



Natural
Resources
Commission

*Overview of findings and
recommendations of the*

**Review of the Water
Sharing Plan for the Namoi
and Peel unregulated river
water sources 2012**

This slide pack provides an overview of the Commission's review and should not be taken as our advice regarding the Namoi and Peel plan review. The Commission's official advice and full recommendations for the plan are available via our website – <https://www.nrc.nsw.gov.au/wsp-reviews>

Acknowledgement of Country

The Natural Resources Commission acknowledges and pays respect to traditional owners and Aboriginal peoples of the Plan area including the Gomeroi native title claimants, and the Kamilaroi/Gamilaraay nations.

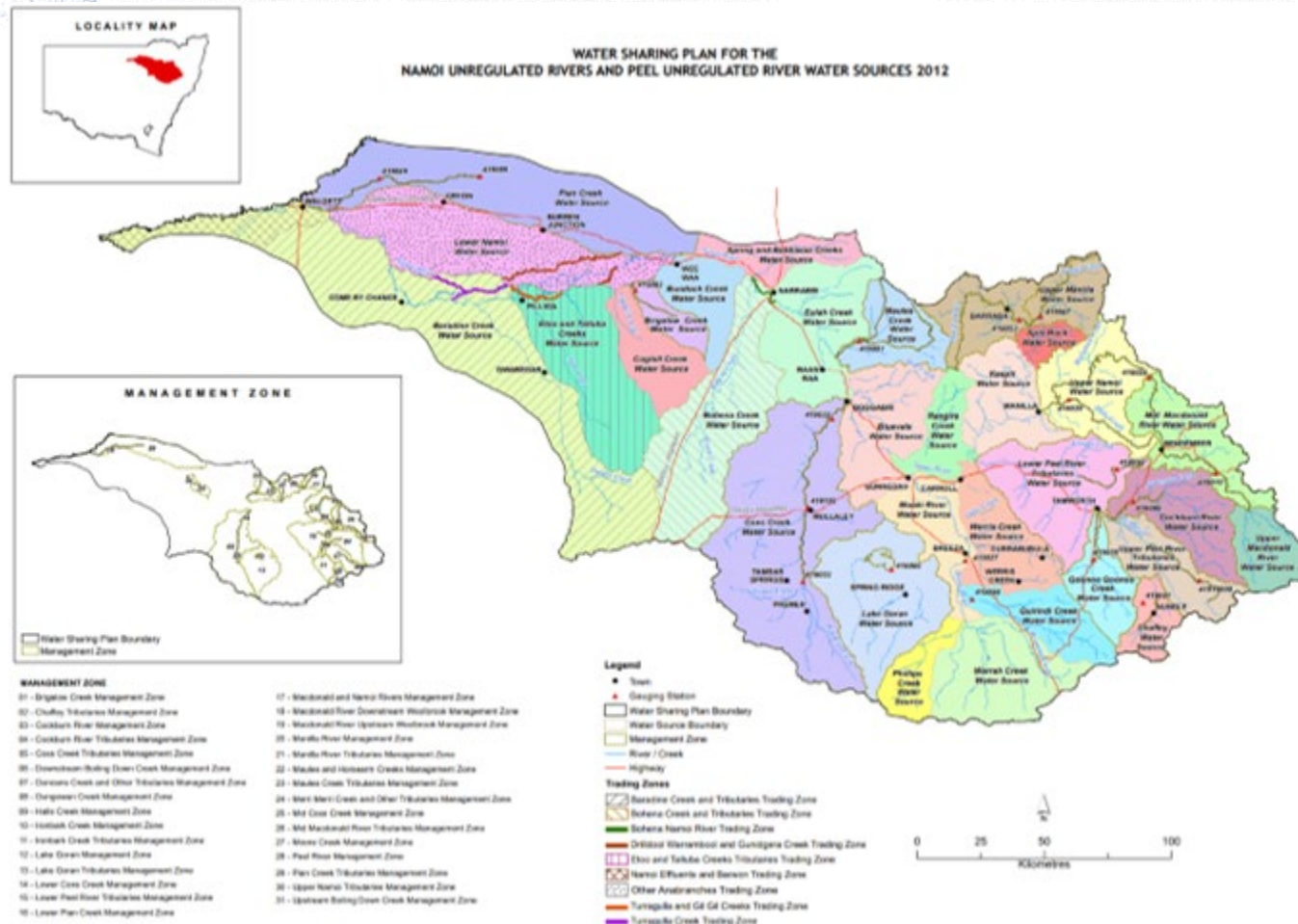
The Commission recognises and acknowledges that Traditional Owners have a deep cultural, social, environmental, spiritual and economic connection to their lands and waters. We value and respect their knowledge in natural resource management and the ongoing contributions of many generations to this understanding and connection.

