Healthy Rivers Dubbo

Dubbo NSW 2830

[redacted]

Submission

Namoi regional Water Strategy

Healthy Rivers Dubbo (HRD) is a grass roots community network 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 Elders past and present, and acknowledge that this land was never ceded.

HRD is pleased to have the opportunity to comment on the NSW Government's draft regional water strategy (RWS) for the Namoi.

Dungowan dam

HRD strongly objects to the inclusion of Dungowan dam and pipeline proposal being listed as a commitment of the RWS. This proposal should be listed as an option, with no greater prioritisation than other options in the RWS.

If the dam proposal were presented as an option instead of a commitment, HRD would not support it.

Recently the Productivity Commission's draft report on National Water Reform used the Dungowan dam proposal as a case study for flawed decision making.

The dam is estimated to provide on average 6,000 megalitres of water a year, at a cost of more than $60,000 per megalitre. By comparison, the current market price of one megalitres is $1,341.

The report also pointed out the inescapable truth – that the water system is fully allocated, and any promise of 'new water' from this dam is an illusion. The RWS does not point out the fact that the system is completely allocated and cannot stretch to existing commitments, let alone projected growth in demand.

Rather than spend $484 million on a dam, the same volume of water could be bought from entitlement owners for just $10 million dollars a year.

The business case must include impacts of the project on a variety of cultural, environmental and socio-economic values in the catchment.

It is critical that the business case for the dam be released to the public before any finding decision is made. Releasing the business case would align with the draft NSW State Water Strategy first priority - *'to build community confidence and capacity through engagement, transparency and accountability'.*

Climate Change

Water is becoming scarcer, and will continue to do so at an exponential rate. This RWS should be finding ways to reduce the demand for water, not attempt to sure up and expand water extractive industries.

The climate change predictions included in the RWS are referred to as the worst case scenario, however the impacts of human made climate change are encroaching rapidly. There are critical tipping points looming ahead which will likely increase the impacts of climate change exponentially. Given the experiences of severe drought in recent years, HRD believes the forecasts in the RWS are more likely to be reality in a few short decades.

The RWS explains that the number of times Keepit and Split Rock dams fall below 5% could more than double, while Chaffey dam will be below 20% for long periods.

Page 37 of the RWS states "*just relying on our historical data to make water management decisions no longer represents the best course of action.*"

If NSW were to take its own advice and make water management decisions with climate change as a consideration, it would be clear that building a new dam would be a complete waste of time and money, as there will be far less water in the dams that already exist.

Environmental Outcomes

Water for the health of the river is the highest priority of the Water Management Act (WMA), and should also be the highest priority of the RWS.

The RWS identifies that river health and native fish populations are in poor condition, and that the Namoi contributes 24% of inflows into the Barwon Darling River system.

Given that the health of the river is the highest priority under the WMA, HRD strongly supports these options that would improve river health, native fish, waterbirds and wetlands:

- Option 22: Improved connectivity with Barwon-Darling
- Options 15, 17, 18 & 19: Implement the Native Fish Passage Strategy, address cold water pollution, encourage riparian restoration, screen pumps
- Option 20: Remove floodplain structures that cause adverse impacts
- Options 23,24,25: Improved management of water for environmental outcomes
- Option 21: Restore water quality
- Option 16: incentives to landholders to protect & restore water dependent ecology
- Option 30: More transparency on impacts of major development on water sources
- **Missing Option**: improved connectivity & management of billabongs and lagoons
- **Missing Option**: recover the remaining 9.5 gigalitres needed under the Murray Darling Basin plan for environmental use.
- **Missing Option**: Floodplain harvesting management rules that protect downstream connectivity flows.

First Nations

HRD Strongly support all options that improve First Nations access to water supply and cultural water; improve capacity, engagement and employment in water management; and that recognise the significance of cultural knowledge and improve cultural outcomes:

- All options from 46 to 56.

Groundwater

The Namoi is the region most heavily dependent on groundwater. During the 2017-2020 drought, groundwater levels in some parts of the Lower Namoi were the lowest ever recorded.

Groundwater extraction for irrigation has breached water sharing plan limits in parts of the Upper Namoi.

There is are significant knowledge gaps around the connectivity between surface and groundwater. A recent study of rivers in Victoria published in the journal Science[1] reveals the worrying inability of rivers to recover years after droughts break. The report pointed to the possibility that taking more groundwater in drought is impacting the fresh water cycle long after the rains return.

"... water catchments are more complex than we thought," Dr Peterson said.

"We just don't know what causes them to recover and what the thresholds are.[2]

HRD strongly supports options that increase our knowledge of groundwater:

- Option 5: Investigate the use of advanced water treatment technologies for towns
- Option 6: Reuse, recycling and stormwater projects
- Option 9: Reliable access to groundwater by towns
- Option 26: Improved understanding of groundwater processes
- Option 27: Implementation of a groundwater quality program
- Option 31: Water efficiency projects (towns and industries)
- Option 35: Implement Great Artesian Basin Strategic Management Plan
- Option 43: Sustainable access to groundwater by all users
- Option 44: Improved transparency in managing groundwater resources sustainably
- Option 45: Land use change and population growth impacts on water resources
- **Missing Option**: Adopt more efficient irrigation technology

Reducing demand for water

HRD strongly supports support all options that reduce water consumption in towns and industry. More efficient use of water is critical to achieve sustainable communities into a future with less water:

- Option 5: Advance water treatment technologies for towns
- Option 6: Reuse, recycle and storm water projects
- Option 10: Dual water systems for towns
- Option 14: Water security for small communities
- Option 31: Water efficiency projects (towns and industries)
- Option 35: Implement Great Artesian Basin Strategic Management Plan
- Option 36: New drought operational rules (Namoi and Peel rivers)

[1] https://science.sciencemag.org/cgi/doi/10.1126/science.abd5085
[2] https://www.abc.net.au/news/science/2021-05-14/water-catchments-may-not-recover-from-droughts/100131400

Objections

HRD strongly objects to the following options that are counter to environmental outcomes:

- Option 2: Inter- regional pipelines including from Macleay or Barnard Rivers
- Option 4: Suspension of environmental water provisions in Peel River
- Option 7: Connect Peel River to Quipolly Dam
- Option 12: Desalination of groundwater for industry
- Option 13: Joint exploration for minerals and groundwater