



I N L A N D  
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N E T W O R K

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## **Comments on Draft Namoi Surface Water Resource Plan**

The Inland Rivers Network (“IRN”) is a coalition of environment groups and individuals that has been advocating for healthy rivers, wetlands and groundwater in the Murray-Darling Basin since 1991.

IRN welcomes the opportunity to provide comments on the Draft Namoi Surface Water Resource Plan (draft WRP).

### **Introduction**

IRN submitted substantial comments to the Status and Issues Paper on the Namoi Surface Water Source released in 2017.

Key aquatic ecological assets in the Namoi include high fish diversity and river reaches that provide vital habitat for native water-dependent species by supporting their dispersal, migration and movement; lower Namoi anabranch and floodplain billabong wetlands downstream of Narrabri; in-stream pools and low flow channel refuges that support local and migratory species and riparian and in-channel vegetation.

We raised the issue of significant risks to key environmental assets and ecological function.

These include medium to high risks to ecological values on the regulated river system arising from the take of water and regulation of flows.

There are locations where turbidity, nutrients, pH and dissolved oxygen results are outside of target ranges, and risk from thermal pollution and blue-green algae blooms.

Key environmental assets will be at risk under median and dry climate change scenarios.

The draft WRP does not mitigate these key risks. The NSW Government planning principle to minimise change in Water Sharing Plans (WSPs) to provide certainty for water users places the health of the river system at continued high risk and causes failure to meet the objects of the Basin Plan.

The management of floodplain harvesting is a key issue. We note that the first Namoi Regulated WSP calculated 21 GL of floodplain harvesting extraction with an additional 56 GL on farm harvesting not recorded as take.<sup>1</sup> The current assessment of this water take identifies a much higher level of extraction of overland flows in this catchment.

We also note that the replacement WSPs included in the draft WRP provide no volumes for the extraction of flood flows from the Namoi floodplain and that an amendment clause has been included.

This is an important issue due to the impact on significant ecological values in the WRP area and the high connectivity with the Barwon-Darling River. We are concerned that the Healthy Floodplains Project does not include a rigorous assessment of the cumulative downstream environmental, social and economic impacts of floodplain harvesting.

IRN strongly opposes the proposal to change the supplementary access rule in the Lower Namoi. This will cause a net reduction in the protection of Planned Environmental Water (PEW). IRN also does not support the proposed 50% increase in the Upper Namoi water allocation account. This will result in an increase in water use during median and dry climate scenarios.

We also strongly oppose the proposal to transfer high security licences from the regulated system to unregulated water sources.

IRN supports the formation of an Environmental Watering Advisory Group (EWAG). This must be included as a mandatory requirement in the draft WRP with its membership clearly identified.

EWAGS have been successful in other river systems by providing local knowledge working together with key government agencies including Fisheries, environmental water holders, CEWO, DPIE-Water and Water NSW.

We do not support current arrangements whereby available water determinations are based on the worst period of low inflows into the water source, as identified in flow information held by the Department before 1 July 2004 for the Namoi regulated and 1 July 2010 for the Peel regulated. This must be amended to take in the current, more severe period of low inflows.

The lack of modelling inputs using the most recent worst drought of record inflows results in over allocation of available water and increases the risk of poor management of extreme events, as is being experienced in the draft WRP area at this point in time.

This has an impact on the management of risk which is identified as high for many of the criteria, especially for environmental water requirements.

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<sup>1</sup> NSW Parliament, 15 May 2018. Question and Answers Paper No. 181, Qu 7933 Floodplain Harvesting Extractions

## **Risk Assessment**

The risk assessment for the draft WRP identifies an alarmingly high level of risk to the availability of environmental water and capacity to meet environmental watering requirements in the Namoi Surface Water Source. There is also high risk to water quality across the water source.

There are a number of not tolerable risks that will not be mitigated. This is unacceptable and possibly not lawful under the Basin Plan.

We also note that many high risks are regarded as tolerable because the ability to mitigate the likelihood is low. This is a failure of the WRP process.

The NSW Government position to prioritise third party impacts with bias towards water user certainty through minimal changes to rules in WSPs has caused a failure in the mitigation and management of risk to the health of this major water source. There is a failure in the process to recognise that poor river health has significant impacts on the achievement of the objectives of the Basin Plan and within the WSPs.

There are economic, social and environmental impacts caused by a failure to mitigate risk to river health.

