

Submission**GW056**

Recorded Date	
Response ID	
Confidentiality instruction - publishing submission externally	I do not give permission for the department to publish my name with my submission on the department's website. In selecting this option, I understand that my submission will be published anonymously.
Confidentiality instruction - sharing submission internally within department	I give permission for my name and email to be shared within the department.
Submission choice - file upload or complete survey	I wish to upload a file containing my submission rather than complete this survey
File upload - instead of completing survey - ID	F_b28bJ1PbK2Nbof7
File upload - instead of completing survey - Name	Namoi Water submission to draft NSW Groundwater Strategy.pdf
File upload - instead of completing survey - Size	236324
File upload - instead of completing survey - Type	application/pdf
Thinking about your relationship to groundwater, which of the following user groups or parts of the - Selected Choice	Industry
Thinking about your relationship to groundwater, which of the following user groups or parts of the - Other (please specify) - Text	
In which region are you located	Namoi
* How important is it for you to access groundwater as a resource	Very important
* To what extent do you agree with the following statements - Groundwater is important for basic human needs (drinking, cooking)	Strongly agree
* To what extent do you agree with the following statements - Groundwater is important for stock watering	Strongly agree
* To what extent do you agree with the following statements - Groundwater is important for Aboriginal communities and Country	Strongly agree
* To what extent do you agree with the following statements - Groundwater is important for agriculture	Strongly agree
* To what extent do you agree with the following statements - Groundwater is important for the environment	Strongly agree
* To what extent do you agree with the following statements - Groundwater is important for industrial businesses (including mining)	Strongly agree
* To what extent do you agree with the following statements - Groundwater is important for manufacturing (water bottling, food processing and others)	Agree

* Please indicate what you think NSW's groundwater needs will look like over the next 20-40 years.	Not sure
* Which part/s of the community do you think will have the greatest change in their groundwater need	Not sure
* Do you think you should change the way you will use groundwater in the future	Yes, I've already begun to change my groundwater usage habits
* How well do you know the NSW groundwater management framework, rules and legislation	Very well
* Please rank the 4 key issues affecting groundwater management in NSW from most important to least - Our climate is changing, and groundwater recharge and demands will be affected	2
* Please rank the 4 key issues affecting groundwater management in NSW from most important to least - The risks to groundwater from development and land use change are increasing	4
* Please rank the 4 key issues affecting groundwater management in NSW from most important to least - Community notions of sustainability and fair access to groundwater have evolved	3
* Please rank the 4 key issues affecting groundwater management in NSW from most important to least - Our understanding of groundwater, its behaviour and use is improving	1
Please tell us of any other challenges that are affecting groundwater management in NSW	Refer to submission
* Please rank these challenges in order of importance, where 1 = Most important and 4 = Least import - Our policy framework for sustainable groundwater management needs to be updated to be more responsive to emerging challenges such as climate change	1
* Please rank these challenges in order of importance, where 1 = Most important and 4 = Least import - Ecosystems that depend on groundwater face increased threats such as intensive groundwater extraction and pollution	2
* Please rank these challenges in order of importance, where 1 = Most important and 4 = Least import - There is a lack of strategic integration between management of groundwater, surface water and land	3
* Please rank these challenges in order of importance, where 1 = Most important and 4 = Least import - Threats to the quality of groundwater resources are increasing over time and these need to be addressed	4

Please tell us any other challenges you think will affect the protection of groundwater resources an	
* How important for you is the protection of groundwater resources and the ecosystems that depend on	Very important
* To what extent do you agree with draft action 1.1?	Disagree
* To what extent do you agree with draft action 1.2?	Strongly agree
* How important to you are each of the following sub-actions required under Action 1.2? - Refresh and expand our approach to sustainable groundwater management	Important
* How important to you are each of the following sub-actions required under Action 1.2? - Manage groundwater and surface water together	Neutral
* How important to you are each of the following sub-actions required under Action 1.2? - Integrate groundwater considerations into land use planning decisions	Neutral
* How important to you are each of the following sub-actions required under Action 1.2? - Improve management of large developments impacting groundwater	Neutral
* How important to you are each of the following sub-actions required under Action 1.2? - Strengthen cross-border groundwater management	Very important
* To what extent do you agree with draft action 1.3?	Agree
* How important to you are each of the following sub-actions required under Action 1.3? - Review and update our approach to protecting groundwater dependent ecosystems	Important
* How important to you are each of the following sub-actions required under Action 1.3? - Deliver a program to improve our understanding of groundwater dependent ecosystems	Important
* To what extent do you agree with draft action 1.4?	Agree
* How important to you are each of the following sub-actions required under Action 1.4? - Review groundwater source extraction limits using new knowledge	Important
* How important to you are each of the following sub-actions required under Action 1.4? - Better manage impacts of extraction at a local level	Important

