

Draft NSW Water Strategy submission form

The NSW Water Strategy will be the first 20-year water strategy for all of NSW. It will provide a blueprint to help us tackle the key challenges and opportunities for water management across the state.

For more information about the strategy or to download a copy of the strategy, please visit dpie.nsw.gov.au/nswwaterstrategy.

Your voice is important

We would like to hear your views on the draft strategy, including whether you think it identifies the right priorities, challenges, opportunities and actions.

Please provide your feedback in the submission form below and email your completed submission to nsw.waterstrategy@dpie.nsw.gov.au or post to NSW Water Strategy, Department of Planning, Industry and Environment, Locked Bag 5022, Parramatta NSW 2124 **by 28 March, 2021**.

The form will take approximately 15 minutes to complete and your response can remain anonymous if you wish (see question 1).

Questions marked with an asterisk (*) require an answer.

If you have any questions about making a submission, please email:

nsw.waterstrategy@dpie.nsw.gov.au

Making your submission public

We collect information about you, which may include personal information, to assess submissions in response to the department's dealings and activities, and to perform other functions required to complete the project. This information must be supplied. If you choose not to provide the requested information we may not be able to assess your submission.

To promote transparency and open government, we intend to make all submissions publicly available on our website, or in reports. Your name or your organisation's name may appear in these reports with your feedback attributed, unless you have chosen to remain anonymous.

If you would like your submission and/or feedback to be kept confidential, please let us know when making your submission. You will be asked for your confidentiality preference at question 1.

If you request that your submission be kept confidential, it will not be published on our website or included in any relevant reports. However, it will still be subject to the *Government Information Public Access Act 2009*.

Your submission will be stored securely consistent with the department's Records Management Policy and you have the right to request access to, and correction of, your personal information held by the department.

Further details can be found in our privacy statement available on our website.

industry.nsw.gov.au/privacy

1. Information on confidentiality and privacy*

I give permission for my submission to be made publicly available on the NSW Department of Planning, Industry and Environment website.

- Yes
 No

I would like my personal details to be kept confidential.

- Yes
 No

2. Your details

Name*

Contact phone number*

Postcode*

Email address*

Do you identify as an Aboriginal person?

- Yes
 No

Are you an individual or representing an organisation?*

- Individual
 Organisation

3. Organisation or business details

Who do you represent?

- Government Local
 Peak representative organisation Please specify
 Local Water Utility
 Other (please specify)

4. Draft vision

The NSW Government has developed the draft NSW Water Strategy as part of a suite of long-term strategies to maintain the resilience of the state's water services and resources over the coming decades.

The proposed vision for the draft NSW Water Strategy is sustainable water resources for thriving people, places and ecosystems, both now and for future generations.

Which aspects of water management are most important to you and your local community?

Provision of safe and affordable water supply and sewerage services to our villages and towns.

Equitable access to secure water for agribusinesses, industry and rural residents.

Equitable provision of community facilities and recreational opportunities to provide the community with access to rivers and dams.

Do you support the proposed vision for the draft NSW Water Strategy?

- Yes
 No

Please tell us more about your response:

The vision statement of "Sustainable water resources for thriving people, places and ecosystems, both now and for future generations" is sound, however this vision statement could be further enhanced by including the phrase "with affordable and equitable access and services to all communities." This is important as the current access and services are not equitable across the state, and to date the focus has been limited to areas where the economic return to the State owned Corporations are highest, or the regulatory effort is easiest, and this is having detrimental impacts across all of regional NSW.

5. Draft objectives

The draft NSW Water Strategy sets high level objectives and principles to guide water service delivery and resource management across NSW. We have identified six core objectives which underpin the draft strategy. These are based on the *Water Management Act 2000*. They are:

- protecting public health and safety
- liveable and vibrant towns and cities
- water sources, floodplains and ecosystems protected
- cultural values respected and protected
- orderly, fair and equitable sharing of water
- contribute to a strong economy.

Which objectives are most important to you?

Please rank the objectives from most important to least important (where 1 is most important and 6 is least important).

- 2 Protecting public health and safety
- 1 Liveable and vibrant towns and cities
- 3 Water sources, floodplains and ecosystems protected
- 4 Cultural values respected and protected
- 6 Orderly, fair and equitable sharing of water
- 5 Contribute to a strong economy

Do you have any comments on any of the proposed objectives?

It is not good practice to simply rank a series of objectives in an arbitrary order when there is such a high level of interconnectedness associated with each of them. Essentially what we should be aiming to achieve is;

That all communities in regional NSW are provided with equitable access to "safe and affordable" water supply and sewerage services, and that this will deliver triple bottom line benefits to the community and environmental health, as well as benefit the local economy and foster growth in regional areas.

6. Draft guiding principles

The draft strategy also proposes seven principles to guide the long-term strategic planning for water resource management in NSW. These principles work in tandem with the draft objectives to guide development and implementation of actions.

The guiding principles are:

- healthy environments sustain social and economic outcomes
- water is a limited (although recyclable) resource
- systems thinking to optimise outcomes
- data-enabled planning and decision-making
- transparency and accountability to engender community trust
- forward thinking to build preparedness and resilience
- giving effect to Aboriginal rights and access to water.

Which principles are most important to you?

Please rank the objectives from most important to least important (where 1 is most important and 7 is least important).