The NSW Government position stated in the risk assessment is that *'These risk results cannot be addressed during WRP development as NSW planning principles minimise change for WSPs within their initial ten year period to provide certainty for water users.'* This position causes the continuation of considerable high risk to river ecology, social and cultural values and long term economic viability.

In the Peel Regulated water source the current critical mechanisms for mitigating risk eg access to uncontrolled flows and release of the Environmental Water Allowance (EWA) are tied to general security available water determinations, rather than to the needs of the environment. A portion of the Peel EWA can be extracted therefore further increasing risk to the environment.

Likewise in the Namoi Regulated, the proposed change to the supplementary access rule will further increase risk to water available to the environment. The end of system flow rule, identified as a current critical mechanism, is tied to water levels in Keepit and Split Rock dams and confined to three winter months. These rules do not improve the risk to environmental assets and values in the Namoi water source.

There are a high number of not tolerable risks to water available to the environment in the Namoi unregulated water sources. This is particularly in regard to the protection of base flows, low flows and freshes. This risk must be addressed through changes to cease to pump rules and the protection of a portion of natural freshes with a minimum of the 80%ile in the unregulated Namoi and Peel WSP.

Overbank flows are of critical environmental value to replenish floodplain processes, facilitate native fish breeding and recharge groundwater sources.

IRN strongly objects to the risk to overbank flows being assessed as tolerable because of third party impacts. Naturally occurring overbank flows in the Namoi are frequently captured by

floodplain harvesting. We note that the risk from this interception activity is assessed as high in the regulated Namoi. This high risk is not tolerable and the Healthy Floodplains Project needs to include a rigorous assessment of downstream ecological impacts of floodplain harvesting to better manage and mitigate this high risk.

The important environmental function of overbank flows must be better protected and restored as required under Basin Plan objectives.

IRN does not support the assessment that the risk from climate change to water available for the environment in the Namoi water source is medium for median and dry scenarios with only moderate consequences.

We note that the risk to water users from a dry climate scenario has been assessed as high, particularly for general security licences in the Namoi and Peel.

The current severe drought in the Namoi has had a significant impact on environmental values and all water users. It is critical that water availability is assessed on the most recent drought of record so that over allocation does not occur.

IRN considers that the risk assessment for the Namoi water source is very poor and must be redone with due attention to the environmental objectives of the NSW *Water Management Act 2000* (WMA), Federal *Water Act 2007* and the Basin Plan.

## **Water Quality**

We note that the management of all high and medium risks to water dependent ecosystems from poor water quality is referred to the Water Quality Management Plan (WQMP).

The WQMP aims to provide a framework to protect, enhance and restore water quality that is fit for purpose for a range of outcomes that:

- Fulfil First Nation peoples spiritual, cultural, customary and economic values
- Protect and improve ecological processes and healthy aquatic ecosystems
- Provide essential and recreational amenities for rural communities
- Assist agriculture and industry to be productive and profitable

These aims are greatly compromised through the NSW planning principle that protects water user certainty above all other considerations.

IRN does not consider that the WQMP adequately mitigates the identified medium and high risks of water quality degradation in the Namoi WRP area.

Appendix E of the WQMP identifies a number of strategic decisions options to mitigate high and medium water quality risks. One of these is to review the adequacy of WSP rules for flow dependent issues. The WQMP fails to do this.

We note that the key water quality objective, WQ1: Protect, maintain or enhance water quality to ensure it is fit for purpose, is to be managed entirely through the regulated and unregulated WSP. The emphasis on minimal change to the WSP rules in the draft WRP raises key concerns that the high and medium risks to water quality will not be adequately mitigated.

However, the proposed change to the supplementary access rule in the Lower Namoi and proposed increase in water availability in the Upper Namoi, will increase extraction opportunities and therefore, increase the risk of poor water quality.

The WQMP must examine the suitability of current WSP rules to provide improved outcomes for river health.

Appendix E also questions the appropriateness of Basin Plan water quality targets and suggests reassessing risk using revised, locally derived targets. IRN strongly objects to this approach within a WRP to be accredited under the Basin Plan.

We note that there are significant knowledge gaps in all areas for the following WQ objectives:

WQ7 Reduce the mobilisation of toxicants and pesticides.

WQ8 Reduce contamination from pathogens into water sources.

WQ9 Protect, maintain or enhance connectivity between water sources to support downstream processes including priority carbon and nutrient pathways

The WQMP fails to recommend a strategy to fill these knowledge gaps or measure the possible significant impacts on water quality in the Namoi water source.

