

[REDACTED]

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From: DPIE Harvestable Rights Review Mailbox  
Sent: [REDACTED]  
To: [REDACTED]  
Cc: DPIE W Regional Water Strategies Mailbox  
Subject: Re: Having your say on Water Issues - Protecting your Farms - EMAIL NO 3 of 3

Good morning, [REDACTED].

Thank you for your submission on the North Coast Regional Water Strategy.

Please note submissions for the NC RWS can be submitted to the regionalwater.strategies@dpiensw.gov.au email address.

I have forwarded your below email to that address by cc'ing it in this email.

Kind regards

[REDACTED]

(On behalf of the Coastal Harvestable Rights Review team)

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**Sent:** [REDACTED]  
**To:** DPIE Harvestable Rights Review Mailbox  
**Subject:** FW: Having your say on Water Issues - Protecting your Farms - EMAIL NO 3 of 3  
[Please find my submission on the Harvestable Rights Review](#)

## North Coast Regional Water Strategy

1. **This submission is being made on behalf of water users and landowners in the Mid North Coast Area and in particular includes the Port Macquarie-Hastings, Kempsey Shire, Nambucca Valley, Bellingen and Coffs Harbour local government areas.**

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

We would like the personal details to be kept confidential. YES

2.

### Contact details

[REDACTED]

\* Do you identify as an Aboriginal person? **Yes**

Are you making this submission as an individual or as a representative of an organisation?

\* Representative of Organisation

3. Organisation or business details

This submission is being made on behalf of water users and landowners in the Mid North Coast Area and in particular includes the Port Macquarie-Hastings, Kempsey Shire, Nambucca Valley, Bellingen and Coffs Harbour local government areas.

4. Draft regional water strategy objectives and vision

This submission refers specifically to the North Coast Regional Water Strategy which we understand is one of 13 strategies (12 regional water strategies and a Greater Sydney Water Strategy) being developed by the department. As all regional water strategies are being developed in line with the following objectives, our comments refer to these:

- We support the responsible delivery and management of water for local communities. We understand that water security is vital and support the objective to improve water security.

The importance of water quality: Most primary producers are conscious of “clean water”, however over the years there has been little emphasis on education and communication of this important aspect. As there are new entrants into the commercial use of water, there needs to be a program to educate and inform irrigators of their responsibilities and penalties. Affordable meters or affordable technology should be compulsory to collect data on water use – not to “police” water use, but to be aware of what water is being used and to monitor variations etc. With flood management, there has been complacency over the years and, as we have seen with the March 2021 floods when many people were taken by surprise, more must be done on management for regional towns and communities. We often hear references proclaiming that people have never seen a flood at that level previously, but many such protestations are by people who are not familiar with the history of local flooding because they are newcomers to an area or because they were not even born. People need to be more aware of flooding potential.

- Enable economic prosperity - Improve water access reliability for regional industries: Covid19 has clearly demonstrated that we need to be more self-sufficient in New South Wales. We need to be open to opportunities for food production and manufacturing. Water availability is vital in achieving this. Legislation which impedes must be streamlined. On the Mid North Coast, most of the catchments are “closed.” It is time to reconsider how Water Sharing Plans are developed. This process must be reviewed and improved to achieve economic prosperity and to achieve reliable water access.

- Recognise and protect Aboriginal water rights, interests, and access to water - Including Aboriginal heritage assets

We agree that Aboriginal water rights should be recognised and respected.

Aboriginal heritage assets should be protected; however, caution is required that this is not exploited, by particularly by third parties who may have ulterior motives or personal ideology.

- Protect and enhance the environment - Improve the health and integrity of environmental systems and assets, including by improving water quality

While we should protect our environment, it is exceedingly difficult to comment on how we should enhance the environment particularly after the 2019 bushfires. The bushfires wreaked havoc on the environment. We do not know how much fauna was destroyed. Trees were so severely burnt, it will take decades for the bush to recover, but first the carcasses of the trees blackened from the fiercest fire will have to decay and rot before the bush can really begin to recover. For years there had been no controlled burns, not even the roadside vegetation or median strips on highways! Trees have been proliferating to the extent that there are far more trees in New South Wales than ever before. These crowded trees take moisture from the ground; the ground was so dry and parched, there was no moisture in the mulching leaf litter to impede a fierce fire. To enhance the environment, it needs to be managed – not locked up as a National Park and pat yourself on the back that we are protecting the environment.

