

Draft NSW Water Strategy submission form

The NSW Water Strategy will be the first 20-year water strategy for all of NSW. It will provide a blueprint to help us tackle the key challenges and opportunities for water management across the state.

For more information about the strategy or to download a copy of the strategy, please visit dpie.nsw.gov.au/nswwaterstrategy.

Your voice is important

We would like to hear your views on the draft strategy, including whether you think it identifies the right priorities, challenges, opportunities and actions.

Please provide your feedback in the submission form below and email your completed submission to nsw.waterstrategy@dpie.nsw.gov.au or post to NSW Water Strategy, Department of Planning, Industry and Environment, Locked Bag 5022, Parramatta NSW 2124 **by 28 March, 2021**.

The form will take approximately 15 minutes to complete and your response can remain anonymous if you wish (see question 1).

Questions marked with an asterisk (*) require an answer.

If you have any questions about making a submission, please email:

nsw.waterstrategy@dpie.nsw.gov.au

Making your submission public

We collect information about you, which may include personal information, to assess submissions in response to the department's dealings and activities, and to perform other functions required to complete the project. This information must be supplied. If you choose not to provide the requested information we may not be able to assess your submission.

To promote transparency and open government, we intend to make all submissions publicly available on our website, or in reports. Your name or your organisation's name may appear in these reports with your feedback attributed, unless you have chosen to remain anonymous.

If you would like your submission and/or feedback to be kept confidential, please let us know when making your submission. You will be asked for your confidentiality preference at question 1.

If you request that your submission be kept confidential, it will not be published on our website or included in any relevant reports. However, it will still be subject to the *Government Information Public Access Act 2009*.

Your submission will be stored securely consistent with the department's Records Management Policy and you have the right to request access to, and correction of, your personal information held by the department.

Further details can be found in our privacy statement available on our website.

industry.nsw.gov.au/privacy

1. Information on confidentiality and privacy*

I give permission for my submission to be made publicly available on the NSW Department of Planning, Industry and Environment website.

- Yes
 No

I would like my personal details to be kept confidential.

- Yes
 No

2. Your details

Name*

Contact phone number*

Postcode*

Email address*

Do you identify as an Aboriginal person?

- Yes
 No

Are you an individual or representing an organisation?*

- Individual
 Organisation

3. Organisation or business details

Who do you represent?

- Government Please specify
- Peak representative organisation Please specify
- Local Water Utility
- Other (please specify)

4. Draft vision

The NSW Government has developed the draft NSW Water Strategy as part of a suite of long-term strategies to maintain the resilience of the state's water services and resources over the coming decades.

The proposed vision for the draft NSW Water Strategy is sustainable water resources for thriving people, places and ecosystems, both now and for future generations.

Which aspects of water management are most important to you and your local community?

Transparency regarding decisions involving town water supplies and its priority with regard to other water entitlements
Having consistency between LWU's IWCM, regional and State water strategies
Clarification of responsibilities in determining secure yield assessments based on who is the resource manager

PFAS - there is a knowledge gap regarding how the State government is strategically managing PFAS contamination groundwater resources in Wagga Wagga
Management of town surface water supplies affecting water quality, for example MIB / Geosmin, turbidity, fireash

Restrict groundwater recharge to coastal areas to reduce risk to inland groundwater resources for potential contamination
Cost shifting to users (bulk water charges)

Do you support the proposed vision for the draft NSW Water Strategy?

- Yes
 No

Please tell us more about your response:

Overall yes, however we make the following comments:
We are concerned that the aim of analyzing scientific data will not be adequately resourced and lead to more cost shifting to regional / local communities
Planning horizon of only 20 years is already out of step with LWU's IWCM 30-year planning horizon (that is, they are not synchronised)
There is no reference to the proposed frequency to review the strategy
How do the Murrumbidgee Regional Plan and the State Water Strategy integrate with the ACT plan (if one exists)?

5. Draft objectives

The draft NSW Water Strategy sets high level objectives and principles to guide water service delivery and resource management across NSW. We have identified six core objectives which underpin the draft strategy. These are based on the *Water Management Act 2000*. They are:

- protecting public health and safety
- liveable and vibrant towns and cities
- water sources, floodplains and ecosystems protected
- cultural values respected and protected
- orderly, fair and equitable sharing of water
- contribute to a strong economy.

Which objectives are most important to you?

Please rank the objectives from most important to least important (where 1 is most important and 6 is least important).

