

Lachlan Water Strategy 18 Nov 2022

Orange and Region Water Security Association Inc

NSW Department of Planning and Environment- Water

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### **Submission**

#### **Lachlan Regional Water Strategy – Draft 2**

Orange and Region Water Security Association (**ORWSA**) takes the opportunity to comment, thank you.

There are many positive suggestions in the Action Plan that ORWSA would support but will outline some points for further consideration.

The most critical point is to base any NSW Water Strategy for the future on the expected availability of water and not on past historical data.

Any Water Strategy should assist the accomplishment the Aims of the Murray- Darling Basin Plan. In this regard it is imperative that that NSW Water Sharing Plans are completed in order that the Water Resource Plans can be adopted.

The end-of-system health of the Lachlan River will clearly indicate the results of the Lachlan Water Strategy.

- ✓ Environmental Water should be classified as high security, made available to suit environmental needs.

Environmental water should be uncoupled from general security water constraints.

- ✓ A review of licenced water entitlements should be undertaken due to the expected reduction in streamflows and replenishment of aquifers

This could be better than using restricted allocations to assign water when “available water” is short in supply, would take away the frustration of irrigators.

- ✓ ORWSA does not support the raising of Wyangala Dam Wall due to numerous adverse environmental impacts including additional water loss from evaporation.

ORWSA would support the Wyangala Dam safety upgrade as soon as practical. An upgraded wall may allow for great controlled flood mitigation, similar to Burrendong’s operational procedures (100%+).

- ✓ The Wyangala storage should function as a regional water source that could secure water for the region – Orange, Bathurst, Parkes – via existing and extending the pipeline infrastructure of Central Tablelands Water network.
- ORWSA, cautiously, supports water re-use projects as many projects encourage greater water consumption in an expected drying climate. The Lachlan Water Strategy should not encourage water use to a maximum. Any water re-use should achieve an equivalent amount of water remaining in the extractive streams.
  - Councils (water authorities) should receive credit for the return of STP treated water back to the catchment, thereby maintaining a circular water cycle. This would assist the baseline stream flow a local stream. In Orange it would greatly enhance the Summer Hill Creek environment.
  - Supports the extension of the stormwater harvesting in Orange provided that better environment outcomes are achieved for Summer Hill Creek.
  - The ecology of Summer Hill Creek has suffered greatly since the STP treated water was diverted - in 1998- to Cadia Valley Operations. (Agreement 1996)
  - This diversion (9ML/day on average) disrupts other features of Orange’s Raw Water Supply – no water treated for the recycle water pipeline, the need for substantial environmental flows from Suma Park Dam (can approx. 900 ML some years), higher water charges because of the operation of the Macquarie River to Orange Pipeline.

Many Orange residents do question Cadia Valley Operation’s social licence to operate because of its impact on the local water balance. The Productivity Commission Report- May 2021 – asks for a review of arrangements of this nature.

- ORWSA would not support any further increase water consumption by Cadia Valley Operation for mining activities and would seriously object to increased imported water storage capacity.

These points above are worthy of consideration in the Lachlan Water Strategy.

- The impact of Water Trading should be clarified in the Lachlan Water Strategy knowing that a review is currently in progress by ACCC.
  - ORWSA would object to general water licences conversion to high security water licences, except for towns gaining additional entitlements.
  - ORWSA questions the trading general security licences for higher value use, as farmers can’t compete against larger companies, like mining companies. It could change the intended use of the water, licenced for grapes and used for mining rocks upon a trade.
  - Regis Resources is investigating the possibility of acquiring water licences – active, a dozer or surrendered licence – to satisfy its demand for water. This activity will increase water consumption in the Belubula River Catchment which would be against expectations for the future.

- The operation of mines- Cadia (CVO) and possibly McPhillamys (Regis Resources) in the upper Lachlan Catchment (Belubula Catchment) could have serious impacts on the availability and quality of water in the region.
  - Cadia (CVO) possibly leaching contaminants, including copper, into the local streams
  - McPhillamys – if approved – leaching from a permanent stock pile of salt contamination, salts that currently pollute Waragamba Dam, in a tailings storage.

Acknowledging improved water quality measures, in the action points, in the draft, the Lachlan Water Strategy should give clear directions on how water pollution can be avoided during any mining process.

- ✓ Townships could take a few simple steps to improve their water security:
  - Introduce mandatory rainwater tanks on all new buildings for use in toilets, laundry, and gardens. Residents could save about 50% of the amount of council supplied water they use.

Introducing water saving rules as adopted by Orange.

Townships in warmer areas – Parkes, Forbes ..\_ could encourage replacing evaporative air conditioners (and coolers) with solar powered reverse cycle air conditioners.

Transition to a water sensitive city and making water a focus for the city.

[www.watersensitivecities.org.au](http://www.watersensitivecities.org.au)

Time to revisit the introduction of state-wide demand regulations, suggested by the NSW Water Minister before “Critical Needs” were enforced. The Lachlan Water Strategy should be well planned to avoid the re-introduction of “Critical Needs” legislation. After 7 years of operation, ORWSA doesn’t know if an audit (cost benefit analysis) of the Macquarie River Pipeline has been completed.

Continue with stop leakage programs.

- If Wyangala Dam is treated as a water source for the region – as outline above – there would be no need for the Belubula Water Security Project to proceed. The Wyangala solution would be much better for the Coombing Creek/Belubula stream health. It would be a substantial saving on the State Budget.
  - On rejection of the Wyangala solution, ORWSA could accept a reasonable case for increasing the size of Lake Rowlands to its original design capacity (9 GL) from its current capacity (4.5 GL) to be investigated further. This would secure Central Tablelands Water supply.
  - ORWSA totally rejects the proposed pipeline between Lake Rowlands and Carcoar Dam because of its environmental impact on Coombing Creek and the Belubula River downstream. The pipeline would facilitate greater consumption of water- in a drying climate - and create additional water loss to evaporation. This proposed pipeline would transfer water from the unregulated section to a regulated section of the Belubula catchment, an untenable situation.

The NSW Regional - Lachlan Water Strategy should align with the aspirations of the Murray-Darling Basin Plan.