



Nature Conservation Council

The voice for nature in NSW

NSW DPI

Regional Water Strategy Team

18 November 2022

By Email: regionalwater.strategies@dpi.nsw.gov.au

Submission: Second Draft Lachlan Regional Water Strategy

The Nature Conservation Council of NSW (NCC) is the state's peak environment organisation. We represent over 170 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

We welcome the opportunity to comment on the Second Draft Lachlan Regional Water Strategy (RWS).

This submission indicates which actions NCC supports, and any actions we consider are missing across the four priorities of the Water Strategy.

Priority 1: Build resilience to climate extremes

NCC is very encouraged to note that the raising of Wyangala dam wall, and the Belubula Water Security Project are not presented as government commitments in this RWS. These projects would have an unacceptable environmental impact in the Lachlan valley and beyond.

There was an opportunity to prioritise the sustainable use of water through better demand management for towns with this RWS. NCC feels that this opportunity has been missed.

Missing Action: A state wide public education program for purified recycled water use.

NCC supports actions 1.1 to 1.4 and 1.6 that seek to provide better governance, improved water modelling, the inclusion of First Nations people in decision-making and water efficiency measures for small communities.

Missing Action: Develop a plan to source water entitlements for Cultural Flows.

NCC does not support actions 1.5 and 1.7 - increasing the dependence on groundwater supply for town water supply.



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The 2021 State of the Environment Report notes that demand for groundwater increased significantly between 2017–18 and 2019–20 from roughly 11% of the state's overall metered water use to 27%, mainly due to extended and severe drought.¹

Groundwater in the Lachlan catchment experienced significant drawdown through the millennium drought that has not been recovered. Status and issues papers produced for the development of the Lachlan Water Resource Plan states that the Lower Lachlan Alluvium has a decline of up to 6 metres and the Upper Lachlan Alluvium a decline of over 24 metres in areas of highest impact².

Expanding the existing regional pipeline network will increase competition for water when the entire region is in drought. Demand management should have higher priority.

Priority 2: Ensure the best use of existing water for the environment

Missing action: remove constraints to natural flows through the system, rehabilitate fish habitat between Wyangala and Forbes through mitigation of the 150km sand slug.

NCC supports actions 2.1, 2.2, 2.4 and 2.5, improving management of sedimentation and fish passage, and the review of the Lake Brewster Efficiency Project.

Action 2.3 to assess upgrade of existing weirs or the construction of new weirs in the Lower Lachlan has NCC's partial, conditional support. All upgrade projects must be assessed for environmental impact, including access to natural seasonal flows that support wildlife breeding cycles. This action should also identify weirs for removal. NCC does not support the construction of new weirs, in line with the NSW weirs policy: "The goal of the State Weirs Policy is to halt and, where possible, reduce and remediate the environmental impact of weirs".³

Priority 3: Support economic growth in a capped system

Any growth in water use by one industry will cause a decline in water availability for other sectors.

NCC supports actions 3.1, 3.3, and 3.4 - improving access to climate information, climate impact studies, improved water efficiency and increased employment and business opportunities for First Nations people.

Action 3.5 could include reference to a state-wide purified recycled water education program, and to improved water efficiency through the Jemalong Irrigation district infrastructure upgrades.



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NCC has conditional support for action 3.2 - water use in relation to plan limits. The tributary utilisation rate must be publicly reported, and along with supplementary access, be included with any assessment of water use in relation to plan limit. The Sustainable Diversion Limit should be reassessed to ensure the environmental requirements of the system are met.

Priority 4: Improve our knowledge of water resources

NCC supports actions 4.1 to 4.3 - groundwater assessment, review of floodplain management plans and integration of strategic land and water planning.

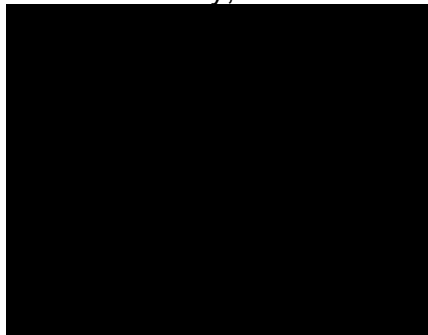
The assessment of groundwater use, including the mapping of all groundwater dependent ecosystems and the base line condition of aquifers should be a high priority in the Lachlan.

Development on floodplains is a very live issue at the moment, highlighted by major flooding events in the central west right now. Improving management of floodplain development must be a high priority in the final RWS, especially in light of severe flooding events expected to become more common with climate change impacts.

Thank you for the opportunity to participate in the consultation.

Your key contact point for further questions and correspondence is [REDACTED], available via [REDACTED]. We welcome further conversation on this matter.

Yours sincerely,





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¹ SOE Report p 90

² <https://www.industry.nsw.gov.au/water/plans-programs/water-resource-plans/status>

³ [NSW weirs policy](#)