- 1 Protecting public health and safety
- 3 Liveable and vibrant towns and cities
- 5 Water sources, floodplains and ecosystems protected
- 6 Cultural values respected and protected
- 2 Orderly, fair and equitable sharing of water
- 4 Contribute to a strong economy

Do you have any comments on any of the proposed objectives?

Our only comment would be that there is a high level of interconnectivity between the objectives and that we found the ranking process challenging as a result.

6. Draft guiding principles

The draft strategy also proposes seven principles to guide the long-term strategic planning for water resource management in NSW. These principles work in tandem with the draft objectives to guide development and implementation of actions.

The guiding principles are:

- healthy environments sustain social and economic outcomes
- water is a limited (although recyclable) resource
- systems thinking to optimise outcomes
- data-enabled planning and decision-making
- transparency and accountability to engender community trust
- forward thinking to build preparedness and resilience
- giving effect to Aboriginal rights and access to water.

Which principles are most important to you?

Please rank the objectives from most important to least important (where 1 is most important and 7 is least important).

- 4 Healthy environments sustain social and economic outcomes
- 1 Water is a limited (although recyclable) resource
- 7 Systems thinking to optimise outcomes
- 5 Data-enabled planning and decision-making
- 3 Transparency and accountability to engender community trust
- 2 Forward thinking to build preparedness and resilience
- 6 Giving effect to Aboriginal rights and access to water

Do you have any comments on any of the guiding principles?

The IWCM process is efficient and effective. It should be seen as the key planning document for water management in NSW

7. Opportunities, challenges and actions for improved state-wide water management

The draft NSW Water Strategy outlines seven strategic priorities for action, focused on meeting the core objectives based on the *NSW Water Management Act 2000*. These strategic priorities are:

1. Build community confidence and capacity through engagement, transparency and accountability
2. Recognise Aboriginal rights and values, and increase access to and ownership of water for cultural and economic purposes
3. Improve river, floodplain and aquifer ecosystem health, and system connectivity
4. Increase resilience to changes in water availability (variability and climate change)
5. Support economic growth and resilient industries within a capped system
6. Support resilient, prosperous and liveable cities and towns
7. Enable a future focused, capable and innovative water sector.

Under each priority the draft strategy identifies several opportunities and challenges, and a total of 41 proposed actions to improve water management across the state.

Do you have any comments on the seven strategic priorities identified?

Priority 1 actions should also include improvement of inter-departmental coordination between regulating agencies (EPA, DPIE, Health, OLG) in the management and control of water / wastewater incidences, strategic planning etc., as well as intra-departmental coordination within each agency (particularly DPIE)

Priority 3 actions to include management of environmental and regulated water not to cause adverse effects to water quality, for example - extreme changes in river water levels and flow regimes

Priority 6 - Work collaboratively with LWUs ... should include other agencies / departments such as OLD, EPA, Health, Planning, other LWUs sharing water resources, as well as DPIE. More detail required here.

Priority 7 actions should also include timely and relevant changes to legislation and regulations to enable the piloting and introduction of new technologies

Do you have any comments on any of the proposed actions identified?

Please see our comments in the email attached to this fillable submission form

Are there any additional opportunities, risks and challenges that should be considered in the draft strategy?

Please see our comments in the email attached to this fillable submission form

What actions should be prioritised for immediate implementation and how should they be implemented?

More clarity on the review and implementation framework of this State Water Strategy, and development of a resource plan together with along term financial plan. Basically, follow similar processes that DPIE and OLG are requiring local governments and LWUs to follow using the IWCM framework

8. Other comments

Do you have any other comments on the draft NSW Water Strategy?

9. How did you hear about the opportunity to provide feedback on the draft NSW Water Strategy?

Please select all that apply from the list below:

- Newspaper
- Radio
- Department of Planning, Industry and Environment website
- Direct email
- Social media
- Have your say NSW website
- Word of mouth
- Other (please describe)

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From: [REDACTED]
To: [State Water Strategy Mailbox](#)
Cc: [REDACTED]
Subject: Submission by Riverina Water County Council
Date: Thursday, 25 March 2021 5:32:42 PM
Attachments: [REDACTED]

Dear State Water Strategy Team,

Please find attached our submission to the Strategy.

In addition we make the following comments here in relation to the following two questions (as the template did not provide sufficient space for same):

Do you have any comments on any of the proposed actions identified?

