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**Department of Planning and Environment
4 Parramatta Square
12 Darcy Street
Parramatta 2015**

Re: The Macquarie-Castlereagh Water Strategy 2nd draft

To whom it may concern,

I am writing to you on behalf of the Environmentally Concerned Citizens of Orange (ECCO). The aim of our group is to be an advocate for environmental issues, one of which is water management.

. Orange is situated at the headwaters of the Macquarie and Bell rivers, and consequently the Murray Darling River system. ECCO has long believed that it is essential that any management plan be primarily concerned with the environmental health of the river and that sustainable practices based on the best information and science are implemented.

When considering future action for the management of water within the Macquarie-Castlereagh systems, we must take into consideration future modelling in relation to climate change. Climate change forecasts predict inflows into Burrendong dam could decrease by 50% by 2070. We must not be lulled into a sense of false security by current weather conditions. It is predicted that the chances of a drought as severe as that which was recently experienced may increase from one in one thousand years to as frequently as one in thirty years. It is therefore essential that the possibility of severe drought be included when considering future water allocations, and that the environment should not lose out in planning to confront the challenges of drought and climate change.

We must not regard the Macquarie as a gutter through which water for irrigation is transported. Our number one priority must remain the health of the river system as expressed in the NSW Water Management Act 2000 which emphasised the importance of maintaining and conserving a healthy aquatic habitat for our rivers.

ECCO strongly objects to the omission of a review of regulated river water accounting and allocation processes, which did not progress to the second draft of the document despite strong community support for its inclusion.

The Macquarie River is heavily impacted by the demands of Orange, Bathurst and Dubbo. We strongly support action that recommends a confirmation of the level of water security needed to support regional cities. We are of the opinion that the extraction of water for Orange via the

Macquarie River pipeline was unwarranted and environmentally unsound. We would strongly oppose any efforts made by Orange City Council to apply for an additional water allocation from the river, including any extension to existing stormwater harvesting projects. We would also strongly object to any suggestion that an additional dam should be built on the Macquarie to service regional cities. Additionally, we strongly object to any funding or action allocated to a re-regulating weir at Gin Gin, the establishment of which could compromise downstream flows to the iconic Macquarie Marshes.

We generally approve of actions to support industry and community climate adaptation as long as they are consistent with the aims of sustainability and environmental protection. We do not, however, support research into groundwater sources which is targeted solely to further facilitation of groundwater extraction for commercial use, nor do we support the increased availability of high security licences. Those wishing to sell their licences should do so to the Commonwealth.

Priority 4 is concerned with how to manage the water in the Macquarie- Castlereagh system to ensure the best use of the water for the environment. ECCO is in favour of the restoration of the health of the river and a commitment to repairing historical and environmental damage. The only way this can be achieved is to ensure that more water is available for the environment. We support the environmental flow regime and the identification of significant environmental assets.

ECCO strongly objects to any implementation of the current floodplain harvesting program. The policy is deeply flawed as it directs an environmentally unsustainable level of water from Ramsar listed wetlands, floodplains and downstream. Any extraction of water through floodplain licencing should not be permitted until all unapproved floodplain infrastructure is removed.

Any regulation of floodplain harvesting must not be approved until all environmental, social and cultural impacts are considered, and if necessary remedied, and that any subsequent floodplain permission to harvest water be preceded by the best scientific information and advice.

The Macquarie River has long been the subject of over allocation for the purpose of extraction. We must not lose track of the fact that this system is crucial for the existence of iconic Ramsar listed wetlands as well as having important cultural and heritage values. We must not allow the interests of water extraction to overshadow the importance of these values.

ECCO thanks you for the opportunity to comment.

Yours sincerely

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