* How important to you are each of the following sub-actions required under Action 1.4? - Improve clarity around management of groundwater sources with a low long-term entitlement share value	Neutral
* To what extent do you agree with draft action 1.5?	Neutral
* How important to you are each of the following sub-actions required under Action 1.5? - Review and update our approach to managing groundwater quality	Important
* How important to you are each of the following sub-actions required under Action 1.5? - Deliver a program to better understand groundwater quality and risks	Important
Please tell us any other suggested actions you think we should consider in Strategic Priority 1	
* Please rank these challenges in order of importance, where 1 = Most important and 3 = Least import - Increasing demand for groundwater for other uses can undermine its use for town water supply	1
* Please rank these challenges in order of importance, where 1 = Most important and 3 = Least import - New and expanding industries need to consider groundwater opportunities and constraints	3
* Please rank these challenges in order of importance, where 1 = Most important and 3 = Least import - Aboriginal rights to groundwater and Aboriginal uses of groundwater are not adequately recognised	2
Please tell us any other challenge you think will affect community and industry resilience in using	
* How important is it for you that communities and industries using groundwater resources have a rel	Very important
* To what extent do you agree with draft action 2.1?	Agree
* To what extent do you agree with draft action 2.2?	Agree
* How important to you are each of the following sub-actions required under Action 2.2 - Provide better information on groundwater opportunities and constraints to communities and industries	Very important
* How important to you are each of the following sub-actions required under Action 2.2 - Enable the increase of sustainable groundwater use in targeted areas	Important

* How important to you are each of the following sub-actions required under Action 2.2 - Foster innovative groundwater solutions, including Managed Aquifer Recharge (also called 'water banking', to support communities and industries)	Important
* To what extent do you agree with draft action 2.3?	Agree
* How important to you are each of the following sub-actions required under Action 2.3 - Increase access to groundwater for Aboriginal people	Important
* How important to you are each of the following sub-actions required under Action 2.3 - Protect groundwater-dependent places of significance to Aboriginal communities	Important
* How important to you are each of the following sub-actions required under Action 2.3 - Better integrate Aboriginal knowledge into groundwater management	Important
* Do you identify as Aboriginal and/or Torres Strait Islander	Neither
Please tell us what groundwater health and secure groundwater supply means for you, your family, you	
Please tell us about the changes you have seen in groundwater management in your cultural landscape	
Please indicate which of these cultural opportunities you have seen in action in the way groundwater - Selected Choice	
Please indicate which of these cultural opportunities you have seen in action in the way groundwater - Other (please specify) - Text	
Please provide any other comments about cultural opportunities or challenges in groundwater manageme	
What are the most important benefits of cultural and economic opportunities in the water industry - Selected Choice	
What are the most important benefits of cultural and economic opportunities in the water industry - Other (please specify) - Text	
Please provide any other comments about benefits of cultural and economic opportunities and how we r	
Cultural heritage file upload - ID	
Cultural heritage file upload - Name	
Cultural heritage file upload - Size	
Cultural heritage file upload - Type	
Please tell us any other suggested actions you think we should consider in Strategic Priority 2	

* Please rank these challenges in order of importance, where 1 = Most important and 3 = Least import - Being underground and difficult to investigate, information about groundwater is lacking	3
* Please rank these challenges in order of importance, where 1 = Most important and 3 = Least import - There are gaps in our scientific knowledge and research capabilities	2
* Please rank these challenges in order of importance, where 1 = Most important and 3 = Least import - Our groundwater monitoring network is ageing and has limited coverage	1
Please tell us any other challenge you think is affecting the use of information and data to m	
* How important is it for you to have access to more information and data about groundwater manageme	Very important
* How interested are you in finding out more about how groundwater is managed and used	Very interested
What ways could the department use to communicate with you and others in your community about ground	
Please tell us what type of information and data about groundwater resources you would like availabl	
* To what extent do you agree with draft action 3.1?	Agree
* To what extent do you agree with draft action 3.2?	Agree
* How important to you are each of the following sub-actions required under Action 3.2 - Expand the range of knowledge and insights products including information systems, platforms and interfaces for storing, managing, accessing and interrogating groundwater data	Very important
* How important to you are each of the following sub-actions required under Action 3.2 - Improve and diversify how we communicate information on groundwater resources and their management	Important
* How important to you are each of the following sub-actions required under Action 3.2 - Support strategic planning and decision-making by councils and groundwater users with improved access to information on groundwater and its management	Very important
* How important to you are each of the following sub-actions required under Action 3.2 - Develop a unified framework to consolidate and analyse all groundwater data across all relevant agencies and groundwater users and impacting activities	Important

