

Quambone Pastoral Co. Pty Ltd

Natural Resources Commission

Email: nrc@nrc.nsw.gov.au

Dear Sir/Madam

**RE: SUBMISSION FOR THE NRC REVIEW OF THE WSP FOR THE
MACQUARIE AND CUDGEGONG REGULATED RIVERS WATER
SOURCE 2016**

I would like to provide comment to the NRC in regard to the WSP for the Macquarie Cudgegong Regulated Rivers Water Source 2016, specifically to what effects us directly. We live at Quambone and own grazing country on the eastern side of the Macquarie Marshes Floodplain.

Review Question - To what extent do you think the plan has contributed to environmental outcomes, and what changes are needed to the WSP to improve environmental outcomes?

I believe the remaining Environment exists despite the current Water sharing plan not because of it. To demonstrate my point the drought from 2017 to 2020 the Water sharing plan ran out of water for the Environment. The only reason it recovered was the record-breaking three year wet period that followed the drought. The over extraction of Water allowed by the plan decimated Water bird breeding in the marshes from 1974 being 1 million birds to 2016 being under 50,000 birds.

We support the 160,000mg Macquarie environmental water allowance (EWA) but note that it is not as effective as it could be, the priorities under the act state that the sharing of water from Water source must protect the water source and its dependent ecosystem and sharing or extraction of water under any other right must not prejudice the principal set out in paragraphs above that is the dependent system thus I propose, to comply with the priorities, the EWA should be lifted above the general security Water for

irrigation extraction and placed just below town water supply and high Security water.

The second priority under the act is to protect basic landholder rights that is stock and domestic Water. Under the current plan The Gum Cowal Terrigal system receives 10,000 mg if there hasn't been any other flow in the current year and this water is taken out of tributary flows this in effect lowers the stock and domestic water to below extractive uses. To remedy this. I propose that the Gum Cowal Terrigal S&D water be increased in total and allowed out of any source, including the dam, and be taken independent of whether there has been environmental Water, thus be taken away from the control of the department staff.

The WSP does not protect, enhance and restore the water source, and the new floodplain harvesting management rules are grossly ineffective, still allowing unlimited extraction as can be evidenced by the new advertising for new storages, Macquarie Ag 3 storages totalling 660Mg.,

We strongly support the work of the Environmental Flows Reference Group (EWAG), and this should be made official within the WSP.

Connectivity should not only be longitudinal, achieving lateral connectivity is equally as important, but this is not happening as a result of the lack of connectivity rules.

I note in the 2003 WSP "note." Which gives expected results from the rules being implemented. These have been removed in future plans as they highlight the depts failures. I strongly suggest reading previous plans. Below photo of expectations of continuous flow at Miltara

The LTAAEL needs to be protecting the environment, it is not at the moment, the LTAAEL needs to be lowered to reflect the scientific evidence re environmental damage and then further lowered to reflect the draft Regional Water Strategy climate outlook page 33-35

The drought of record needs to be updated.

All EWA should remain EWA throughout the basin, not socialised back into the consumptive pool once it enters Burrendong Dam.

Part 12 System operation rules

58 System operation rules

This Part is made in accordance with section 21 (e) of the Act.

59 Replenishment flows

- (1) The following replenishment flows shall be made when required and when water is available from uncontrolled flows:
 - (a) up to 10,000 ML/yr to the Gum Cowal/Terrigal system,
 - (b) up to 4,000 ML/yr to Crooked Creek below "Mumblebone",
 - (c) up to 1,000 ML/yr to the Bogan River, from Nyngan to the Gunningbar Creek confluence,
 - (d) up to 1,000 ML/yr to Beleringar Creek, downstream of Albert Priest Canal,
 - (e) up to 1,500 ML/yr to Reddenville Break, and
 - (f) up to 5,000 ML/yr to Beleringar Creek.

Note. The replenishment requirements may vary considerably from year to year due to the seasonal conditions. The volumes in subclause (1) are what is necessary to replenish the entire river length in dry antecedent conditions.

- (2) The following replenishment flows may be made available when required:
 - (a) up to 15,000 ML/yr to Marra Creek, from its offtake, downstream to its junction with the Barwon River, and
 - (b) up to 15,000 ML/yr to the lower Bogan River, downstream of its junction with Gunningbar Creek to its junction with the Barwon River.
- (3) Sufficient volumes of water shall be set aside from assured inflows to this water source and reserves held in Windamere Dam and Burrendong Dam water storages to provide for subclause (2).
- (4) A replenishment flow of up to 50 ML/day shall be provided below the Macquarie Marshes, from "Miltara" to the Barwon River, at least twice each water year.

Note. The Northern By-pass Channel may be used to provide the flows under subclause (4), supplementing natural flows through the marshes to maintain the target flow.

Note. In most years, flows through the Macquarie Marshes will provide a continuous water supply at "Miltara".

60 Water delivery and channel capacity constraints

Where necessary for determining extraction rights, managing water releases or providing water under access licences, the maximum water delivery or operating channel capacity shall be determined and specified in accordance with procedures established by the Minister, taking into account:

- (a) inundation of private land or interference with access,
- (b) the effects of inundation on the floodplain and associated wetlands,
- (c) the transmission losses expected to occur,
- (d) capacities of water management structures controlled by the Department, and

Review Question - To what extent do you think the plan has contributed to social outcomes and what changes are needed to the WSP to improve social outcomes?

The original Water sharing plan was written, designed and instigated by the department of Water resources. The main objective was to justify their development actions since the Dam was built, it definitely was not about sustainability, environment, social outcomes or Australian community economic outcomes. It was solely to satisfy their customer base and secure their bureaucratic future. I was about 10-12 at the time 1975 and distinctly remember the land holders around the marshes pointing out all the mistakes of the department (many have been found to be true over time) and being told that the plans had to be made and that they could be improved or

changed as the problems were being discovered but a starting point for a plan had to occur and could be corrected. Most of the landholders were very frightened of this knowing that the bureaucracy did not care for anyone below the their irrigation industry.

