

# Woolcott Group Pty Ltd

ACN 114 558 351



NSW Water

By email: [regionalwater.strategies@dpie.nsw.gov.au](mailto:regionalwater.strategies@dpie.nsw.gov.au)

To whom it may concern:

**Re: Proposed (option 32) intra-regional pipeline diversion of Namoi River water at Blue Hole to Split Rock dam**

I am writing to express my grave concerns about the proposal to divert water from the unregulated Namoi River at Blue Hole to Split Rock dam through the construction of a pipeline. As a long-term resident of the area, my primary concern is the impact of the proposed diversion of the unregulated Namoi River flow on the ecology of the Namoi River, particularly in the greater Manilla area. As an irrigator, I am also worried about the impact of the proposed diversion on the availability of water. Over more than a decade, I have worked hard to establish a viable business producing irrigated lucerne and other crops. In that time, I have made substantial sacrifices to invest in both water licences and infrastructure. I have significant concerns that the changes will substantially devalue my investment, rendering the operation no longer commercially viable.

Details on the proposed scheme have not been well publicised and community consultation has been inadequate. As I will outline below, there are significant problems with the proposal that have not been addressed by Water NSW or the state government. The community is eager to work with both Water NSW and the state government to improve water sustainability. Our land, our rivers, our people and our economy depend on sustainably managing the water in our catchment and beyond. But the community cannot contribute to this cause if we are not given full and frank disclosure of the aims and assumptions of the governing bodies who work on our behalf.

In April 2021, Water NSW held a public meeting at Manilla Townhall. The panel was asked directly about the purpose of the proposed diversion. The answer given was that the change would reduce the evaporation loss of the water stored at Keepit dam. We asked what the evaporation losses at Keepit dam were. We were told six gegalitres. For those not working in the field, it can be difficult to process such figures. There was no discussion regarding other advantages other than savings in evaporation losses. This exchange does not constitute informing the stakeholders. After the meeting, it became clear that we had learned very little about the reasoning behind the proposal. What are the losses at Split Rock dam?

What was the saving in evaporation losses expected by the proposed diversion? And, given the many strategies that can be employed to improve water losses, why was this best strategy ecologically, financially and for the region's community?

As noted, the community is willing and eager to work with Water NSW to improve water security. As a first step, I, and I know many other community members, would like to have a detailed discussion with the relevant authorities about how the following issues raised by the proposed diversion would be addressed.

We would like to clarify the savings from the proposed diversion. How does this compare to other water security and sustainability measures? Without context, it is difficult to understand the extent of the savings. We would also like to understand how the savings justify the cost of the measures.

- The unregulated Namoi River system is known as being one of the few inland riverine systems in the Murray-Darling Basin that is still flourishing. Any intrusion into and disruption of the system, such as the weir, pumping station and pipelines of the proposed diversion, will have clear and measurable impacts on the ecosystem. A submission to the NSW Legislative Council Inquiry by Professor Richard Kingsford, the direction of the Centre for Ecosystem Science at UNSW, on the 'Rationale for, and Impacts of, New Dams and other Water Infrastructure in NSW, states, 'We cannot simply adopt a drought proofing approach by building more dams. This has cost communities and environments enormously. The proposed projects inadequately look to the future and represent early 20<sup>th</sup> Century thinking, without any of the subsequent science informing decision-making.'
- There have been many studies on the impact that weirs and other water diverting measures has on the ecology of riverine systems. Jun Wook Hur and their colleagues state, 'The sustainability of river ecosystem services may depend on the stability of river food webs. The complexity of food web structures, particularly the multiple sources of food, plays an important role in supporting complex food webs and maintaining their stability. Our results suggest that the presence of weirs in river channels may decrease the availability of food sources for competing species and increase their competition for resources.'

On our river frontage alone, we have sighted over 10 platypus burrows. The river also has an abundance of fish, monotremes, invertebrates and other species. Many of these species are endangered already. We cannot afford as a community to jeopardise these habitats.

As a community member, I am worried that the health of our rivers and ecologies will be damaged by this proposal. The river's health has been maintained over millennia. First by the First Nations people of the land and subsequently by the European settlers who lived and farmed here. This is a legacy that we can all be proud of. Riverine ecologies are under increasing pressure already due to climate change and development. We cannot

afford to endanger the few areas that are currently flourishing by interfering with system that is working well.

