



Healthy Rivers Dubbo

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Submission to Namoi Surface Water Resource Plan

To: NSW Government

Department of Industry

By e-mail: namoi.sw.wrp@dpi.nsw.gov.au

Healthy Rivers Dubbo is a community grass roots group dedicated to providing a strong voice for our local rivers, aquifers, wetlands, and for the Murray-Darling Basin as a whole. As ambassadors for healthy rivers, wetlands and groundwater, we have been active in our community calling for transparency and accountability in all aspects of water management.

Healthy Rivers Dubbo pays our respects to the Traditional Owners, past, present and future, of the land we live in. We acknowledge that the land in which we live was never ceded.

Healthy Rivers Dubbo (HRD) welcomes the opportunity to make a submission to the draft Namoi Water Resource Plan (WRP).

HRD strongly objects to the proposed rule that would allow the transfer of high security licences from the main river into tributaries to cover mining water interception activities.

HRD strongly objects to the exemption for approved Environmental Planning & Assessment Act (EP&A) developments with aquifer interference activities from meeting water sharing rules.

Approvals under the EP&A Act should recognise comply with water sharing rules.

The same water access rules need to apply to all water users. Water is precious, and becoming rarer as our climate is becoming drier. The draft December 2013 report from NSW DPI Office of Water: Assuring future urban water security¹, found that Western NSW can expect 30% to 50% less potable water available by 2030.

¹ http://www.water.nsw.gov.au/_data/assets/pdf_file/0005/665609/assuring-future-urban-water-security-draft.pdf

By minimising the changes to Water Sharing Plans (WSPs) to provide certainty for water users, the NSW Government is not giving the needs of the environment the consideration required to meet the objectives of the Basin Plan.

HRD is alarmed at the high level of not-tolerable risks identified in the risk assessment for the draft WRP. It seems there are existing intolerably high risks to the availability of environmental water and capacity to meet environmental watering requirements in the Namoi. There is also a very high risk to water quality across the water source.

With such a high number of intolerable risks, the proposed rules offered in this WRP should support a reduction in extraction. As it is, this proposed WRP would likely fail to comply with the Basin Plan.

HRD is strongly supportive of the formal establishment of an Environmental Water Advisory Group in the Namoi through the rules of the WSP.

Compliance assessment should be undertaken by the Natural Resource Access Regulator, or the Natural Resources Commission. For the public to have trust in the system, compliance assessment cannot lay with the Customer Advisory committees.

95% of the growth in use of Tamworth water supply being attributed to the Lower Namoi Long Term Annual Average Extraction Limit, rather than the Peel water source is masking the problem of the Peel being over allocated. Public trust in water agencies in NSW is eroded by such proposals.

The cumulative environmental impact of Floodplain Harvesting (FPH) has not been assessed in the Northern Basin – HRD advocates that this should happen.

For the draft WRP to meet requirements under the Basin Plan, the volume of FPH access licences to be granted must be obtained through a shared reduction of all other access licences, so that the current LTAAEL is maintained. This will prevent a net reduction of PEW in the WRP area.

In conclusion, Healthy Rivers Dubbo considers that the objectives of the Basin Plan will not be met by this draft Water Resource Plan.

Melissa Gray

Convenor

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