The Commission also recognises and pays respects to all Aboriginal peoples for whom these waterways are significant.

Our review

- The Natural Resources Commission has a statutory role to review water sharing plans approaching their 10-year expiry
- Our review considered evidence provided via public submissions, stakeholder consultation, technical advice and document review as well as other relevant State-wide and regional government policies or agreements that applied
- Our review evaluated if the plan's environmental, social, cultural and economic outcomes had been achieved and identified where improvements can be made
- Finally, our review recommended whether the plan should be extended as is or replaced with an improved plan

Namoi and Peel unregulated water sharing plan



Overview of plan area

- The plan area transitions from tablelands to central slopes and western floodplains covering a mix of highly productive farmlands and forested land
- The plan supports the internationally significant wetland Lake Goran as well as billabongs, lagoons and floodplains
- The majority of employment in the plan area occurs in the Tamworth LGA where healthcare and social assistance is the largest employer
- Water dependent industries in the plan include agriculture, mining and tourism
- Tamworth and Gunnedah are the major regional centres, with smaller towns Barraba, Manilla, Narrabri, Nundle, Quirindi, Carroona, Breeza, Tambar Springs, Walgett, Wee Waa and Werris Creek contributing to a total population of 92,078 in the plan area

Overall recommendation

- There are material risks to the achievement of environmental, social and cultural outcomes and economic outcomes
- the plan should be improved based on the Commission's recommendations and replaced by 1 July 2025.

Recommendation options available under s43A of the <i>Water Management Act 2000</i>	
Extend existing plan for 10 years	
Improve and replace plan within 2 years	⊗



Actions for plan replacement

- The Commission has identified key issues that should be addressed in plan replacement to improve environmental, social, cultural and economic outcomes
- The following slides detail these issues and the actions that should be undertaken by DPE Water to improve plan outcomes
- Full recommendations made by the Commission to be considered by DPE Water in plan replacement are included in our public report available on our website

Managing at the appropriate scale

Key issues

- The Plan does not adequately consider the interactions between the unregulated rivers and the regulated rivers, or between the unregulated rivers and groundwater. The Namoi catchment needs to be considered as a whole.
- Lack of extraction management at a sub-catchment scale (i.e. Peel Valley) limits the ability to manage extraction risks at a sub catchment scale
- Different extraction patterns across the Namoi creates equity issues if extraction is only assessed at the catchment scale

Recommended actions for DPE-Water

- Develop a water balance and improved modelling framework for the Namoi catchment to better manage cumulative extraction risks
- Review the current sub catchments and include Pian Creek and Lake Goran as sub catchments
- Use sub catchment for both water trading and as extraction management units

Improve water management against extraction limits

Key issues

- The plan lacks a sustainable, numerically defined long-term average annual extraction limits (LTAAELs)
- Available water determinations (AWDs) have been set to 100 percent for all licences
- A lack of LTAAEL assessment and AWD adjustment risks overextraction and potentially impacts river resilience
- Impacts of floodplain harvesting are likely to be significant
- Basic landholder rights have increased since plan development

Recommended actions for DPE-Water

- Establish sustainable, fixed numeric LTAAELs based on best available information including all forms of extraction, ecological requirements, hydrological and climate information
- Quantify total extraction including accounting of extraction by floodplain harvesting to allow management of cumulative risk
- Determine the plan's LTAAEL for each extraction management unit
- Undertake LTAAEL compliance and adjust AWDs as required
- Apply a conservative AWD until compliance is completed
- Review and provide for requirements of basic landholder rights and native title rights

Changes to water accounting will improve transparency and equity

Key issues

- Water accounting rules allow town water extraction to be offset in a different Plan area at a different time which creates difficulties managing extraction and impacts downstream users
- Account management of AWD reductions applicable between unregulated access licences and proposed unregulated floodplain harvesting licences and proposed unregulated and regulated floodplain harvesting licences generates inequitable outcomes

