

## Draft NSW Water Strategy submission form

The NSW Water Strategy will be the first 20-year water strategy for all of NSW. It will provide a blueprint to help us tackle the key challenges and opportunities for water management across the state.

For more information about the strategy or to download a copy of the strategy, please visit [dpie.nsw.gov.au/nswwaterstrategy](https://dpie.nsw.gov.au/nswwaterstrategy).

### Your voice is important

We would like to hear your views on the draft strategy, including whether you think it identifies the right priorities, challenges, opportunities and actions.

Please provide your feedback in the submission form below and email your completed submission to [nsw.waterstrategy@dpie.nsw.gov.au](mailto:nsw.waterstrategy@dpie.nsw.gov.au) or post to NSW Water Strategy, Department of Planning, Industry and Environment, Locked Bag 5022, Parramatta NSW 2124 **by 28 March, 2021**.

The form will take approximately 15 minutes to complete and your response can remain anonymous if you wish (see question 1).

Questions marked with an asterisk (\*) require an answer.

If you have any questions about making a submission, please email:

[nsw.waterstrategy@dpie.nsw.gov.au](mailto:nsw.waterstrategy@dpie.nsw.gov.au)

### Making your submission public

We collect information about you, which may include personal information, to assess submissions in response to the department's dealings and activities, and to perform other functions required to complete the project. This information must be supplied. If you choose not to provide the requested information we may not be able to assess your submission.

To promote transparency and open government, we intend to make all submissions publicly available on our website, or in reports. Your name or your organisation's name may appear in these reports with your feedback attributed, unless you have chosen to remain anonymous.

**If you would like your submission and/or feedback to be kept confidential, please let us know when making your submission.** You will be asked for your confidentiality preference at question 1.

If you request that your submission be kept confidential, it will not be published on our website or included in any relevant reports. However, it will still be subject to the *Government Information Public Access Act 2009*.

Your submission will be stored securely consistent with the department's Records Management Policy and you have the right to request access to, and correction of, your personal information held by the department.

Further details can be found in our privacy statement available on our website.

[industry.nsw.gov.au/privacy](https://industry.nsw.gov.au/privacy)

## 1. Information on confidentiality and privacy\*

I give permission for my submission to be made publicly available on the NSW Department of Planning, Industry and Environment website.

- Yes  
 No

I would like my personal details to be kept confidential.

- Yes  
 No

## 2. Your details

Name\*

Contact phone number\*

Postcode\*

Email address\*

Do you identify as an Aboriginal person?

- Yes  
 No

Are you an individual or representing an organisation?\*

- Individual  
 Organisation

## 3. Organisation or business details

Who do you represent?

- Government Please specify
- Peak representative organisation Please specify
- Local Water Utility
- Other (please specify)

## 4. Draft vision

The NSW Government has developed the draft NSW Water Strategy as part of a suite of long-term strategies to maintain the resilience of the state's water services and resources over the coming decades.

*The proposed vision for the draft NSW Water Strategy is sustainable water resources for thriving people, places and ecosystems, both now and for future generations.*

**Which aspects of water management are most important to you and your local community?**

**Do you support the proposed vision for the draft NSW Water Strategy?**

- Yes
- No

**Please tell us more about your response:**

Supported in general terms but see my comments

## 5. Draft objectives

The draft NSW Water Strategy sets high level objectives and principles to guide water service delivery and resource management across NSW. We have identified six core objectives which underpin the draft strategy. These are based on the *Water Management Act 2000*. They are:

- protecting public health and safety
- liveable and vibrant towns and cities
- water sources, floodplains and ecosystems protected
- cultural values respected and protected
- orderly, fair and equitable sharing of water
- contribute to a strong economy.

### Which objectives are most important to you?

Please rank the objectives from most important to least important (where 1 is most important and 6 is least important).

- 4 Protecting public health and safety
- 5 Liveable and vibrant towns and cities
- 1 Water sources, floodplains and ecosystems protected
- 3 Cultural values respected and protected
- 2 Orderly, fair and equitable sharing of water
- 6 Contribute to a strong economy

### Do you have any comments on any of the proposed objectives?

See my submission

## 6. Draft guiding principles

The draft strategy also proposes seven principles to guide the long-term strategic planning for water resource management in NSW. These principles work in tandem with the draft objectives to guide development and implementation of actions.

The guiding principles are:

- healthy environments sustain social and economic outcomes
- water is a limited (although recyclable) resource
- systems thinking to optimise outcomes
- data-enabled planning and decision-making
- transparency and accountability to engender community trust
- forward thinking to build preparedness and resilience
- giving effect to Aboriginal rights and access to water.

