

**From:** [REDACTED]  
**To:** [DPIE W Regional Water Strategies Mailbox](#)  
**Subject:** Objection to the building of a new Dungowan dam  
**Date:** [REDACTED]

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I object to the building of a new Dungowan dam for the following reasons:

1. The main objective of the Namoi Regional Water Strategy should be to use available water in a sustainable manner by managing water demand.
2. The NSW Government is saying that the Climate Change predictions for the Namoi Region are a worst case scenario, but those predictions are more likely to be what is experienced. They indicate a shift in seasonal rainfall patterns with lower rainfall overall - less in winter and spring, more in summer and autumn. Evaporation, average temperatures and the number of hot days and fire weather will increase. The number of times Keepit & Split Rock Dams fall below 5% capacity more than doubles while Chaffey Dam will be below 20% for long periods. Also prolonged 10-year dry periods and more short sharp droughts like 2019.
3. The draft Strategy identifies that river health is poor and that native fish population health is very poor. Water for river health is the highest priority of the NSW Water Management Act.
4. Strongly object to Dungowan Dam & Pipeline being a commitment of the strategy.

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Including an unviable project that does not meet the affordability criteria causes a bias in investment decisions. This project should be subject to prioritisation like all options in this strategy.

5. The Namoi contributes 24% of average inflows to the Barwon-Darling. The draft Strategy fails to recognise that 9.5 billion litres (gigalitres (GL) are still to be recovered from the Namoi under the Murray-Darling Basin Plan for environmental use.
6. The draft Strategy does not acknowledge that water in the Namoi Region is over-allocated and cannot stretch to existing commitments, let alone any projected growth in demand.
7. The Namoi is the region most heavily dependent on groundwater. Groundwater extraction for irrigation has breached water sharing plan limits in parts of the Upper Namoi.
8. Strongly support that the final Namoi Regional Water Strategy achieve improved outcomes for 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
- Options 26 – 29 & 43, 44: Research into groundwater health and sustainable access
- 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

9. 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.

10. Strongly 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)
  - **Missing option:** Adopt more efficient irrigation technology
11. Object 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

Regards



Tamworth

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Productivity Commission, February 2021. Draft Report Review of National Water Reform