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Lachlan Valley Water Inc

Sustainable, productive and efficient water use in the Lachlan Valley

**Submission to
Department of Planning, Industry and Environment
Draft NSW Water Strategy**

March 2021

SUBMISSION ON THE DRAFT NSW WATER STRATEGY

1. Introduction

Lachlan Valley Water (LVW) welcomes the opportunity to make a submission on the draft NSW Water Strategy. Lachlan Valley Water is an industry organisation representing more than 500 surface water and groundwater licence holders in the Lachlan and Belubula valleys. Membership of LVW is voluntary and our members represent all categories of licences except for those held by environmental water managers. While this submission is made on behalf of our members, individual members will also make their own submissions.

2. Overview

As noted above we welcome the opportunity to make a submission, however, there have been numerous reviews of water policy and water management at both Commonwealth and State level over recent months and we are concerned that there may be some fatigue at yet another call for submissions on what is a very wide-ranging strategy. In addition, input to the State Strategy is being requested midway through the exhibition of the regional water strategies, and before there has been any feedback on the regional strategies where submissions have already closed.

We therefore suggest that greater face-to-face engagement with the community, and particularly with regional communities, would assist with input on this State Strategy.

3. Draft vision

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

However, we consider that the vision is very high level, and as mentioned above, recommend that the development and implementation of a workable State Strategy will require further detailed engagement with the community, and particularly with local water utilities and the full range of licence holders.

Aspects of Water Management Important to the Lachlan Community

As water security and management options vary widely across the state, and LVW represents water users in the Lachlan catchment, our submission focuses more specifically on how the draft Strategy vision can be delivered in the Lachlan region.

- Water security and reliability are essential to support towns, the entire community, the regional economy, industries and irrigated agriculture, and a sustainable environment. In a catchment where inflows are highly variable, and which was identified back in the NSW State Infrastructure Strategy 2014 as having poor levels of water security and reliability, as well as low flood management capability, we consider it is necessary to proceed with infrastructure investment to help manage both water security and flood mitigation.
- Strategies and actions that support a high level of water security for local water utilities, without having a negative impact on the reliability of other licences, are also

important. It is expected that the strategies will vary depending on the local water utility, but enabling access to multiple supply sources is considered important.

- In relation to licenced water entitlements, it is important that adaptive management is implemented to deal with the risk of climate variability, rather than adopting a highly defensive management approach. NSW has already developed a range of options to progressively manage risk to licence entitlements through the Extreme Events Policy and the Incident Response Guide, and we support more constructive management through these options.

4. Draft objectives

All the NSW Water Strategy objectives are highly important, and LVW assesses that the three most important priorities are:

- protecting public health and safety
- orderly fair and equitable sharing of water, as it applies to all water users in the widest sense, not simply licence holders
- water sources, floodplains and ecosystems protected

Prioritising these objectives will contribute to achieving the other three objectives

- cultural values respected and protected
- contribute to a strong economy
- liveable and vibrant towns and cities

5. Draft guiding principles

Again, all the principles are important, and it is therefore challenging to apply a ranking from most to least important.

Most important principle:

- Water is a limited (although recyclable) resource

In LVW's view this principle drives the overall purpose and objectives of the draft Water Strategy.

The second tranche of principles are:

- Transparency and accountability to engender community trust
- Data-enabled planning and decision-making.

It is assessed that the above three principles will provide guidance, knowledge and policy direction for the remaining four principles:

- Healthy environments sustain social and economic outcomes
- Systems thinking to optimise outcomes
- Giving effect to Aboriginal rights and access to water
- Forward thinking to build preparedness and resilience

6. Opportunities, challenges and actions

LVW supports the seven strategic priorities. It should also be recognised that many of the actions listed are already at some stage of implementation.

For example, Action 1.2 to increase the amount and quality of publicly available information about water in NSW. There is already a large volume of information available through the WaterNSW Water Insights Portal and Real time data, the NSW Water Register, the Department's dashboards, environmental water registry, groundwater annual reports. This action may, in reality, be more about making people aware of what information is available and how to locate it.

Comment on proposed actions

Action 1.5 Take the final steps in floodplain harvesting reform. This action should acknowledge that there are 10 floodplain management plans in the southern Basin and no clear process about how an assessment will be made in regard to floodplain harvesting in this region. It should incorporate the feedback from the review of these floodplain management plans that is currently underway.

Action 2.4 Provide Aboriginal ownership of and access to water for cultural and economic purposes. The Federal Government committed \$40 million for purchase of water for this objective back in 2018 as part of an amendment to the Basin Plan, and it is unclear why there has been no implementation of this to date.

Action 3.1 Implement NSW Long Term Water Plans to protect and enhance ecological systems. The Strategy must factor in that the environment and all sectors of the regional economy will be affected by climate variability, and that policy and management must adapt to the this variability in the system.

Action 3.4 Invest in long-term and effective monitoring, evaluation, reporting and research. It is extremely important to implement this action and to have current and up-to-date data available. A clear example of this is the need to update the NSW River Condition Index, which is currently dated 2012, not long after the end of the Millenium drought. This data is now almost 10 years out of date, and effective management depends on current monitoring data being available.

Action 4.3 Improve drought planning, preparation and resilience. NSW already has effective and workable drought management strategies which identify when inflows are less than forecast, which in turn allows early and proactive management.

Action 5.4 Identify infrastructure and operational options for each region of NSW. This is an essential action to support the regional communities, businesses and industries that rely on water access, in view of the increased climate variability that has occurred over the last 20 years and is forecast to continue.

LVW believes there is a strong economic rationale to provide a significant improvement in water security and reliability in this catchment, and that it would have community-wide benefit for towns, environment, licence holders, Aboriginal communities and industry.

Please feel free to contact me for further information on any of the issues in this submission.

Yours faithfully



Mary Ewing
Executive Officer