We note that strategies to meet WQ9 include protecting tributary flows through cease to pump rules at low and zero flows, end of system target, supplementary access rules.

The risk assessment identifies that zero and low flows are at non tolerable risk in many Namoi unregulated systems, the end of system target is tied to water levels in the dams and the protection of supplementary flows in the Lower Namoi is under threat while also attached to water determinations in the Namoi system.

The NSW planning policy of maintaining security for water users greatly threatens the achievement of WQ9 in this water source.

There are numerous high and medium risks across most water quality targets that will not be adequately mitigated by the rules in WSPs or many of the strategies in the WQMP.

The issue of salinity risk in the Namoi water source is of interest with high salt stores in the Manilla, Upper Namoi and Peel Rivers contributing to salt load in the storages and tributary inflows. Tributaries to the Lower Namoi: Peel, Mooki and Coxs Creek can deliver salinity spikes. Reliance on dilution flows from the major storages may not be adequate in times of low water availability.

While the current risk to aquatic ecosystems is assessed as low at the Goangra gauge towards the end of the system, salinity management within the Namoi water source is critical for instream health and connectivity flows to the Barwon Darling.

Improved water quality management is a significant issue for the Namoi water source that has not been adequately addressed in the draft WRP.

## **Issues in WSPs**

### **1. Environmental Objectives**

In order to meet the requirements of the Basin Plan Cl 8 (10) in the Namoi and Peel regulated WSPs and Cl 10 (1) in the Namoi and Peel unregulated WSP should have the broad environmental to protect and restore the ecological condition of these water sources and their water-dependent ecosystems.

IRN considers that the rules in the WSP fail as critical mechanisms to manage the high level of risk to these water sources.

### **2. Regulated Upper and Lower Namoi**

#### **2.1 Failure to meet WSP environmental objectives and targets**

Strategies to meet the targeted environmental objectives of the plan include reserving a portion of natural flows to partially mitigate alterations to natural flow regimes and maintain hydrological connectivity between the water source and riparian zones, wetlands and floodplains.

These strategies are considered to be provided by Cl 45, 48 and 55. IRN does not consider these rules to be adequate provision to achieve the targeted objectives. These rules are associated with extraction needs and water order delivery, rather than meeting environmental requirements.

##### **1.1.1 Cl 45**

Under Cl 45 the taking of uncontrolled flows in the Upper Namoi only protects flows below 100 ML on the Manilla River and below 200 ML on the Namoi River. This is an inadequate protection of natural flow regimes and achieves very little hydrological connectivity. This rule does not demonstrate a commitment to protecting a range of natural flow heights.

##### **1.1.2 Cl 48**

Under Cl 48 the Schedule 1 Barwon Darling flow targets are too restrictive and do not assist in protecting a first flush connectivity flow into the system.

The Schedule 1 flow targets at:

2 (1) provide basic rights access with no discernible environmental targets.

2 (2) provide for only two opportunities for fish passage across weirs during the main fish breeding season. This rule does not provide for the length of time between water years where fish passage flows have not been available.

2 (3) provide for one blue-green algal bloom suppression flow, not necessarily at a time when a bloom may be occurring in the Barwon-Darling.

The majority of rules in Cl 48 relate to protecting water availability under supplementary announcements rather than mitigating alterations to natural flow regimes and maintaining hydrological connectivity. The protected flow heights are associated with available water determinations rather than meeting environmental flow targets.

Only flows as low as 10 ML are protected in the Lower Namoi upstream of Walget Weir with no time limit for commencement of take when water availability is less than 90,000 ML

The flow targets in Tables A, B and C have little or no relationship to achieving targeted environmental objectives, particularly the Basin Watering Strategy objective to provide an overall 10% increase in flows to the Barwon-Darling from connected tributaries.

IRN strongly opposes the proposal to change Cl 48 (3) (b) to increase supplementary flow access above 10% between 1 July and 31 October.

This 90:10 rule share should be extended across the whole water year to better achieve the targeted environmental objectives of the WSP.

### 1.1.3 Cl 55

Minimum flow rules for an end of system flow to the Walget gauge are tied to the storage levels in Keepit and Split Rock dams.

These rule only protects a very low 75% of the natural 95%ile daily flows in winter months from June to August.

