



12 November 2023

Department of Planning and Environment – Water
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By email to: regionalwater.strategies@dpie.nsw.gov.au

LACHLAN REGIONAL WATER STRATEGY: UPDATED SHORTLIST OF OPTIONS 2024

The National Parks Association of NSW (NPA) appreciates the opportunity to submit comments on the updated shortlist of options for the Lachlan Regional Water Strategy 2024.

NPA's mission is to protect nature through community action. Our strengths include State-wide reach, deep local knowledge, evidence-based input to policy and planning processes, and over 65 years' commitment to advancing the NSW protected area network and its professional management. We also provide outstanding opportunities for experiencing and learning about nature through our unrivalled program of bushwalking, field surveys, bush regeneration and other outdoor activities.

The NPA believes it is important that the NSW Government protect and sustain healthy and resilient freshwater ecosystems and their associated biodiversity (flora and fauna). This requires actions to i) protect and sustain healthy and resilient freshwater ecosystems and their associated biodiversity (flora and fauna) and that ii) Natural flows and flow regimes must be protected and managed so that riverine connectivity and associated floodplains remains healthy from the source to the sea (or from sources to naturally terminal wetlands).Reserve

The region covered by the plan includes more than 19 protected areas. They include: Lake Cowal, Yathong Nature Reserve, Nombinnie Conservation Area, and Lachlan Valley National Park. Eight wetlands are listed on the Directory of Important Wetlands of Australia and two wetlands are proposed to be listed as Ramsar Wetlands of International Significance. Yet many of these areas do not have, or cannot hope to realize, an environmental water allocation. The total environmental water entitlement with catchment is 15%- 80% of this is below Lake Cargelligo.

Our Previous Submission 13 November 2020

We noted in 2020 that the proposed RWS included several proposals that the NPA regarded as having a high probability of reducing environmental health across the catchment. We strongly **objected** to the Wyangala Dam Wall Raising Project. We were also opposed to: Option 3: increasing the size of Lake Rowlands Dam, Option 27: Changes to Lake Cargelligo, Option 31: removing a natural lake above Lake Cargelligo, Option 39: more weirs in Lower Lachlan. While many of these actions seem to no longer be part of the RWS, we believe it important to note **our view about these proposals remains unchanged.**

We note the changes that have occurred have largely simplified the structure of the plan: there have been changes to the titles of Priority 2 and 3, and the removal of Priority 4 with its actions changed from 4.1 to 1.7; 4.2 to 2.7; and 4.3 to 1.9.



Priority 2 Improve Catchment Health.

The NPA's view is that Priority 2 should be titled: *Improve catchment and river health.*

The NSW Water Strategy, together with the 12 regional water strategies, which underpin it, form a key part of the strategic planning framework for water management in NSW. The Lachlan RWS identifies the NSW Water Strategy and the NSW Groundwater strategy as part of the broader state-wide strategy shows connections to the wider policy.

However, the NSW Government has also committed in the longer term to partner with Commonwealth in regard to the health of the Lachlan in another plan. The LTWP identifies water management strategies for maintaining and improving the long-term health of the Lachlan's riverine and floodplain environmental assets and the ecosystem functions they perform. While the LTWP and the RWS have different roles, where possible they should be complementary and consistent to ensure a whole-of government approach.

Attachment E of the RWS looks at the assessment of long list of options and how were incorporated into a shortlist. It would appear that several, such as cold-water pollution, were subsumed into others (such as for 2.4) but the 'Summary' relating to those items has not changed. There is a need to ensure this now wide context is not lost.

