

# Submission to the Natural Resources Commission reviews of the Water Sharing Plans for the Upper Namoi and Lower Namoi Regulated River Water Sources and the Macquarie-Cudgegong Regulated River Water Sources

April 2025



*Coffin left in the dry Namoi River March 2019 at Walgett after a community funeral for the death of the river. DEG wants to ensure that baseflows are maintained so we never experience this again.*

## Executive Summary

Dharriwaa Elders Group (DEG) is an association of Aboriginal Elders who live in Walgett, a river town of about 2,100 people, the majority Aboriginal. Walgett is where the Baawan (Barwon) and Ngamaay (Namoi) Rivers and many creeks, warrambuls and lakes meet in a large floodplain wetland, upstream of Bourke. Walgett is at the end of the Lower Namoi Regulated River Water Source<sup>1</sup> and beside the end of the Macquarie River, and is now home to Gamilaraay, Yuwaalaraay, Ngiyambaa and Wayilwan Aboriginal Nations, as well other Aboriginal and non-Aboriginal people.

Rivers have always been, and remain central, to Walgett culture and life. Rivers used to provide drinking water and food (particularly regular fish meals), healing activities, water for birds and animals, gardens and food security. For Aboriginal people the health of the rivers and people come first.

DEG's Caring for Water and Country program has a vision for Walgett where the wellbeing of Country, including a renewed health of the river systems and groundwaters will enable the social, economic and cultural wellbeing of our community. This Program includes a River Ranger program<sup>2</sup> that monitors water quality and other indicators of river health and that of the ecosystem that depends on it. Our work is a practical example of building knowledge and evidence by combining Walgett Aboriginal knowledge and experience, with that of leading independent western researchers.<sup>3</sup> We share the knowledge we are building with community and collaborators in this submission and numerous others which can be [read here](#).

DEG has long held concerns for the health of surface and ground waters of Walgett. Over its 25 years of operation, DEG has become increasingly aware of the lack of planning for climate change, and the low priority given to Walgett's water security.

**DEG's members live with the undisputable decline in river flows and river health that has occurred over the last few decades. It is clear this is due to over extraction upstream and a failure to halt irrigation growth, despite Governments commitments to do so through the Murray-Darling Basin Cap, the Basin Plan and New South Wales Water Sharing Plans. This situation must be reversed, including by improvements made to Water Sharing Plans.**

## Recommendations

The Water Sharing Plan should be amended by:

1. including the Strategy Principles identified in the draft Aboriginal Water Strategy in the Aboriginal cultural objectives,
2. making clear links between the Aboriginal cultural objectives to the strategies and performance indicators that do not rely on native title and are not a replication of strategies and performance indicators for environmental objectives,

---

<sup>1</sup> Water Sharing Plan for the Upper Namoi and Lower Namoi Regulated River Water Sources 2016, 4(3).

<sup>2</sup> supported by the Murray Darling Basin Indigenous River Ranger Program of the National Indigenous Australians Agency.

<sup>3</sup> More information about DEG's Caring for Water and Country Program can be found at the following link: <https://www.dharriwaaeldersgroup.org.au/index.php/yuwayangarrali/caring-for-country>.

