is too far from Walgett and Narrabri uses groundwater. Option 38 - will create untold issues who even raised this? Option 41- Narrabri's recreation spaces did not suffer in the drought as there was sufficient groundwater and the council sold their General Security licence annually for significant profit and put the money into reducing losses through the sewerage system in the town. The proposal for a weir on Narrabri creek was demonstrated to have created massive issue this year when the creek flowed backwards from doctors creek all the way to the RSL club, a weir would have meant Macdonalds KHH nursery and the crossing theatre may all have gone under water. Option 44 - we already have transparency, we have a good hydro who has helped keep water users informed and the new data available on line provides sufficient information for any interest party to view.

Do you have any comments on the draft options?:

The draft list is inadequate even as a first cut of options, Namoi Water suggests that a meeting should be held to discuss how these options were developed and the lack of context provided in how the community needs to respond. Is this a case of highest numbers win? If that's the case we will ensure every farmer submits individually or is it that Namoi Water represents 800 farmers that our submission will be weighted accordingly?

9. Option combinations

Do you have any thoughts on how the options could be combined with other options?:

This is an irrelevant question given the lack of context in the report.

Are there additional options that we should consider?:

This is an irrelevant question given the lack of context in the report.

10. Other comments

- diversification of water supplies (solution Dungowan) Namoi Water does not have a view on the dam upgrade expect to state that there is no clarity regarding where the "extra" water is coming from? There remain significant barriers to this project and they should be assessed carefully. - Namoi Water members do not support any proposal to merge the water storage infrastructure of the Namoi and the Peel. Several past submissions have been made on this matter and to quote one Peel farmer "why would you give the Namoi a broken leg too? We already have one there is no sense in crippling two valleys". This relates not only to pricing but also market issues and the real risk of water shift. The problems of the Peel are clearly created by IPART keeping the fixed charge low and increasing the number of sleeper licences to the point that there

Do you have

any other
comments
about the
Namoi
Regional
Water
Strategy?:

are such a small number of Peel farmers actually farming primarily due to the cost of water and poor returns for the industries available in the climate/environment unless they are of intensive or industrial nature. - protecting natural systems such as improving river connectivity, please provide how you intend to do this without having an impact on the existing water licence reliability? The removal of fish barriers is laughable, Namoi farmers committed to three weirs when Keepit was upgraded (Mollee, Gunidgeria and Weeta Weirs) for an estimated cost of \$10 million for the fish offset. Given Fisheries and Water NSW have spent the last 8 years debating the quantum of fish passage the price of Mollee blew out to \$10 million and we still have no evidence that the fish are passing through because there is no baseline data. Further Gunidgera has been delayed over the last three pricing determinations and now is under a new cost sharing of 80% being funded by the farmer instead of 50/50 as per the agreement when the fish offset was approved. This does not meet with your principle of affordable cost structure. How government can grossly inflate the cost of infrastructure to such an extent by bureaucratic delay is beyond an episode of utopia and these issues should be clearly noted in this report.

11. Referral

How did you
hear about the
public
exhibition of
this strategy?:

Communication from peak body

12. Additional information

Upload
supporting
documents:

No file uploaded