

**ECCO Submission Re: Draft Groundwater Strategy
August 14, 2022.**

Dear Sir/Madam

Thank you for the opportunity to comment on the draft Groundwater Strategy for New South Wales. I am writing this response on behalf of the Environmentally Concerned Citizens of Orange (ECCO). ECCO is a local not for profit environmental group based in Orange. We have been operating since 2006. Our role is that of environmental advocacy, which includes supporting the management of our water resources so that their health and biodiversity is considered.

ECCO supports Strategic Priority 1: *Protect groundwater resources and the ecosystems that depend on them.* Located in the Orange district are several important groundwater resources, the protection of which have been a concern of ECCO and other local environment groups. Their protection relies on their accurate location. We would like to see funding made available to accurately locate the presence and extent of local aquifers.

Local aquifers have been affected by mining; Local mining projects have authority to access underground water. It is important that this access be transparently and independently monitored to ensure that the health of our local aquifers is maintained. It is also important that any pollution or interference of aquifers from mining activity be remediated by the mining company responsible.

ECCO also supports the concept of Strategic priority 2 which states *Build community and industry resilience through sustainable groundwater use.* We do not, however, support the approach adopted by the draft strategy. ECCO objects to the proposed actions that encourage the exploitation of groundwater to further extend and enhance its use for the purposes of the development and extension of industries such as mining and gas production. Such a use, especially in the case of using groundwater to facilitate coal and gas projects is counter to our ambition to reduce carbon emissions and to reach our carbon reduction targets.

Strategic Priority 3 is also worthy of support. The priority states: *Improve groundwater management decisions with better information.* Better information is always desirable. However, it must be stressed that the main purpose of the acquisition of better information should be to provide knowledge for the protection of our groundwater resources, not to provide information to facilitate their extraction and exploitation for

greater commercial benefit. The better information referred to in Strategic Priority 3 must include information on the impact of groundwater use and interference through mining activities. To enable the acquisition of better information to occur, it is highly important that the research is carried out by an independent authority. Better information should also include an assessment of the cumulative effects of past use of groundwater by mining companies, as well as the impact of current use.

In conclusion ECCO supports in principle the Draft NSW Groundwater Strategy. We agree that it is essential to protect our groundwater resources. In order to ensure their protection, we agree that our groundwater should be used sustainably, and we agree that better information is important if we are to make better decisions on the management of our groundwater resources. Mining activities have a significant impact on our groundwater, so it is unfortunate that the Draft Strategy in its present form does not do enough to protect groundwater in New South Wales from such activities. ECCO would like to see less emphasis placed on the encouragement of economic growth in the draft strategy, and more on the protection of the environmental needs of our groundwater. We do not want this Strategy to be a document acting as a stalking horse to legitimize further exploitation of a resource that is already compromised.

Yours sincerely,

A black rectangular redaction box covering the signature of the sender.