3. including the volume of all three long-term limits as legislation (not just a note),
4. including the model run number/s used to derive all three long-term limits as legislation (not just a note),
5. requiring that the annual allowable take for the Long-Term Average Annual Extraction Limit and the Sustainable Diversion Limit (Annual Permitted Take) can only be calculated using the model used to derive the Long-Term Average Annual Extraction Limit and the Sustainable Diversion Limit,
6. requiring a separation of duties for the calculation and assessment of compliance for all three Long-Term Limits. That is, these are not carried out by one Minister,
7. requiring monitoring and publication, including an audit trail, of irrigation infrastructure since 1995 (the Baseline year for Cap),
8. requiring that new irrigation development is offset by retiring existing irrigation development,
9. requiring the annual publication of all calculations to determine compliance of all three Long-Term Limits,
10. including all forms of take in the long-term limits (including, rainfall runoff and evaporation),
11. monitoring all forms of take on an annual basis (including on-farm dams and commercial plantations),
12. reducing allocations in the year following non-compliance with the long-term limits, by an amount equal to the exceedance of the long-term limits,
13. implementing all findings from the final Connectivity Expert Panel report,
14. including an end-of-system flow target in the Macquarie,
15. requiring an annual assessment of environmental flow targets that is publicly available,
16. reducing allocations in the year following non-compliance with the environmental flow targets,
17. replacing 'uncontrolled flows' in clause 55 in the Macquarie Water Sharing Plan with another term that is defined and does not have a duplicate meaning,
18. requiring that rainfall runoff must be measured and debited from an account,
19. removing the clause: *Any commercial benefit obtained by the taking or use of the water is only ancillary or incidental to the purpose for which the water was taken.* (Clause 42(3)(b) in the Macquarie Water Sharing Plan and 40(3)(b) in the Namoi Water Sharing Plan),
20. removing allowable carryover for Floodplain Harvesting, and
21. amend Clause 60 of the Namoi Water Sharing Plan require consultation with the Walgett Council and holders of Specific Purpose Aboriginal cultural water access licences.

This submission is structured as:

1. the extent to which the plans have met their environmental, social, economic and cultural objectives,
2. changes to the Water Sharing Plans – Aboriginal cultural objectives
3. changes to the Water Sharing Plans – Strategies
4. changes to the Water Sharing Plans – Other

This submission uses the term long-term limits to mean the three limits in the Water Sharing Plan: the Sustainable Diversion Limit; the Murray-Darling Basin Cap and the Long-Term Diversion Annual Extraction Limits.

All parts of this submission apply broadly to both the Namoi Regulated River and the Macquarie-Cudgegong Regulated River water sharing plans, unless specifically stated otherwise.

## The extent to which the plans have met their environmental, social, economic and cultural objectives

In our lifetimes we have witnessed the continual degradation of our rivers. This degradation has increased since the commencement of the Water Sharing Plans in 2016 and the plans they replaced made in 2004.

DEG endorses the findings of the Connectivity Expert Panel, including that:

*the evidence is unequivocal that reduced connectivity in the Northern Basin is having negative impacts on downstream ecosystems and communities. Further, the evidence is clear that a significant portion of this impact is due to rules for sharing water upstream.<sup>4</sup>*

The current Water Sharing Plans have demonstrably failed to achieve their environmental, social, economic and cultural outcomes.

Several independent reviews have found that water management in New South Wales defies its own legislation and unfairly prioritises irrigators over everyone and everything else.<sup>5, 6, 7</sup> This has prevailed for decades and is impervious to the Government of the day.

Inflows into the Southern Basin have declined by half this Century, compared to the last 20 years of the Twentieth Century. There is now a growing body of Western science showing that half of the decline is due to increased irrigation in the Northern Basin.<sup>8, 9</sup> This is despite the policies that

---

<sup>4</sup> Connectivity Expert Panel. (2024). *Connectivity Expert Panel Final Report*.

[https://water.nsw.gov.au/\\_data/assets/pdf\\_file/0003/616737/connectivity-expert-panel-final-report.pdf](https://water.nsw.gov.au/_data/assets/pdf_file/0003/616737/connectivity-expert-panel-final-report.pdf)

<sup>5</sup> Ombudsmen New South Wales. (2017). *Investigation into water compliance and enforcement 2007- 17*.

<https://cmsassets.ombo.nsw.gov.au/assets/Reports/Investigation-into-water-compliance-and-enforcement-2007-17.pdf>

<sup>6</sup> New South Wales Chief Scientist and Engineer. (2023). *Independent review into the 2023 fish deaths in the Darling-Baaka River at Menindee*.

