

24 June 2022

Regional Water Strategies

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

Dear Sir

Re: Submission to Draft North Coast Regional Water Strategy

Thank you for the opportunity for Council to make a submission to the draft North Coast Regional Water Strategy short listing. The exhibition period for the draft strategy has meant that the elected Council has been unable to consider a submission, and this submission is based on Council's current policy position. Council is considering the draft strategy at its meeting of 28 June 2022 and if additional issues are raised by the elected body they will be included in a supplementary submission.

It is noted that Option 1 (Expand the Clarence-Coffs Harbour Regional Water Supply Scheme) and Option 4 (Augment Shannon Creek Dam) were not progressed for short listing. Council raised some issues in its submission to the long listing regarding these options, **Were it proposed (following the current exhibition period) to reinstate to Options 1 and 24 in the final strategy, Council requests an opportunity to again respond to these options.**

It is noted that Option 24 (Improve fish passage in the North Coast region) is short listed as Action 2.1. One of the high priority fish barriers proposed for replacement or remediation is the Nymboida Weir which is where Council's drinking water supply is extracted. It is noted when this option was assessed in the long list that under "considerations" the document indicated it was important that "local council and water user access requirements, including funding, are considered in the design of new fishway structures to ensure reliability of supplies are not negatively impacted or are offset." **Council requests the final strategy include a statement that implementation of Action 2.1 will need to ensure Council's access to drinking water is not compromised.**

The short list report has included a new option 37 (Cancelling mining licences or leases within the Clarence River catchment) which was not included in the long list and has not been proposed for shortlisting. At its meeting of 24 November 2020 Council resolved in part (Resolution 6a.20.049):
to oppose mining in the Clarence River Catchment and to seek the support of both state and federal governments to impose a moratorium on further mining exploration licences and to cancel existing licences.

Council requests the final strategy be revised to include Option 37 as an action.

Page 41 of the draft strategy indicates that “there was also significant opposition to inland catchment diversions given the perceived economic and environmental costs” and that on page 60 of the draft strategy under “what we have heard” the draft strategy indicates “it is not ecologically sustainable to divert water to other catchments or regions.” Council is concerned that the draft strategy has only noted community feedback opposing diversion and has not specifically indicated reasons this option should not proceed. It is noted that the Draft Border Rivers Regional Water Strategy Consultation Paper indicates on p120 regarding what was formerly Option 8 in that strategy’s long list (Inland diversion from the east (Clarence River – large diversion)):

Not viable due to low benefit to cost ratio and uncertainty about realisation of benefits

Council’s position on diversion is best summarised in Resolution 6a.20.036 from its meeting of 22 September 2020:

That Council reiterate its policy position of opposition to any proposal that would result in any diversion of water from Clarence catchments, as previously resolved by Council resolutions 12.005/06, 05.006/07, 10.017/10 and 15.081/16.

It is requested that the final North Coast strategy include a similar statement indicating diversion of the Clarence River is not viable.

Thank you for the opportunity to make this submission. If you require further information please contact Council’s [REDACTED]

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