



I wish to provide comment on the Draft NSW water strategy. The document provides some useful background to the current status of water management in NSW and the Murray-Darling Basin particularly pertinent is:

- the acknowledgement of the fundamental role of water and it is an 'agnostic resource' with multiple uses *"Our rivers, creeks, wetlands, floodplains, estuaries and groundwater sources support almost every aspect of our daily lives: "*
- Page 10 which outlines a key dilemma the NSW community faces. That is how to *"Deliver and manage water for local communities—improve water security, water quality and flood management for regional towns and communities"* while also trying to *"Protect and enhance the environment—improve the health and integrity of the environmental systems and assets, including by improving water quality. And as figure 8 shows water is an increasingly limited resources with increasing pressure on its use. We must manage it wisely and be adaptively given the changing situation.*

However it would seem the critical role of water in providing ecosystem services is overlooked. Water is not simply something either for 'the environment' or 'the community' but there is an important nexus between these two user clusters. It is only conceptually mentioned on page 42: *"water is a limited (although recyclable resource)".* Yet the draft Strategy fails to provide actions aims specifically at maintaining ecosystem services so that we can re-use this resource again and again.

This means overall I am supportive of the Vision, Objectives and Priorities of the draft Strategy, but see a few key oversights:

- *"**Improve** engagement, collaboration and understanding"* as part of *"building community confidence and capacity"*. What does 'improve' specifically mean beyond being a value laden term? There need to be greater fairness in community engagement. There is a fair bit of research that unpacks this idea and shows fairness has both procedural and distributional justice elements. Procedure is related to transparency and some of this is captured in the actions - but there needs to be more. Distribution is about all stakeholder groups treated equally in terms of information and opportunity
- *Priority 3 improve river, floodplain and aquifer ecosystem health and system connectivity.* There are no priorities specifically addressing connectivity such as meeting the prior commitment to fish ways, designing these fishways so they allow fish movement both ways and have low mortality rates. Nor is there mention of unnecessary weir removal. I would have thought that even stating a commitment to implementing the actions in the native fish strategy would be useful.
- *Priority 5: supporting economic growth and resilient industries* As mentioned above, there is a need to include in this section the maintenance ecological processes so that downstream users do not have to continually be exposed to toxic algal filled water. It might also include the importance of maintaining functional wetlands to act as filters.

Finally, the draft Strategy must also be adaptive. It should be able to respond to new evidence as it becomes available For example:

- Recommendations by the Murray Darling Basin Authority for changes to any plans supporting Water Resource Plans as part of the accreditation process;
- Finalised 30 year Integrated Water Cycle Management Strategies for NSW's 92 local water utilities;
- Evaluation of government's Safe and Secure Program
- Reviews of processes by the NRC that indicate a bias or discrepancy in community engagement processes

Yours faithfully