[https://www.chiefscientist.nsw.gov.au/\\_data/assets/pdf\\_file/0009/606915/Menindee\\_Report\\_Dec-2023.pdf](https://www.chiefscientist.nsw.gov.au/_data/assets/pdf_file/0009/606915/Menindee_Report_Dec-2023.pdf)

<sup>7</sup> Independent Commission Against Corruption New South Wales. (2020). *Investigation into complaints of corruption in the management of water in New South Wales and systemic non-compliance with the Water Management Act 2000*. <https://www.icac.nsw.gov.au/investigations/investigation-reports>

<sup>8</sup> Chiew FHS, Weber TR, Aryal SK, Post DA, Vaze J, Zheng H, Peña-Arancibia JL and Robertson DE (2022) *Evaluation of causes of reduced flow in the northern Murray–Darling Basin CSIRO Technical report for the Murray–Darling Basin Authority*. <https://www.mdba.gov.au/sites/default/files/publications/evaluation-of-causes-of-reduced-flow-northern-mdb-with-errata.pdf>

<sup>9</sup> Chu, Williams, Manero and Grafton. (2025). *Effects of long-term meteorological trends on streamflow in the Northern Murray-Darling Basin (MDB), Australia 1981-2020*.

<https://www.sciencedirect.com/science/article/pii/S2214581825000564>

net irrigation development is set at historic levels and supposed to be managed through long-term limits.

As a direct consequence of declined inflows, water and food insecurity has become a great concern to DEG. Our rivers used to supply much of our food – fish, yabbies and mussels, and all of our drinking water. Now, nearly half of Walgett’s Aboriginal community suffers food and water insecurity.<sup>10</sup>

Walgett Council has a local town water utility licence of 2,271 megalitres. Despite water being available on the town water licence and except for a small amount of water taken in 2021 and 2022, Walgett has not taken water from the river since 2016/17.<sup>11</sup> This is because either, there is no water in the river, or the water is too polluted to be treated to become drinkable.

This means that Walgett’s town drinking water is sourced from the Great Artesian Basin. However, the sodium levels in that water are almost twice the amount recommended by the Australian Drinking Water Guidelines and 15 times the amount recommended for people with high blood pressure.<sup>12</sup> Many of our members have been going to sleep hungry or thirsty at night.<sup>13, 14, 15</sup>

Despite our persistent advocacy over 25 years, Walgett’s drinking water quality has not improved and DEG has taken matters into its own hands. DEG has installed a reverse osmosis unit outside its shopfront office to supply safe drinking water for the Walgett community. In early April 2025 DEG’s kiosk had dispensed over 23,000 litres of water since it was launched 13 December 2023.

## Changes to Water Sharing Plans - Aboriginal cultural objectives

Aboriginal cultural objectives should include the Strategy Principles identified in the draft Aboriginal Water Strategy.

There should be clear links between the Aboriginal cultural objectives to the strategies and performance indicators that are in addition to satisfying Native Title requirements and are not a replication of strategies and performance indicators for environmental objectives.

---

<sup>10</sup> Yuwaya Ngarra-li Community Briefing Report: Key Findings from the Food and Water Security Surveys in Walgett, February 2023. [https://www.dharriwaaeldersgroup.org.au/images/downloads/WalgettReport\\_A130223b\\_web.pdf](https://www.dharriwaaeldersgroup.org.au/images/downloads/WalgettReport_A130223b_web.pdf)

<sup>11</sup> WaterNSW. (2025). *New South Wales Water Register: Information about a water source: Total number of water access licences and water usage for a water source*. <https://waterregister.watarnsw.com.au/water-register-frame>

<sup>12</sup> Dharriwaa Elders Group. Community Led Development, University of New South Wales. (2019). *Yuwaya Ngarra-li Walgett Food Forum Report (8 April 2019)*. <https://www.dharriwaaeldersgroup.org.au/images/downloads/YuwayaNgarra-liFoodForumReport27June.pdf> >15.

