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**SUBMISSION**

**to the**

**NSW Department of Planning,  
Industry and Environment**

**on the**

**Draft For North Coast Regional Water Strategy**

**The North Coast Environment Council (NCEC)** is the peak regional conservation group on the NSW North Coast which has been active in protecting the environment for more than forty years. Our organisation receives no government funding, relying on the 'in kind' contribution of dedicated volunteers to highlight issues of environmental concern and campaign for an end to environmental destruction.

**Introduction**

The NCEC was one of only two North Coast environment groups that attended a zoom meeting on the regional water strategy for the Far North Coast. This leads us to question how widely this consultation process was promoted to genuinely engage the community. We hope that the indigenous communities within the planning area were engaged in meaningful consultation and their views genuinely considered.

There is considerable cynicism amongst our members of the value of engaging in such government processes given our members past experience on Water Management

Committees to develop Water Sharing Plans in the early 2000's. At that time it seemed that only lip service was paid to the concerns of environmental representatives while commercial water users wishes were generally met. More recently we have seen scandal after scandal, revealing massive water theft and roting of the system while those responsible for compliance turned a blind eye. Many of our rivers ceased to flow altogether, causing unprecedented fish kills and the decline and demise of entire ecosystems as a result. We believe that Political interference on behalf of vested interests is a major factor in the demise of our rivers.

Our concerns were recently vindicated by the NSW ICAC enquiry into water management over the past decade which found an obvious bias towards commercial irrigation at the expense of the environment. This bias needs to be reversed. There needs to be a much stronger emphasis on improving catchment management practices to protect low flows and water quality.

The stated objectives are similar to those of the past, to *“deliver and manage water for local communities”*, *“Enable economic prosperity”*, *“Recognise and protect Aboriginal water rights”*, and finally, *“Protect and enhance the environment”*. However the pursuit of Economic prosperity generally comes at the expense of all other values, which is why our rivers are in the current mess.

The climatic predictions presented in the draft strategy paint a realistic but bleak picture of future expectations of more frequent and severe heat waves and droughts and less frequent but more severe flood events. Unless major changes are made to both land and water management practices key environmental assets will continue to increasingly deteriorate and be lost.

### **Water Diversion Dams and Infrastructure.**

At the outset it should be stated that the NCEC is totally opposed to water diversions between catchments or sub catchment as well as the building of new dams and the raising of existing dam walls. All these options deprive and degrade downstream riparian and aquatic ecosystems, often including Endangered Ecological Communities.

Both the proposed Byrill Ck and Dunoon Dams have been the subject of extensive community opposition. The excessive resources spent in construction of the proposed Dunoon dam will see a lost opportunity to invest in system-wide water efficiency which is the cheapest & fastest way to ensure supply-demand balance. New dams would encourage continued inefficient and often wasteful water management by local governments and consumers. They would have no incentive to do things differently.

We understand that the proposed Dunoon dam will result in higher prices for consumers due to a fourfold increase in the cost of water. This will impact unfairly on people with low incomes, the unemployed and pensioners. We support water efficiency strategies such as rainwater tanks, recycling and storm water capture to augment domestic supplies to meet the needs of increasing population.

## **Total Catchment Management**

Better catchment management across the landscape is fundamental to making improvements to water yields and quality. The recent changes to vegetation management legislation which have seen rates of land clearing and logging escalate need to be re written to significantly reverse this trend.

Water management strategies and legislation cannot be developed in isolation from land management regulations. Land management regulations have been incrementally weakened over the past decade and this will be increasingly reflected in poorer water yields and quality from our catchments..

Extensive land clearing and native forest logging are known to have long term, negative impacts on rainfall, water yields and water quality.

(see submission to this draft plan by [REDACTED] for the North East Forest Alliance regarding the importance of mature vegetation to protect and enhance beneficial hydrological processes).

Mature forests are known to regulate hydrological processes, they retain water in the landscape for longer following rain events than cleared land or young regrowth forests.

The 1938 NSW Soil Conservation Act wisely classified all land over eighteen degrees as 'protected land' where clearing activities were mostly prohibited or closely regulated to prevent erosion from steep slopes entering waterways. In the pursuit of 'economic prosperity' these regulations have been weakened to allow land clearing and intensive logging on slopes over thirty degrees.

Riparian protection has also been significantly reduced particularly in both public and private native forestry logging operations, down to a mere five metres on fundamentally important headwater streams.

The weakening of slope limits and riparian buffers has come about largely due to lobbying by the timber industry to get at the last remaining areas of large mature trees, which had wisely been protected under previous legislation. At the same time more intensive logging is proposed under the new logging rules for both public and private forests.

The benefits to the community of higher more reliable water yields from mature forests as well as their carbon and wildlife value certainly greatly outweigh the short term limited economic benefits of logging public native forests.

To attempt to meet improved environmental outcomes there is an obvious need better manage riparian and wetland areas across all tenures.

This includes extensive environmental weed control and restoration, beginning with headwater streams, as well as livestock exclusion from sensitive areas and erosion mitigation.

### **Land use.**

The further expansion of intensive horticulture crops with high water requirements such as blueberries in drier, marginal country should be more closely regulated. Many problems have been identified with this emerging issue in the Clarence Catchment including , land clearing, water use, plastic pollution, and pesticide run-off. These will likely also be occurring in the Far North Coast upper catchments as the industry further expands . We believe that there is a need to impose regulations that would require the preparation of a development application and water management plan also taking into account land capability prior to approval.

Changes to legislation to allow the damming of lower order streams to facilitate this unsustainable expansion should be opposed. We understand there has been lobbying to be able to dam third order streams which should be off limits as private commercial water storages.

### **Ground water**

Ground water resources should be judiciously managed, based on a full understanding of aquifer characteristics and rates of recharge and nearby groundwater dependent ecosystems. Drilling and hydraulic fracturing for gas mining, and underground mining that might impact aquifers should not be permitted. 'Water mining' for the production of bottled water should be opposed.

### **Mining**

As well as often requiring large volumes of water, mining activities have the potential to seriously impact water quality. The NCEC believes that mining leases need to be re-mapped across the whole of Australia to identify sensitive areas, drinking water catchments, heritage sites, and places of environmental significance, and scenic beauty, where mining simply should not occur, and declare them off-limits.

### **Conclusion**

In conclusion we are pleased that the realities of climate change have finally been acknowledged in the current NSW Government water planning initiatives. We urge that the bias towards commercial water use at the expense of the environment be seriously addressed.

The webinar we attended talked about the need to gather more environmental data about our river systems to make informed decisions. While more useful data is always welcome, extensive data have been gathered and plans developed over the past thirty years, through Catchment Management Committees, Catchment Management Boards followed by Catchment Management Authorities. These each identified the main causes of degradation of our rivers and streams. However in each case actions proposed to address these causes have largely failed. We believe this has been mostly due to lobbying by vested interests resulting in political interference in getting appropriate outcomes for the environment.

The science is clear on what needs to be changed to better sustainably manage our streams, rivers and precious water resources. We fully support government incentives to encourage

better landscape management however this needs to be coupled with stronger legislation to protect catchment values.

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Yours Sincerely

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