

# Trangie Local Aboriginal Land Council

## Cultural and Heritage Committee

*Water Sharing Plan for the Macquarie and Cudgegong Regulated Rivers Water Source 2016: Review.*

Submissions close 10th March 2025.

Contact: [REDACTED]

### Summary:

**The Wambuul is Over Allocated, Over Regulated and Over Complicated.**

The river operator must be responsible for maintaining minimum flows in the river and providing connection to the Ramsar listed Maliyanga Ngurra (Macquarie Marshes).

### Water Management Act 2000 (WMA):

- The **WMA** has failed to give “**at least equal weighting**” to **Environmental outcomes**.<sup>\*1</sup>
- This historic failure negatively affects all current water allocations for the **Environment**.

### The Water Sharing Plan (WSP):

- The **WSP** still favours the Irrigation Industry over the **Environment**.
- **Basic Landholder Rights** should be quantified in the **WSP**.
- **Basic Landholder Rights** should not be left at the whim of **WaterNSW**.
- **Connectivity Targets** must be quantified and included in the new **WSP**.
- **End of System Flows** must be quantified and included in the **WSP**.
- **Connectivity Targets and End of System Flows** must include **Volume and Duration**.
- **Data collection and dissemination** must be a priority of the **WSP**.
- **Environmental Water Advisory Group (EWAG)** to be included in the **WSP**.
- **EWAG's** should be mandated in the **WSP** for all regulated rivers.
- **Water Quality data should be collected and used to drive the WSP**.
- **Water Quality** improvement should be a goal of the **WSP**.
- **Bulk Water Transfers (BWT)** must have a transparent trigger point.
- **BWT from Windemere to Burrendong must be categorised as PEW**.
- **Tributary Inflows are our last natural flows, not regulated releases**.
- **Tributary Inflows should not be used to meet orders**.

### Aboriginal Cultural Outcomes:

- **First Nations People** must be a priority in the attempted recovery of the **Wambuul**.
- **Cultural Water Licenses (CWL)** must be quantified and included in the **WSP**.
- **Aboriginal Cultural Outcomes** must be identified and included in the **WSP**.
- **CWL volumes** must be quantified and included in the **WSP**.
- **CWL** must be allocated and its source identified in the **WSP**.
- **CWL** are currently not yet available and take up has not been encouraged.
- **CWL** is a restrictive license compared to a normal **WAL**.
- **CWL** should have the same rules regarding **Carry Over and Saleability**.
- **Cultural** outcomes are possible if **CWL** were allowed to be traded on the open market.

### Base Line Data:

- Comprehensive **Base Line Data** must be collected before future decisions are made.
- Future decisions on the **WSP** must be driven by **Base Line Data**.
- **Base Line Data** must be transparent and available to anyone without exception.
- **Rainfall Rejection** and **Tributary Utilization Rate** must be included in data sets.
- **Surplus Flows** fail to be properly defined and quantified in the **WSP**.
- Our River is officially classified as “**Over Subscribed**” and its recovery must be prioritised.
- The **Sustainable Rivers Audit 2** confirms the Poor health of the Wambuul.
- **State of the River** or **River Report Cards** say the **Wambuul** in **Poor to Very Poor** health.
- Both Dams must have a **Hard Floor**<sup>\*2</sup> to protect the river, the people and the environment.
- The **Hard Flood** should be set at an absolute minimum to satisfy the **Drought of Record**.
- The **Hard Floor** should quarantine water for the duration of the **drought of record**.
- General Security releases must be revoked if the **Hard Flood** is triggered.
- The latest **Drought of Record** must be continually updated and included in the **WSP**.
- **Evapotranspiration Data** should be collected and used to guide the **WSP**.
- **Evapotranspiration Data** should be available to anyone without exception.
- **Rainfall Rejection Data (RRD)** must be made available and considered in the **WSP**.
- **RRD** must be transparent and available to anyone without exception.

### Long Term Annual Average Extraction (LTAAE):

- **LTAAE** calculation is biased toward Irrigation at the expense of the Environment.
- **LTAAE** must reflect the **WMA** principles of “**Equal weighting**” to the Environment.
- **LTAAE** will be impacted severely and negatively by **Climate Change**.
- **LTAAE** must better protect the River, Environment and water dependant species.

### Flood Plain Harvesting (FPH):

- **FPH** must be quantified, regulated, metered and enforced.
- **FPH** has led to a complete loss of flows in some watercourses like Trangie Cowal.
- All **FPH** licenses and extraction limits must allow for minimum downstream flows.
- Extraction limits for **FPH** must be based on available flows to satisfy **all** licensed extraction.

### Burrendong Dam Flood Mitigation Zone (FMZ):

- The **FMZ** must remain a safety feature of the dam’s operation.
- Protection of the **FMZ** should not be open to debate.

### Mid River Re-Regulating Storage (MRRRS):

- **MRRRS** needs to be removed as an option and better river management applied.

\*1. ICAC INVESTIGATION INTO COMPLAINTS OF CORRUPTION IN THE MANAGEMENT OF WATER IN NSW AND SYSTEMIC NON-COMPLIANCE WITH THE WATER MANAGEMENT ACT 2000. (ICAC Report November 2020). “the evidence established that the rights of productive water users were given priority over the rights of other stakeholders and that there was a clear alignment between the department’s strategies and goals and those of the irrigation industry”.

\*2 A **Hard Flood** would be a protected level for both dams. This level would be a percentage or volume of storage set aside for High Security Licences, Basic Landholder Rights and must be also maintain a minimum river flow for the duration of the current Drought of Record. At this trigger point General Security licenses would be suspended for the duration of the drought. The Drought of record must be updated to include the longest drought to date.