<sup>13</sup> Yuwaya Ngarra-li Community Briefing Report: Key Findings from the Food and Water Security Surveys in Walgett, February 2023. [https://www.dharriwaaeldersgroup.org.au/images/downloads/WalgettReport\\_A130223b\\_web.pdf](https://www.dharriwaaeldersgroup.org.au/images/downloads/WalgettReport_A130223b_web.pdf)

<sup>14</sup> Williams. (2023). *The Australian town where water security is felt more than some communities in Bangladesh*. [https://www.abc.net.au/news/2023-04-13/walgett-nsw-water-insecurity-worse-than-bangladesh/102212784\\_3](https://www.abc.net.au/news/2023-04-13/walgett-nsw-water-insecurity-worse-than-bangladesh/102212784_3)

<sup>15</sup> Patty. (2023). *The town where Coca-Cola runs more freely than drinking water*. <https://www.smh.com.au/national/nsw/the-town-where-coca-cola-runs-more-freely-than-drinking-water-20230410p5cz93.html>

## Changes to the Water Sharing Plans - Strategies to achieve Environmental and Aboriginal cultural outcomes

The strategies to achieve the environmental and Aboriginal cultural objectives in the Water Sharing Plans are:

1. managing access to water consistent with native title rights (*Aboriginal cultural outcomes*),
2. providing water for Aboriginal cultural objectives (*Aboriginal cultural outcomes*),
3. compliance with long-term limits (*environmental outcomes*),
4. maintaining longitudinal and lateral connectivity within and between water sources, including flows to partially mitigate altered flow regimes (*environmental and Aboriginal cultural outcomes*).

### Managing access to water consistent with Native Title rights

The strategy to manage access to water consistent with Native Title rights is not applicable because there is no Native Title in the Macquarie or Namoi valleys.

### Providing water for Aboriginal cultural objectives

The strategy to provide water for Aboriginal cultural objectives is made available through the provision of Specific Purpose Aboriginal cultural water licences, of 10 megalitres per Aboriginal person or community. To date, no water has been issued under these licences.

### Compliance with long-term limits

The current processes to ensure compliance with long-term limits are ineffective. They cannot contribute to environmental outcomes in any way. Briefly:

1. the long-term limits exist in name only. They can and have been increased outside legislated processes and without any public or parliamentary scrutiny,<sup>16</sup>
2. the assessment of compliance with long-term limits is flawed and lacks any controls necessary for stakeholders to have confidence that the assessments are correct,
3. some extractions are not included in the limits and are not measured, monitored, or regulated (for example, rainfall run-off and evaporation from on-farm storages). We note that both of these exemptions exceed the total long-term average floodplain harvesting volumes,
4. some extractions named as being in the limits are based on unchanged estimates that are decades old and have never been updated (for example, commercial plantations and hill-side dams), and
5. there are no effective remediation measures to address growth in extractions, should long-term limits be implemented.

---

<sup>16</sup> Slattery & Johnson. (2021). *Licensing floodplain harvesting in Northern New South Wales: analysis and implications*. <https://www.parliament.nsw.gov.au/lcdocs/submissions/76066/Attachment%20B%20-%20Slattery%20and%20Johnson.pdf>

DEG is available to discuss these issues in more detail should the NRC require further information or examples.

### *Changes to the Water Sharing Plans needed to enable compliance with long-term limits*

Given the importance of compliance with long-term limits to meet the environmental objectives of the Water Sharing Plans, it is critical they are effective, implemented properly and fully through processes that ensure maladministration and malfeasance is prevented and/or detected.

The Water Sharing Plans should be changed to ensure compliance with long-term limits by:

1. including the volume of all three long-term limits as legislation (not just a note),
2. including the model run number/s used to derive all three long-term limits as legislation (not just a note),
3. requiring that the annual allowable take for the Long-Term Average Annual Extraction Limit and the Sustainable Diversion Limit (Annual Permitted Take) can only be calculated using the model used to derive the Long-Term Average Annual Extraction Limit and the Sustainable Diversion Limit,
4. requiring a separation of duties for the calculation and assessment of compliance for all three Long-Term Limits. That is, these are not carried out by one Minister,
5. requiring monitoring and publication, including an audit trail, of irrigation infrastructure since 1995 (the Baseline year for Cap),
6. requiring that new irrigation development is offset by retiring existing irrigation development,
7. requiring the annual publication of all calculations to determine compliance of all three Long-Term Limits,
8. including all forms of take in the long-term limits (including, rainfall runoff and evaporation),
9. monitoring all forms of take on an annual basis (including on-farm dams and commercial plantations), and
10. reducing allocations in the year following non-compliance with the long-term limits, by an amount equal to the exceedance of the long-term limits.

