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Submission

Lachlan Regional Water Strategy: Updated Shortlist of Options

Introduction

The Inland Rivers Network (IRN) is a coalition of environment groups and individuals that has been advocating for healthy rivers, wetlands, and groundwater in the Murray-Darling Basin since 1991.

IRN welcomes the opportunity to engage in the refinement of proposed actions for the Lachlan Regional Water Strategy (RWS). We participated in the first stage of the RWS development process by providing feedback on options that are beneficial to the environment and community, options that would cause environmental harm and identified missing options.

We also responded in November 2022 to the proposed short list of options proposed at that time. We note that there have only been minor changes to the list of priority options between the two iterations of the draft RWS.

We strongly support the removal of the Wyangala Dam Wall Raising Project and the Belubula Water Security Project as NSW Government commitments under the RWS.

We note the changes to the titles of Priority 2 and 3 and the removal of Priority 4 with actions spread across the other three priority areas.

Priority 2 should be titled *Improve catchment and **river** health* – this is a vast improvement on the previous title for these actions. We fully support the new emphasis in Priority 3 on a sustainable economy in a capped system. The acknowledgement that any growth in water use

in new industries will come at the expense of existing water users and the environmental health of the river system is a major step forwarded in approach for the Lachlan Region.

The high-level priority for the RWS should be the management of water demand while addressing ecological needs to ensure ecosystem resilience to withstand increased pressures from climate change extremes.

IRN supports the recognition that water availability is capped, creating the challenge to better manage new industry water demands. Improved understanding of the environmental and social impacts of the water market should be a priority including the impact of new water intensive industries competing for water with established agricultural production.

IRN strongly supports the options to improve and fund catchment management challenges that threaten river and habitat health.

The inclusion of options to support First Nations communities access to water and engagement in water management decisions is also strongly supported.

Consideration must also be given to improvements in water sharing plans rules to enhance environmental water availability to build river ecosystem resilience and mitigate against a drying climate.

IRN offers the following recommendations for a final Lachlan RWS and implementation plan.

High priority actions

1. Demand management

The highest priority must be given to demand management across urban areas and industrial water use, including agriculture. This will help to reduce reliance on water critical for ecosystem health, especially during prolonged drought.

While there is mention of support for improved efficiency in the Jemalong Irrigation District in the consultation paper ¹, there is no priority action to improve efficiency, demand and increased water security through this option. This option should be covered under Action 3.5.

Actions 1.1 and 3.5 must include funding for a regional mobile education unit to improve understanding of purified recycled water processes and opportunities. Under a circular economy approach some of the waste stream from water recycling can be used to establish new local industries eg extraction of phosphorous and other nutrients.²

2. Fish habitat

High priority actions to rehabilitate the catchment landscape to improve river health and to support native fish passage and recruitment are critical in the Lachlan and Belubula Valleys.

Improved fish passage must also be achieved through the removal of unnecessary weirs.

¹ DPE October 2022. Lachlan: Shortlisted Actions – consultation paper p 100

² Water Reuse in a Circular Economy Context: <https://unesdoc.unesco.org/ark:/48223/pf0000374715.locale=en>

Actions 2.1, 2.2 and 2.3 must include the rehabilitation of fish habitat between Wyangala Dam and Forbes through mitigation of the current 150km sand slug. This action would also help to prevent low-level flooding.

3. Groundwater management

Groundwater is a critical source of water in the Lachlan that has been permanently depleted in some areas through overuse during droughts. Improved understanding of the water source and demand is critical and must be given high priority in the RWS implementation plan.

We note that the new draft version of the RWS has picked up on our previous comments about recognising the needs of groundwater dependent ecosystems and better management of permanent depletion of aquifers.

The new **Action 1.8** better identifies the research needed in a comprehensive Lachlan groundwater study.

4. Flood management

Improved management of the Lachlan floodplain is critical to better understand the impact of infrastructure and works on flood flows. Development control on floodplains is a significant issue that must be addressed.

We note that this issue has now been elevated to **Action 2.1** and the need for a Lachlan Floodplain Management Plan is identified in **Action 2.7**

IRN considers that an audit of all structures on the Lachlan floodplain is critical for identifying mitigation measures, particularly along major transport corridors such as the railway line through Forbes that exacerbates flooding in the town. This is required before issues relating to floodplain structures can be addressed.

Support for other Priority Actions

IRN continues to support the following actions proposed in the shortlist:

1. First Nations opportunities

Actions 1.4, 2.6 and 3.4 Participation in water management decisions, place-based cultural outcomes, employment and business opportunities

2. Small town water supply

Action 1.6 Supply of water tanks and new technologies eg hydropanels

3. Improved models and knowledge

Actions 1.3, 1.8, 3.1, 3.3, 3.5 Upgrading hydrological models, improving groundwater model, improved access to climate information, conducting a climate change impact study,

4. Integrated planning

Action 1.9 It is critical that water availability and river health are considered in all land use planning processes. IRN supports this issue being elevated as a priority under the consideration of climate resilience. The proposed increase in mining activity in the region will have a significant impact on other water users including agriculture, town water supply and the environment. The issue of water availability in the Lachlan during extreme drought must be Considered in all major development proposals and changes in land use.

Conditional Support for Priority Actions

IRN gives conditional support to the following actions proposed in the shortlist:

Action 2.3 Upgrade of re-regulating structures in the Lower Lachlan. A system level assessment of existing structures and feasibility study for additional Lower Lachlan weir must consider environmental impacts including the implications for wildlife breeding cycles affected by the capture of natural seasonal flows Tributary inflows provide important environmental benefits that must be recognised. Held environmental water releases cannot be the only source of support for all ecosystem function along the full length of the Lachlan River and wetland systems. This Action should also identify weirs for removal.

Action 2.5 Review Lake Brewster Efficiency Project. We note that 2009 reports³ identified for review and evaluation do not appear to be available. A clear understanding of the trade-off between wetland values and customer service needs to be considered.

Action 3.2 Water use in relation to plan limits. An investigation into water use and water user behaviour must consider that the utilisation rate calculation excludes access to Supplementary, uncontrolled flow use and tagged trading. The plan limit must also be reviewed to ensure that it is a realistic estimate of water availability that also supports a healthy river system. An action to review rules in Lachlan water sharing plans to improve water availability for environmental health and to build ecosystem resilience should be included in the final RWS and implementation plan.

Actions not supported

IRN does not support the following actions proposed in the shortlist:

Action 1.5 There should be no further reliance on or encouragement of increased groundwater use for town water supply. The overuse of groundwater in the Lachlan is a significant issue. Demand management must be top priority for all towns in the region.

Action 1.7 Expanding the regional water grid will not solve critical human needs when the entire region and neighbouring regions are in extended drought. Towns should become more self-reliant through the use of a range of demand management and efficiency measures. Expanding the water grid will put more pressure on the source of water supply and on the share of water for environmental health and ecosystem function.

³ DPE October 2022. Lachlan: Shortlisted Actions – consultation paper p 90

Conclusion

IRN supports the move away from infrastructure projects that will increase environmental harm.

We fully support the focus on improved water use efficiency. The implementation of water recycling for industry and purified water recycling to better secure town water supply in the region must be given highest priority. There must be sustainable economic diversification away from water intensive industries.

Climate change will seriously impact on current water policy and management arrangements. The environmental and cultural values of the Lachlan region have been significantly impacted by poor water management practices in the past. These need to be ameliorated before the worse impacts of climate change occur.

For more information about this submission please contact IRN at:
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