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Friday 12 August 2022

**Submission
Draft State Groundwater Strategy**

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

CWEC welcomes the opportunity to comment on the draft State Groundwater Strategy (the draft Strategy) with the anticipation that our input will be considered in the final document.

We support the aims of the draft Strategy to:

- Protect groundwater resources and the ecosystems that depend on them
- Build community and industry resilience through sustainable groundwater use
- Improve groundwater management decisions with better information

However, to achieve these aims there needs to be clear and documented recognition of the current condition of groundwater sources and their dependent ecosystems.

There also needs to be a recognition that groundwater sources in some areas have been over-relied on for agricultural use, particularly during droughts, and that current limits to extraction in water sharing plans are not based on the best available science.

It is of great concern that the Central West groundwater sources in the Lachlan and Macquarie catchments are under threat and were subject to a review of water levels in 2021.

The review identified that the Upper Lachlan groundwater source has areas of long-term declining water level trends and large seasonal drawdowns in response to extraction and drought and that a section 324 Order limiting extraction and trade in Zone 1 is in place until 30 June 2024.

Areas with declining water levels are also being monitored in the Lower Lachlan and Lower Macquarie groundwater sources.

It is imperative that the final Strategy recognises these major problems and that a survey of the condition of groundwater dependent ecosystems (GDEs) is conducted in the areas where groundwater levels have dropped below natural levels.

CWEC is concerned that the draft strategy is not focussing on sustainable groundwater use. Rather it is pushing increased reliance on groundwater for economic development in a drying climate. This is irresponsible in the Central West where major impacts on groundwater from large mining projects is evident and ongoing.

The Cadia goldmine near Orange has drawn down a significant volume of regional groundwater and has currently stopped underground operations because of groundwater incursion.¹

The final Strategy must include an assessment of the cumulative impact of mining on groundwater sources in the Central West including loss of base flows to rivers and streams, threats to GDEs and loss of aquifer structural integrity.

Finally, CWEC supports that groundwater must be more closely considered in all land use planning and major development proposals. For this reason, CWEC strongly opposes the proposal to raise Wyangala Dam wall to capture an additional 650 GL. This volume of water flow currently provides important recharge to the Upper and Lower Lachlan groundwater sources. The impact of the Wyangala Dam project on groundwater sources must be a key focus of the environmental assessment process.

Public investment into improved mapping of GDE location and condition is the first step in improving sustainable management of groundwater. The emphasis on research into projects to increase economic output from groundwater use is not supported.

Yours sincerely

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¹ <https://www.abc.net.au/news/2022-08-03/australia-gold-mine-orange-stops-extraction-underground->