* How important to you are each of the following sub-actions required under Action 3.2 - Support data and database integration across agencies to address data gaps and improve customer service delivery	Important
* To what extent do you agree with draft action 3.3?	Agree
* How important to you are each of the following sub-actions required under Action 3.3 - Expand our multi-disciplinary understanding of groundwater	Important
* How important to you are each of the following sub-actions required under Action 3.3 - Improve our groundwater models where required	Important
* How important to you are each of the following sub-actions required under Action 3.3 - Increase our capacity and capability to apply leading groundwater science	Important
* To what extent do you agree with draft action 3.4?	Agree
* How important to you are each of the following sub-actions required under Action 3.4 - Improve our groundwater monitoring infrastructure	Very important
* How important to you are each of the following sub-actions required under Action 3.4 - Improve our groundwater monitoring programs	Very important
Please tell us any other suggested actions you think we should consider in Strategic Priority 3	
Please provide any final comments	
Any additional material - file upload - ID	F_2dEZcyEQHuQI9cb
Any additional material - file upload - Name	Namoi Water submission to draft NSW Groundwater Strategy.pdf
Any additional material - file upload - Size	236324
Any additional material - file upload - Type	application/pdf
Personal information: name, email - Name	[REDACTED]
Personal information: name, email - Email	[REDACTED]
Business name, if responding on behalf of a business - Your business name (if you are responding on behalf of an organisation)	Namoi Water
* How did you hear about this survey? Select all that apply. - Selected Choice	Email or e-newsletter from the department
* How did you hear about this survey? Select all that apply. - Other (please specify) - Text	
* What age bracket do you fit into?	[REDACTED]
* How do you describe your gender	[REDACTED]
* Speak language other than English at home? - Selected Choice	[REDACTED]
* Speak language other than English at home? - Yes (please specify) - Text	[REDACTED]
* Identify as person with disability?	[REDACTED]
Text	[REDACTED]



namoi water

Namoi Water submission to: Draft NSW Groundwater Strategy August 2022.



About

Namoi Water is a widely recognised and highly regarded peak industry group which represents water entitlement holders across the Peel, Upper Namoi and Lower Namoi valleys in the North West of New South Wales.

Namoi Water has a proud history of providing strong, positive contributions towards the management of water, and as an apolitical, not-for-profit organisation we advocate for and support proactive, sustainable water policy and legislation that provides positive outcomes for our members whilst also meeting the environmental, economic, cultural, and social requirements of the local communities throughout the catchment.

It is recognized by Namoi Water that groundwater is likely to become an increasingly important water source in a changing climate, and the management of this water is critical for it to remain sustainable for environment, community, and industry.

Namoi Water welcomes this opportunity to provide a submission to the Draft NSW Groundwater Strategy.

Executive Summary

Namoi Water finds the draft NSW Groundwater Strategy unsatisfactory.

It is a document which reads more like a high-level academic desk-top study than a strategic document which gives purpose, direction, and outcomes. It is apparent the document is intended to be high level, but in doing so has failed to include sufficient specific details regarding changes, process, or outcomes.

Namoi Water is concerned the draft NSW Groundwater Strategy has an emotive, alarmist and sensationalist tone that is not applicable to such a document. This language only heightens negativity and enhances misunderstanding and misinformation amongst those with low levels of water literacy. There should be language used which is appropriate to present the strategy in an objective, factual, neutral tone. There must be a key focus throughout the strategy that the tone remains factual, objective and uses a scientific evidence-based decision-making process. This would ensure the strategy aligns with the National Water Initiative (NWI) to deliver environmental, social, and economic outcomes for communities.

Another failure of the draft NSW Groundwater Strategy is the lack of provision of details regarding the positive developments which have been achieved in NSW groundwater management, and the ongoing consultations between stakeholders to continually reassess both current and future circumstances.