This rule is highly inadequate in that it reserves a very small portion of natural flows and does little to mitigate alterations to natural flow regimes or to maintain hydrological connectivity between the water source and riparian zones, wetlands and floodplains.

## 2.2 Definition of PEW

Cl 15 defines PEW as:

- (a) the physical presence of water in the water sources,
- (b) the long-term average annual commitment of water as planned environmental water.

The WMA also includes a definition of PEW as the water that is not committed after the commitments to basic landholder rights, and for sharing and extraction under any other rights, have been met.

All other WSPs have the three references defining PEW. No reason has been provided in supporting documents to explain why the definition of PEW is limited in this WSP.

## 2.3 Environmental Flow Rules

Cl 55 is the only environmental flow rule in the WSP. This is very limited and highly inadequate for delivering improved environmental outcomes in the water source, as outlined above. There are no allocations in the storages to provide environmental watering to the high value environmental assets supported by the Namoi water source.

We note that a volume of Held Environmental Water (HEW) is managed for environmental benefit in the water source and that this volume will increase to meet the Sustainable Diversion Limit (SDL) for the Namoi. However, the current HEW is in general security (GS) licences with limited availability. There have only been three deliveries of HEW since 2013.

This water can be extracted from the Gulligal and Wee Waa lagoons through rules in the unregulated WSP.

The dependency on the supplementary flow rules for providing some environmental benefit to the water source is significant and the only real source of PEW.

It is critical that the current rule to protect 90% of uncontrolled flows between 1 July and 31 October is not diminished. Any increase in supplementary access will cause a net reduction in the protection of PEW and therefore, will not meet the requirements of the Basin Plan.

### **3. Regulated Peel**

IRN considers the Peel regulated water source to be vastly over allocated. The rules in the WSP have failed to address this issue. The rules for compliance with the Long Term Average Annual Extraction Limit (LTAAEL) are entirely inadequate and do not protect PEW in this water source.

#### **3.1 Accounting for Growth in Use**

Water management in the Peel accounts for 95% of growth in Tamworth water supply through the Lower Namoi LTAAEL. This fails to recognise the ongoing impacts of this growth on the health of the Peel River, on the protection of PEW and on other water users. The management of Tamworth water supply is a significant issue that is not being addressed in the draft WRP.

#### **3.2 Failure to meet WSP environmental objectives and targets**

Strategies to meet the targeted environmental objectives of the plan include reserving a portion of natural flows to partially mitigate alterations to natural flow regimes and maintain hydrological connectivity between the water source and riparian zones, wetlands and floodplains.

These strategies are considered to be provided by CI 41, 48 and 49. IRN does not consider these rules to be adequate provision to achieve the targeted objectives. These rules are associated with extraction needs and water order delivery, rather than meeting environmental requirements.

##### **3.2.1 CI 41**

The access to uncontrolled flows in the Peel is in lieu of licenced supplementary access rules. While the rule limits access to uncontrolled flows by 50% the flow heights protected from access are very low. The rule is also connected to water availability rather than to demonstrated environmental outcomes.

When GS availability is less than 0.35 units uncontrolled flows can be drawn down to a 5 M/day flow measured at the Carroll Gap gauge. When GS availability is above 0.35 units uncontrolled flows can be drawn down to 50 ML/day.

Access to uncontrolled flows should not be related to water availability. These flows are critical natural inflows to the regulated system and need to be better protected.

These flow heights do not achieve the targeted objectives of the WSP and should not be identified as achieving these under Cl 8.

Cl 41 (4) allows for extraction of EWA releases from Chaffey Dam as uncontrolled flows.

IRN considers this definition of released water to be entirely misleading. This subclause contradicts the definition of PEW and is a failure to meet the objects of the WMA.

IRN strongly objects to the taking of EWA. This subclause must be removed from the WSP. These rules do not achieve the targeted objectives of the WSP.

### 3.2.2 Cl 48

A minimum daily release of 3 ML/day from Chaffey Dam does not provide flow variability or any significant environmental benefits.

This low regulated flow is more likely to provide conveyance capacity for delivering basic rights flows and water orders.

This low regulated flow does not achieve the targeted environmental objectives of reserving a portion of natural flows to partially mitigate alterations to natural flow regimes and maintain hydrological connectivity between the water source and riparian zones, wetlands and floodplains.

### 3.2.3 Cl 49

This rule does not provide any security for the delivery of the EWA at a time when it will be most beneficial to environmental outcomes or protect its instream flows.

