

Natural Resources Access Regulator,
Licensing and Approvals – West,
Locked Bag 5022, PARRAMATTA NSW 2124

nrar.enquiries@nrar.nsw.gov.au

Dear Sir/Madam

East Orange Wetland Stormwater Harvesting Project
Approval Reference No. A027231

The Central West Environment Council (CWEC) is an umbrella group representing several local district environment groups in the Central West of NSW. CWEC appreciates the opportunity to comment on this proposal, to which its members object on the following grounds.

GENERAL CONCERNS

- The Review of Environmental Factors is mainly concerned with environmental impacts on Blackman's Swamp Creek, but this creek is one of the main tributaries for Summer Hill Creek, which eventually flows into the Macquarie. When Suma Park is not spilling, Summer Hill Creek is almost completely dependent on flows from Blackman's Swamp Creek. The impacts on the downstream ecosystems have not been considered adequately in this review. This could be an important loss of natural flows not just to Summer Hill Creek, but to the Macquarie itself.
- Summer Hill Creek itself is already known to be a highly stressed creek. This was recognised by government department (DLWC) in 1998, which gave it the highest priority for management. Governments at all levels should be seeking ways to improve the riverine environments, not increasing extraction. The creek has suffered from decades of development: Suma Park Dam, diversion of treated water to Cadia Mine, holding ponds etc.
- It is understood that increased extraction might lead to a higher level of water being kept in Suma Park Dam, thereby decreasing the likelihood of having the environment flows cut when the water level drops too low. However, even if this happens, it should be noted that this would only benefit the small portion of the creek above Third Crossing, where the monitoring of the requirement for 1.75 ML/day is undertaken. These wholly inadequate environmental flows rarely reach Fourth Crossing, let alone Ophir and further downstream.
- A decrease in flows is also very significant when you realise how dependent some of the conservation areas in Mullion, Ophir and Giralang, are on 'freshest' in the warmer months.

LEGAL CONCERNS

- It is our understanding that this proposal, in particular the new weir, is in contravention of the Water Sharing Plan for the Macquarie Bogan Unregulated Rivers Water Sources 2012, so why is it even being considered?

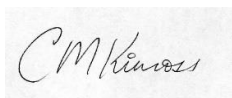
CONCERNS RE BIODIVERSITY

- We are particularly concerned about the effect this scheme will have in dry periods on fauna, particularly native fish and aquatic mammals. The stage 1 of the stormwater harvesting was primarily constrained to extraction of water just at high peaks. Due to the nature of this proposal, with water being diverted to a wetland, permitting a much longer extraction period at lower flows, the risk to the natural environment is unacceptable.
- Increased extraction and a lower flow regime are likely to favour introduced fish species over the native species, which is of major concern to CWEC. A new weir is likely to be an impediment to fish passage and OCC should be considering some means of minimising this problem via ladders or similar.
- Platypus are of particular concern as there is some evidence that their populations are declining in NSW and may be considered for 'vulnerable' listing (as has recently happened in Victoria). They are already listed as "Near Threatened" both in Australia and internationally according to the IUCN 'Red List'. Platypus are dependent on deep pools that need to be connected by riffles that need to be kept wet. Prior to any more extraction of additional water from the creek, a much more thorough analysis of the status of the platypus, and this development's likely impact in the catchment is needed.
- The accumulated effects of this proposal on biodiversity have not been adequately considered. Stage 1 had some adverse effects as have all the other developments in the catchment. To continually assess environmental impacts based on the current situation is a sure route to the 'death by a thousand cuts' for our riparian ecosystem.

There is an assumption that humans can only survive with an economy based on growth. This is, of course, completely unsustainable, especially in areas like this with poor water resources. We need to be transitioning instead to a stable economy before environmental degradation is irreversible. It is quite unfair to expect a small creek system, already over-extracted and over-stressed, to prop up the desire of local governments for expanding populations. Orange City Council should either rein in its focus on growth or find alternative sources of water.

We therefore ask NRAR not to issue a Water Supply Works Approval under the Water Management Act 2000.

Thank for your opportunity to comment.



Dr. Cilla Kinross, President, Central West Environment Council.

17th September 2021.

