

Regional Water Strategies Team,
Lands and Water Division
NSW Department of Industry

By email to: regionalwater.strategies@dpi.nsw.gov.au

Dear Sir / Madam

DRAFT FAR NORTH COAST REGIONAL WATER STRATEGY

Introduction

The Park Management Committee of the National Parks Association of NSW (NPA) welcomes the opportunity to comment on the Far North Coast Regional Water Strategy (the Strategy).

Established in 1957, NPA is a community-based organisation dedicated to the protection and conservation of nature. Our activities are particularly focused towards advancing:

- long-term protection of biodiversity and supporting ecological processes
- an expanded network of protected natural areas
- better systems of environmental law, policy, and planning
- evidence-based natural resource management
- a closer connection between people and nature.

Healthy and resilient river and groundwater systems are vital for our collective wellbeing. NPA has consistently advocated for ecologically sustainable water use and sound management of water resources through participation in government processes and collaborative projects with other environmental groups and academic bodies.

General Comments

Much of the content of the Strategy is also included in other regional water strategies. NPA suggests that there should be one document that includes the common material in all strategies such as options and objectives. Ideally this would be one statewide strategy that sets out the framework for the regional strategies. The regional water strategy for a particular area could then focus primarily on matters that are specific to that area. Doing this would considerably shorten the regional water strategies and make them more user-friendly.

The Strategy emphasises the importance of unregulated rivers in supplying water. It also recognizes the high biodiversity of the Northern Rivers area. Any further regulation of rivers, including increased water extraction, is likely to negatively impact biodiversity and the integrity of aquatic and terrestrial ecosystems.

Strategy Options and Objectives

NPA strongly supports the option of protecting and enhancing natural systems. This should be achieved primarily by maintaining natural vegetation, particularly, in the upper catchments of rivers as well as replanting native vegetation along waterways where logging, clearing for agriculture or disturbance by cattle or bushfires has occurred.

We also support licensing changes that would make water allocations more ecologically sustainable.

Water catchment works should be minimized and only occur where a clear environmental benefit can be demonstrated.

Preventing discharge of sewage and agricultural and other waste into waterways is also critical in maintaining water quality and biodiversity.

We strongly support improving water use and delivery efficiency and conservation. NPA considers that this should be done primarily by recycling of water and efficiency measures rather than through new or upgraded infrastructure or extracting water from new sources. We do not support increasing on-farm water storages because of the negative impact they may have on downstream water ecosystems, including loss of low level flushes triggered by small rainfall events. Any water harvesting reduces water downstream both for the environment and water users.

We agree that communities should be better prepared for climate extremes and rising sea levels. Diversifying access to and increasing use of surface or ground water will not increase the total amount of water in the system and potentially could have significant environmental impacts.

Improving the recognition of Aboriginal people's water rights, interests and access to water should be promoted.

The Objectives of the Strategy (section 1.2) should be prioritized. The primary objective of the water strategies should be to improve the health and integrity of water dependent ecosystems. This would facilitate provision of Aboriginal water rights, interests and access to water. The second objective should be the ecologically sustainable allocation and use of water. Water allocations must not negatively impact the condition of water dependent ecosystems within each catchment. The objective: "Enable economic prosperity" should be deleted as promoting economic returns over sound environmental management of water use and extraction leads to over extraction and environmental degradation as has been seen in the Murray-Darling Basin.

Gaps in knowledge

The strategy refers to gaps in knowledge including about water quality, the amount of water extraction from unregulated rivers and the interaction between ground and surface waters, as well as the location and importance of agricultural lands.

NPA considers that it is unfortunate that the strategy is proceeding without this information being available. We have concerns that decisions about long-term water use could be based on erroneous assumptions if data about these matters are not available.

Climate variability & water governance

NPA is pleased that there is consideration in the Strategy of how climate change may impact water resources in the future.



A water allocation system centred on legal entitlements measured in volumetric amounts does not reflect the variation in river flows that are low most of the time. The consequence is that water governance in NSW is:

- inordinately complex,
- encourages over-allocation for consumptive use,
- lacks transparency, and
- allows for regulatory failures such as activation of 'unused' entitlements.

There is an urgent need to review of the current regulatory regime.

The creation of the Natural Resources Access Regulator to monitor water use could help restore public confidence that water extraction is being extracted fairly. NPA supports use of telemetry and transmission of water use data to the regulator.

Water resource limits

There is no basic information about the total magnitude of the resource itself such as a table summarising for each major catchment the total catchment yield (ML) per annum. Consequently, a reader cannot form an impression of the extent to which catchment yield is committed to consumptive use under wet, dry or drought conditions. It is essential that the Strategy define upper limits on water extraction. Such limits will have direct implications for potential population growth and agriculture.

Dams

NPA does not support the construction of new dams, the raising of existing dams or off-stream storages because of their financial and environmental costs. Dams do not increase total water volume within catchments.

NPA particularly opposes the proposed Dunoon Dam. It would:

- cause the loss of 34 ha of endangered Lowland Rainforest including 7 ha of rare warm-temperate rainforest on sandstone,
- significantly impact nine species of threatened flora,
- significantly reduce the habitat of 17 threatened faunal species, including koalas,
- fragment wildlife corridors, and
- harm important Aboriginal cultural heritage.

NPA's Position on Options in Long List of Options

Options Supported by NPA

5, 6, 7, 8, 9, 16 (however industry should pay), 20-35, 37, 38, 39

Options that NPA strongly opposes

12, 13, 14 (see discussion above), 15, 17, 18, 19 (potentially could flood Toonumbar and Richmond Range National Parks as well as flood adjacent State Forest).

Options about which NPA has concerns

1, 2, 3, 4

Options for desalination

10 and 11. These options are expensive both financially and energy-wise. If constructed they should use renewable energy.



Options on which NPA is unable to comment

36 - NPA has not had the opportunity to consider the NSW Extreme Events Policy

Conclusion

NPA supports the development of regional water strategies. It is essential that maintaining or improving water quality and ecosystem health be prioritised over economic and industry interests. If this does not occur, the quantity and quality of both ground and surface water will likely deteriorate.

We are pleased to see the Strategy incorporate recent modeling of the impact climate change. A maximum should be set for water extraction in each catchment under current conditions. The strategy should also state that the amount of water extraction that is permissible for activities such as agriculture and silviculture may need to be significantly reduced in the future as climate change impacts become more severe.

Yours faithfully,


Convenor, Park Management Committee
National Parks Association of NSW