It is unfortunate that Namoi Water is making a submission containing such a level of negative feedback, but this is a critical strategy that must see momentous change to be deemed acceptable.

Submission

Namoi Water questions the approach taken by the draft NSW Groundwater strategy. It is disappointing that this opportunity to ensure the strategic direction of NSW groundwater management was developed without consulting the irrigation industry. This would have allowed industry to detail to government where much of the work that is proposed by this draft strategy is already done.

There have been marked improvements in in water management in NSW in recent years which should have been acknowledged throughout this strategy. The setting of Sustainable Diversion Limits, NSW Non-Urban Metering Policy rollout, Murray Darling Basin Plan water recovery and the establishment of an independent compliance regulator in the Natural Resource Access Regulator (NRAR). To not mention these improvements allows misconceptions and misinformation to flourish, rather than have the public aware of the significant improvements already achieved.

To ensure an adequate level of water literacy regarding the management of groundwater there must be details which explain Water Sharing Plans (WSPs), Available Water Determinations (AWDs), extraction limits, metering, trade rules and policy framework. This draft strategy does not provide sufficient detail to these key aspects. This lack of detail also means it is impossible for water users to consider impacts that this high-level strategy may have on the ground, how it will affect their operations and their investment in water infrastructure.

Namoi Water is concerned regarding statements which can easily be misinterpreted as potential non-compliance with extraction limits.

The Strategy states:

- *“We can see that the total groundwater access rights (the entitlements of both BLRs and access licences) currently exceeds the combined extraction limits in the inland alluvial groundwater systems.”*
- *“There are 24 groundwater sources where the number of shares for issued licences is significantly higher than the extraction limit”*

Extraction limit compliance is not directly linked to the number of entitlements issued. AWDs are used to ensure that compliance is met. These statements lead a person with a low level of water literacy to assume there is an issue with exceeding extraction limits. This serves to generate false alarm to the public and erodes the faith in water management further.

The strategy states:

- *“review and update approaches to sustainable groundwater extraction”* including *“new knowledge is now available to update our groundwater source extraction limits”*.

These statements are of significant concern to Namoi Water. These statements cause unnecessary public alarm and concern, further eroding confidence in water management. Without evidence to make changes to management beyond the framework that exists this only serves to create uncertainty and anxiety to communities.

Namoi Water ask the question:

Where is the science-based evidence to demonstrate a review is necessary?

The strategy states:

- *“refresh and expand our approach to sustainable groundwater management”*

There is no further detail of how groundwater management is to be refreshed or expanded.

The strategy states:

- *“our policy framework for sustainable groundwater management is not adaptive enough”*

Namoi Water disagrees with this statement. The current policy framework is extremely adaptive via the use of AWDs and can vary water usage based upon water availability and can accommodate climate change impacts. Our concern is that this could result in further variability in allocation to users who require certainty and stability to make decisions around managing water and to justify investments in goals such as improving their water use efficiency.

Namoi Water is concerned that the strategy does not adequately consider the Murray Darling Basin Plan, nor provide any level of acceptable detail how NSW would continue to operate in line with Basin Plan reforms.

Namoi Water is disappointed that there has been no consultation with the irrigation industry until now to allow the key issues for the industry to be reflected in the draft strategy. It is encouraging to see consideration given to

initiatives such as Managed Aquifer Recharge (MAR). This is a complex, location specific water management technique and would require much more detailed work to be done to determine suitability and feasibility. Improvements in groundwater monitoring assets and practices are also a welcome proposal. Other key issues which require higher level of details include Groundwater Dependent Ecosystems, understanding of groundwater and surface water connectivity,

Namoi Water ask the question:

Why is the data used in the strategy only up to 2019/2020?

There is more recent data readily available which should be included.

It is concerning to Namoi Water that the social and environmental priorities and expectations of the public pertinent to groundwater management are highlighted, but there is no mention regarding those of industry. This does not allow for fully informed or considered decisions.

Namoi Water feels the Regional Water Strategies, which are region specific, would be the appropriate place for groundwater management to be included, in the same manner as surface water. This would accommodate the flexibility which is required in such varying and complex systems across NSW.

Conclusion

Namoi Water is grateful for the opportunity to make a submission and are available for consultation upon request.

Namoi Water are members of NSW Irrigators Council and are in full support of their submission to this Strategy.

Contact

[Redacted contact information]



namoi water