



Nature Conservation Council

The voice for nature in NSW

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[REDACTED] Regional Water Strategies
Department of Planning Industry and Environment
Locked bag 5022
Parramatta NSW 2124

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Dear [REDACTED]

Far North Coast Regional Water Strategy

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 160 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

NCC, together with the NCC Water Working Group, welcomes the opportunity to participate in developing the Regional Water Strategy (the Strategy) for the Far North Coast catchments.

Water is a scarce resource in Australia. Climate modelling indicates that water resources will diminish further in the future. Climate Change predictions for the Far North Coast region indicate that rainfall runoff in the region could be significantly reduced. Rain patterns will change and evaporation, average temperatures and the number of hot days will increase.

Management of our water resources is a critical responsibility of the NSW and federal governments. Sustainable management of water demand under predicted circumstances must be the main objective of all Regional Water Strategies.

1. Introduction

1.1 Environmental health as a priority: Regional Water Strategies must all reflect the objectives of the *NSW Water Management Act 2000*. The Act prioritises environmental health of water sources and the principles of ecologically sustainable development. Repairing the ecological health of NSW rivers should therefore be of first-order importance.

Five factors hamper the ability of Regional Water Strategies to achieve the goals of the Act:

1. The absence of a framework that should be provided by a State Water Strategy
2. The failure to address declining reliability of water supply to existing water licences. The over-allocation of water in the context of declining inflows must be addressed so long-term water security can be better managed



3. Inclusion of several infrastructure project options in the Lachlan and Macquarie-Castlereagh Regions that are existing NSW Government commitments
4. The potential for the proposed Strategies to increase water dependency rather than encourage sustainable water use
5. The risk of damaging the integrity of aquifer systems by allowing extraction of groundwater to reach 120 per cent of Sustainable Diversion Limits during dry times

1.2 A strategic response to climate change predictions: The work undertaken by the Water Division of the Department of Planning, Industry and Environment (DPIE-Water) to improve predictive modelling for water availability in regional NSW is important for a strategic response to the impacts of a warming climate. Access to the Chief Scientist's independent review of the modelling would further support informed planning.

All regions addressed in these Strategies have over-allocated water under current climate conditions. Projections indicate that over-allocation will exacerbate already difficult circumstances. These Strategies should work to actively reduce water dependency and use.

1.3 Basic information: The Strategies all require some basic information about the resilience of water resources as a foundation for decision making. If plans flag any increased water use or dependence on groundwater for town water supply and industry during drought, they must also address the relationship between surface water and groundwater sources. The overlap between High Ecological Value Aquatic Ecosystems (HEVAE) and Groundwater Dependent Ecosystems (GDEs) is an essential consideration.

2. Comments on Draft North Coast Regional Water Strategy

2.1 Maintaining and diversifying water supplies

The Strategy includes the construction of new dams and raising of existing dams walls as options to be considered. Construction of new surface water infrastructure, however, has been shown to be an ineffective mechanism at addressing issues of water security and should only be considered as a last resort.

Dunoon Dam: Ross County Council's proposal to construct Dunoon Dam in the Channon Gorge as part of its *Future Water Project 2060*, should be removed as an option for the Strategy. The councils *Future Water 2060 Project* faced widespread condemnation from the community when it was open to comment earlier this year, with a staggering 91% of submissions opposing the project. Dunoon Dam would have a significant impact upon a number of threatened and rare ecological communities.

Specifically, the Dam would destroy Channon Gorge, resulting in:

- the loss of 34 ha of Lowland Rainforest EEC including seven hectares of rare warm-temperate rainforest on sandstone.
- the loss of nine threatened flora species
- the loss of habitat for 17 species of threatened fauna, including koalas and platypus
- the severance of local wildlife corridors
- harm to important Indigenous cultural heritage

The principle of “avoid, minimise, offset” has not been applied to this aspect of the Rous County Council’s proposed *Future Water Project 2060*, and as such it should be removed as an option for the Strategy.

2.2 Supporting Water Use and Delivery Efficiency and Conservation

System wide water efficiency: Professor Stuart White, Director of the Institute for Sustainable Futures at UTS, has argued against the construction of new surface water infrastructure (specifically Dunoon Dam) to help meet the future water needs of the Far North Coast in his review of the *Future Water Project 2060*. Professor White has suggested system-wide updates to increase efficiency and reduce waste will nullify any shortfall of water-supply predicted by 2060, and subsequently remove the need for new infrastructure to meet demand. Efficiency upgrades to water systems have been proven to generate great outcomes, including in work done in Sydney and South-East Queensland.

Professor White’s position is supported by the Water Services Association of Australia’s (WSAA) report “All Options on the Table”. This paper suggests that “our reliance on [rainfall] dependent water supply options is a risk to the water security of our cities and communities”. It outlines the need for immediate action to be taken to diversify the water portfolio of Australian communities to safeguard against a future of increasing water scarcity. Continuing to rely on traditional surface-water infrastructure will lock communities into a future of water insecurity. WSAA details the essential role that ‘smart’ options such as efficiency measures, and that these must be prioritised and implemented by communities immediately.

Professor Whites work, and the report by WSAA, should inform the Department’s decision when considering how to prioritise options.

2.3 Protecting and Enhancing Natural Systems

A win for nature and the community: NCC supports all options in the Strategy which seek to support the natural hydrological systems of the Far North Coast. This will support ecosystems and the life that relies on these systems, and is essential for the region's future water security. Ensuring that extraction licenses from water sources are limited, strict pollution controls are in place and that the restoration of habitats along waterways are funded/supported will provide benefit to both nature and the community.

3. Options supported by NCC

NCC supports options that recognise the significance of cultural knowledge. Water sharing plans must meaningfully engage with First Nations sovereignty, knowledge, and expertise in water management.

The final Far North Coast Regional Water Strategy can achieve improved outcomes for river health, native fish, waterbirds and wetlands through the following options:

- Option 20: Establish sustainable extraction limits for Far North Coast surface water and groundwater sources
- Option 21: Establish and/or increase environmental water releases from major storages in the Far North Coast



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- Option 22: Convert low flow water access licences to high flow water access licences
- Option 24: Bringing back riverine and estuarine habitat and threatened species
- Option 26: Improve fish passage in the Far North Coast region

Options that reduce water consumption in towns and industry. More efficient use of water is critical to achieve sustainable communities into a future with less water. These include:

- Option 6: Remove impediments of water use reuse projects
- Option 8: Direct potable reuse of purified recycle water
- Option 11: Regional desalination
- Option 16: Provide purified recycled wastewater for industry and rural users
- Option 34: Regional Demand Management Program

4. Options opposed by NCC

The following options are counter to environmental outcomes because they will further regulate and alter the natural flow regime of rivers in the region.

- Option 12: Raise Clarrie Hall Dam level
- Option 13: New Dam on Byrill Creek
- Option 14: New Dunoon Dam on Rocky Creek
- Option 15: Increase Harvestable rights
- Option 19: Raise Toonumbar Dam level

Regardless of the options that the Final Far North Coast Regional Water Strategy seeks to pursue in finalising this policy, each must first be tested for its contribution to/impact on ecological sustainability and biodiversity conservation before it is progressed further.

We refer the Department to submissions made by local environment groups that have a close knowledge of the local community, and attachment to the areas under discussion in this strategy. Submissions made by these groups have an intimate understanding of the various options presented for the Far North Coast Water Strategy.

NCC and our Water Working Group welcome further discussion on these draft rules. Your key contact point for correspondence is [REDACTED].