### *Maintaining longitudinal and lateral connectivity*

The current provisions to achieve longitudinal and lateral connectivity are totally ineffective and they cannot contribute to environmental outcomes in any way, because:

1. the end of system flow rates in the Namoi are not delivered. There are no repercussions for them not being delivered,
2. there are no end-of system flows in the Macquarie, and
3. the flow rates to suspend floodplain harvesting are cosmetic because they are set at levels when there is unlikely to be water on the floodplain.

### *End of system flows*

The Namoi Water Sharing Plan contains environmental flow targets at the end of the system to achieve a minimum daily flow rate in June, July and August. Table 1 shows the number of years that the environmental flow targets have been met since 2004.

Table 1: Number of years the environmental flow targets in the Namoi Water Sharing Plan have been met

No of months the flow target has been met	Number of years
Not met in any month	17
Met in one month	2
Met in two months	1
Met in three months	1
<b>Total</b>	<b>21</b>

Source: WaterNSW. (2025). *New South Wales Real-Time Data: Rivers and Streams: 419 – Namoi River Basin: 419026 Namoi @ Goangra*. <https://realtime.data.watarnsw.com.au/water.stm>

Table 1 shows that since 2004, the environmental flow targets in the Namoi Water Sharing Plan were not met in any month for 17 out of 21 years. The environmental flow target was only met in all three months in one year out of 21 years. When environmental flows were available in any month, they coincided with large supplementary water use and large end-of-system flows,<sup>17, 18</sup> indicating they were result of naturally high flows and not releases by river operators.

There is no end of system environmental flow target in the Macquarie Water Sharing Plan.

The Namoi Water Sharing Plan does not provide for monitoring, compliance or any remediation if end-of-system flows aren't met.

#### *Flow rates to suspend access to floodplain harvesting*

Another provision to meet longitudinal connectivity in both Water Sharing Plans is no access to Floodplain Harvesting when the volumes at Menindee Lakes are very low (195 gigalitres in the Macquarie Water Sharing Plan and 250 gigalitres in the Namoi Water Sharing Plan) and flows at specified gauges are lower than certain flow rates. Table 2 shows the flow rate triggers that deny floodplain harvesting when the volumes at Menindee Lakes are very low compared to overbank flow rates.

Table 2: Flow rates that preclude floodplain harvesting take when the volumes in Menindee Lakes are very low compared to overbank flow rates

River	Gauge	Flow rates where floodplain harvesting cannot occur when the volumes in Menindee Lakes are low	Overbank flow rates
Namoi	419 012 Boggabri	4,600	22,000 <sup>19</sup>

<sup>17</sup> New South Wales Government. (2025). *Usage dashboard: REG Historical Usage*.

<https://water.dpie.nsw.gov.au/our-work/allocations-availability/water-accounting/usage-dashboard>

<sup>18</sup> WaterNSW. (2025). *New South Wales Real-Time Data: Rivers and Streams: 419 – Namoi River Basin: 419026 Namoi @ Goangra*. <https://realtime.data.watarnsw.com.au/water.stm>

<sup>19</sup> DPIE. (2020). *Namoi Long Term Water Plan, Part A: Namoi catchment*.

<https://www.environment.nsw.gov.au/sites/default/files/namoi-long-term-water-plan-part-a-catchment-200095.pdf>

Namoi	419 021 Bugilbone	4,500	13,400 <sup>20</sup>
Macquarie	Combined 421 088 Marebone Break and 421 090 Marebone Weir	3,400	4,000 <sup>21</sup>

Table 2 shows that the flow rates that deny access to floodplain harvesting are much lower than overbank flows. Given that floodplain harvesting occurs when water is overbank, these clauses are unlikely to ever be used because there is unlikely to be an opportunity to harvest water off the floodplain.

