Thank you for the opportunity to respond to The Draft Regional Water Proposal for the North Coast: Shortlisted Actions- Consultation Paper. My specific observations are confined to the Macleay Catchment and issues arising from **Ovens Mountain Pumped Hydro project**, **Armidale Regional Council's plans and Comet Vale Mine.**

p.11 *this consultation paper seeks your views on what the best actions are to set the North Coast region up for the future before a final strategy and implementation plan are developed.*

The document being considered is largely a briefing paper, with highlighted issues, and statements of hopeful intent. The proposed Actions 1.3 and 1.4 will remain beyond the purview of planning as long as many 'developments' along the river are not subject to appropriate transparent and public scrutiny; the automatic exclusion from consideration of State Sign Projects (e.g Ovens Mountain Pumped Hydro) and projects such as those being considered by The Armidale Regional Council in any overall plan are grave limitations.

Undertake whole-of-catchment planning, decision making and project delivery

Action 1.3 **Support improved governance**	Develop a new governance approach that recognises stakeholder roles and responsibilities and supports whole-of-catchment planning, coordination, decision-making, and project delivery.
Action 1.4 **Deliver a river recovery program**	Deliver a whole-of-catchment program that prioritises and guides works to improve the health of the region's rivers and the ecosystems they support (including native and threatened aquatic species).

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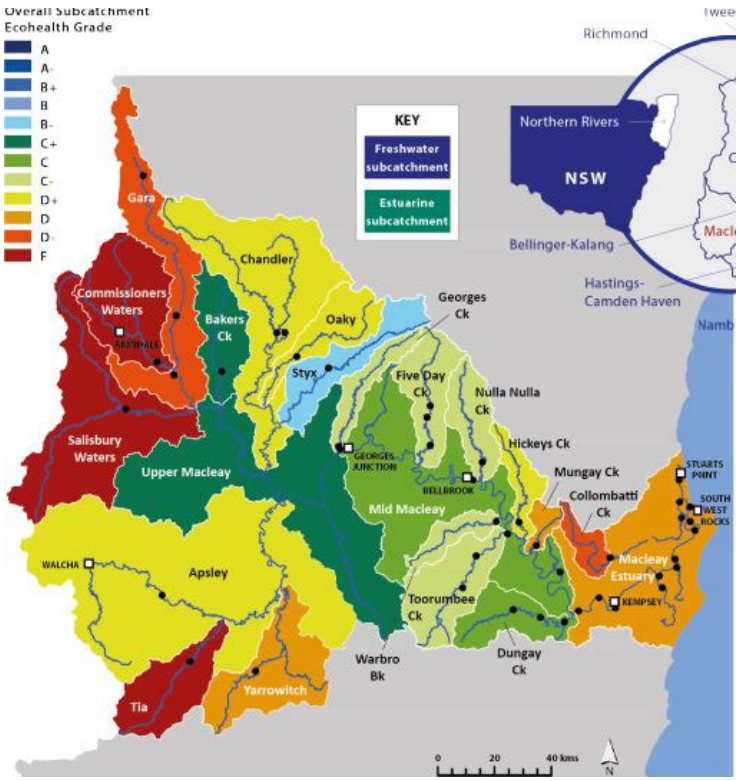

There is also a need for active rehabilitation and environmental restitution for historical legislation and activities which contribute significantly to the poor water quality in the Macleay catchment. The Macleay River Ecohealth Project: Assessment of River and Estuarine Conditions 2015-2016 report (here) includes the following map which indicates the concerted effort that will is required to return the upper reaches of the river to health. Comet Vale Mine (see below) continues to discharge polluted mine-water into Commissioners Waters.

The Ovens Mountain Pumped Hydro project, which was briefly considered in the Longlist of Actions, is an example of a project which will have significant impact on the river yet is not included in planning as it has been deemed a Critical State Significant Infrastructure Project. In this way many aspects of its development have been removed from transparent and public scrutiny.
Concerns include:

- the impact of the construction of the infrastructure which will require extensive road upgrades and new river crossings- all at the cost of the environment and with consequences for river and riparian health;
- the erosion and sediment controls which will be required to protect the river
- the infrastructure required to connect to the grid and the consequent opening up of runoff channels and loss of healthy vegetation
- the possible contamination of the river in the construction process by antimony and arsenic
- the size of the reservoir and the sealing to minimise extraction from the Macleay
- the management of sewerage and waste from the proposed 600 workforce camp during

- the rehabilitation of the camp & infrastructure after construction
- rehabilitation at the end-of-project-life

Armidale Regional Council (ARC) and Armidale's water security.

a) On 23 March 2022 Armidale Regional Council passed the following motion

Armidale Regional Council
Ordinary Council Meeting
Wednesday, 23 March 2022 Page 11

RESOLVED

That Council:

a. Note the report from NSW Public Works Advisory; Armidale Regional Council Water Security Assessment and Options Evaluation Report Final R2 – incorporating 2022 growth projection.

b. Note that Council staff have lodged enquiries with Essential Energy regarding the acquisition of the Oaky River Dam as a potential Water Supply Option.

c. Adopt the recommendation from Public Works Advisory and Council staff to proceed with the development of options one and two being;

   i. Oaky River Dam 25ML/Day + 6.5metre raising of Malpas

   ii. Styx River Dam 25ML/Day + 6.5metre raising of Malpas

d. Note that, following adoption of recommended options, Council staff along with PWA will commence the preparation of a business case.

