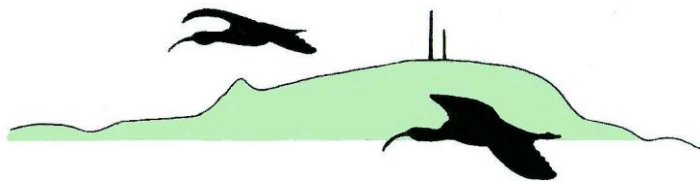


**ORANGE FIELD NATURALIST  
& CONSERVATION SOCIETY INC.**

[REDACTED]  
[REDACTED]  
[REDACTED]



Department of Planning and Environment  
4 Parramatta Square  
12 Darcy Street  
PARRAMATTA NSW 2015

**Re: Macquarie – Castlereagh Water Strategy – second draft**

To whom it may concern,

Orange Field Naturalist and Conservation Society (OFNCS) is grateful for the opportunity to comment on the second draft of the Macquarie – Castlereagh Water Strategy. The Society has been an advocate for the environment since its inception in 1974.

This strategy must have as its primary focus the sustainable and better management of water to make sure the health of the rivers and wetlands are maintained. This is critical because of the likely impacts of climate change. Orange is on the headwaters of the Macquarie River and any water that falls here should be managed well for the environment. Potentially it should flow down the full length of the river system and on to the Darling River.

Over allocation of water has been a problem in this catchment for a long time. The Macquarie Marshes, a significant Ramsar wetland, have been shrinking for decades. Parts of them even burnt during the last drought as they were so dry. Fish numbers have also been declining and breeding habitats in the catchments have been affected by low water levels. More water needs to be redirected and given back to the environment so that these declines are reversed. This would reflect the NSW Water Management Act 2000 that acknowledges the importance of healthy aquatic habitats in rivers.

The current flooding and the severe drought of 2017-2020 demonstrate the challenges of managing water at a time of variability due to climate change. And it is predicted to get hotter and drier. Rainfall data from 2004 **must** be added to the modelling, especially for calculating water allocations for Burrendong Dam. Licences for floodplain harvesting should not be made available until an assessment of the environmental and cultural damage they has caused has been done. The floodplain harvesting policy means that an environmentally unsustainable level of water diversion will occur. Allowing for five years of entitlement to be captured at one time is inappropriate. Modelling without this data and assessment will give an incomplete picture of the water in the river system. Cease-to-divert flow targets that are scientifically based on environmental sustainability must also be considered.

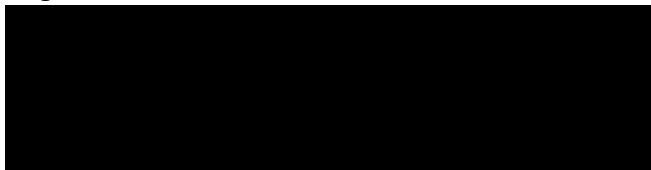
While the water security of towns is critical, storm water harvesting must only be used to take water when peak flows occur. They must not harvest water at baseline flow levels. The

scheme proposed for Orange East will take water at this baseline level and will result in over-extraction from Summer Hill Creek. This is already a highly stressed system. The expansion of cities such as Orange, Bathurst and Dubbo as well as industries and agriculture will place even more demands on water supplies. This will increase competition for water and must not reduce the water that is available for the environment. All users need to understand that water is a limited resource and they must implement sustainable water use and water saving strategies rather than increase their take from the Macquarie River.

There should be no further investigation of the Gin Gin re-regulating weir project. Instead, the existing weir should be replaced by a new structure to allow fish passage as designed for the dam safety upgrade fishway project, which has been legally required since 2009.

The Macquarie – Castlereagh Water Strategy must provide more water for the environment at a time when there are increasing demands for water and climate change predictions suggest less water will be available.

Regards,

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Orange Field Naturalist & Conservation Society

18<sup>th</sup> November 2022