#### *Changes to the Water Sharing Plans needed to achieve longitudinal and lateral connectivity*

The Water Sharing Plans should be changed to achieve longitudinal and lateral connectivity by:

1. implementing all findings from the final Connectivity Expert Panel report,
2. including an end-of-system flow target in the Macquarie,
3. requiring an annual assessment of environmental flow targets that is publicly available,
4. reducing allocations in the year following non-compliance with the environmental flow targets.

## Changes to the Water Sharing Plans - Other

Other changes to the Water Sharing Plans include:

- clarify uncontrolled flows,
- rules for specific purpose access licences, and
- carryover for floodplain harvesting, and
- grouping of water orders.

### Clarify uncontrolled flows

The Macquarie Water Sharing Plan includes the taking of uncontrolled flows under floodplain harvesting (regulated river) access licences:

- when there are uncontrolled flows,
- when there no credits in the water access licence holders account,
- are allowed without debit,
- when the water is captured in a tailwater drain, and
- when no other work is taking the uncontrolled flow at the time the tailwater drain is capturing uncontrolled flows (Clause 55 Macquarie Water Sharing Plan).

<sup>20</sup> DPE. (2020). *Namoi Long Term Water Plan, Part A: Namoi catchment*.

<https://www.environment.nsw.gov.au/sites/default/files/namoi-long-term-water-plan-part-a-catchment-200095.pdf>

<sup>21</sup> DPE. (2020). *Macquarie-Castlereagh Long Term Water Plan, Part A: Macquarie-Castlereagh catchment*.

<https://www.environment.nsw.gov.au/sites/default/files/macquarie-castlereagh-long-term-water-plan-part-a-catchment-200086.pdf>

Clause 55 is ambiguous and could be interpreted as allowing extractions from the river during uncontrolled flows. This clause should be improved by replacing ‘uncontrolled flows’ with another term that is defined and does not have a duplicate meaning.

Water that is taken without debit means that it will never be measured and therefore regulated. Even if rainfall runoff remains an exempt extraction, unmeasured water will confound the Regulator’s ability to ensure compliance. This clause should be improved by requiring water captured under Clause 55 to be measured.

## Rules for specific purpose access licences

The Water Sharing Plans provide for up to 10 megalitres of high security water for each Aboriginal person. The Minister can only grant the water licences if:

*Any commercial benefit obtained by the taking or use of the water is only ancillary or incidental to the purpose for which the water was taken.*

Denying Aboriginal people from achieving commercial benefit from their water is unjustified, unfair and contrary to the vision of the plan to provide for:

*the economic benefits of surface water to Aboriginal communities.*

This clause should be removed.

## Carryover for floodplain harvesting

The floodplain harvesting licence water access licence volumes and accounting rules will greatly exceed the long-term average floodplain harvesting take. The volumes are shown in Table 3.

*Table 3: Floodplain harvesting water access licence volumes, maximum annual take and long-term average take*

Floodplain harvesting	Gigalitres
Overbank flow Long-term average take	27.5 <sup>22</sup>
Floodplain harvesting water access licences issued	48.9 <sup>23</sup>
Carryover (5 megalitres per share) and maximum annual use	244.5 <sup>24</sup>

To achieve a long-term average take of 27.5 gigalitres when a maximum of 244.5 gigalitres can be taken in a year requires floodplain harvesting to occur roughly once every ten years. However, the modelling used to inform the Connectivity Expert Panel calculated that floodplain harvesting in the Macquarie occurs nearly every year. It is a mathematical impossibility that a maximum annual take of 244.5 gigalitres will result in a long-term average take of 27.5 gigalitres. This

<sup>22</sup> DPIE. (2019). *Macquarie Regulated River System – Modelling – Baseline Diversion Limit Scenario (update)*. <https://www.mdba.gov.au/sites/default/files/publications/macquarie-castlereagh-wrp-attachment-a-to-schedule-f-macquarie-regulated-river-system-modelling-bdl-scenario-update.pdf>

