

Department of Planning, Industry and Environment

By email: NSW.waterstrategy@dpie.nsw.gov.au

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Dear Sir/Madam,

Submission on the Draft NSW Water Strategy

The National Parks Association of NSW (NPA) was formed in 1957 and sixty-four years later we have 15 branches, 4,000 members and over 20,000 supporters. NPA's mission is to protect nature through community action. Our strengths include state-wide reach, deep local knowledge and evidence-based approach to conservation advocacy.

NPA welcomes the NSW Government's commitment to a strategic, long term and 'whole of landscape' approach to the management of coastal and inland waters through the preparation of the Draft Water Strategy (DWS). The complexity of legislation, strategies, policies and regulatory processes relating to water is a significant structural barrier to clarity of objectives and on-the-ground outcomes. The DWS offers a valuable opportunity to clearly state government's objectives and to outline the processes that will deliver upon those objectives.

The introduction to the DWS states that it is intended to 'set high level objectives and principles to guide water service delivery and management across NSW' (p8). NPA would recommend that this aspiration be rephrased as 'to implement the statutory objectives and principles in the *Water Management Act*'. The current phrasing inverts the appropriate relationship between statute and strategy.

One of the consequences of this inversion is that the DWS presents a very incomplete account of the environmental objectives and principles of the *Water Management Act*. NPA recommends explicit reference to the objects in Chapter 1(3) '*(a) to apply the principles of ecologically sustainable development, and (b) to protect, enhance and restore water sources, their associated ecosystems, ecological processes and biological diversity and their water quality*

and the principles in Division 1 (5)(2a) '*water sources, floodplains and dependent ecosystems (including groundwater and wetlands) should be protected and restored and, where possible, land should not be degraded, and*

(b) habitats, animals and plants that benefit from water or are potentially affected by managed activities should be protected and (in the case of habitats) restored, and

(c) the water quality of all water sources should be protected and, wherever possible, enhanced, and

(d) the cumulative impacts of water management licences and approvals and other activities on water sources and their dependent ecosystems, should be considered and minimised'

In the absence of careful articulation with the objects and principles in the *Water Management Act* the DWS effectively side steps the legislative primacy of protecting biodiversity, environmental assets and ecosystem services. Despite the acknowledgement (p32) that the delivery of environmental water is supposed to be the first priority of the water management system, the DWS consistently elevates other factors above the environment. Examples include:

- The description of the 'common planning assumptions underpin(ning) all of these plans and strategies lists 'population, demography, housing, employment, climate, fiscal and economic forecasts' (p13) without any mention of the environmental objectives in all of the relevant plans, strategies and statute.
- The objective 'Improve river, floodplain and aquifer ecosystem health and system connectivity' is framed in 'aspirational' terms (p68) as 'The health of water resources and their catchments across NSW is protected and improved to support environmental, social, cultural and economic needs and values- now and in the future'.

NPA is disappointed that, while the DWS discusses the growing pressures associated with climate change, population growth, agricultural practices and increasing demands from industry, it fails to acknowledge that current policy settings have permitted a level of extraction that has severely diminished the environmental values of many catchments. The restoration of these values and catchments requires significant change in the prioritisation of water allocations.

The proposed efficiency measures in the DWS notwithstanding, water is a limited commodity that is heavily overcommitted. Rather than providing strategies to address this situation, the DWS continues the myth of an ever-expanding ability to deliver water for economic growth. The DWS cannot provide a viable long term strategic approach to water until government is prepared to acknowledge that most of our catchments are already committed beyond the point of sustainability and the overall level of extraction needs to be significantly reduced.

I can be contacted at [REDACTED]

Yours sincerely,

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National Parks Association of NSW
protecting nature through community action