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Groundwater Strategy team

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## Comments on draft NSW Groundwater Strategy

Dear groundwater policy people,

This draft Strategy looks good. Like most government documents it has lots of glossy photos<sup>1</sup> and this one uses good maps to explain some of its content as well as diagrammatic summaries that might be useful to some readers. The text is not only well structured and well explained: I also agree with most of what is proposed, but not quite all. Something is missing.

I was pleased to read that this draft Strategy proposes a change in policy direction with an intention of enabling groundwater to be managed sustainably despite predicted changes to a climate that will reduce surface flows and groundwater recharge in most of NSW while increasing the demand for water in hotter and often drier seasons.

Thank you for drawing attention to these changes and some of their implications for groundwater management and use. The map with predicted change in recharge is sobering. The implications for people who depend on groundwater need to be known. They should not assume they can pump from deeper down – they might need to plan to reduce their dependence on groundwater by changing what they do, or how they do it (doing better with less) or even where they live. The implications for groundwater dependent ecosystems (GDEs) could be even worse since they are limited in ability to change or move. The high levels of human use of most aquifers are likely to have already combined with other stresses on what remains of ecosystems dependent on those aquifers to reduce their natural resilience.

I am pleased to see that GDEs and the need to plan to protect groundwater for ecosystems figure prominently in the draft Strategy and that some significant work has been done towards identifying GDEs. It is good to see that groundwater extraction limits are to be reviewed but there is a lack of commitment to reduce extraction where and when it is adversely affecting GDEs. If potential impacts are suspected, or if health of a GDE is poor and groundwater extraction is suspected of possibly being a contributing factor, a precautionary approach should be taken to protect the GDEs by reducing extraction. The Strategy should commit to setting extractions limits and rules that will be ecologically sustainable as well as physically sustainable. Given trees can't quickly grow deeper roots when groundwater is pumped down out of reach, and that stream base flows from groundwater used to occur in drought conditions in many locations and groundwater levels now tend to be drawn down in droughts, protecting GDEs may require limiting lowering of water tables or timing of extraction not just changes to LTAAELs. The Strategy should say how actual water needs of GDEs will be protected.

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<sup>1</sup> I had difficulty downloading such a big document at a location with poor internet connection – presumably due to including so many big photos in addition to the other images - and no alternative smaller version. Nice to see photos of springs out Bourke direction but so many of the other big photos of water had little to do with groundwater and made the lack of photos of dry country or drought times more poignant, but I couldn't have downloaded it at all if someone added more.

There is not much explanation in the draft of how far from ecologically sustainable and physically sustainable the current levels of use are. How much aquifer collapse could have occurred and how much risk is there of this?

I do not agree with the proposal in action 2.2 to enable economic growth through increased use of groundwater. So many of the aquifers are already heavily used and the impacts of current use are not fully understood – this seems likely to continue making past mistakes. Businesses and towns should be encouraged to reuse and recycle water rather than to take more from the environment.

I support the concepts of enabling Aboriginal people to get access to groundwater and of protecting the groundwater needs of culturally important assets. A clearer means of achieving this needs to be included in the Strategy.

The Strategy implementation proposal in Chapter 6 do not give sufficient priority to identifying and meeting Aboriginal needs – this must start to be achieved within 5 years. Similarly, a start should be made to protecting water for GDEs in whatever water sharing plans are replaced in this next 5 years, so work should be prioritised in relation to the schedule of which plans are due to be reviewed and replaced first.

The Strategy should focus on achieving better management quickly then improving this, rather than on gathering information with the intention of improving management some time later.

Thank you for your work to manage NSW groundwater including by developing the draft Strategy and in seeking and considering public input.

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