Subclause 49 (5) gives priority to water orders when the capacity to release all water demands from Chaffey Dam is insufficient.

This rule should be changed to allow a 50:50 share of release capacity.

Subclause 49 (7) permits access to EWA water as specified in Cl 41.

IRN strongly objects to this lack of protection for PEW. This subclause must be removed from the WSP.

## **3.3 Definition of PEW**

Cl 15 defines PEW as:

- (a) the physical presence of water in the water sources,
- (b) the long-term average annual commitment of water as planned environmental water.

The WMA also includes a definition of PEW as the water that is not committed after the commitments to basic landholder rights, and for sharing and extraction under any other rights, have been met.

All other WSPs have the three references defining PEW. No reason has been provided in supporting documents to explain why the definition of PEW is limited in this WSP.

### **3.4 NRC Review**

The Peel regulated WSP requires amendment provisions to allow for recommendations from the NRC review to be adopted.

## **4 Unregulated Namoi and Peel**

### **4.1 Poor WSP strategy to meet environmental objectives and targets**

IRN does not support Cl 10 (3) (c) that allows in-river and off-river pools, and significant identified lagoons to be pumped to less than full capacity. This will not assist in meeting the targeted environmental objectives particularly the protection and restoration of target ecological populations and water quality.

The definition of less than at full capacity for in river, off river pools and lagoons is very difficult to regulate. Pools are important drought refugia and must be protected.

This rule must be changed to cease to pump from in-river and off-river pools, and significant identified lagoons when there is no visible flow.

### **4.2 Failure to meet WSP environmental objectives and targets**

Strategies to meet the targeted environmental objectives of the plan include reserving a portion of natural flows to partially mitigate alterations to natural flow regimes, restrict the take of water from in-river and off-river pools, and significant identified lagoons and restrict or prevent water supply work approvals on third order or higher streams in designated water sources.

These strategies are considered to be provided by flow classes established in Division 2 Part 8 and Cl 47 and 52. IRN does not consider these rules to be adequate provision to achieve the targeted objectives. These rules are associated with extraction needs rather than meeting environmental requirements.

#### **4.2.1 Flow classes**

Cl 46 Table B identifies the Very Low Flow and A class flow heights across the unregulated water sources.

Very Low Flow classes of 'no visible flow' and A class flows of 'visible flow' fail to achieve the protection of a portion of natural flows.

This also fails to meet the definition of PEW being '*the commitment of the physical presence of water in these water sources*'.

IRN strongly opposes that rules for the Peel unregulated system remain unchanged from the 2010 WSP. This is currently being reviewed by the NRC. There needs to be amendments

included in the WSP to allow for NRC recommendations to improve the management of the Peel unregulated system.

Very Low Flow classes should be at a minimum of 80%ile flows to achieve the targeted objectives of the WSP by protecting a portion of natural flows.

#### 4.2.2 CI 47

This rule does not achieve the targeted objective of the WSP because it has a significant number of exemptions.

IRN strongly opposes the exemption in association with an aquifer interference activity that is an approved EP&A Act development if there are no reasonably practicable measures the access licence holder can take to comply with the access rules under this clause.

The approval under the EP&A Act should take into account the rules of the WSP so that the environmental objectives are met, rather than providing an exemption in the rules that fails to meet the WSP objectives.

Water management plans in approved EP&A Act developments are difficult to regulate and cannot be assured to provide for the environmental needs of a water source.

This significant exemption must be removed from the WSP.

IRN does not support CI 47 (4), (5) and (6) as outlined above. A cease to pump rule for pools, lagoons and lakes must be at no visible flow in the water source. Evaporation will continue to cause a drop in the level of these critical habitats. This should not be exacerbated by ongoing extraction that is difficult to regulate.

Gulligal and Wee Waa lagoons are very important environmental assets in the Namoi catchment. IRN strongly objects to any legal access to environmental water, especially HEW that has been delivered to these water bodies.

CI 47 (6) that allows these lagoons to be pulled down to below 80% is not acceptable and will cause a failure to meet the environmental objectives of the WSP and the Basin Plan.

All environmental water must be protected from extraction in this water source.

#### 4.2.3 CI 52

IRN does not support the construction of in-river dams in any of these water sources.

These structures will impede the longitudinal connectivity within the water source. This is a key targeted environmental objective of the WSP.

