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Draft NSW Great Artesian Basin Water Sharing Plan

Introduction

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

We welcome the opportunity to provide comment on the draft Water Sharing Plan (WSP) for the NSW Great Artesian Basin groundwater source (GAB).

CWEC considers improved water management in inland NSW is critical for a sustainable future, particularly in the context of climate change scenarios.

Groundwater is a very important water source that must be protected from over-extraction and poor management. Groundwater is quickly becoming a more reliable source of water for times of critical need during extended drought and must be managed conservatively.

The capping and piping program for the GAB has been very successful to date and must be completed to protect environmentally important mound springs and to ensure water supply into the future.

Spring complexes supported by the GAB provide critical surface habitat in an arid landscape. They are listed as matters of national environmental significance under federal legislation, some are also listed as sites of significance under the Ramsar Treaty and are listed as critically endangered ecological communities under NSW legislation.

For example, the springs formation at Peery Spring Complex are recognised as one of the rarest landforms in Australia and the largest active spring complexes in the Murray-Darling Basin. These springs deserve protection through stronger rules in the amended GAB WSP.

CWEC considers the draft amended GAB WSP is a backward step from current water sharing rules for this significant groundwater source.

CWEC supports the recommendations of the Natural Resources Commission (NRC) to merge the NSW GAB Shallow WSP with the GAB WSP. This will reflect, and better manage, the high level connectivity between these water sources.

An amendment provision should be included in both WSP to allow this to occur during the next 10 year lifespan of the plans.

We also support other NRC review recommendations, as outlined below.

Comments on WSP rules:

1. Metering and measurement

It is critical that all water take from the NSW GAB is metered, particularly in areas with irrigation licenses. Log book records are inadequate and difficult to monitor for compliance purposes.

The NSW Government adopted a metering policy in response to recommendations of the Matthews Report (2017). This policy should also be adopted to improve management and compliance for groundwater extraction.

2. Long term annual average extraction limit (LTAAEL)

Compliance with the plan limit or LTAAEL should be assessed every three years to ensure no growth in use, particularly during periods of extreme drought.

A three year assessment period will enable better monitoring and management of the impact of climate change on all water sources. It is essential that this rule be included in the GAB WSP.

There are a large number of sleeper licenses in the NSW GAB recharge areas. These have a high risk of being activated and significantly increasing extraction during prolonged drought, at the same time that recharge is diminishing.

A three yearly LTAAEL assessment will better protect this important water source and its dependent ecosystems.

The NRC questions the adequacy of the LTAAEL compliance trigger for managing short-term activation of sleeper licenses. A more regular compliance assessment

would better assist compliance and better ensure the maintenance of sustainable extraction.

We note that extraction in the Eastern Recharge Groundwater Source has exceeded annual extraction limits in four of the last six years. It is imperative that an appropriate compliance trigger be included in the amended WSP and that LTAAEL assessment occur every three years.

3. Protection of NSW GAB dependent spring complexes.

More work is needed to scientifically assess set back distances for new bores and water supply works to protect spring complexes identified as high priority groundwater dependent ecosystems (GDEs).

Standardised setback rules are not adequate to protect the needs of significant GDEs. The proposal to consider shorter setback distance rules for new works is unacceptable and not based on scientific assessment. The concept of minimum impact on springs is subjective and cannot be properly measured.

No impact should be allowable for springs. These significant habitats in the arid landscape of western NSW are critically endangered and must be protected from any risk of localised drawdown.

The WSP needs a provision to rehabilitate works that pre-date the set-back distance rules.

4. Better management of artesian water flows

CWEC strongly supports the proposed change in strategy to reach the environmental objectives in the WSP by including the continuation of investment in capping and piping artesian bores. This will increase the pressure within the artesian groundwater sources thus improving the health of mound springs and other GDEs, including Ramsar listed wetlands.

We also support the delivery of the 'water tight bore' policy to better manage access and shares of artesian water in the NSW GAB.

5. Conveyance access licenses

CWEC strongly supports the inclusion of provisions in the NSW GAB WSP to establish conveyance access licenses. The purpose of this improved regulation is to cover uncontrolled or wasted water flows in open bore drains.

The purpose of this regulation is to account for uncontrolled flows and to encourage greater participation in the cap and pipe program.

These new license provisions must be cancelled once uncontrolled flows are contained and should not be tradeable.

6. Extraction Limit

6.1 Central, Surat and Warrego Groundwater Sources

CWEC strongly supports the setting of the extraction limit to 2008 levels of take.

The consideration of adding 30% of savings from the cap & pipe program to the extraction limit through new licensed entitlements will impact on environmental gains made through public infrastructure investment.

There is no scientific basis to the proposal to release 30% of water savings as increased entitlements. This makes a mockery of the purpose of water sharing to improve the sustainability of water use.

6.2 Southern and Eastern Recharge Groundwater Sources

CWEC does not support an increase in the level of take in the Southern and Eastern recharge areas of the NSW GAB. New knowledge of the total recharge volume should not cause an increase in extraction.

The net volume of extraction from recharge inflows should not be maintained at the current level of 70%. This will cause an increase in take.

The percentage of take should be adjusted down to reflect current extraction levels. This will improve the sustainable management of the groundwater source and improve adaptation to climate change impacts over the life of the WSP.

There should be no change to the extraction limit in the Southern and Eastern Groundwater Sources.

6.3 Release of new entitlements

CWEC strongly objects to any new aquifer access licenses being issued in any areas of the NSW GAB. We note that there was very strong public objection to the release of additional license entitlements in 2009.

7. Boundary of Warrego Groundwater Source

CWEC strongly supports the NRC recommendation to update the administrative boundary of the Warrego groundwater source as defined in schedule 2 based on latest available knowledge.

The Warrego groundwater source has better water quality than in the Central and Surat groundwater sources and must be managed accordingly.

The boundary should be shifted 150km west, and 50km east of where it is currently defined, to better reflect improvements in understanding the connectivity of the water sources.

8. Carry over and unit shares

CWEC strongly objects to carry over of any water entitlements in the NSW GAB. Carry over increases pressure on the resource during times of lower recharge.

As noted above, extraction in the Eastern Recharge Groundwater Source has exceeded annual extraction limits in four of the last six years.

Access licenses must be managed through a 1 ML unit share allocation with an annual limit of 100% of entitlement.

9. Aquifer Interference Licences

CWEC strongly opposes any increase in aquifer interference from large scale mining or gas projects in the GAB recharge area. This is unsustainable development and will threaten the future availability of groundwater while increasing the risks of climate change.

The proposed provision in the WSP that new Aquifer Interference Licences be made available to large extractive industries should be removed.

There needs to be greater transparency around the impacts of groundwater take associated with mining and gas extraction. These impacts should be controlled through the rules in the WSP.

Conclusion

CWEC does not support any proposals to increase extraction rates in the NSW GAB.

Recommendations made by the NRC review have been identified in this submission that should be adopted in the amended WSP.

Yours sincerely



Cilla Kinross
President