

16 July 2021

The Natural Resources Commission  
GPO Box 5341  
Sydney NSW 2001

Via email: [nrc@nrc.nsw.gov.au](mailto:nrc@nrc.nsw.gov.au)

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To whom it may concern,

**Submission to the statutory review of the Water Sharing Plan for the Castlereagh  
Unregulated River Water Sources 2011**

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 160 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

NCC welcomes the opportunity to participate in the Natural Resources Commission (NRC) review of the *Water Sharing Plan for the Castlereagh Unregulated River Water Sources 2011* (the WSP).

The Castlereagh Unregulated River Water Sources WSP could positively influence the health and longevity of water flows in the region if it meaningfully pursues and implements environmental objectives. In this region, the protection of threatened native fish, the risk of high salinity levels and connectivity with the Macquarie and Barwon Rivers are of key importance.

NCC welcomes further discussion on this review. Your key contact point for correspondence is Strategy and Operations Director, [REDACTED]

Sincerely,



**Chris Gambian**  
Chief Executive  
Nature Conservation Council of NSW

## 1. Environmental health as a priority for all water sharing plans

Regional Water Strategies and Water Sharing Plans across NSW must all reflect the objectives of the NSW Water Management Act 2000 (the Act). The Act prioritises environmental health of water sources and the principles of ecologically sustainable development. Repairing the ecological health of NSW rivers should therefore be of first-order importance.

## 2. Response to key review questions

### 2.1 The WSP contribution to environmental outcomes

The objective to 'protect, preserve, maintain and enhance the important river flow dependent and high priority groundwater dependent ecosystems of these water sources' has not been met.

#### **Insufficient monitoring**

The condition of the environment must be monitored if a WSP is to effectively serve its purpose to protect and preserve. A 2019 audit of the WSP by Alluvium found limited evidence of targeted monitoring and no evidence reporting of performance indicators in the WSP for the Castlereagh Unregulated and Alluvial Water Sources 2011 during the audit period.<sup>i</sup>

The WSP does not identify specific target ecological populations nor does it include plans or processes with which to measure performance.

#### **Failure to meter for extraction limits**

Without broad scale metering in this water source, the objective of maintaining compliance with a long-term average annual extraction limit and a long-term average sustainable diversion limit cannot be met.

#### **Lack of gauges**

The implementation of environmental rules, such as cease to pump rules based on river heights, relies on the installation of gauges within the water source. Gauges required to determine river heights have not been installed. Gauges and meters to measure water use must be installed as a high priority if the WSP is going to meet its objectives.

The rules in the current WSP about cease-to-pump and start-to-pump should be retained. To do otherwise would risk that flows to the Barwon-Darling are further compromised during periods of low flow.

#### **Environmental objectives of the WSP**

**Protection of low flows upstream of Binnaway:** The protection of low and base flows upstream of Binnaway must be clearly defined as an ecological objective of the WSP, and rigorously assessed for effectiveness. The risk assessment in the draft Macquarie-Castlereagh Water Resource Plan identifies an unacceptably high risk to base flows and low flows upstream of Binnaway. The risk assessment also reports very high consequence score due to threatened fish being present.

**Reducing salinity risks:** Reduced salinity must be listed as an ecological objective of the WSP. NCC member group, the Inland Rivers Network, has identified the significant risks of salinity to key environmental assets and ecological functions in the lower sections of the Castlereagh River.<sup>ii</sup> High salinity impacts the health of water-dependent ecosystems in the Castlereagh River. Addressing salinity in the lower Castlereagh requires the protection of low and base flows upstream.

## **2.2 The WSP contribution to social outcomes**

Water extraction is not being restricted under the operation of this WSP. With no limit on water extraction, there can be no improvement on social outcomes such as access to water for basic rights and water for cultural, heritage and recreational uses. No cultural water access licences have been granted in this water source.

## **2.3 The WSP contribution to economic outcomes**

The operation of this WSP does not restrict the volume or timing of water extracted from this water source. There may be significant, negative economic implications of a long-term absence of active water management for the region.

## **2.4 The WSP contribution to meeting its objectives**

The 2019 audit of the WSP found that several provisions were not meaningfully being implemented or were only partially being given effect to.<sup>iii</sup>

## **2.5 What changes do you feel are needed to the water sharing plan to improve outcomes?**

The WSP should:

- identify and protect ecological values, and include the risks posed by salinity and low and base flows.
- include and enforce targeted monitoring and reporting of key performance indicators as a legal requirement.
- create a legal imperative for extraction to be within the LTAAEL and the long-term average SDL.
- facilitate the urgent installation of gauges at the end of the five zones so that cease to pump rules can be enforced.
- include a WSP implementation plan, clearly identifying the interaction and roles of the departments involved.

The maxim “no metre, no pump” should become a rule in the WSP, banning all pumping until a metre is fitted to a pump.



**Nature Conservation Council**  
The voice for nature in NSW

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- <sup>i</sup> [https://www.industry.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0010/289477/Castlereagh-River-Unregulated-and-Alluvial-Water-Sources-2011.pdf](https://www.industry.nsw.gov.au/__data/assets/pdf_file/0010/289477/Castlereagh-River-Unregulated-and-Alluvial-Water-Sources-2011.pdf)
- <sup>ii</sup> Inland Rivers Network comments to the Status and Issues Paper on the Macquarie-Castlereagh Surface Water Source released in late 2016.
- <sup>iii</sup> [https://www.industry.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0010/289477/Castlereagh-River-Unregulated-and-Alluvial-Water-Sources-2011.pdf](https://www.industry.nsw.gov.au/__data/assets/pdf_file/0010/289477/Castlereagh-River-Unregulated-and-Alluvial-Water-Sources-2011.pdf)