

11 October 2024

Natural Resources Commission
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Ref: 17353837
Enquiries: [REDACTED]

Re: Water Sharing Plan for the North Coast Coastal Sands Groundwater Sources 2016

To whom it may concern,

MidCoast Council (Council) is pleased to be able to provide comment on the Water Sharing Plan for the North Coast Coastal Sands Groundwater Sources 2016 (the WSP).

This submission has been prepared by Council first and foremost as a local water utility. Council also plays a role as custodian, and beneficiary of the local natural environment. We have no objections to the overall intent of the WSP and support evidence-based management of groundwater sources to support sustainable water extraction into the future.

The WSP covers the Great Lakes Coastal Sands Groundwater Source. In the south, this groundwater source provides the raw water source for the Tea Gardens Water Supply Scheme that services the towns and Tea Gardens and Hawks Nest. To the north, it provides a secondary raw water source for the Manning Water Supply Scheme via the Nabic Water Supply System.

The MidCoast Local Government Area is subject to significant growth with our reticulated water supplies underpinning the regional economy and social wellbeing. In addition, our natural water sources hold significant social, economic and cultural values to the Worimi and Biripi peoples.

We are committed to ongoing protection and enhancement of the environmental values and ecosystem services provided by the Great Lakes Coastal Sands Groundwater Sources.

Comments

Council provides the following commentary to the suggested points for consideration.

1. *To what extent do you think the plan has contributed to environmental outcomes?*

Principle environmental outcomes such as the protection of groundwater dependant ecosystems (GDEs) and the prevention of saline water intrusion to groundwater sources appear to be well articulated in the WSP. However, there are several challenges in assessing the contribution of the WSP to environmental outcomes including:

- The observation that generally groundwater sources do not appear to be subject to significant stress from extraction in our area,
- A general paucity of groundwater data for the region,

- The lack of available metrics to inform the condition of GDEs, and,
- The rigorous site-specific licence conditions imposed on Council's groundwater supplied schemes (i.e. those in addition to the WSP).

While the WSP does articulate clear objectives to maintain and improve environmental outcomes, the beforementioned points limit Council's ability to speak to WSP effectiveness in this area.

2. *To what extent do you think the plan has contributed to social outcomes?*

Social values are sometimes defined as values principally determined by people and communities. Thus, in this instance social outcomes could be considered as the cumulated community identified benefits derived from groundwater sources.

In Council's experience, groundwater sources generally have a lower profile and community awareness than surface water sources. As such, social outcomes may be less likely as result of direct interaction with groundwater sources, and more likely due to the benefits provided by value-added processes such as municipal water supply.

The WSP appears to clearly articulate and promote social outcomes through the vision statement, objectives and strategies. From a local water utility perspective, it could be considered that the WSP has delivered social outcomes through the provision of ongoing sustainable extraction to support the Nabitac Water Supply System and Tea Gardens Water Supply Scheme.

3. *To what extent do you think the plan has contributed to economic outcomes?*

As a local water utility, Council considers that the principle economic outcome in our jurisdiction is from the provision of reticulated water services. As the current WSP supports the ongoing sustainable extraction of water to support the Nabitac and Tea Gardens Schemes, it could be concluded that the plan has positively contributed to economic outcomes for the region.

The current WSP also includes provision for the distribution of groundwater sources across a range of users and this adds further economic outcomes for our communities not serviced by reticulated water supplies.

4. *To what extent do you think the Plan has contributed to cultural outcomes?*

The WSP appears to clearly articulate and promote cultural outcomes through the stated acknowledgement and objectives of the plan. The Worimi and Biripi people of the MidCoast have long and tangible associations with the natural water sources within the region. While exercising these cultural values appears to be occurring across the region it is difficult to determine the contribution of the WSP.

5. *To what extent do you think the plan has contributed to meeting its objectives?*

As indicated previously, groundwater sources within the MidCoast region could generally be considered as not under significant impact from extraction. For instance, they do not appear to be as highly contested when compared to regional surface water sources. While the objectives of the WSP appear to be being expressed for groundwater sources in our region, the influence of the plan on resource status is not clear.

6. *What changes do you think are needed to the water sharing plan to improve outcomes?*

From Council's perspective as a local water utility, custodian and beneficiary of the local environment, the following suggestions may improve plan outcomes:

- The development of improved environmental metrics. Groundwater sources within the MidCoast region are subject to large natural variations. There is also a general deficit of historical groundwater data for the area. Current groundwater management still relies heavily on variables such as static water level (SWL) and calculated aquifer recharge volumes. There may be instances where applying SWL and recharge triggers do not align with the condition of other environmental values such as GDE condition.

Opportunity may exist for the development of novel and more sophisticated environmental metrics with increased sensitivity to environmental values of concern. These may provide opportunity to better align prescribed groundwater triggers with actual environmental conditions.

- Clear prioritisation of extraction licences associated with municipal water supplies. As an example, The Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022 provides specific rules exemption for the local water utility (Part 6, Division 4, s37).

Council prioritises the protection of the environment when managing raw water sources. However, during times of critical water availability, Council is required to maintain the reticulated water supply as an essential service to the community. The addition of specific reference to exemptions for the local water utility in the WSP provides certainty to both Council and the community that the plan has considered and prioritised the municipal supply during rare but extreme conditions.

- Include provision for novel aquifer recharge options. Some Australian jurisdictions outside New South Wales have looked to artificial aquifer recharge as a method to increase water security and manage environmental impacts. While similar schemes may not be currently planned for the water sources subject to this WSP, the inclusion of opportunity to consider artificial recharge in broader recharge calculations and water budgets may facilitate these opportunities in the future.

Thank you for the opportunity to provide feedback on the current *WSP for the North Coast Coastal Sands Groundwater Sources 2016*. Should you have any queries regarding this submission, please contact [REDACTED] on [REDACTED] or [REDACTED].

Kind regards,

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[REDACTED]
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