



**Department of Planning and Environment  
4 Parramatta Square  
12 Darcy Street  
Parramatta 2150**

**Re: The Lachlan Regional Water Strategy, second draft.**

To whom it may concern

I write this submission on behalf of the Environmentally Concerned Citizens of Orange (ECCO). Our organisation is a local Orange group, which aims to be an advocate for the environment. This includes providing environmental support on issues relating to water management. Orange is associated within the headwaters of the Belubula river ,which flows into the Lachlan. We are also aware of the pressures on the Lachlan River system caused by mining and irrigation, often to the detriment of the Lachlan riverine environment.

For this strategy to be acceptable, its principal objective must be to ensure that the waters of the Lachlan river should be managed in a sustainable manner. The NSW Water Management Act 2000 states that the health of the river system, wetlands and aquatic habitats should be given top priority. For this to happen, the Strategy needs to include the removal of the Wyangala Dam wall raising and the Lake Rowlands projects, both of which would seriously impact upon the natural flow and downstream water delivery that is essential for the health of the Lachlan.

ECCO recognises the importance of the Water Strategy Priority one, which refers to building resilience to climate extremes. We support Actions 1.3, 1.4,1.6, which aim to provide better governance, improved modelling, inclusion of First Nations people in decision making and water efficiency measures for small communities. We do not support actions 1.5 and 1.7 which advocate increased dependence on existing groundwater for town supply, which is not sustainable. Neither is the increased proliferation of pipelines which threaten to crisscross the region. Instead, more emphasis needs to be placed on water efficiency and demand management for towns and communities, including more education on the uses of recycled water usage.

We are also supportive of the Strategy priority which acknowledges the necessity to ensure the best use of existing water for the environment. To ensure this it is necessary that included in this priority are actions that ensure that constraints affecting natural flows are removed so that the conditions required for the functioning of the river’s ecology are maintained. ECCO supports the actions 2.1,2.2, .4, 2.5, which refer to improved management of sedimentation, fish passage and Lake Brewster. A serious impediment to fish habitat between Wyangala and Forbes in the form of a 150km sand slug needs to be remediated. An action to deal with this should be included.

Action 2.3 refers to upgrades or construction of new weirs in the lower Lachlan. Any assessment or consideration of this action must not proceed before all relevant environmental impacts are taken into account, including access to natural flows that support wildlife breeding cycles. Contemplated actions should also include identification and removal of existing weirs that are impeding environmental flows.

Priority 3 aims to support economic growth within the challenges of a capped system. It must be recognised that any growth in a capped water system will result in winners and losers, such as a restriction of economic activities or a decline in environmental values. Actions 3.1, 3.3, 3.4, 3.5 are to be supported as they refer to much needed improved access to climate information, climate impact study, employment and business opportunities for First Nations people and improved water efficiency. Rural water users such as those in the Jemalong Irrigation District are specifically mentioned as requiring support for increased irrigation efficiency, but there is no action provided to deliver this.. It is essential that all stakeholders are given clear objectives to work towards if the strategy is to be successful.

There is still much to learn about the complexities of water management. ECCO supports action 3.2, which concerns assessment of all types of water use and irrigation behaviour, including access to groundwater and impact of wet years. Such work is essential if we are to understand the consequences of actions taken by water sharing plans and the limits to water as a resource.

Priority 4 is supported for the above reasons. We need to know more about water resources if we are to manage them sustainably. ECCO supports the action that states as a priority groundwater assessment, review of floodplain management plans and the integration of land and water management planning. The assessment of groundwater and floodplain management are of particular importance.

It is hoped that the final draft of the Lachlan Regional Water Strategy will deliver actions for the management of the Lachlan River which will be effective for both environmental protection and sustainable use.

ECCO thanks you for the opportunity to comment.

Yours sincerely

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