## **Proposed WSP Rule Changes**

1. Increase in the maximum volume held in a GS water allocation account in the Upper Namoi

IRN objects to the proposal to allow a 50 % increase in carry over in the Upper Namoi. This will cause a reduction in the net protection of PEW in this water source and on downstream water users in the Lower Namoi.

It will cause a growth in use and therefore threaten compliance with the LTAAEL.

The PEW report maintains that annual usage will remain capped at 100% per unit share. Therefore, it is difficult to understand the purpose of this rule change.

It seems that the intent of this rule is to benefit a small number of GS entitlement holders in the Upper Namoi. However, the long term implications have not been adequately considered.

This rule could result in an increase in water use during median and dry climate scenarios and impact on the PEW rules associated with storage volumes.

2. Supplementary flow access rule

As stated above, IRN strongly opposes any increase in access to the winter month supplementary flow share rule. It is imperative that 90% of natural flows into the Namoi regulated water source be protected from extraction. This is important to meet the WSP and Basin Plan environmental objectives. It is also critical for maintaining important connectivity flows to the Barwon-Darling.

IRN recommends that the 90:10 supplementary flow sharing rule be extended over the entire water year.

3. Cap on trade to Upper Namoi

IRN supports this rule change. Any increase take in the Upper Namoi impacts on storage levels and the rules for releasing PEW.

4. Trade between regulated and unregulated water sources

IRN strongly opposes the proposal to transfer high security regulated access licences to unregulated water sources.

This is an unsustainable approach to water management and should not be progressed.

Unregulated water sources have highly variable water access that must be taken into account when considering the approval of increased interception activities.

This is particularly relevant in a drying climate scenario.

This proposed rule change will impact on all other water users and the environmental health of the water sources. It will have significant environmental, social and economic impacts.

## 5. Formation of EWAG

IRN supports that an EWAG be established to assist decision-making on environmental water management in the Namoi water source.

The establishment of this advisory committee should be formalised through rules in the water sharing plan including the representative membership.

## 6. Compliance assessment advisory committees

IRN strongly objects to the role of compliance assessment being placed in the hands of Water NSW Customer Advisory Committees (CAGs). Both Water NSW and its customers have a major conflict of interest in the operation of water sharing plan rules.

Compliance assessment must be undertaken by a state-wide independent body such as the Natural Resources Access Regulator or the Natural Resources Commission. This will improve the transparency and trust in the process.

### **Other Key Issues:**

#### 1. Water availability determination

The regulated river WSPs must be changed so that the most recent drought of record is included in modelling used to determine water availability. The current definition that worst drought be defined as the worst period of inflows prior to 2004 for the Upper and Lower Namoi and 2010 for the Peel is a high risk approach to water management in the context of climate change.

The rules Cl 56 (1) and Cl 52 (1) respectively should be changed so that:

#### Maintenance of water supply

The period of lowest accumulated inflows to the water sources is identified by the most recent lowest inflow information held by the Department.

#### 2. Compliance with LTAAEL

IRN strongly objects to 95% of the growth in use of Tamworth water supply being attributed to the Lower Namoi LTAAEL rather than to the Peel water source.

This accounting method masks the over allocation of the Peel water source and the environmental impacts of continued growth in use.

Chaffey Dam was raised to secure Tamworth water supply. The infrastructure was completed in 2016 in time to capture significant inflows and fill to the new water level. This increased volume has been used over a three year period and the dam is now very low. An announcement of an increase in the Dungowan Dam capacity will further decrease natural flow regimes in the Peel River system

Further increases in storage capacity has a high likelihood of increasing growth in use with high consequences to the health of the Peel water source.

### 3. Floodplain Harvesting (FPH)

IRN has been advocating for a full cumulative environmental impact assessment of all FPH extraction on downstream water users and environmental assets. The small to medium size overland flows captured by this extraction method have important ecological functions such as recharging groundwater systems, providing natural flows to wetlands, providing connectivity flows to connected rivers, in particular, the Barwon-Darling and returning nutrients and food sources to rivers.

IRN understands that the volume of FPH extracted from the Namoi catchment is far greater than predicted in the current WSPs.

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.

#### **Conclusion**

The direction of the draft WRP provides no confidence that the environmental assets in the Namoi system and connectivity with the Barwon River will benefit over time.

The high and intolerable risks to the environment and water quality will not be mitigated by the environmental flow rules in the WSPs and are at continued risk through NSW Govt policy.

IRN considers that the draft Namoi Surface Water WRP will not meet the objectives of the Basin Plan.

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