Submission by Peter Gill Dated [redacted]

Lodgement via Webmail system: nsw.waterstrategy@dpie.nsw.gov

** To be Redacted

Public comment: Draft NSW Water Strategy

This submission is lodged on a personal and individual basis. The context of my experience is as a resident who has wider views at State and National levels over sustainability of water use and seeing a fair balance between Town/Environmental/Industrial and Irrigation usage. I have lived somewhere in the Murray Darling Basin for some 55 years. My background has been in Construction and Infrastructure.

I am not against Industrial use or Irrigation usage, the issue I see is that water use has been over-allocated, the system is under pressure and as a result there is a demand from the Public for a more transparent and open access to the subject of water management and building a robustness into water supplies.

Over-achingly it is important that towns and industry and the environment are also supported by the strategy. Whilst many point to irrigation as the economic driver, this is not the only driver as towns must exist to service agriculture, process the products, provide community services and serve as a base for industry which both supports agriculture and other opportunities.

Concurrently it is well observed that the NSW Government wishes to encourage decentralization from the major cities to the country areas. COVID has seemingly also added impetus to this for a number of reasons not totally related to rural pursuits – perhaps mainly being the connectivity afforded by the Broadband and a realization of that business can be transacted outside large cities.

The Environment allocation and use of water, may be seen by water users (in the main Irrigators) as a loss from their perspective, however, there are offsets such as amenity and recreation which attract and retain people who provide services, tourism which supports town business and the wider environment in terms of fish, bird, animal and plant breeding and growth.

It appears that the overall NSW Water Security Strategy is being undertaken in a scenario where the NSW Government is increasingly under pressure on Water. The SA Royal Commission, Productivity Commission, ICAC and recently ACCC have released reports which have been very critical of the actions of the NSW Government.

As a resident of NSW, I wish to see a balance struck wherein there is a solution for the greater good which is not beholden to Big Irrigation at the expense of the environment and other residents of NSW.

It is noted that concurrently with this NSW Water Security Strategy there are twelve (12) individual Regional strategies (and Two (2) Metropolitan strategies under a concurrent, slightly offset/delayed program. The level of detail and time required within the given time-frames makes it extremely difficult for an individual citizen to read, comprehend and respond to the range of strategies.

Furthermore, the efficacy of this approach of fast tracking the state wide level strategy and Regional strategies concurrently must be questioned as surely issues raised in one are an integral part of the other. Political imperative does not cut it as a reason, water security is far too important an issue to be rushed.

It appears to me that the NSW Government is certainly under a range of pressures arising from ie:

- Drought 2017 to 2020
- Public disquiet over Flood Plain Harvesting (FPH)
- Public disquiet over new dams
- Towns severely impacted by lack of water
- Reports by other bodies critical of Government handling of water security

However, intransigence, reported favoritism to Big Irrigation at the expense of the wider public and the environment along with some extremely poor and disappointing outcomes for the environment and town supplies during the 2017-2020 drought has now manifested itself time-wise.

It is my view that whilst there may be an urgency to resolve the issue of water security, the rush with which this process is being undertaken is an attempt to prop up the status quo whilst those who may wish to have their say are at a dis-advantage timewise.

Whilst the development of a Strategy may be admirable, the strategy will fail unless the basics are achieved. Anything else is simply words and window dressing around doing and achieving little.

I am a resident of Tamworth. We were subjected to significant water restrictions (Level 4 and worse) from Mid 2019 to November 2020. It is a widely held view that Tamworth was placed in this situation due to Sixty percent (60%) of Chaffey Dam being released over an 18 month period. This dam spilled last in august 2016. It is further held and noted that there were significant outflows from the Peel into the Namoi.

Having overviewed the Draft NSW State Water Strategy, I have a general concurrence with the overall strategy, noting the comments I have made above. I will make a reply to the Namoi Regional Strategy separately under the provisions of that exhibition.

However, whilst conceding there will be some cross commentary between the two submissions I make, I put forward the following points:

I make these points against the Table of Priorities appended below:

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

The points raised in my view are fundamental to the strategy, yet there appears no inclusion of such fundamentals in the Draft NSW Water Strategy as put on display.

Point 1 of the Table of Priorities is not served by leaving critical elements such as those below out of the Draft and any discussion by the Public during an Exhibition such as the Draft NSW Water Strategy. These are fundamental points of performance necessary.

<u>Service Standard</u>

> The extract below details the best of my efforts to trace the source of this information. It is certainly logical from a planning perspective. The concept hails from the Chaffey Dam Augmentation EIS of 2012 where the rule at that time was 5/10/10.