- Building a weir in the middle of this system would alter the intermittent flow regimes that play a major role in the lifecycles and biological processes that this ecosystem has adapted to thrive within. Some have suggested that the pipeline would only operate under high flow conditions. But it is these very flows, which would be reduced, possibly drastically, that the system has adapted to. These patterns and flows form a bedrock for the ecosystem.
- As a water licence holder, I also know that many of the conditions for water access are governed by criteria such as the flow over the Manilla weir. These are outlined in the various Water Sharing Plans that will be impacted by the diversion. Water taken from the Unregulated Upper Namoi will reduce the flow over the weir, resulting in these criteria not being triggered as early (if at all). There has been no discussion about the impacts on these criteria.

These are not abstract criteria. When these criteria are not met, which would be less often if the proposed diversion takes place, we are not able to access water. When we cannot access water, we cannot irrigate or fill our storages. When that happens, we lose our livelihoods. In a rural area, such as Manilla, when farmers fail, there are impacts across the economy. Thriving towns enter a death spiral with many never recovering.

Thirty percent of the yearly flows through the Upper Namoi System is environmental flow. When asked about how the diversion would affect environmental flow, the committee answered that there was no environmental flow in the diversion water. Since this water will no longer be flowing through the system, where will the shortfall in environmental flow come from? Will we reduce the amount of environmental flow at the cost of the environment? Or will the Upper Namoi Water users be expected to supply the shortfall in the form of a reduction of the annual available water determinations.

#### Water Sharing Plan

- The Water Sharing Plan determines the available water in the various zones within the river system. The Upper Namoi Unregulated water source has a limit of 9,790 megalitres. It appears that this limit has been reached as no additional access licenses can be permanently or temporary transferred under section 71R, 71S & 71T of the Water Management Act into this system.
- If the limit is 9,790 megalitres, will this be affected by the diversion of water from the Upper Namoi Unregulated? Will the available water determinations be reduced as result of the water diverted from system? As I've already noted, there will be less water flowing through the system for environmental purposes. Will this be compensated for by reductions in the water available to irrigators or reductions in environmental flow?

- By diverting the Unregulated Upper Namoi, more water will be available in the regulated system, which will lead to an increase in the higher water usage charges collected. I do not like to think that this would have any effect on the making a decision of this magnitude, but it must be noted that this would be a (hopefully unaimed for) side effect of the proposal.
- The meeting I attended also touched on the future security of Manilla's water supply. If this were the driving factor, the proposed change makes little sense. Far better, like Guyra or other municipalities, to develop groundwater resources (New England Fold Belt (MDB) Fractured Rock Water Source. This could be done either through an exploration and drilling project or through purchasing the rights to an existing bore and purchasing appropriate licences. The costs of such a project would be insignificant in comparison to the proposed diversion, and the alternative development of groundwater resources would have a much smaller impact on the ecology and economy of the local area.

There are many ways to improve water sustainability in the region. For example, the Manning River is currently diverted into the Hunter River in order to secure water for the Liddell Power Station. After Liddell's closure, that water will be available for other uses. Then, that water can be diverted into the back of the Peel without the need for pumping. This project has already been identified and has been christened 'Top Hat'. We would like to see cost-benefit analyses outlining how a project such as the proposed diversion of the Upper Namoi Unregulated compares to other possible solutions, such as 'Top Hat'. From the information provided to us, the Upper Namoi Unregulated diversion seems a poor investment of limited funds.

Thank you for taking the time to read this letter. As I think is clear, I, and my community, are passionate about our river, our country and our future. Water sustainability is key to health of everything in our community. We are ready and willing to engage with Water NSW and the state government to improve sustainability, but to do so we need to be informed, have our concerns taken seriously and our input listened to.

I hope this letter can in some small way begin that process of dialogue. I and my community have been stewards of this portion of the Upper Namoi for centuries. We want to work with you to protect it and the Murray-Darling Basin as a whole. We will work to ensure it survives and thrives by working through whatever means necessary: by consulting with environmental protection agencies, working with Water NSW and the state government, or using the legal protections available to us in defending our environment and livelihoods.

