

RE: Submission for The Draft Regional Plan October 2022

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<https://water.dpie.nsw.gov.au/plans-and-programs/regional-water-strategies/public-exhibition/macquarie-castlereagh-regional-water-strategy>

Overall The Draft Regional Plan generally is generally disappointing with few positives for lower reaches of the Macquarie Valley, and once again, it seems to acknowledge that there is an impact to the environment as a result of reduced flows, however, in the modelling and business cases, the Plan excludes the impact in the different proposed options will have on the lower reaches including the RAMSAR listed Macquarie Marshes.

- Throughout the Draft Regional Plan, the area of 'Lower Macquarie' seems to mainly represent the irrigation area around Narromine and Warren. Many of the options you have earmarked to benefit the Narromine/Warren area will negatively impact downstream Macquarie River areas (the actual lower Macquarie), therefore it is totally misleading and unreasonable to refer to the upstream irrigation areas of Warren and Narromine as the Lower Macquarie. The Narromine to Warren area has traditionally been referred to as the Mid Macquarie.
- Adjusting Drought of record which is used for water allocations should be updated to better reflect the past and expected climatic conditions going forward. This option should be given high priority as it can only result in greater water security for all users going forward.
- Flood Plain Harvesting appears to be represented throughout the Plain in a favourable manor, however, key issues continue to be ignored by the government of the day including a lack of acknowledgement of end of flow targets and 500% carry over rule. It is likely FPH will have a significant negative impact to the downstream environment.
- Majority of the Macquarie Marshes are on private land, however, maps only show the Macquarie Marshes that are National Parks. Why can't the complete(including private landholder) Macquarie Marshes be indentified on maps?.

Gin Gin Weir

- It is very disappointing to see that the Draft Regional Plan has included the Gin Gin weir as an option . The presented data used to justify the weir in the modelling seems to reflect a clear bias towards the upstream irrigation industry while the ecological impact seems to have been completed and presented in a way to cover up the environmental impact the proposed weir would have.
- The use of an 'Annual Average Flows' 'annual % flow decline' of flow to the Marshes' covers up the impact which is likely going to seasonal and dry/wet cyclical.
- The Draft Regional Plan identifies cotton as the main irrigation industry in the valley so it is reasonable to assume that majority of proposed 6.6GL yield from the weir will be extracted over the hot summer cotton growing season. This will result in longer periods of low or no flows than what is shown in modelling, resulting in a much greater impact to the Marsh ecology over summer months.
Even the graph on Figure 7 P33 showing median flows at Carinda indicates the proposed weir is going to have a significant impact on the river here over the summer.
- Flows can change fluctuate significantly during multiyear drought and wet cycles and the impact the the proposed weir will have will be far greater in the below average years.
- The proposed weir will likely result in increased losses of Macquarie river water to upstream aquifers . There is a known connection between the aquifers used for irrigation around the Narromine area and the Macquarie River. The plan should reflect that flows will be further decreased down the Macquarie River as a result of these losses.
- P 155 on the Economic Table, use of data seems very general with a lack of transparency and references as to how the data was obtained/sourced and what is or isn't included;
 - The business case does NOT appear to include the impact of reduced flows will have on Graziers in the Marshes and the downstream irrigation industry (in the Marshes and around Carinda). It is unreasonable to only include the benefits of such a project while ignoring the negatives.
 - Does the Gross Value Added benefit include a loss of production for land that can't grow other dry land crops if it is irrigated. Ie, there is a cross over in growing seasons between dry land winter crops and irrigated cotton crops, therefore, there will be a significant reduction of winter crop production the additional land irrigated as a result of the weir.
 - It would be good to have greater transparency with the data used for the business case, however, the presented data seems to have a very clear bias in favour of the upstream irrigation industry at the expense of downstream businesses. The Plan

should provide certainty that the downstream graziers and irrigation industry will be included in any future business case for this proposal.

- It is highly likely the Gin Gin weir will further contribute to the Boom Bust cycles of the Valley if there becomes a greater dependence on the irrigation industry.

- The colour coded Ecological Assessment of Gin Gin on P157.
 - The table does not show how the study was done or what area/s is chosen for this study ? Shouldn't the reader be aware of what areas were included and excluded in this study? Otherwise it is potentially misleading.
 - Results do not show the impact of the ecological issues that have been raised on page p156 of the strategy and in the Macquarie Marshes.
 - Once again use of annual and long term averages masks the ecological impact to the wetland ecology of the Macquarie Marshes.
 - Building the weir which will result in increased upstream extractions can only have a negative impact on the connectivity to the Barwon system and is a contradiction to other objectives of the plan.
 - What quality has become a big issue along the river system (including Macquarie Marshes) when flows are stopped. This is a well published issue.

- The Draft Plan should provide certainty that the downstream lower communities and environment will be included in any future business or environment studies undertaken for the proposed weir.

- An option to upgrade the existing weir including a fish way should be included in the Draft Regional Plan.

- The Macquarie Marshes needs greater water security over droughts to protect the wetland ecology and it is unlikely the Macquarie Marshes will be given priority once the Dam hits drought management stages as shown in the past. To The weir will enable natural flows to be held up in Drought Management Stages which this and will be an absolute disaster for the wetland ecology Macquarie Marshes including turtles mussels.

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