NSW Guidelines on Assuring Future Urban Water Security
2 NSW Office of Water, December 2013
GUIDELINES
DRAFT
The 5/10/20 design rule requires storages to be sized so as to ensure that full unrestricted demands can be supplied in wet, average and shorter dry periods but that moderate duration, frequency and severity of water restrictions will be required in extended drought periods. Under this design rule, the total time spent in drought restrictions should be no more that 5% of the time, restrictions should not need to be applied in more than 10% of years and when they are applied the water supply system should be able to provide 80% of the unrestricted dry year water demand (ie. 20% reduction in demand) through a repetition of the worst recorded drought commencing at the time restrictions are introduced. This methodology approximates the severity of a "1 in 1,000 year" drought.

What this is saying is that a reasonable Town Supply Standard

Available Water Determination and Allocations

Having attended Public forums by DPIE and Water NSW regarding the Peel Valley Emergency works, the record low inflows were promoted as the source of the water availability woes. The blame appeared to be sheeted at predicted inflows not materializing despite "drought of record" meant to be used as an input. Very surprisingly even though there was an early "warning" of a trend in these figures, no corrective action was taken against water allocations for non-town users. For the 2018-2019 water year the General Security allocation remained unchanged at 0.38 from the beginning until the end of the water year. Maintenance of these releases until they ceased 30th June 2019 left Chaffey Dam at 22% capacity.

The point I wish to make is that for General Security, allocation should only be made on the basis of water actually held or available, not on the basis of further predicted inflows.

Amalgamation of Water Sources

In the case of the Peel Valley, amalgamation of the Peel Valley Regulated Surface Water Source into the Namoi is not supported by the author. This is based on the various machinations and influences of downstream water users against the needs of Tamworth Regional Council and the towns which make up the Council area.

Environmental Water

It is galling to see water classified as Environmental to the residents of Tamworth become available as General Security once it exits the Peel Valley. Again as a point made before it would be expected that this be incorporated within the Draft NSW Water Strategy and applied consistently state wide.

Town Supply Algorithms

As a general observation (speaking for Tamworth) it appears that our region runs on a 5 to 6 year cycle. The current water allocation cycle used is for 2 years. Considering Chaffey Dam at 100GL capacity there is licensing for a 38 GL General Security, 16.5 High Security and 1 GL Stock/Domestic ie Total 56 GL Licence Allocation against the 100GL capacity, there is potential for the situation to change dramatically well inside the 5 to 6 year cycle required for Town Security. On some very preliminary figures a compartment of 40 GL would be an indicative starting point (at current demand levels) to secure Tamworth Water Supply. It would be reasonable to apply the same strategy to other towns.

Distributed Water Network

This is the concept of an interlinking of water sources allowing transfer between sources. (Whilst "Bradfield" schemes keep getting discussed, it is the sheer scale (and cost) required which for a security over a 5 year period starts to require very large dams and pipelines. By way of scale Warragamba Dam at 2000 GL delivering 1.6GL per day 500 GL per annum to Sydney via 1 x 2400Dia and 1 x 3000mm dia pipeline would irrigate 5000 Ha.)

The concept I propose is much akin to South Australia's Morgan Whyalla pipeline at about 1200mm dia delivering around 100 ML per day. This would link dams and essentially serve critical human needs and industry. It would allow transfer from places with to places without water. Should additional sources become available eg new dams, desalination plants, underground, new dams become available they can then be incorporated into the "grid".

Recycled Water

Whilst touted as a magical solution to all Town Supply problems, there is a very strong social equity situation when perfectly good drinking source water by passes a town to be used to irrigate a crop. Meanwhile the prospect of pressuring residents to have this as part of their town water supply remains.

The source of Effluent is finite and there wastage and salt disposal issues around the likely treatment processes along with cost.

The concept of obtaining a biologically safe water which can be substituted in uses where it replaces potable drinking water is supported. This may be used to support appropriate industrial uses and provide those users with some immunity to drought.

Common Basis of Restrictions

One would imagine that it is very necessary for a State Level Strategy to have a common basis of water restriction levels uniformly across the state. The Draft NSW Water Strategy as presented is silent on this point. (This is about the measures applied at the various Levels of a Drought Management Plan)

This needs (in my view) to be based on a total supply options scenario rather than a specific dam capacity and be able to be implemented as required to suit the needs of the particular town water supply scheme.

Thank you for considering my submission.

Peter Gill

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