

[REDACTED]

Regional Water Strategies Team,
Lands and Water Division
NSW Department of Industry

By email to: regionalwater.strategies@dpi.nsw.gov.au

Dear Sir / Madam

DRAFT SOUTH COAST REGIONAL WATER STRATEGY

Introduction

The Park Management Committee of the National Parks Association of NSW (NPA) welcomes the opportunity to comment on the South Coast Regional Water Strategy (the Strategy) and the Draft Regional Water Strategy: South Coast: Long list of options.

Established in 1957, NPA is a community-based organisation dedicated to the protection and conservation of nature. Our activities are particularly focused towards advancing:

- long-term protection of biodiversity and supporting ecological processes
- an expanded network of protected natural areas
- better systems of environmental law, policy, and planning
- evidence-based natural resource management
- a closer connection between people and nature.

Healthy and resilient river and groundwater systems are vital for our collective wellbeing. NPA has consistently advocated for ecologically sustainable water use and sound management of water resources through participation in government processes and collaborative projects with other environmental groups and academic bodies.

General Comments

The strategy describes a range of threats and challenges for each catchment, including climate change based on modeling.

Given that the relationship between ground and surface waters is not fully understood and that the reserves in hard rock aquifers are unknown, the current condition and full extent of surface and ground waters are also unknown. Allocating water without first determining the extent of the resource is likely to lead to over-allocation of water and degradation of both surface and ground waters reserves.

NPA does not support the construction of new dams or off-stream storages because of their financial and environmental costs. The Strategy explicitly recognises the environmental harm done by the Brogo dam. Dams also do not increase total water volume within catchments.

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Coastal lagoons should be managed to maintain as near natural character as possible.

Strategy Objectives

The Objectives of the Strategy (section 1.2) should be prioritised. The primary objective of the water strategies should be to improve the health and integrity of water dependent ecosystems. This would facilitate provision of Aboriginal water rights, interests and access to water. The second objective should be the ecologically sustainable allocation and use of water. Water allocations must not negatively impact the condition of water dependent ecosystems within each catchment. The objective: "Enable economic prosperity" should be deleted as promoting economic returns over sound environmental management of water use and extraction leads to over extraction and environmental degradation.

Issues such as flood mitigation must be addressed through the planning system as well as the Strategy.

There has been significant erosion, loss of water quality, downstream siltation and negative impacts on groundwater primarily in the Bega River catchment from clearing for cropping, logging and the impacts of cattle. It is vital that remnant vegetation, including wetlands, particularly, in the upper catchments be retained to minimize sedimentation and improve water quality. We note that many of the upper catchments are already in national parks.

The Strategy also needs to include mechanisms for increasing native vegetation cover throughout all catchments to restore catchment hydrology. This is especially needed in catchments that were severely impacted by bushfires that had significant negative impacts on aquatic animals such as platypus. These mechanisms need to be integrated within relevant legal frameworks for native vegetation, forestry, mining and rural land.

Good water quality in coastal ecosystems is important for local fisheries and oyster farming as well as tourism.

Climate variability & water governance

It is pleasing to see consideration in the Strategy of how climate change may impact water resources in the future. Unfortunately, a water allocation system centred on legal entitlements measured in volumetric amounts does not reflect the variation in river flows that are low most of the time. The consequence is that water governance in NSW is:

- inordinately complex,
- encourages over-allocation for consumptive use,
- lacks transparency, and
- allows for regulatory failures such as activation of 'unused' entitlements.

Review of the current regulatory regime should itself be a key strategy objective.

The creation of the Natural Resources Access Regulator monitor water use could help restore public confidence that water extraction is being extracted fairly. NPA supports the use of telemetry and remote data transfer to the regulator to provide accurate information about water usage.

Water resource limits

There is no basic information about the total magnitude of the resource itself such as a table summarising for each major catchment the total catchment yield (ML) per annum. Consequently, a reader cannot form an impression of the extent to which catchment yield is committed to consumptive use under wet, dry or drought conditions.

It is essential that the Strategy define upper limits on water extraction. NPA opposes any increase in water extraction. To achieve reductions in water use, water recycling, demand management and winding back of over-commitments in water allocations including, if necessary, licence buybacks should be undertaken.

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Comments on the Long List of Options

Proposals that NPA would support:

7, 9, 23, 27, 28, 29 (good for other fauna not just fish), 30, 31, 32, 33, 35, 39, 40, 43.

We welcome the deferral of 5.

Proposals that NPA would support conditionally:

8 – would not support if more extraction was permitted

24 – would not support if more off stream storages permitted

25. - would not support if used to justify more subdivisions and only support if subject to stringent environmental assessment and conditions

26 - would not support if irrigation expanded without consideration of environmental constraints and impacts

34 – would only support if it is used to wind back extraction.

42 - would not support if allows more extraction

44 – do not oppose planning but would not support increased use of coastal groundwater resources unless there will be no longer term negative impacts on the quantity or quality of the groundwater

Proposals on which NPA is unable to comment

14 – not enough information available, appears to be a management issue

41 – NPA has not had the opportunity to consider the NSW Extreme Events Policy

Proposals that NPA has significant reservations about

1. would oppose if it involves significant dam enlargement.

2. see above

3. would support if uses renewable energy but notes it would be very expensive

6. would not support if it requires an enlarged dam

10. would support if uses renewable energy other than pumped hydro but notes it would be very expensive

Proposals that NPA strongly opposes

11, 13, 15, 17, 18, 19 (due to possible adverse impact on South East Forests National Park), 37, 38

Proposals that there is not enough information about and NPA is likely to oppose

12, 16, 20, 21, 22, 36

Proposal about which NPA is neutral

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Conclusion

NPA supports the development of regional water strategies. It is essential that maintaining or improving water quality and ecosystem health be prioritised over economic and industry interests. If this does not occur, the quantity and quality of both ground and surface water will likely deteriorate.

We are pleased to see the Strategy incorporate recent modeling of the impact climate change. A maximum should be set for water extraction in each catchment under current conditions. The strategy should also state that the amount of water extraction which is permissible for activities such as agriculture, silviculture and mining may need to be significantly reduced in the future as climate change impacts become more severe.

Yours faithfully

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National Parks Association of NSW

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