

Submission to Draft NSW Water Strategy

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Thank you for the opportunity to comment on the Strategy. I am a resident of the Far North Coast community, a farmer, a botanist and an author.

I congratulate you on the document which appears to be very comprehensive. I cannot comment on all the content since I am no expert on water engineering or planning. However, I have become better informed about water during the process of opposing the proposed Dunoon Dam near Lismore. Being aware of the destruction of the unique and irreplaceable natural and cultural heritage that this dam would entail, I have looked for other ways to ensure water security in our region and in our state as a whole.

The Draft NSW Water Strategy, I was thrilled to discover, seems to put new dams well down the list of options for water security. In fact, the strategy mentions dams only once (p. 112) as a source of new water. It takes seriously issues that I consider paramount, such as employing diverse strategies for water security instead of the eggs-in-one-basket approach of building new dams.

This is important in regards to the Dunoon Dam. It was voted down at the December 2020 meeting of the water authority, Rous County Council, but is not yet eliminated as a possibility. I believe that many of my comments regarding the Dunoon Dam could apply to other regional dams or dam-raising proposals as well.

If I appear to be focussed on dams it is because the Dunoon Dam is the major water issue in my area.

I would like to comment on the following Priorities and Actions in the Water Strategy:

Priority 2 *Recognise Aboriginal rights and values and increase access to and ownership of water for cultural and economic purposes.*

In particular, **Action 2.6**, *Work with Aboriginal people to maintain and preserve water-related cultural sites and landscapes*, has direct relevance to the proposed Dunoon Dam. The inundation area is a landscape of particular significance to local Widjabul Wia-bal people, being a regular occupation place with a burial ground. It is also the place to which they were forcibly moved during the invasion days, and is part of their survival journey.

A detailed Cultural Heritage Impact Assessment in 2011, and another in 2013, were conducted at the site, confirming the pre-European age of the burial sites. Both assessments concluded that the local Traditional Owners were of one voice in opposing the Dunoon Dam. If the Strategy is to engage fully with the Traditional Owners, and not just consult-then-ignore, then their opinions must be respected and acted on. In the local case this means (a) not proceeding with a dam that they have categorically rejected, and (b) handing back the land to their control.

I support the following statements from the Strategy and hope that they are genuine in their intent:

“Water is also at the heart of Aboriginal people’s connection to Country and culture, and First Nations are acknowledged as the traditional custodians of all of NSW’s water resources. First Nations and Aboriginal people have rights and a moral obligation to care for water under their law and customs.” (p.7)

“Recognise and protect Aboriginal water rights, interests and cultural values—including Aboriginal heritage assets.” (p. 10)

“Work with Aboriginal people to maintain and preserve water-related cultural sites and landscapes.” (p. 42)

“Consistent with the premise of the Closing the Gap National Agreement, the Partnership Agreement will be underpinned by the principle that Aboriginal people should have a genuine say in the design and delivery of policies, programs and services that affect them, and that the way government works with Aboriginal people needs to change.” (p.62).

Priority 3 *Improve river, floodplain and aquifer ecosystem health, and system connectivity.*

Dams never improve river or ecosystem health. They can only damage it. In the case of the Dunoon Dam, an Endangered Ecological Community of Lowland Rainforest on the NSW North Coast would be partially cleared and a particularly rare subtype (warm-temperate rainforest on sandstone) would be almost completely removed. (Terrestrial Ecology Impact Assessment, Rous County Council 2011). The rainforest at the Dunoon Dam site represents 1% of the remaining Big Scrub rainforest. It must not be destroyed.

The recommendations in **Action 3**, *Take landscape scale action to improve river and catchment health* (p. 146) must exclude large dams. I hope that the “specific priorities and target programs towards improving land use and land management practices in catchments where these are major contributors to a decline in river and catchment health” include those areas where dams have already damaged aquatic and terrestrial ecology. In addition,

this action should preclude further damage on the same stream, as is the case with the Dunoon Dam.

A February 2019 discussion paper *Northern Rivers Watershed Initiative*, produced by Rous County Council and the Northern Rivers Joint Organisation (of six LGAs), recommends landscape-scale investment in protecting and rehabilitating the Northern Rivers region. This initiative requires funding and would fit well into the Strategy's "landscape scale action". Initiatives like this should be included in the Strategy.

Priority 5 *Support economic growth and resilient industries within a capped system.*

It is heartening to see that the Strategy recognises that sources of water are not increasing, and in fact may decrease with climate heating. It is not possible to keep finding new dam sites.

I would like to see the Strategy go one step further and acknowledge that in a capped system unlimited economic growth and use of resources is not possible. Endless growth ignores the laws of physics and is simply a pyramid scheme. Such schemes are illegal for good reason because those at the bottom, including all of Nature, lose out badly when the system eventually crashes.

Interestingly, the Strategy cautiously approaches the idea of growth *not* being limitless with the addition of **Action 6.1**, *Foster the circular economy in our cities and towns* (p. 153). I would include the rest of the state as well and expand this section to include more than just resource recovery and zero emissions.

I strongly support **Action 6.6**, *Proactive support for water utilities to diversify sources of water*: "The Government will support water utilities to diversify sources of water including groundwater, stormwater harvesting and recycling. This will include progressing relevant regulatory reform and community acceptance campaigns to help increase the uptake of diverse water sources with the potential to increase water security and resilience for towns and communities". This is exactly what our North Coast Community needs!

Additional comments:

Dam policies. I am concerned that dams are still on the agenda in NSW for ideological reasons and are being supported by politicians, would-be politicians and others. In my area this is certainly the case with supporters of the Dunoon Dam presenting the old "toilet-to-tap" slogan to oppose the use of recycled water. This slogan is well-known world-wide as TTT. It popularises ignorance and should be specifically discounted by the Strategy.

The Strategy should spell out that dams (a) are risky economically (b) do not provide secure water on their own and (c) destroy natural environments and cultural heritage.

The Strategy should list which dams, or dam-raising, are under discussion and how they fit with the priorities outlined in the document.

Private sector ownership. I am strongly opposed to **Action 6.9, *Enable private sector involvement in the NSW water sector***. This would be a retrograde step which endangers community ownership of both the resource and the problems. Private ownership seeks the profit but avoids dealing with the problems.

Tanks. The Strategy should encourage the collection of water where it is used, ie tanks. They are extremely efficient because there is no transport involved. Increased use of tanks could be facilitated by LGAs and water utilities providing subsidies. Farmers and rural dwellers often boast that they know how to live frugally with water because they depend on tanks. This attitude, if extended widely, would promote a culture of conservative water usage which would reduce the demand for new sources of water.

Photographs. As a final minor criticism, I was disappointed to see that the many beautiful photographs in the Strategy were not captioned with locations. We all need to develop a genuine attachment to real places. Generic no-name photos are frustrating and they undermine your message of caring for our landscapes.