As a result, the downstream communities have lost productivity, production, jobs, population, young families, services in their community and an overall loss of sustainability for the future.

The current water sharing plans give Water to the irrigation industry at the available water determination (AWD) the market value of this Water from the state government is zero dollars immediately afterwards ABARES has found that the average value of water is \$545 Mg see table 1

<https://www.agriculture.gov.au/abares/research-topics/water/the-impacts-of-further-water-recovery>

This gift or forgone income by the state government is an enormous cost of production subsidy? For example the cotton Industry using 10 megalitres per hectare is receiving a \$5450 subsidy. This means that irrigated production, food and fibre, of which Australia export almost all, is being sold to wealthy countries that can afford to pay full market value, potentially below the cost of production. Ie "dumping".

If irrigators had to purchase at market value up to their license limit then Water would go to the highest value use. This would increase the economic output of Australian agriculture. It would also decrease the irrigation production of low value Mass products such as wheat Barley etc. Which through supply and demand would decrease supply competing with dryland production and increase the price of those products. Resulting in a massive production and economic increase for rural Australia. This would comply with the Commonwealth Water act objectives see 3 Objects next page.

The drought of record has not been updated. This is ridiculous considering how much the climate has changed over the last few decades.

3 Objects

The objects of this Act are:

- (a) to enable the Commonwealth, in conjunction with the Basin States, to manage the Basin water resources in the national interest; and
- (b) to give effect to relevant international agreements (to the extent to which those agreements are relevant to the use and management of the Basin water resources) and, in particular, to provide for special measures, in accordance with those agreements, to address the threats to the Basin water resources; and
- (c) in giving effect to those agreements, to promote the use and management of the Basin water resources in a way that optimises economic, social and environmental outcomes; and
- (d) without limiting paragraph (b) or (c):
 - (i) to ensure the return to environmentally sustainable levels of extraction for water resources that are overallocated or overused; and
 - (ii) to protect, restore and provide for the ecological values and ecosystem services of the Murray-Darling Basin (taking into account, in particular, the impact that the taking of water has on the watercourses, lakes, wetlands, ground water and water-dependent ecosystems that are part of the Basin water resources and on associated biodiversity); and
 - (iii) subject to subparagraphs (i) and (ii)—to maximise the net economic returns to the Australian community from the use and management of the Basin water resources; and
- (e) to improve water security for all uses of Basin water resources; and
- (f) to ensure that the management of the Basin water resources takes into account the broader management of natural resources in the Murray-Darling Basin; and
- (fa) to ensure that the use and management of Basin water resources takes into account spiritual, cultural, environmental, social and economic matters relevant to Indigenous people, including in relation to their knowledge, values, uses, traditions and customs; and
- (g) to achieve efficient and cost effective water management and administrative practices in relation to Basin water resources; and
- (ga) to ensure that the governance of water markets and trading arrangements relating to Basin water resources is appropriate, and that governance measures promote integrity and transparency in water markets; and
- (h) to provide for the collection, collation, analysis and dissemination of information about:
 - (i) Australia's water resources; and
 - (ii) the use and management of water in Australia.

We had no stock and domestic water in 2019/2020. There should be at least a three year drought reserve in Burrendong Dam to allow for BLR.

The DOR needs to be updated.

Review Question - To what extent do you think the plan has contributed to economic outcomes and what changes are needed to the WSP to improve economic outcomes?

In addition to the social outcomes question above.

Many irrigation licenses are owned by overseas investors or Australians that are taxed in foreign countries. This doesn't seem to comply with the objects of the Commonwealth Water act especially D3 to 'maximise net economic returns to the Australian community from the use and management of basin water resources'. Example of this is the gifting of Water from the state government at the available water determination to the Canadian pension fund basically mounted Police and essential workers in Canada. The result is that the state government doesn't have enough money for New South Wales essential workers, teachers, firefighters, police, nurses etc but the Canadian pension fund can instantly sell their irrigation water and transfer that money back to Canada and pay essential workers in there country. How dumb are we?

Local state and federal governments when disposing of assets are required to sell them through expressions of interest, auctions or tenders this is intended to avoid corruption and to ensure these assets go the highest value use in the National interest for some reason Water, one of Australia's rarest assets, is given to the irrigation industry at the available water determination for free,\$0 only recovering part of the cost of delivery and administration. This is causing perverse economic social environmental outcomes. It could be said that the state government is paying irrigators to destroy the environment and Lower productivity to satisfy just a few individuals/entities many of which are not Australian.

The WSP has to prioritise environment needs before economic needs. This is not happening.

We completely oppose the increasing of the full supply level of Burrendong Dam into the flood mitigation zone. This would shorten natural flood events, meaning less bird breeding events. The environment should not be carrying all the risk, this is contrary to the principles of the Water Management Act.

Floodplain Harvesting management rules are just another example of how the WSP is prioritising selected economic outcomes to the detriment of the environment. The river should never have to owe anyone because of a 500% carryover rule. The trading of FPH entitlements should also not be allowed.

Floodplain Harvesting should be restricted whenever supplementary is restricted.

The gross transfer of wealth upstream to the detriment of the environment and communities downstream beggars belief.

Review Question - Cultural outcomes and changes to improve cultural outcomes?

Little improvement in cultural outcomes.

New WSP should observe dual naming - Macquarie Wambuul River

Traditional owners should be granted their Closing the Gap entitlements plus Cultural Water.

Yours Faithfully

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