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NSW DPI
Regional Water Strategy Team

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Submission: Second Draft Macquarie-Castlereagh 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.

We are pleased to have the opportunity to provide comment on the second draft Macquarie-Castlereagh Regional Water Strategy (RWS).

Priority 1: Secure water supplies for growing regional cities and towns

Burrendong is a large public dam, which if it was managed differently could provide significantly more water security for regional cities and towns.

Pass practice of turning to groundwater when surface flows are less available is not sustainable. PFAS have been detected in aquifers in Dubbo. Groundwater recharge rates could reduce by 15% by 2060 due to climate change¹.

HRD is pleased that the option of pumping the dead water from the bottom of Burrendong dam was not needed, and that the option did not progress to the second draft RWS. Before Burrendong dam was built, there were many gold mines in the valley, and where ever there are gold mines there is arsenic and other toxic chemicals. The pumps and infrastructure purchased for that purpose should be sold.

Recommendation: the cap on the drought of record be lifted, and all droughts since 2004 be considered when annual available water determinations are made from Burrendong dam.

This option was supported by the community in the first round of the RWS, and was then flicked over to the state water strategy, and did not advance to this second draft RWS.

The NSW Water Strategy states:

"After the Millennium Drought, NSW opted not to take a more conservative approach to its water allocations to improve water security for critical needs in the event of a future severe drought. Rather, in the event of the next drought, it was preferred to use other emergency drought mitigation measures to support communities. These include carting water for some

¹ NSW Groundwater Strategy

domestic uses and restricting access to carryover water in general security licence accounts to meet higher priority needs.

In the wake of the recent drought, there are again calls to reduce water allocations to mitigate the impact of future droughts—that is, to be more conservative in how much water is allocated over a particular period to keep more water in reserve. However, this could potentially have a cost to productivity across non-drought years.”²

The paragraphs above clarify that the NSW government would prefer to allow the rivers to run dry and have to cart water to domestic users, rather than update the drought of record and potentially reduce the water available for general security water users in non-drought years.

The Water Management Act does not give general security water access licences priority over the environment, yet the NSW Government is.

The state water strategy offers a discussion paper by 2024. This is far too little too late.

After the drought of record is updated, options to pipe the river may not be necessary.

In the Upper Macquarie, there must be an urgent review of how much water is captured on farm under the 10% harvestable right.

HRD supports Local Councils implementing Integrated Water Cycle Management Plans as agreed under the 2004 National Water Initiative. Communities must develop unique non-rainfall dependent water source solutions.

Recommendation: NSW lead a state wide public education program on the use of purified recycled water.

Priority 2: Reduce water security risks in the region’s west

HRD is supportive of an additional off-river storage at Nyngan. It could be covered with solar panels to reduce evaporation.

The suggestion of changing the operation of the effluent creeks has raised a lot of concern in the community. The unfortunate wording the department used in the RWS regarding the option providing more water for the Marshes has fuelled anger, and divided the community. While this option may have environmental merit, this RWS process seems to have galvanised parts of the community against it.

The Lower Macquarie is below Carinda, not around Warren, which is the mid-Macquarie. The Department often uses this language, which makes communities below Marebone feel like they are not considered. It is concerning for environmental stakeholders, as there is a lot of misinformation in the catchment that the Macquarie is a closed system. The consistent misuse of Lower Macquarie by the department when referring to the Mid-Macquarie, stokes this dangerous misinformation.

HRD strongly objects to increasing the full supply level of Burrendong dam above 100%. Any increase of regulated water source means a reduction in unregulated water source. Bird breeding event only happen in natural floods, when the dam is spilling. Stopping dam spills earlier to keep more water in the dam will cause sudden drops in water levels, causing bird breeding events to fail.

² NSW Water Strategy page 88

HRD strongly objects to a new re-regulating weir at Gin Gin, which would have significant impact on threatened and endangered native fish and other wildlife, Ramsar wetlands, migratory birds and threatened natural places.

Before pipelines are considered, the drought of record should be updated to include all droughts, and the harvestable right take in the Upper Macquarie should be assessed.

HRD is supportive of flow targets in the unregulated water sharing plan than allow for increased connectivity with the Barwon.