- Action 1.3 - Rebuild and develop DPIE's in-house groundwater and hydrologic modelling resources and expertise
- Action 1.4 - include reference for NRAR to ensure governance requirements are met by State government agencies / departments... "who's watching the watcher?"
- Action 3.6 - NO aquifer recharge west of divide due to risk of permanently damaging water quality via contamination. At the moment we consider that relying solely on the EPA to control treated effluent discharges or recharge water quality into aquifers is risky.
- Action 3.7 - Comments:
 - increasing connectivity between valleys/catchments should not be at the expense of the source catchments' future water balance requirements. A collective IWCM framework needs to be considered with agree weightings of importance.
 - Is improving interconnectivity between valleys limited to water security for critical human needs, or is there a risk of scope creep to include other times and/or users?
- Action 6.2 - Comments:
 - The risk assessment framework used by DPIE (and Health) in determining LWU's risks is questionable. No / little consultation with LWUs was used to qualify the data, develop the risk framework, and does not accurately represent some of the published results.
 - Clarity is needed on sharing of risks between LWUs and NSW government. This should also include sharing costs. For example, LWU's are burdened by the true life cost of fluoridation, when another industry is benefitting.
 - Actions do not focus on improving the inter-agency / department coordination that regulations LWUs (OLG, Health, EPA, DPIE, Planning etc, WaterNSW), and also intra-departmental coordination within each agency / department.
- Action 6.4 - Comments:
 - The risk prioritisation for the delivery of Safe and Secure Water Program should include an agreed framework to identify and assess the risks with LWUs. The current framework was rushed too fast for the sake of demonstrating a degree of prioritisation, and it opens itself to further scrutiny.
 - More recognition required of LWU's that are doing the right things, and don't qualify for any SSF assistance, that is funding model may be seen as rewarding poor practices / management
 - SSF program failed to identify and include training gap requirements for many "build" options being considered, especially in the current environment where it's difficult to find water industry RTO and trainers. For example, upgrading a water treatment plant requiring high level of training and expertise to run for disadvantaged LWU's may be considered a high risk.
- Action 6.5 - Comments:
 - Focus on Town/Cities/Regional water use should be proportional to the bigger picture of water users, for example Murrumbidgee Catchment: Town Water is 75GL, compared to total resource of 384GL. Refer: https://www.industry.nsw.gov.au/_data/assets/pdf_file/0015/342204/WAS-murrumbidgee-20210115.pdf
- Action 6.6 - Greater recognition of returned water into the system from STPs etc, including consideration for the original extraction of source waters to be offset

- Action 6.7 - Comments:
 - Do not support aquifer recharge west of divide, compared to coastal examples of aquifer recharge where potential contamination travels into the ocean. The risk is too great
 - Better coordination between EPA and DPIE to manage the risk based on who's accountable and responsible for the management of resource.
- Action 6.8 - Comments:
 - IWCM planning framework to include:
 - Frequency of reviews
 - Consistent forward planning horizon with other planning documents (including LWU's IWCM)
 - Resourcing strategy to support IWCM planning framework
 - Commitment by state government to support be committed to the IWCM framework, that is to reduce potential "surprises" and "captain's calls"
- Action 7.2 - This action is also dependent on preparedness to introduce enabling legislation by government agencies involved (EPA, Health, DPIE, OLG, Planning, etc)
 - Action 7.3 - This action needs to recognise market forces have not delivered or failed to provide appropriate numbers of RTOs and trainers. This may be attributed to DPIE providing (uncertified) training) as well as being an industry regulator ie. Barrier of entry for new training entrants into the market

Are there any additional opportunities, risks and challenges that should be considered in the draft strategy?

- The strategy could be strengthened by improved reference to local government and LWU's, and the importance of the partnership to this strategy.
- Risk due to continued lack of Inter-agency / department coordination and commitment: For example:
 - major PFAS risks to Wagga's groundwater supply are not being adequately coordinated by relevant agencies to provide clear and consistent strategies, contingencies and messaging to LWU and their communities.
 - Duplication and the 'force fit' planning requirements for local government, for example the OLG's IPR framework versus DPIE's Best Practice framework.
- Potential risk of groundwater aquifers due to aquifer recharge, where management between EPA and DPIE is disjointed
- Risk: the State Water Strategy plan just sits on a shelf and becomes irrelevant soon after a change in DPIE's leadership or in state government.
- Flood mitigation: The State Water Strategy should include references of how floods are to be managed with available storages together with controlled releases. This issue is compounded by the operation of Snowy Hydro producing electricity.
- The state water strategy does not refer to other upstream water plans such as Queensland or ACT. Or is this bundled in MDA plans? How?

We look forward to the next stage of the development of the Strategy and appreciate the opportunity to be involved.

Regards

[Redacted Signature]



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