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Submission to the Regional Water Efficiency Strategic Plan (WESP), and Regional Water Efficiency Implementation Plan (WEIP)

Introduction

The Clarence Environment Centre (CEC) has maintained a shop-front presence in Grafton for over 30 years, and has a proud history of environmental advocacy. We have a 25 year involvement with the Regional Water Supply, from its inception, and have been represented on the Water Efficiency Team committee for more than 15 years.

During that time, we have seen a great deal of time and effort put in by both Clarence Valley and Coffs Harbour Councils, to successfully reduce per-capita water usage. As a result, we have had trouble finding anything new in the above documents. We also had some difficulty understanding some of the the terminology which we found excessively cumbersome.

Also we couldn't follow the rationale for some items. For example, why is there a column for "staff costs" in the table developing actions for "Monitoring, Evaluation and Reporting"? Are those actions dependent on whatever funds Council decides to allocate towards developing those actions? If so, what certainty is there of any of these actions being undertaken while ever council's spending remains unsustainable?

These relatively unimportant issues aside, we are concerned over the omission of what we see as **critical considerations relating to supply**, a crucial consideration in the equation where efficiency is what balances demand against that supply. Under the circumstances, considering ways to minimise risks to that supply would seem to be paramount, something that isn't apparent from reading these documents.

There is an action in the WEIP (a prime example the hard to understand terminology), which states: *"Data collection actions will focus on the components of demand that are not well understood and would help to direct appropriate investment. Examples include: consumption patterns and drivers, the number of non-efficient households and high water users to provide improved understanding of water demand in terms of temporal and spatial differences, customer sectors and uses, short and long-term climate influences and other drivers of demand"*.

As we said above, it's all about demand, with no focus on supply, and we believe that needs to be rectified.

Does Council have any idea how much water will be available over the long term?

We are told that the WEIP approach “*will consider the dynamics of the demand profile and other factors influencing demand trends such as climate*”. However, there are no actions whatsoever to deal with the single most significant factor influencing demand trends, population growth.

In fact population growth receives no mention at all, despite recent approvals for very large residential developments at West Yamba, Iluka and Gulmarrad, not to mention a new jail with a population the size of Maclean. (Note: Coffs Harbour could likewise be considering unfettered expansion, but this submission focuses on the Clarence Valley)

Also it is a major concern that these documents fail to really consider the impacts of climate change. We are assured that: “*Councils recognise the predicted impact of climate change and the expected reduction in water availability in the future*”. But the goal does not seem to accept that, simply stating: “*The WESP focuses on ongoing water conservation during normal climate conditions*”.

It then deals with “*demand forecasting*” by using “*Historical records corrected for influence of climate*”. How can they do that when they don't appear to have a clue as to what level of reduction in water we might expect? Nowhere in these documents is there any mention of slowing or stopping development, even though every additional household will be taking more and more water from this ever diminishing supply.

The ignoring of other factors contributing to reduced supply

When it comes to regional water availability, we are totally reliant on rivers for supply, and rivers are dependant on rainfall to keep flowing. Now, everyone knows that the amount of water flowing down those rivers, particularly during drier times, has dramatically dropped over time, mainly due to irrigation. Every river in the state has their own Water Sharing Plan, which allows landowners to pump water under licence from those rivers. At the same time every owner of land adjoining a river is entitled to take water for domestic purposes and for livestock.

In recent times, with no requirement for metres on those pumps, or compliance monitoring to ensure over extraction doesn't occur, water theft is becoming more common. At the same time subdivision of river front land continues, adding more landowners who are entitled to pump water. However, this does not appear to be a consideration for Council's planners.

In recent years, intensive horticulture, a virtually unregulated farming activity, has expanded beyond all expectations. As their first action, all of these operations build a dam, or dams to hold the equivalent of their “harvestable rights”, which they are entitled to do on first and second order streams without approval. Again there is no metering or monitoring to ensure that dam isn't pumped out several times each year, thus far exceeding those “rights”.

All of the water collected in those dams, is water that never even reaches the rivers. In fact there is evidence that some ephemeral streams and wetlands now only contain water during major flash flood events as a direct result of these dams and upstream extraction.

So why, when it would seem critically important to maintain those flows, does irrigation for horticulture or other cropping, which so diminishes river flows, receive no mention in the above documents. This would seem even more critical when considering the increased evaporation that will occur over time from climate change, something else that receives no consideration by the documents in question.

The ignoring of catastrophic pollution risks from mining

The entire coastal population south from Iluka to beyond Kempsey, along with inland cities like Armidale and its satellite towns and villages, are totally dependant on drinking water that originates from the Dorrigo Plateau.

The question we ask is: **Why is mining exploration, particularly for those minerals that are highly toxic, or involve the use of toxic pollutants during the extraction process, allowed to occur all across the Plateau? More to the point, why does this issue, which has the potential, albeit minimal, to wipe out the entire regional water supply, receive no mention in these documents?** Further more, as far as we are aware, neither Clarence Valley or Coffs Harbour City Council, has ever opposed a mining exploration licence, or lobbied State Government to make the Plateau off-limits to mining.

It is not as though there haven't been pollution events in that region before, and that, coupled by the fact that it enjoys the highest rainfall of anywhere in NSW, should have had alarm bells ringing. Flash floods are something that has triggered catastrophic tailings dam failures around the globe, but mining exploration continues unabated in the area.

Continuing to ignore risks that are already known

With the problems experienced at the Shannon Creek dam in late 2019 from bushfires, and subsequent flash flooding in early 2020, problems which have continued right up until very recently, we would have expected some action to minimise future risk might have been appropriate. However, there is no mention of bushfire, or flood in either document.

We believe the control of fire in the future is absolutely critical, and an urgent need for plans to reduce fire frequency and intensity. For example, a professional, fully resourced, rapid response force to ensure bushfire outbreaks during catastrophic fire periods are stopped before they get out of control as they did last year. We believe total fire bans should be imposed during drought regardless of what time of the year it is.

Last year part of the Shannon Creek catchment was burned to the water line in winter. It is our belief that a water efficiency implementation strategy must consider matters that affect water quality and therefore availability. **We fully appreciate that this might be considered to be a state government responsibility, but Council needs to be more proactive in lobbying for change.** After all it is ratepayers that stand to lose the most.

We thank Council for the opportunity to comment.

John Edwards
Honorary Secretary.