The Motion on being put to the vote was CARRIED unanimously.

At the Armidale information session on the Strategy I was informed that such decisions were beyond the scope of the Strategy; this rather makes a mockery of the concept of 'whole-of-catchment planning, decision making and project delivery'. One of the many submissions to ARC's Community Plan and Delivery Program (*asked) that Council examine options other than the two decided on at the meeting of March 23, 2022. The Oaky solution will cost an estimated $111 million, or $137 million including raising Malpas, the later equal to a cost of $13,700 for every property connected to the water supply. Treatment plant upgrades, apparently costed at $100 million, will also be required making the total cost $23,000 for every property currently connected to the supply.*
And went on to observe:
Other considerations could include:
1) the possibility that the 2.2 GL of water used by Guyra and Armidale in 2021 (representing 53% of PWA's modelled demand for 2021, and similar consumption in the first quarter of 2022) represents a permanent shift in water consumption, due in part to increased charges and greater use of water

saving devices. If so, whether the models need to be recalibrated to provide useful data on future demands.
2) the costs and benefits of additional subsidies for water saving devices compared to the cost of increasing the secure water yield by more than 67% of actual consumption in 2021 (the 67% increase in secure yield above 2021 consumption that could be obtained by raising the Malpas wall by 6.5 metres).
3) the costs and benefits of rolling out smart water meters to save even more water by early detection of leaks (including those on ARC's water network), improved consumer feedback, as well as saving $167,000 a year in labour for manual meter reads.
4) actions to develop environmental sustainability.
5) examination of willingness to pay for additional water supplies compared to willingness to reduce demand by more than 10% in extreme drought years.

As can be observed from the Ecohealth map the Styx River, one of those being considered for damming, is the only tributary of the Macleay which is even moderately healthy- to dam it is simply not in the interests of the river as a whole.

b) ARC's commitment to increased population *(*population growth of more than 25 percent over *)* and intensive horticulture causes concern. Lack of transparency in the past, lack of confidence in assessments of groundwater reserves and lack of monitoring of river-take all contribute. As the Strategy indicates proper monitoring and scientific calibration of water reserves is necessary. However, it is difficult to imagine this occurring given the importance placed on 'growth' and the headwaters of the Macleay continue to be depleted by these acts of 'water-mining'.

Comet Vale Mine is at Rockvale, 33kms north-east of Armidale

Attempts by individuals and groups have been unsuccessful in having the responsible mine accept responsibility for the pollution (contaminated sediment, loose rubbish and run-off) of Boundary Creek and Wollomombi River, headwaters of the Macleay Catchment

This was the scene in 2015 as reported to Armidale Dumaresq Council *Household rubbish (including mower blades, zippered apparel remnants, asthma sprays, wire, the whole range of plastic bags) is strewn throughout the 170 tonnes of 'mulch' dumped on the site.*

A mineshaft spews red, toxic water into a dam which, built at the end of a drought period, is too small to accommodate the run-off experienced in a 'normal' wet summer. Blackberries were simply covered, not sprayed as required; large sheets of plastic blow freely across the site and mine signs and posts are strewn about.

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above - contaminated water flowing into a too-small dam.

Left- close up of 'mulch'

In 2022 most of the rubbish from the dumped 'mulch' has made its way downstream; the mine continues to discharge water into a too-small dam as is shown in the photo adjacent from October 2021 (the torn lining of the dam is evident centre-back) and subsequently into the headwaters of the Macleay.

No government body will accept responsibility and the Macleay continues to suffer. Any genuine whole-of-catchment plan must include strategies to remediate past legislative failings and practices.

Two final observations:

1. **Objectives**

Although we were reassured at the information session in Armidale that lists were 'not hierarchical' it is difficult not to read the list of objectives on p. 13 as identifying the State Governments priorities. Genuine consideration for the health of the waterways would relegate 'enable economic prosperity' and advance 'protect and enhance the environment'.

Objectives

Deliver and manage water for local communities	Recognise and protect Aboriginal water rights, interests and access to water	Enable economic prosperity	Protect and enhance the environment	Affordability

2. **Harvestable Rights and Rehydration of soil**

The recent change in harvestable rights to allow landholders in coastal-draining catchments in NSW to capture and store up to 30 per cent of the average annual regional rainfall runoff from their property in harvestable right dams on first and second order streams is excessive and mitigation measures are completely inadequate. It was opposed in a number of submissions to the long-list of which I am aware; this change should be rescinded. Attention should be focused, instead, on encouraging rehydration of the landscape to improve the capacity of the ground surfaces and the soil beneath to absorb water (with better groundcover management and increasing soil carbon); subsequently allowing soils to release excess water gradually, assisting in control of storm and flood peaks which are expected to be exacerbated with climate change. Prolonging flows in this way will benefit ecosystems. Much of New England farmed country is approximately 1.3%. soil carbon: at 1%soil carbon infiltration of water is12mm/hr while at 3% soil carbon infiltration is 200mm/hr.

Genuine commitment on the part of the NSW Government to a comprehensive legislative framework with appropriate compliance and monitoring provisions and severe penalties for infringement is a basic requirement to ensure the health of our waterways into the future.

[redacted]