Planting a million trees in Sydney by 2022 may seem like a worthy project – but where will the water come from for these trees? Will there be dams or tanks to capture the water to help water these trees to establishment? Will they keep concreting Sydney so that no water replenishes the earth?

Will people be given carte blanc to continue planting trees of forest without any water entitlement? Do you know how much water is required while trees are established? Will the owners of these projects have to pay for a water entitlement? Has this water use been included in a water sharing plan?

- Affordability - Identify least cost policy and infrastructure options

To achieve the above outcomes water must be affordable, but sanity must prevail. In the one local government area, the council in their wisdom undertook to build a dam for future water security. Through their rates, the ratepayers are helping to repay the large loan. However, due to the conditions imposed, after rainfall events, the council must pump the collected water out of the dam into the nearby water course. The dam has only been used during the most recent drought and that required the council, at great cost, to pump water from the borefields into the dam! This is a waste of resources and does not meet the affordability test.

To have healthy and resilient water resources (that withstand extreme events and adapt to these changes) for a liveable and prosperous North Coast region, firstly commonsense must prevail. Decisions must be made on a fair basis, not by a department, or a government, who may include ideologues who put their personal preferences first. Our resources must be professionally managed, not for preservation or conservation, but for the benefit of people, their jobs, and the environment. This may mean you cannot be all things to all people. It may mean hard decisions must be made, but at the end of the day we need responsible management over and above sustainable management. On that basis we would support the proposed vision for the North Coast.

#### 5. Information and modelling used to develop the North Coast Regional Water Strategy

- New climate data - Observed historical climate data – recorded rainfall, temperature, and evaporation data - Paleoclimate data – scientific reconstructed data using sources such as tree rings - Climate drivers – key drivers of wet and dry periods.

People on the ground, primary producers, irrigators etc have records that should also be accessed. It would be fool hardy not to include their experiences – they are a magnificent store of information – not new climate data, but actual climate data.

- Review of existing studies – to identify drivers and risks for water resource management  
We support a review of existing studies. New technology and the use of drones could aid this process. It is important however, that new studies are not dominated by people with fixed views.

In particular, the current degradation of our rivers from floods should take precedence. For years, the authorities have claimed that unsealed roads and cattle are responsible for the degradation when there is ample evidence that proves there are more significant factors. The long-held tradition of extracting gravel which kept our riverbanks from undermining of gravel “slugs” should be restored in a responsibly managed process.

It must be remembered that there is no better water storage than our rivers, but unfortunately, they have become clogged with gravel and are now no more than clogged drains. This is a result of poor management since gravel extracting was ceased.

- Community engagement –

Community engagement is vital in this process not just with local councils and joint council organisations or Aboriginal peak bodies and Aboriginal community groups,

but with the community and stakeholders. The re-introduction of extension type officers to engage, communicate and educate the community would be money well spent and reap rewards. However, such office must not be dominated by their personal preferences.

1. Do you have any comments about the information used to develop this strategy?

There is some concern regarding new climate data, particularly if in isolation from those who have been farming the land for generations. It is also important that there is not data dump – most people have heavy workloads and do not want to be wading through reams of paper, technical data and university speak language.

B. Please provide details if there is additional information you think we should also consider.

See our submission on Harvestable Right dams for further information – which is attached.

While there were those who objected to judicial gravel extraction, no-one has monitored saltwater incursion. This is not coming from increase sea level rise, but rather from the natural pondage being infilled by gravel. This exacerbates the natural dynamic attributes of the river systems and results in undermining of trees and loss of riverbanks. This in turn results in more gravel filling the deep-water pondage and in dry times, because there is no water in the system, the saltwater moves past the usual tidal zone. Salt water is like a poison to riverine vegetation and as it moves further along the river, the riverine vegetation dies. We have been lobbying for years for this to be considered and we trust that if a clear vision is to be developed, this will be considered.

We are sure that engaging with generational farmers will reveal further information. It would be a worthy exercise.

Our rivers and creeks are the best natural storage for our precious freshwater resource – but they need to be managed and maintained.