This RWS lists seven priority 2 actions. Many of which could have contextualised summaries to encompass LTWP outcomes. At present only Action 2.3 broadly refers to the LTWMP. This could be more explicit throughout, for example, Actions 2.3 and 2.4 summaries could become explicitly consistent with the LTWP's desire to *'manage water to improve the condition and increase the distribution and abundance of native fish populations involves restoring hydrology and physical habitat to expand the extent and carrying capacity of suitable habitat.* Such inclusion will ensure the purpose of any activity is not lost and will enable better monitoring and evaluation of the plan down the track. It is therefore **the NPA's view that the summaries relating to the actions 2.1- 2.6 under Priority 2 should be framed so they explicitly complement the relevant outcomes in the Lachlan LTWP.**

Action 2.7. The RWS acknowledges *a whole-of-valley approach to floodplain management will benefit some of the Lachlan's most critical wetlands.* A total of 471,000 hectares of wetlands are mapped within the Lachlan catchment. The western portion of the Lachlan catchment supports extensive areas of floodplain woodlands and wetlands, dominated by river red gum with grassy understorey that occur along the river and the effluent creeks (Green et al. 2011). But some protected areas are not currently within the scope of having an environmental water flow- which makes 'natural' floodplain flows vitally important. ***It is the NPA's view that the summary relating to action 2.7 specifically acknowledge that a key outcome from this action is the need to ensure the flow of water to Protected Areas is maintained and not inhibited by any new or unapproved floodplain structures.*** Many of the protected areas in the Lachlan were originally identified as 'outstanding' significant environmental assets for the region, where purchased, and are now maintained using public monies because of this significance. It would be a perverse outcome for the NSW Government water management framework to not also work to explicitly protected them.

Other key points.

The inclusion of options to support First Nations communities' access to water and engagement in water management decisions is supported.

Action 1.5 and 1.7 are not supported as framed. There should be no further reliance on, or encouragement of, increased groundwater use for town water supply. Nor will simply extending the regional water grid address critical human needs when the entire region is in drought. **These actions should be joined into a more holistic approach which includes demand management, education, efficiency measures and off stream storage infrastructure to overcome periods when critical human needs are threatened.**

Summary

The primary objective for these regional water strategies should be to provide for the sustainable allocation of water. In NPA’s view sustainability for this regional water resource must include:

- i) the provision of water flows to sustain the condition of water dependant ecosystems (Of particular importance are water dependent ecosystems of national and international significance, including wetlands listed under the Ramsar convention) as well as
- ii) the provision of water to Support a strong, diversified and sustainable economy in a capped system.

[Redacted]

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Regional Water Strategies Public Exhibition 3



Submission Questionnaire

Lachlan Regional Water Strategy Challenges and shortlisted actions

The NSW Government is taking action to improve the resilience of water resources in the Lachlan region. The Lachlan Regional Water Strategy sets out a shortlist of proposed actions to help deliver healthy and resilient water resources for a liveable and prosperous region.

Your voice is important

This is your opportunity to let us know which actions you support and think should be implemented to help set the region up for the future.

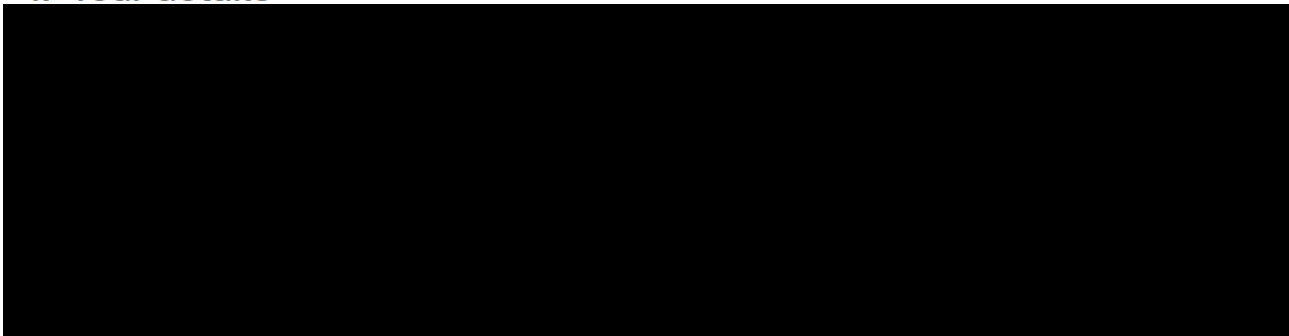
This questionnaire will take approximately 15 minutes to complete, and your response can remain anonymous if you wish (see question 7).

Questions marked with an asterisk (*) require an answer.