Recommended actions for DPE-Water

- Ensure plan provisions account for extraction at the location and time water is extracted, including take by floodplain harvesting
- Review plan accounting rules to ensure priorities outlined in the Act are maintained
- Review the impact of carryover provisions on the risk of LTAAEL exceedance
- Where AWD reductions occur these should not be applied to local water utility and domestic and stock access licences

Greater protections of town water supply are required

Key issues

- The plan does not prioritise local water utility licences over other licences as required by the Act
- Access rules and carryover provisions do not adequately protect downstream town water supply requirements
- There is a need for improved reliability of town water supply for towns reliant on water supply from the plan such as Walgett
- There is a need for the plan to accommodate increasing demand for town water in Tamworth due to predicted population growth

Recommended actions for DPE-Water

- Include all access rules for town water supply in the plan
- Determine the adequacy of town water supply rules based on pressures imposed by industry, population growth and climate change
- Provide a mechanism to allow for growth in demand for town water supply in the plan
- Review and consolidate existing licence conditions and water supply work approval conditions to ensure they protect town water supply and basic landholder rights
- Consider a requirement for specific rules on Pian Creek to protect replenishment flows that support delivery of Walgett's town water supply

Strengthen protection of water for the environment

Key issues

- Gauging stations within the plan area have not been utilised to generate flow-based water access rules
- Visible flow rules that apply across the majority of the plan area are likely to be insufficient to support ecological function
- Access rules that impact on Lake Goran are likely to be inadequate
- Lack of clarity on water used to meet replenishment flow requirements, and the adequacy of current replenishment flow volumes given projected climate change
- Risks of floodplain harvesting have not been appropriately considered or managed

Recommended actions for DPE-Water

- Utilise current hydrometric network to establish flow-based access rules and move away from no visible flow access rules
- Ensure all high value water sources have flow based access rules to protect water dependent ecosystems including Lake Goran and Wee Waa and Gulligal Lagoons
- Ensure that conditions attached to water licences and works approvals are appropriate to protect high priority needs
- Install hydrometric equipment to monitor water levels at Wee Waa and Gulligal Lagoons
- Extend active management to protect held environmental water to the plan
- Apply cease to pump thresholds as mandatory conditions on access licences
- Define replenishment flows in the plan and ensure protection of these flows for their intended use
- Revise plan provisions to manage risks of floodplain harvesting

Improve management of connectivity of plan water sources

Key issues

- Water sources in the plan are highly connected. Impacts of surface water extraction are likely being exacerbated by groundwater extraction. Linked access rules should be developed to manage this connectivity.
- The plan can contribute water to meet Barwon Darling flow plan targets

Recommended actions for DPE-Water

- Strengthen the definition of connectivity in the plan clarifying that ephemeral streams are highly connected
- Improve plan objectives to recognise importance of water connectivity
- Consider the need to revise plan access rules to mitigate impacts of extraction during low/no flow periods from connected groundwater sources and ephemeral streams
- Consider and implement any necessary changes to the *Water Sharing Plan for the Namoi Alluvial Groundwater Sources 2020*
- Determine flows required from the plan to contribute to Barwon Darling flow targets and update plan rules, as required, to support these targets

Improve trade and equity outcomes

Key issues

- Grouping of plan water sources on a sub catchment scale will allow for an improved assessment of trade risk and more equitable management of extraction across water users
- Differential trading rules have been applied to the same licence category

Recommended actions for DPE-Water

- Trading zones to be updated to a sub catchment scale to improve management of extraction
- Trading rules allow for different access conditions to be placed on the same type of licence within the same water source raising issues of equity
- Include explicit equity objectives, strategies and performance indicators in the plan

Improve outcomes for Aboriginal people

Key issues

- Lack of proactive involvement of Aboriginal people in the determination of Aboriginal value and rights for the purpose of water planning and management
- No protection of known Aboriginal high value water dependent cultural assets
- Limitations on use of water by Aboriginal people
- Controlled allocations have been issued without evidence of Aboriginal water rights being considered
- Lack of acknowledgement and recognition of Native Title in the plan

Recommended actions for DPE-Water

- Include registered Native Title claims including claims underway
- Consult with Aboriginal stakeholders to facilitate water access rights required to meet cultural and economic uses
- Identify and protect high value water dependent cultural assets
- Controlled allocations to be prioritised for cultural water use
- Do not restrict cultural access licences to 10ML
- Ensure plan is consistent with the NSW water strategy relating to Aboriginal people's rights and values and access and ownership of water



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