### Which principles are most important to you?

Please rank the objectives from most important to least important (where 1 is most important and 7 is least important).

- 1 Healthy environments sustain social and economic outcomes
- 2 Water is a limited (although recyclable) resource
- 6 Systems thinking to optimise outcomes
- 5 Data-enabled planning and decision-making
- 4 Transparency and accountability to engender community trust
- 7 Forward thinking to build preparedness and resilience
- 3 Giving effect to Aboriginal rights and access to water

### Do you have any comments on any of the guiding principles?

see my written submission

## 7. Opportunities, challenges and actions for improved state-wide water management

The draft NSW Water Strategy outlines seven strategic priorities for action, focused on meeting the core objectives based on the *NSW Water Management Act 2000*. These strategic priorities are:

1. Build community confidence and capacity through engagement, transparency and accountability
2. Recognise Aboriginal rights and values, and increase access to and ownership of water for cultural and economic purposes
3. Improve river, floodplain and aquifer ecosystem health, and system connectivity
4. Increase resilience to changes in water availability (variability and climate change)
5. Support economic growth and resilient industries within a capped system
6. Support resilient, prosperous and liveable cities and towns
7. Enable a future focused, capable and innovative water sector.

Under each priority the draft strategy identifies several opportunities and challenges, and a total of 41 proposed actions to improve water management across the state.

### Do you have any comments on the seven strategic priorities identified?

see my written submission

### Do you have any comments on any of the proposed actions identified?

see my written submission

### Are there any additional opportunities, risks and challenges that should be considered in the draft strategy?

see my written submission

In particular

• The strategy needs to recognise that over extraction is also occurring in the state from which a good deal of water is coming from -- Queensland . In this state as well, there are too many straws in the glass. NSW needs to apply its influence, together with Federal government, to get the Queensland regulations around the use of Water consistent with those in NSW, and to ensure an equitable quantity of water flows over the Queensland to NSW boarder, at all times, from floods and in drought

**What actions should be prioritised for immediate implementation and how should they be implemented?**

see my written submission

## 8. Other comments

**Do you have any other comments on the draft NSW Water Strategy?**

see my written submission

## 9. How did you hear about the opportunity to provide feedback on the draft NSW Water Strategy?

**Please select all that apply from the list below:**

- Newspaper
- Radio
- Department of Planning, Industry and Environment website
- Direct email
- Social media
- Have your say NSW website
- Word of mouth
- Other (please describe) via an eNGO - Nature Con

© State of New South Wales through Department of Planning, Industry and Environment 2021. The information contained in this publication is based on knowledge and understanding at the time of writing (February 2021). However, because of advances in knowledge, users should ensure that the information upon which they rely is up to date and to check the currency of the information with the appropriate departmental officer or the user's independent adviser.

[REDACTED]

Department of Planning, Industry and Environment  
Locked bag 5022  
Parramatta NSW 2124

Via [nsw.waterstrategy@dpie.nsw.gov.au](mailto:nsw.waterstrategy@dpie.nsw.gov.au)

To whom it may concern,

**Submission on the Draft NSW Water Strategy**

Thank you for the opportunity to provide feedback on the Draft Water Strategy for NSW (the Strategy). I support the proposed intention of the twenty-year Strategy; to improve the security, quality and resilience of the state's water resources over the long term.

We must acknowledge the impact of climate change on the future of NSW water resources and this policy seems to do that. I also welcome the introduction of the concept of a capped system in which economic activity can exist, if managed sustainably. Water is a scarce resource in Australia and climate modelling indicates that water resources will diminish further in the future. Effective and sustainable management of our water is therefore a critical responsibility of the NSW government.

Failures of water management in years gone by have led to the freshwater systems of the Darling-Baaka and the Basin beyond becoming endangered. There are too many straws in the glass. Over-allocation, industrial agriculture, forestry and extractive resource industries must be recognised for their role in harming our rivers. This strategy does not achieve that.

The draft Strategy's release amid other important consultation and reform processes, including floodplain harvesting rules and half-finished water sharing plans is concerning. The strategy's relationship with the changing shape of water policy in NSW is unclear. Indeed, the Strategy reads less as a driver of reform or overarching framework, and more as an educational document on the activities of the Department of Planning, Industry and Environment – Water (DPIE Water).

[REDACTED]

[REDACTED]

# 1. Background

Our laws, the NSW Water Management Act and the Commonwealth Water Act, recognise the first order importance of repairing the ecological health of NSW Rivers. The NSW Water Strategy must match these legislated priorities in practice.

Water is a scarce resource in Australia. Climate modelling shows that water resources will diminish further in the future. A drier, hotter and more extreme climate will change our landscape and industries.

