

870 Ophir Rd Summer Hill Creek NSW 2800

Website: www.cwecouncil.com

NSW Department of Climate Change, Energy, the Environment and Water Water Group

Submission to the draft Water Sharing Plan for the Macquarie /Wambuul Bogan Unregulated Rivers Water Sources 2025

Thank you for providing this opportunity for the Central West Environment Council (CWEC) to make a submission to proposed changes to this water sharing plan and for the extension for comments. CWEC is an umbrella group representing the environmental groups from centres throughout the Central West of New South Wales, all striving to improve the environment of the Central West region.

CWEC congratulates the department on improvements to the 2012 plan in a more consistent alignment between objectives, strategies and performance indicators. Delineating the differences between environmental, economic, social and Aboriginal objectives may not prove so useful, however, as many of these overlap.

The Macquarie/Wambuul Bogan catchment contains significant environmental and cultural values that need better protection. The recommendations made by the Natural Resources Commission and the Connectivity Expert Panel are crucial to achieving improvements in environmental health of these water sources as a key tributary of Barwon-Darling/Baaka River.

Our group supports the publication of the Long Term Average Annual Extraction Limit (LTAAEL) in numeric form. However, its introduction should be brought forward to 2025. These, along with Sustainable Diversion Limits, should be reviewed annually. It is fairly obvious from the condition of parts of the catchment e.g. Summer Hill Creek that the extraction limit has already been exceeded.

CWEC also supports the following:

- rules that protect low flows and connectivity to the Barwon-Darling/Baaka. Rules recommended by the Connectivity Expert Panel for this water source should be included in this draft water sharing plan to come into effect on 1 July 2025.
- prevention of water supply works within 3 km of Ramsar and other significant wetlands. There should not be any exemptions allowed at the Minister's discretion, and replacement works should meet the same stringent conditions as new works.
- taking into consideration the changes in flow regime due to climate change and variability is also an excellent move, actually long overdue.

CWEC strongly opposes exemptions for new instream weirs and dams due to their ecological impact. Many inland towns are actively pursuing growth at all costs and if no exemptions are permitted for town water, it might discourage this ambition. A better solution is to use off river storage (with structures to prevent evaporation).

CWEC recommends that

- the department researches and implements new river models to ensure the best outcome for the environment. It also recommends proper and thorough gauging throughout the catchment
- planned environmental water integrity (PEW) must take priority over other uses, particularly in periods of low flow
- Pumping from pools should cease when inflows cease
- The metering exemption that applies to surface water pumps <100mm and groundwater pumps <200mm be removed. All water extracted and diverted under a water access licence must be metered
- Aboriginal water rights must be prioritized through allocations for cultural water with proactive inclusion of Traditional Owners in water planning and decision-making.

Your sincerely

Mkinoss

Cilla Kinross Central West Environment Council