SUBMISSION BY COFFS HARBOUR CITY COUNCIL TO THE DRAFT REGIONAL WATER STRATEGY: NORTH COAST
April 2021

General

This submission has been prepared by Council officers at Coffs Harbour City Council, for lodgement with the NSW Department of Planning, Industry, and Environment as a response to the Draft Regional Water Strategy: North Coast and are additional to the comments dated 22 January 2021 which remain valid. The consultation period closes on 14 April 2021.

Council understands that the NSW Government is preparing comprehensive regional water strategies that will bring together the best and latest climate evidence with a wide range of tools and solutions to plan and manage each region's water needs over the next 20 to 40 years.

Council is at various stages of developing Coastal Management Programs (CMPs) under the *Coastal Management Act 2016* for all of its major estuaries in the Local Government Area. Through these plans, modified freshwater flows, agricultural landuse and water extraction has commonly been raised as one of the biggest threats to water quality and estuary health. This is further exacerbated by Coffs Harbour's short steep catchments, paired with its small and fragile Intermittently Closed and Opened Lakes and Lagoons (ICOLLs) and the importance of the adjoining Solitary Islands Marine Park. As water management has been such a high priority issue for our community and coastal management stakeholders, Council has been closely following the release of the Draft Regional Water Strategy: North Coast.

Council acknowledges that this draft strategy is part of a suite of appraisals relating to water management that also includes the NSW Water Strategy, the Review of Harvestable Rights and the Review of the Coffs Harbour Water Sharing Plan. This strategy should consider the impacts from any recommended actions in other documents and be considered concurrently. To consider the processes independently could result in decisions made on inaccurate data.

With respect to the Coffs Harbour Water Sharing Plan Council was encouraged by the Natural Resources Commissions (NRC) findings that the Plan should be:

- ***Extended until June 2022*** *to allow enough time and resources to make required Plan improvements*
- ***Replaced by June 2022*** *to address the recommendations in the Commission's report*
- *There is a significant amount of work required to address these recommendations –due to the risks to the unique environmental, social and economic values of the Coffs Harbour Plan area, the Commission encourages appropriate funding and resourcing to address these issues*

However, Council has been advised by DPIE that the draft Coffs Harbour Water Sharing Plan will be released for public exhibition in early 2021 with a goal to have the plan finalised by mid-2021. This timeframe will not foreseeably allow any of the NRC key recommendations to be resourced or implemented, nor any robust data collection to inform decision making around sustainable extraction limits, which may impact on this strategy.

While Council understands that there are timeframes and deadlines associated with the finalisation of the new water sharing plan, Council notes that the Draft Regional Water Strategy recognises the importance of improved data collection as *'a better understanding of how changing water needs may impact the region's water resources is critical to ensuring these resources are managed sustainability into the future'*. Council supports the need for improved data collection and wishes to impress the need for this to inform the suite of reviews relating to water management.

The Draft Regional Water Strategy: North Coast recognises that the Coffs Harbour region has short steep catchments with many sensitive estuaries. The strategy also recognises that many of the region's river are under high hydrologic stress and are affected by poor water quality and that that there has been a shift towards intensive horticulture that requires irrigation as opposed to rain fed crops. The strategy recognises that this that has placed additional stress on these waterways, most notably in the Coffs Harbour waterways and Council supports this view.

Comments on Options

Option 11: Increase use of recycled wastewater for intensive horticulture

The draft strategy notes that Coffs Harbour City Council has invested heavily in upgrading its wastewater treatment facilities to provide an alternative water source for local horticulture businesses. The treatment facilities produce around 13 ML per day of treated wastewater. Currently, 70 agricultural properties use this treated wastewater, mainly for growing blueberries, tomatoes and cucumbers.

However, the report does not acknowledge that recent audits and inspections undertaken by Council staff into the use of recycled water by horticulture operators have identified occurrences where customers have allowed large uncontrolled discharges of Recycled Water to enter downstream water courses.

Further, recent studies by Southern Cross University have concluded that nitrate levels in the waterways downstream of Councils Recycled Water exceeds environmental guidelines. Isotropic analysis of these nitrates found that up to 50% of the nitrate levels in Double Crossing Creek that feds the Intermittently Closed and Opened Lakes and Lagoon (ICOLL) of Hearnes Lake, came from the Recycled Water[1].

While DPI has been working with local producers to support better practices the impact of intensive plant agriculture is of growing concern to the health of the region's waterways and there is a long way to go before any long term, large scale improvements are made to the intensive plant agriculture industry.

As outlined in our comments dated 22 January 2021, Council has 15 years' experience in providing recycled water for intensive plant agriculture and recently has a cost benefit analysis for the current and future expansion of recycled water. The findings showed further expansion wasn't viable and growers weren't prepared to pay the real cost of this water.

[1] https://www.coffsharbour.nsw.gov.au/environment/Compliance-and-Reporting/Documents/Nutrient%20transport%20and%20sources%20in%20headwater%20streams%20-%20Final%20report.pdf

Critically, any increase in the use of recycled water needs to be considered in the context of the impact to the downstream receiving environment, the capacity of the government to regulate and undertake compliance and the willingness of the customer to pay for the product.

Option 14: Increased harvestable rights

The strategy recognises that there is currently a review of harvestable rights for all coastal draining catchments. Council will be making a submission to the review of harvestable rights however in summary:

- Council is very concerned on the impact to the downstream environment from any changes to harvestable rights, particularity to sensitive estuaries which are already under stress from modified freshwater flows, agricultural landuse and water extraction.
- The drinking water supply for the growing population of the Coffs Harbour area could be made less secure as a result of potential increase in the frequency and duration of cease to pump days caused by changes to harvestable rights.
- Due to regional and catchment variability, Council believes that research should be undertaken to review the maximum harvestable right dam capacity (MHRDC) multiplier factors rather than uniformly increasing harvestable rights.

Options relating to protecting and enhancing natural systems.

All options generally focused on preserving and improving the natural environment whether that be coast and estuaries, sensitive species and ecosystems, fish friendly extraction and fish passage, or options focused on improving water quality including riparian restoration, are supported.

Conclusion

Council is supportive of a strategic approach to plan and manage each region's water needs over the next 20 to 40 years however is concerned that some of the options will put an unachievable burden on Coffs Harbour City Council to implement and deliver them. Council is supportive of actions to preserve and improve the natural environment and to manage water resources sustainably into the future.