

16 July 2021

The Natural Resources Commission
GPO Box 5341
Sydney NSW 2001

Via email: 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 North Western Unregulated and Fractured Rock 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 North Western Unregulated and Fractured Rock Sources 2011 (the WSP). 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.

The main increase in water demand in this water source area is likely to be from new mining developments. Against the objective of protecting water fundamental to ecosystem health, the NCC Water Working Group provides the following feedback on the contribution of the WSP:

- There has been no identification of culturally significant values in the water source area and no allocation of Aboriginal cultural special licences.
- The Plan Limits for all water sources are too high. Rainfall runoff and recharge must be reassessed.
- The controlled allocation process for granting new licences must be included as rules in the WSP.
- The aquifer interference exemption for cease-to-pump rules has the potential for significant impact on ephemeral streams. All ephemeral lake systems and streams need to be identified as high environmental value areas.
- Schedule 4 – 'High priority ground water dependent ecosystems' should be updated to include all mound springs and karst systems in the water source area.



Nature Conservation Council

The voice for nature in NSW

- Schedule 2 – 'Access licences used to take surface water exempt from cease to pump rules' should be removed.

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