



870 Ophir Road  
Summer Hill Creek  
NSW 2800

[www.cwecouncil.com](http://www.cwecouncil.com)

Department of Planning and Environment - Water  
Locked Bag 5022  
Parramatta NSW 2124  
[regionalwater.strategies@dpie.nsw.gov.au](mailto:regionalwater.strategies@dpie.nsw.gov.au)

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### **Submission: Macquarie-Castlereagh Regional Water Strategy Shortlist**

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

CWEC is pleased to be able to provide comment on the second draft Macquarie-Castlereagh Regional Water Strategy.

#### **Priority 1: Secure water supplies for growing regional cities and towns**

In the 2017-2020 drought, Burrendong dam came very close to running out of water, falling below 1.5% capacity, when it had been full in July 2017.

All droughts should be considered when working out annual water allocations, not only droughts that occurred before 2004, so that Burrendong dam doesn't empty so quickly in the next drought.

The proposed actions to increase town water security downstream of Burrendong dam, like pipelines and looking for extra groundwater to extract, would most likely not be necessary if water allocations were more conservatively made.

CWEC is very supportive of environmental water released from Suma dam being protected from extraction, and stronger triggers to restrict irrigation access from Chifley dam.

CWEC strongly supports measures to reduce growth in water demand as listed:

- water restrictions to limit town water use during dry periods and prolong water supplies

- community water conservation schemes, such as installation of rainwater tanks and greywater systems, and encouraging water-efficient appliances
- reducing leakage from pipes
- smart metering and pricing

CWEC strongly supports:

- An increase in rainfall-independent water supplies for urban centres;
- Subsidies for water tanks on houses and commercial buildings;
- Support for all local councils to develop and implement an Integrated Water Cycle Management Plan as agreed to under the 2004 National Water Initiative.
- Water sensitive urban design – the integration of urban planning with the management, protection and conservation of the urban water cycle that ensures urban water management is sensitive to natural hydrological and ecological processes.
- Continued development of advanced water treatment and purified recycled water facilities.
- Managed aquifer recharge.

CWEC does not support:

- Increasing the volume of water Orange can access each year from the Wambool-Macquarie River
- New infrastructure in the upper Macquarie, which could include a new Ulmarrah Dam at Dixons Long Point
- Sourcing water for towns in the Macquarie from other catchments

The volume of water captured on farm under the 10% harvestable right in the upper Macquarie should be assessed for compliance, and if found to be too high, corrective steps be taken.

Currently during droughts, groundwater is turned to as an alternative water source when surface flows become scarce. This has led to an unsustainable reliance on aquifers that are susceptible to drawdown. Groundwater recharge could reduce by 15% by 2060 due to climate change.<sup>1</sup> Dangerous PFAS have been found in aquifers around Dubbo. For the purposes of consistent methodology, the state should lead investigations into the condition of aquifers, not regional councils.

CWEC supports the management of Oberon's town water quality issues.

## **Priority 2: Reduce water security risks in the region's west**

CWEC is supportive of a third off river storage at Nyngan.

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<sup>1</sup> NSW Draft Groundwater Strategy

If the water allocations considered all droughts, there may not be the need for so many proposed pipelines.

The full supply level of Burrendong dam should not be increased to 113%. This would be a reduction in unregulated natural flows that are critical to support colonial bird breeding in the Ramsar listed Macquarie Marshes. It would also increase the risk of flooding to towns downstream of the dam.

The Gin Gin re-regulating project should be cancelled, and the old 120 year old structure removed.

Connectivity between the Macquarie and Barwon rivers is much reduced since the valley was developed, CWEC supports steps to increase connectivity.

### **Priority 3 Support industry and community climate adaptation**

The desire for continued economic growth is putting unsustainable pressure on finite water resources.

New and expanding industries like the renewable energy zone, value add food processing and packaging and critical minerals hub, will put pressure on existing water sources.

Climate change could result in general security licences and supplementary licences having access to 23% less water when compared to the long-term historical past climate projection. Exploiting untapped deeper groundwater sources with poorer quality water should not be considered.

As water supplies shrink, existing industries will have to further increase their water efficiency, or reduce their output. New water intensive industries will have to obtain water access licences from the current pool of entitlements.

Advanced technologies like water recycling and purification must be developed.

CWEC does not support increasing the availability of high security licences in the Macquarie catchment.

CWEC is supportive of initiatives that encourage the advancement of First Nations access to water and inclusion in water management decisions.

### **Priority 4: Best use of existing water for the environment**

CWEC supports a review of the sustainable diversion limit in the Macquarie catchment.

Actions 4.1, 4.2, 4.3, 4.4, 4.5, 4.6 and 4.8 are supported by CWEC.

CWEC strongly disagrees with action 4.7 fully implement the NSW Floodplain Harvesting Program.

Floodplain harvesting is being implemented in a way that locks in a very high level of take, and allows five years' worth of entitlement to be taken in a single year. That's very

damaging to the river system, especially as climate change means we are experiencing more severe droughts and floods.

No floodplain harvesting entitlements should be issued in the Macquarie until the cumulative environmental and cultural impact of floodplain harvesting has been assessed.

Yours Sincerely,

President