- 2 Healthy environments sustain social and economic outcomes
- 3 Water is a limited (although recyclable) resource
- 5 Systems thinking to optimise outcomes
- 6 Data-enabled planning and decision-making
- 7 Transparency and accountability to engender community trust
- 1 Forward thinking to build preparedness and resilience
- 4 Giving effect to Aboriginal rights and access to water

Do you have any comments on any of the guiding principles?

The Integrated Water Cycle Management (IWCM) process is efficient and effective, and should be seen as the basic guiding principle for water management in NSW. However, the disjointed planning and regulatory framework that currently exists creates conflicting or costly goals and objectives for the various regulatory bodies and agencies such as Local Land Services, NSW Health, EPA, State Water, DPIE Water, NSW Fisheries, Floodplain Management Authorities, LALCs, etc etc etc. This structure fails to deliver a genuine whole of government approach that considers the specific catchment and community context for each catchment, and does not provide clear guidance for LWUs and other stakeholders within the catchment. This is the main reason for unnecessary cost and delays that make for inefficient and costly water planning at all levels, not just LWUs. Higher level catchment planning for water sources by the state needs to improve and be expanded to reflect IWCM principals. If this was done in consultation with all agencies, the catchment context, issues and constraints would be clearly identified and provide the platform for LWUs to do their long term and strategic planning, as well as all other stakeholders within each catchment.

7. Opportunities, challenges and actions for improved state-wide water management

The draft NSW Water Strategy outlines seven strategic priorities for action, focused on meeting the core objectives based on the *NSW Water Management Act 2000*. These strategic priorities are:

1. Build community confidence and capacity through engagement, transparency and accountability
2. Recognise Aboriginal rights and values, and increase access to and ownership of water for cultural and economic purposes
3. Improve river, floodplain and aquifer ecosystem health, and system connectivity
4. Increase resilience to changes in water availability (variability and climate change)
5. Support economic growth and resilient industries within a capped system
6. Support resilient, prosperous and liveable cities and towns
7. Enable a future focused, capable and innovative water sector.

Under each priority the draft strategy identifies several opportunities and challenges, and a total of 41 proposed actions to improve water management across the state.

Do you have any comments on the seven strategic priorities identified?

The strategic priorities are sound.

Do you have any comments on any of the proposed actions identified?

The actions identified are all sound and supported.

Are there any additional opportunities, risks and challenges that should be considered in the draft strategy?

There is a need to better understand the level of risk around the delivery of water supply and sewerage services in non-metropolitan NSW. At present the NSW Government is relying on the outcomes from the risk assessment process undertaken as part of the Safe and Secure Water Program for each LWUs business. Care needs to be taken when looking at outcomes from a process that was designed for a specific purpose, which was to identify priorities for a finite funding source for capital improvements. This process specifically understates the risk levels for small communities in particular, as these were not seen as a priority for funding under the program. This could lead to the real level of risk being materially understated, and lead to poor decisions being made around future funding and resourcing. There is also a lack of definition of risk appetite and/or acceptable service levels or outcomes and there is a risk of the regulatory agencies applying a "one size fits all" outcome for the various communities that again may lead to a skewed understanding of what the real level of risk is. What is certain however, is that there is a considerable backlog of unserved or under serviced communities in regional NSW that will require a significant contribution from government if they are to ever receive safe, affordable and equitable access to water supply and sewerage services. The current level of funding available under the Safe and Secure Water Program needs to be at least doubled in the medium term while the full nature and extent of the problem is known.

What actions should be prioritised for immediate implementation and how should they be implemented?

In terms of the immediate actions, it is critical to establish what the high-level government policy position is with respect to the regulation of non-metropolitan LWUs, and how and whom should have the final call in determining the balance between often conflicting regulatory objectives in the provision of safe and affordable services to our regional communities. The draft State Water Strategy does not deliver this, and in its current form will only serve to perpetuate the current conflicting individual "mandates" agencies such as the NSW EPA and NSW Health believe they have, whether they be real or perceived. At present there is no overarching Authority or Government Policy that allows for a single body to make a final determination when decisions need to be made that require a balanced understanding of environmental, public health, economic, social, appetite for risk, and ability to pay. If the final State Water Strategy retains this omission, then perhaps the best mechanism is for the Minister to oversee the development of a Memorandum of Understanding between the regulatory agencies, with engagement with the industry along the way to ensure their voices are heard in the process.

8. Other comments

Do you have any other comments on the draft NSW Water Strategy?

The main comment is the need for reform of the regulatory environment within which Local Water Utilities operate. The current regulatory environment lacks a whole of government approach, is inefficient, stifles innovation, and creates a barrier to the delivery of cost effective, safe and reliable services to regional communities. It was hoped that the State Water Strategy would deliver the policy platform and position to drive such reform, but at present this is a glaring omission in the draft. It is strongly recommended that the State Government develops a firm policy for public health and environmental outcomes with consideration of the triple bottom line principles of social, environmental and economic driven outcomes which is then applied consistently across the state by all state government agencies when dealing with LWUs.

9. How did you hear about the opportunity to provide feedback on the draft NSW Water Strategy?

Please select all that apply from the list below:

- Newspaper
- Radio
- Department of Planning, Industry and Environment website
- Direct email
- Social media
- Have your say NSW website
- Word of mouth
- Other (please describe)

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