If you have any questions about the questionnaire, please email: regionalwater.strategies@dpie.nsw.gov.au

You can also provide feedback via [our submission platform](#).

1. Your details



* **Do you identify as an Aboriginal person?** (select one)

Yes No Choose not to answer

* **Are you making this submission as an individual or as a representative of an organisation?** (select one)

Individual Organisation

2. Organisation or business details

If making this submission as a representative of an organisation, who do you represent? (select one)

Government (select one)

- Commonwealth
 New South Wales
 State other
 Local

Peak representative organisation (select one)

- Environment
 Industry
 Business group or business chamber
 Community
 Local Water Utility

Aboriginal organisation (select one)

- Yes
 No

Other (select and provide details)

N/A

3. Regional water challenges

We have identified **6 key water-related challenges** that are an immediate priority for the region. More detail about each regional challenge is available in the Consultation Paper.

1 Managing water resources during more extreme events for people, industry and the environment

Water management in the Lachlan is challenging due to the region’s variable climate and the extensive, low-gradient river system, which is subject to high system losses. Climate change is predicted to bring more extreme events (floods and droughts), warmer temperatures and higher evaporation, stressing the system and giving it less time to recover. Climate change will also likely bring more variable river flows and groundwater recharge rates, impacting water supplies to all water users, including towns and communities, industries and environmental water holders.

Droughts can limit the ability to deliver water to town off-take points and nationally significant wetlands at the end of the system. It can also result in multi-year low or zero water allocations to general security licence holders, which are mostly held by industry and environmental water managers. Towns and communities reliant on unregulated water sources could also experience greater risk of limited water supplies should unregulated streams experience more frequent low-flow or cease-to-flow periods.

2 Understanding flood risks to individuals, businesses and communities

The management of floods is an ongoing challenge for the Lachlan region. The region has experienced significant flood events over the past 122 years of observed records and the intensity of heavy flood producing rainfall events could increase under climate changing scenarios.

Given the flat landscape, many areas of the region are subject to flood risk. Development on the floodplain has meant that floods can significantly impact people and businesses, damage infrastructure, create safety risks and cause financial and economic loss. The devastating flood event in the Lachlan region in late 2022 highlighted the flooding risks to many communities in the region at an unprecedented and catastrophic scale.

But floods are also a vital natural process that support the region's ecosystems, providing benefits such as significant groundwater recharge and connections between rivers and their wetlands and floodplains, such as the Great Cumbung Swamp and Booligal Wetlands in the lower Lachlan River. Tributary flows downstream of the region's major headwater storages are often a major contributor to flooding in the region. Floods are also responsible for the productive soils valued by landholders on the Lachlan region's floodplains.

3 Improving water quality

Poor water quality has a direct impact on the health, wellbeing and resilience of all water users and is a prevalent risk in the Lachlan region.

Maintaining high water quality is a key challenge for the Lachlan region, as poor water quality impacts on ecological health, treatment costs for towns and industries and has an effect on Aboriginal people's wellbeing and connection to Country.

Dissolved oxygen can be depleted during hypoxic black water events and harmful algal blooms—often caused by excessive nutrients—can lead to the death of aquatic plants and animals. Unseasonal temperatures can also directly contribute to fish deaths and high turbidity can reduce the light penetrating of the water column and stress benthic plants. Salinity (both dryland and instream) can impact on vegetation leading to erosion and high turbidity, as well as increase salt loads beyond the tolerance level of some native plants and animals. Existing water infrastructure can also cause cold water pollution impacts which can reduce the range and abundance of native fish.

4 Addressing barriers to Aboriginal water rights

Aboriginal people in the Lachlan region have always been closely linked to rivers, creeks and groundwater sources, and their relationship to these water sources and wetlands is essential to culture, community and connection to Country.

Water management arrangements, a lack of water ownership, and poor access to waterways and culturally important sites restrict Aboriginal people from fulfilling their cultural obligation to care for Country and fail to provide opportunities for Aboriginal people in the Lachlan region. Involving Aboriginal people more closely in decision-making processes around water management could enrich and improve our water-management decisions and in turn provide employment and economic advancement opportunities for Aboriginal people, including youth.