<sup>23</sup> WaterNSW. (2025). New South Wales Water Register: Information about a water source: total number of water access licenses and water usage for a water source. <https://waterregister.watarnsw.com.au/water-register-frame>

<sup>24</sup> New South Wales Government. (2024). *Water Sharing Plan for the Macquarie and Cudgong Regulated Rivers Water Source 2016*. <https://legislation.nsw.gov.au/file/2015-630%2020241004.pdf>

indicates that the floodplain harvesting volumes are too high and that the volumes of shares issued were not modelled.

The Water Sharing Plan should be amended to remove carryover for Floodplain Harvesting.

### Grouping of water orders

The Namoi Water Sharing Plan provides for the grouping of water orders to minimise water needed for conveyance (Clause 60). The river operator is required to consult with water access licence holders representatives and the New South Wales Environmental Water Manager before grouping orders.

This clause should be amended to also require consultation with the Walgett Council and holders of Specific Purpose Aboriginal cultural water access licences.

## Conclusion

DEG has been telling governments about the problems with our rivers and water management, and their impact on us, for decades. Countless independent inquiries and Western science have also been telling Government that too much water is being extracted, and that the New South Wales Water Agencies are institutionally biased towards irrigation.

A fundamental reset is required to save our rivers, its ecosystems and its communities. The power weighting towards irrigation is intrinsic and inherent. It will not be corrected by small changes to Water Sharing Plans. We urge NRC to recommend brave and far-reaching changes to restore this imbalance.

## Recommendations

The Water Sharing Plan should be amended by:

1. including the Strategy Principles identified in the draft Aboriginal Water Strategy in the Aboriginal cultural objectives,
2. making clear links between the Aboriginal cultural objectives to the strategies and performance indicators that do not rely on native title and are not a replication of strategies and performance indicators for environmental objectives,
3. including the volume of all three long-term limits as legislation (not just a note),
4. including the model run number/s used to derive all three long-term limits as legislation (not just a note),
5. requiring that the annual allowable take for the Long-Term Average Annual Extraction Limit and the Sustainable Diversion Limit (Annual Permitted Take) can only be calculated using the model used to derive the Long-Term Average Annual Extraction Limit and the Sustainable Diversion Limit,
6. requiring a separation of duties for the calculation and assessment of compliance for all three Long-Term Limits. That is, these are not carried out by one Minister,
7. requiring monitoring and publication, including an audit trail, of irrigation infrastructure since 1995 (the Baseline year for Cap),

8. requiring that new irrigation development is offset by retiring existing irrigation development,
9. requiring the annual publication of all calculations to determine compliance of all three Long-Term Limits,
10. including all forms of take in the long-term limits (including, rainfall runoff and evaporation),
11. monitoring all forms of take on an annual basis (including on-farm dams and commercial plantations),
12. reducing allocations in the year following non-compliance with the long-term limits, by an amount equal to the exceedance of the long-term limits,
13. implementing all findings from the final Connectivity Expert Panel report,
14. including an end-of-system flow target in the Macquarie,
15. requiring an annual assessment of environmental flow targets that is publicly available,
16. reducing allocations in the year following non-compliance with the environmental flow targets,
17. replacing 'uncontrolled flows' in clause 55 in the Macquarie Water Sharing Plan with another term that is defined and does not have a duplicate meaning,
18. requiring that rainfall runoff must be measured and debited from an account,
19. removing the clause: *Any commercial benefit obtained by the taking or use of the water is only ancillary or incidental to the purpose for which the water was taken.* (Clause 42(3)(b) in the Macquarie Water Sharing Plan and 40(3)(b) in the Namoi Water Sharing Plan),
20. removing allowable carryover for Floodplain Harvesting, and
21. Requiring consultation with the Walgett Council and holders of Specific Purpose Aboriginal cultural water access licences in Clause 60 of the Namoi Water Sharing Plan.