

Natural Resource Commission  
GPO Box 5341  
**SYDNEY NSW 2001**

Dear Sir/Madam

**REVIEW OF THE WATER SHARING PLAN FOR THE UPPER NAMOI AND LOWER NAMOI REGULATED RIVER WATER SOURCES 2016**

*Ref:*

Thank you for the opportunity for Tamworth Regional Council to make a submission to the NSW Natural Resources Commission's review of the Upper Namoi and Lower Namoi Regulated River Water Sources 2016 (WSP).

Council has one issue which it would like to bring to the attention of the Commission.

During the most recent drought between 2017 and 2020, which was considered the worst on record for Tamworth region, Council became increasingly concerned the WSP did not adequately account for in stream losses downstream of Split Rock Dam.

Split Rock dam is the primary supply for the town of Barraba. For the town of Manilla the Namoi Weir on the unregulated Namoi River is the primary supply and Split Rock Dam is the emergency supply. Unlike Barraba, where there is an emergency groundwater supply which can be utilised if the Split Rock Dam supply failed, Council has undertaken test drilling of groundwater in the Manilla area but has not been able to discover a groundwater source with suitable quality and flow to be used as an alternate emergency supply to split Rock Dam. Supply of raw water to Manilla from Split Rock dam is via the Manilla River whilst the supply to Barraba is via a pipeline.

In August 2019 Council was provided with information from WaterNSW during the Upper Namoi Water Users meeting held on 28 August 2019 concerning further releases of bulk raw water from Split Rock Dam. At the time, WaterNSW was planning on releasing up to five (5) Gigalitres (GL) of remaining available general security water during the current water year i.e. to July 2020. The releases were, and are, in accord with the WSP and if they had occurred, had the potential of causing Split Rock Dam to reach dead storage by April 2020. If this had occurred, this would have severely impacted the water supply to both Manilla and Barraba, but particularly Manilla, given there is no alternate source.

During discussion with both Water NSW and the NSW Department of Industry (the responsible NSW government department at the time) Council indicated it required adequate storage volumes within Split Rock Dam to cater for the town water requirements of Manilla and Barraba for a period of at least two (2) years. Following further discussion with WaterNSW at the time;

- Manilla's raw water requirement under severe restrictions is approximately 1 Megalitre per day
- There are significant in stream losses between Split Rock Dam and the intake works for Manilla over 30 Kms downstream.

- Given these losses, the preference for supplying small volumes of water to Manilla, is to block release water. For example, it is predicted that if 5ML/day could be extracted from the Manilla River at the Manilla pump station, the instream losses would reduce and releases may only need to be approximately 20ML/day to obtain 5ML/day at the pumping station in Manilla.
- Council would have to change its pumping strategy during severe drought so that 5 Megalitres of water supplied from Split Rock Dam and released into the Manilla River could be pumped from the Manilla River at Manilla and stored behind the Namoi Weir on the adjacent Namoi River. Council would then pump sufficient raw water from the Namoi Weir to meet the daily demand of Manilla.
- Releasing 20ML every 5 days from Split Rock Dam would mean a total raw water requirement of only 1.5GL/annum, or 3GL over two (2) years.
- In addition, Barraba's raw water requirement is 270 ML/annum with no losses (due to pipeline in place). Over two (2) years this equates to 540 ML

Therefore Council was, and remains, of the view the level of Split Rock Dam should never be able to fall below 3.5 Gigalitres above dead storage level to ensure emergency supply can be maintained for Barraba and Manilla, or at a minimum 3 Gigalitres, to provide 2 years of emergency supply for Manilla only.

Council requests future versions of the Water Sharing Plan for the Upper Namoi and Lower Namoi Regulated River Water Sources include necessary changes to cater for this requirement.

Please contact the undersigned should you wish to discuss this issue further.

Yours faithfully

[Redacted Signature]

[Redacted Name]  
[Redacted Title]  
[Redacted Address]

26 February 2025