

Submission  
No 168

**INQUIRY INTO RATIONALE FOR, AND IMPACTS OF,  
NEW DAMS AND OTHER WATER INFRASTRUCTURE IN  
NSW**

**Name:** Name suppressed  
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Partially  
Confidential

## Gin Gin Weir

I do not support the construction of a new gated weir at Gin Gin, Macquarie River.

The premise on which the requirement for the structure is based appears to be fundamentally flawed and lacks compelling supporting evidence. More transparency to demonstrate the absolute need for the structure is required and alternative options for more efficient use of water need to be pursued. Development and interception of water in catchments upstream of Burrendong Dam, particularly around Bathurst has the effect of reducing future inflows and reliability in the regulated Macquarie water source. These drivers need to be addressed and alternate mechanisms explored.

The third party impacts on downstream users the proposed weir will have, the resultant intergenerational inequity, the damage to the river, environmental assets and intrinsic values are unacceptable.

The numbers just don't stack up.

That's because there are no actual numbers provided to date. Water NSW has persistently claimed that the intent and purpose of a new gated structure at Gin Gin is to capture so-called 'rainfall rejection' orders. Historically, these were orders that were placed by consumptive water users (irrigators) and in the event of rain arriving to water the crops when the order is already in transit in the river, the orders were no longer required and subsequently cancelled. The current Water NSW policy settings favour the party that cancels the water order and unbelievably, their water account is not debited for the cancelled order, even though it has been already released from the dam. So their mistake turns into everyone's problem. If the water in transit can't be traded or sold to another user, it continues along the river system and the commensurate lost volume of the order from the dam is then socialised across all account holders by impacting on the overall reliability.

Rainfall rejection orders are no longer a significant issue in the Macquarie.

When requested, Water NSW has failed to provide the actual volumes of rainfall rejected orders per annum and in which reaches of the river they occur and by whom - which is supposedly centre to their justification for the new structure. This subterfuge is a deliberate withholding of information that the public have a right to know. The surrogate they have been presenting to support the case for the requirement for the structure is a 'modelled case'. These modelled cases use out-dated rainfall rejection volume data from decades past, not recent behaviour at all and do not reflect reality - the modelled cases are essentially a Frankenstein of historical volumes of rainfall rejection cobbled into a contemporary water use setting to project conflated volumes of rainfall rejection to justify the case for a new weir. In recent times, rainfall rejection has significantly dwindled to insignificant amounts in the past decade and to absolutely nothing in the past few years - so a new weir would be absolutely no help in securing water in extremely dry sequences. With sophisticated and accurate weather forecasting now available to every water user at any time of day on a weather app on any digital device, the occurrence of rainfall rejected orders is now virtually non-existent in the Macquarie.

In order to demonstrate full transparency, all the historical actual volumes of rainfall rejection on an event basis, including number of cancelled orders per license holder (names redacted) by year and reach needs to be divulged to the public.

A change in account debiting policy will effectively halt the occurrence of rainfall rejection in the Macquarie Valley

In the event of rainfall rejection still occurring at significant volumes (see above - still waiting to see the actual figures), the introduction of an order-debit policy will effectively deal with rainfall rejection by creating a disincentive to irresponsible water-ordering and save millions of dollars building a

structure that is simply not required. The current practise of socialising the loss across all licence holders due to reckless ordering of water by private individuals can be consigned to the past with a few strokes of a keyboard to change this outdated and ludicrous policy.

The rainfall rejection justification for the new Gin Gin weir is a 'trojan horse'.

Due to the ease in which the rainfall rejection issues could be addressed by simple and inexpensive mechanisms, unfortunately it appears as if rainfall rejection is being used to introduce a mandate now to build infrastructure that will be in the future re-purposed to capture unregulated flows from the Bell, Little, Talbragar and Coolbaggie water sources. These flows are currently supporting a suite of downstream outcomes, including connection flows to the Barwon Darling River and repurposing the weir will effectively undermine the existing set of water sharing rules and the Basin Plan. If this is not the case, legislation is required to provide assurances that the operation of the structure will not ever shift from the declared original intent.

Due diligence is required when investigating impact on the environment, culture and intrinsic values.

The haste in which this project is proceeding, coupled with language being used by ministers and senior public officials, disappointingly suggests that the new weir approval is a *fait accompli*. The area in which the weir is to be constructed is THE most significant and primary Murray cod breeding and recruitment habitat for the Macquarie River. The geomorphology, habitat availability and hydrodynamic complexity make for 'Goldilocks' conditions – just right for this iconic EPBC-listed species to breed, and is supported by scientific evidence. I have grave concerns the negative impact a new structure will have on the specific in-channel conditions favoured by this species particularly and the impact is being trivialised and dismissed. The Gin Gin cod-breeding hot-spot serves as a critical distribution site for this culturally important species, with longitudinal connectivity downstream to resettlement zones spanning both Wiradjuri and Weilywan country and through to Ngemba and Barkindji. If this breeding site is lost, it will be gone forever.

In all, the proposed GinGin Weir fails to address the quadruple bottom line and serves principally to benefit a handful of users whilst negatively impacting on many.