Effective and sustainable management of our water resources, keeping rivers alive and connected from source to sea, is therefore a huge responsibility for the NSW and federal governments.

Safe and sufficient water is a major part of our right to a healthy and sustainable environment. Water pollution, water scarcity and water-related disasters are denying communities in NSW, particularly vulnerable and marginalised groups, their right to a safe environment.

# 2. Principles

A meaningful NSW Water Strategy should adhere to, implement, and monitor the following principles:

- **The strategy needs to recognise that over extraction is occurring** . There are too many straws in the glass. Over-allocation, industrial agriculture, forestry and extractive resource industries must be recognised for their role in harming our rivers. Although this is implicit in this report, it is not clearly spelt out. Those who have been responsible for the over extraction must cut back, and this will have consequences. The report does recognise this, as it talks about employment , economic prosperity and health of communities, but it's not very prominent.
- **First Nations have inherent rights to use and manage waterways, in order to sustain cultural traditions and build sustainable livelihoods for communities.** These rights are recognised in international agreements and protocols, as well as in Australia's domestic law and policy. In all water management contexts, Government must address the ongoing denial of First Nations rights and be led by meaningful consultation with, and response to, the needs of Indigenous communities.
- **Connection of environmental water across valleys, right through the river system is essential.** Connected rivers define a river basin. Rivers must connect for native fish survival and drought resilience. End of system flow targets, and clear consistent definitions of environmental water must form the basis of the rules that establish how water is shared.
- **Water management must be based on the most recent drought of record and up-to-date data.** Climate change is impacting our rivers and wetlands now. We can only increase our resilience if we use the most up to date scientific data about our water. The Government needs to include data from the most recent droughts when working out how much water to

allow to be used by irrigation and it should mandate that climate predictions are incorporated into all Water Sharing Plans and Long-Term Water Plans.

- **Investment in purified recycled water for all urban water supplies is positive.** As water becomes scarcer our communities must be able to re-use what we have, reducing the demand for water. This equally applies in riverside communities.
- **Floodplain harvesting must be managed in a manner that ensures the protection of floodplains and river systems from overallocation of water.** Interim floodplain harvesting licences are necessary until all metering, modelling and good management rules are in place. Locking in new floodplain harvesting property rights before the system is working well could expose the public purse to multi-million-dollar compensation claims.
- **Water management prioritise efficiency of water use and demand management because new dams and new weirs will destroy river, floodplain and wetland health.** The Strategy appears to legitimise proposed dam schemes, and this is a concern. Dams are backwards looking technology. Dams adversely affect the natural flow of rivers and create hydrological, ecological, biological and cultural heritage problems. Rather than make new water, they deny water to the environment and people downstream. Dams are not a just or equitable solution to over-allocation.
- **The extraction of non-renewable resources near or in aquatic systems, including aquifers, riparian areas and floodplains must be constrained by the precautionary principle. There must be no exemptions for water use by mining and irrigation industries.** A recent Independent Commission Against Corruption report into water management in NSW found the Government favoured irrigation over the environment and First Nations concerns to the point where they were breaking their own laws. It is time for the NSW Government to honour the priorities of the NSW and Commonwealth Water Acts and stop allowing exemptions to extractive and non-renewable industries when it comes to water use.
- **Performance indicators are an essential tool to monitor the outcomes of all water management processes.** The Strategy should include defensible performance indicators that are clear and defined. Up-to-date, evidence-based baseline data ought to be used to assess the adequacy and performance of water management processes and in turn direct ongoing adaptive management. Monitoring results should be maintained on a central database that is publicly accessible. Sufficient flexibility to change provisions must be included in any system of evaluation. The Strategy should allow for changing tact where results of monitoring indicate a need to do so.
- **Water policy in NSW requires better communication because everyone has a stake in water.** Local communities should be engaged in all aspects of water resource management. Yet, water policy and the plight of the Murray Darling Basin remains a complex and difficult issue to engage with.

More of the community, particularly in Sydney, deserve a better understanding of what the NSW Water Strategy aims to do, and the present status of our rivers. This Strategy is an opportunity to explain water management better, in more places and spaces and in plain English. The Strategy does clearly explain policy settings however it is missing goals and indicators regarding the ongoing education of the community and improved public access to relevant information.

- **The strategy needs to recognise that over extraction is also occurring in the state from which a good deal of water is coming from -- Queensland** . In this state as well, there are too many straws in the glass. NSW needs to apply its influence, together with Federal government, to get the Queensland regulations around the use of Water consistent with those in NSW, and to ensure an equitable quantity of water flows over the Queensland to NSW boarder, at all times, from floods and in drought

Thank you for the opportunity to provide feedback on this Strategy.

[REDACTED]

[REDACTED]