



Nature Conservation Council

The voice for nature in NSW

17 June 2022

NSW Department of Planning and Environment

Via email: regionalwater.strategies@dpie.nsw.gov.au

To whom it may concern,

Submission on the second draft of the North Coast Regional Water Strategy

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 170 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

We welcome the opportunity to comment on the second draft of the North Coast Regional Water Strategy. We also welcome the improved modelling and data underpinning climate change predictions. Effective preparation for a future where water sources along with their ecosystems are under even greater stress has never been more important.

This submission lists options supported by NCC under the three regional priorities identified by the Department of Planning and Environment.

Priority 1: Take a holistic approach to land and water management

NCC supports and recommends the Department prioritises the following options:

- promote First Nations rights to water
- Improve water governance
- whole of catchment ecosystem recover programs
- best practice land management
- assess the risks of sea level rise
- identify environmental water needs
- plan for climate change
- better understand groundwater and its ecosystems
- improved monitoring of water extraction

Priority 2: Ensure water resources development and its use is sustainable and equitable

NCC supports and recommends the Department prioritises the following options:



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- improving fish passage and fish-safe water extraction
- establish sustainable extraction limits and daily extraction limits
- reduce the take of low flows
- support First Nations business opportunities

NCC is very supportive of options that address the impacts of increased harvestable rights from 10% to 30%.

The recently regulated increase of coastal harvestable rights means there has been a tripling of unmetered water take.

Increasing coastal harvestable rights has an impact on downstream environment. Low flows will be reduced, threatening coastal wetlands, town water supplies and estuarine fisheries. Consequences will include increased water quality degradation and impacts on groundwater recharge.

The NSW Water Management Act (2000) recognises that repairing the ecological health of NSW rivers should be of first-order importance. The Act prioritises environmental health of water sources and the principles of ecologically sustainable development.

No increase in harvestable rights should have been approved prior to a full understanding of local and catchment-wide consequences. It is the very least that the Department can do to prioritise gaining a full understanding of the impact of this policy and moving to protect the environment and downstream uses.

Priority 3: Prepare for future climatic extremes

NCC supports and recommends the Department prioritises the following options:

- support local councils integrated water cycle management providing secure and affordable water supply for towns
- improve information about water availability and risks
- review water markets
- supporting on-farm dams to store licenced water rather than using catchment dams
- increased use of recycled water for intensive horticulture

NCC does not support the proposal that emergency water be provided by the Oven Mountain Pumped Hydro Energy Storage Project as a part the Kempsey integrated water cycle management program.

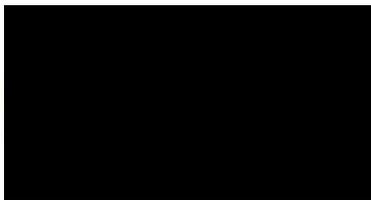
This project was the subject of concern from residents when it was listed in the first North Coast RWS, and their concerns have not been addressed.



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Your key contact point for further questions and correspondence is [REDACTED], available via [REDACTED]. We welcome further conversation on this matter.

Yours sincerely,





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