5 Sustaining the health and resilience of the region's water-dependent ecosystems

The river system, floodplains, swamps, aquifers and wetlands in the Lachlan region provide habitat for many aquatic species, including birds and native fish. The lower Lachlan floodplain is home to 8 nationally important wetlands, which feature areas of valuable river red gum forest and woodlands, blackbox woodland, common reed and lignum. Our challenge is to sustain the health and resilience of these natural assets and ecosystems now and into the future.

Existing water infrastructure, river operations and water extraction, both surface and groundwater, have influenced flow variability, water quality and the distribution of water throughout the catchment. These factors are causing stress on native species and aquatic environmental health, especially at the end of the system.

Based on the new climate risk modelling, the Lachlan region could see more changes to river flows, magnifying the impacts on riverine and floodplain ecosystems. Improving lateral connectivity would support water quality, system-scale productivity and drought refugia as well as improve conditions for native species and aquatic fauna.

6 Supporting economic growth and diversification

The industry profile in the Lachlan region is changing. Over the next 20 years, food processing and agriculture, mining and renewable energy production is expected to expand – aided in parts by upgrades to roads, transport links and government investments in the Parkes Special Activation Precinct. Our challenge is to support new and existing industries in the context of a variable and changing climate.

A key focus for the Lachlan region is to provide conditions that make the region an attractive place to invest. Although industries have adapted to the region's climate, the variability in allocations to general security entitlements can create uncertainties and may deter new industries – including high value industries – from settling in the region.

New emerging industries and regional population growth will also likely create greater competition for available water resources, including groundwater. An increase in groundwater demand could push extraction close to (or above) the allowable limit and pose risk to the long-term sustainability of groundwater sources.

Do you agree that these are the key water challenges for the Lachlan region that we need to focus on? (select one)

Yes No

If no, please outline what you see as the key water-related challenges in this region over the next 20 – 40 years?

4. Addressing the challenges

We have developed 3 regional priorities with actions under each. We want to know which of the actions you support.

The regional priorities are:

- 1 Build resilience to climate extremes
- 2 Improve catchment health
- 3 Support a strong and sustainable economy in a capped system

Priority 1: Build resilience to climate extremes

The actions shortlisted under this priority will:

- build resilience through better integrating regional and local strategic water management activities and improved coordination regarding extreme events
- improve our hydrological modelling capabilities, including scoping a program of works to build a new model for the Upper Lachlan to investigate water security risks to towns and communities in the Upper Lachlan
- support Aboriginal people to be more involved in water management by better valuing their traditional knowledge and contributing to decision making
- improve our understanding of important groundwater sources and investigate opportunities to expand the existing regional water supply grid
- enhance the existing support provided by various State agencies to local councils with respect to flood risk management planning, through ongoing direct support and improved coordination
- improve the integration of strategic land and water planning.

Proposed action		Do you support this action?
1.1	Establish a coordination approach involving all levels of Government, to implement local council and town water-related actions under Priority 1	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.2	Support councils to improve flood risk management in the Lachlan region	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.3	Upgrade the existing hydrological models for the Lachlan catchment to better represent river operations and drought contingency measures	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.4	Develop ongoing arrangements for participation of local Aboriginal people in water management	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.5	Support groundwater use for towns and communities	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.6	Investigate water security for small and remote communities	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.7	Investigate the need to further expand the regional water supply grid	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.8	Improve the understanding and management of groundwater resources in the Lachlan	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.9	Better integrate strategic land and water planning	<input type="checkbox"/> Yes <input type="checkbox"/> No

A) Do you have any comments on the proposed actions identified?

Please see attached submission

Priority 2: Improve catchment health

Actions under this category focus on:

- supporting natural resource management activities in the upper and lower Lachlan region
- addressing existing water quality issues in the region
- protecting important cultural assets and supporting co-benefit outcomes of the use of environmental water where feasible
- removing constraints and impediments to environmental water delivery
- update our floodplain management plans and address unapproved and non-compliant structures on floodplains.