Priority 3: Support industry and community climate adaptation

This option should include supporting the environment in adapting to climate change.

New/expanding industries like the renewable energy zone, value add food processing & packaging, critical minerals hub, will put pressure on existing water sources, let alone shrinking sources.

Exploiting untapped deeper groundwater sources with poorer quality water should not be considered.

This priority should include actions to increase the efficiency of current industries, like stopping flood irrigation with groundwater, and developing innovative water sources for new industries. OneBasin CRC has a significant budget to work with industry in developing water efficient technology, like low pressure underground drip irrigation systems to replace flood irrigation.

The Closing the Gap agreement does not yet include targets for increasing First Nations access to fresh water. Work to develop these targets is overdue, and must be accelerated.

Water models and data in NSW lack transparency. Models should be continuously improved, and be made available to the Murray-Darling Basin Authority for annual validation, valley scale audits and adjustments for real world performance.

There has been hundreds of millions of dollars of public money invested in the Macquarie-Castlereagh irrigation industry for the return of 27 GL of Commonwealth environmental water entitlements. Details of these investments and returns should be public.

HRD does not support increasing the availability of high security licences.

Water related Aboriginal businesses, including Traditional Owner management of the Macquarie Marsh reserves is supported by HRD.

Priority 4: Best use of existing water for the environment

The name of this priority implies that managed environmental water is not currently used in the best way. HRD strongly disagrees, and is disappointed that the Department choses to imply that environmental water is not well managed in the catchment. This feeds into the local narratives and misinformation that permeate and divide the community.

Feedback from the first RWS shows strong support from the community for reversing historical ecological damage, increase connectivity and improving the condition of the Ramsar wetlands for bird breeding. To do this, more water in the environmental accounts would be necessary.

HRD strongly supports upgrades of the Rocky Waterhole Bridge on the Cudgegong, so the environmental water in Windamere dam can be effectively used. Other erosion control and constraint relaxation projects mentioned in the RWS are supported.

The RWS proposes that delivering environmental water with irrigation orders could be a way of improving environmental outcomes, seemingly unaware that this already occurs in the Macquarie. The environmental flows are designed with input from local stakeholders, including landholders, irrigators, community and environmental representatives and department staff. HRD wonders why this action was included in the second draft RWS, was there sufficient feedback from the first RWS for it to be included? Even if it's not deliberate, HRD is concerned that the Department continues to feed the narrative and misinformation in the community that environmental water isn't well managed in the Macquarie.

The action to identify regionally significant riparian, wetland and floodplain areas to protect or rehabilitate implies that this work isn't already done, further perpetrating misinformation and mistruths that create confusion and stress, and divide the community.

There are some very large willow rafts in the Macquarie that need immediate attention. So far, no agency or department has been prepared to address these serious issues.

HRD is very supportive of fish passage projects already underway by WaterNSW at the Marebone break and North Dubbo weir. While work has been delayed, WaterNSW has confirmed these projects are slated to be completed prior to July 2025.

Fitting fish screens on pumps is very important work, and HRD encourages this work to continue. However, this work must not be funded by the forced sale of publically owned environmental water, as it was a few years ago.

Work to remediate unapproved floodplain structures is well overdue and is finally progressing. The difference between the draft and the final Macquarie Floodplain Management Plan identified that two thirds of the floodplain works in the Macquarie are unapproved. Many of these works are considered 'hot spots' that impede critical flows into the Macquarie Marshes. Many of these unapproved works, including 6 hotspots, are being considered for floodplain harvesting licences.

No floodplain harvesting licence should be issued in the Macquarie catchment until all unapproved floodplain works have been remediated.

Floodplain harvesting must not be licenced without first assessing the cumulative environmental, social and cultural impact the practice has had over the last few decades.

In-valley and end of system targets in the water sharing plan currently do not protect the environmental or cultural values downstream.

There will be no reduction in floodplain harvesting diversions upstream of the Ramsar Macquarie Marshes because of the implementation of the floodplain harvesting program.

HRD strongly objects to implementing the floodplain harvesting program being listed as an environmental measure.

For more information about this submission, contact the Healthy Rivers Dubbo Committee

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