Proposed action		Do you support this action?
2.1	Reduce salinity and soil erosion in the upper Lachlan and Belubula catchment	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.2	Protect and rehabilitate regionally significant riparian and instream habitats in the regulated Lachlan River	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.3	Upgrade and automate existing public re-regulating structures in the mid and lower Lachlan to build the functional resilience of critical ecosystems	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.4	Mitigate the impact of water infrastructure and disruption of natural flows on native fish	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.5	Review and evaluate the Lake Brewster Water Efficiency Project	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.6	Support place-based initiatives to deliver cultural outcomes for Aboriginal people	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.7	Support the development and implementation of the Lachlan Floodplain Management Plan and address floodplain structures	<input type="checkbox"/> Yes <input type="checkbox"/> No

A) Do you have any comments on the proposed actions identified?

Please see attached submission

Priority 3: Support a strong and sustainable economy in a capped system

Actions shortlisted under this priority focus on:

- facilitating access to data and information to assist industry to better assess risks and develop mitigation strategies
- exploring water use and water demand of the region’s industries and their resilience to a more variable and changing climate
- advancing economic opportunities for Aboriginal people and developing culturally appropriate placed-based initiatives
- improving our hydrological modelling capabilities to pursue further analysis on a range of infrastructure options that could improve system efficiencies and enhance reliability in the region.

Proposed action		Do you support this action?
3.1	Improve public access to climate information and water availability forecasts	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.2	Investigate water use in the Lachlan region	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.3	Undertake a climate impact study	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.4	Support employment and business opportunities for Aboriginal people in the Lachlan region	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.5	Support system water delivery efficiency measures	<input type="checkbox"/> Yes <input type="checkbox"/> No

A) Do you have any comments on the proposed actions identified?

Please see attached submission

5. Other comments

A) Should any proposed actions in this second consultation document not be shortlisted and why?

Please see attached submission

B) Should any other options in this second consultation document be shortlisted and why?

Please see attached submission

6. Implementation of the Lachlan Regional Water Strategy

An Implementation Plan will be included in the final Lachlan Regional Water Strategy.

A) Which actions should be implemented first and why?

Please see attached submission

Making your submission public

To promote transparency and open government, we intend to make all submissions publicly available on our website, or in reports. Your name or your organisation’s name may appear in these reports with your feedback attributed.

If you would like your submission and/or feedback to be kept confidential, please let us know when making your submission.

If you request that your submission is to be kept confidential, it will not be published on our website or included in any relevant reports; however, it will still be subject to the *Government Information Public Access Act 2009*.

Your submission will be stored securely, consistent with the department’s Records Management Policy and you have the right to request access to, and correction of, your personal information held by the department.

Further details can be found in our privacy statement available on our website.
www.industry.nsw.gov.au/privacy

7. Information on confidentiality and privacy *

I give permission for my submission to be publicly available on the NSW Department of Planning and Environment website.

Yes No

I would like my personal details to be kept confidential.

Yes No

8. Would you like to be kept updated on progress on the development and implementation of the Lachlan Regional Water Strategy?

Yes No

If yes, please provide your details below.

* Email address:

* Name:

* Address:

* Contact phone number:

9. How did you hear about the Public Exhibition of this strategy?

We are interested to know how you heard about the opportunity to make a submission. Please indicate the communication methods below:

- Newspaper
- Radio
- Department of Planning and Environment website
- Direct email
- Social media
- Have your say NSW Government website
- Communication from peak body
- Word of mouth
- Other (select and provide details)

10. Additional Information

If you would like to provide any supporting documents to help us understand your feedback, please email these from the same email you provided in this form or attach supporting documents to this form if you are returning your submission by mail.

All submissions on the draft Lachlan Regional Water Strategy will be reviewed following the public exhibition period.

Please email your completed submission and any supporting documents to:

regionalwater.strategies@dpie.nsw.gov.au

CLICK HERE TO EMAIL SUBMISSION

Or post to:

Regional Water Strategies
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2150

Submissions close Sunday 12 November 2023, 11.59pm

Further details on all regional water strategies can be found on our website
www.dpie.nsw.gov.au/regional-water-strategies



Thank you for your submission.