



11 July 2024

## NPA Submission on the 10-year review of the ACT Water Strategy 2014-44, Striking the Balance

The National Parks Association of the ACT (NPA ACT) is a community-based conservation organisation with more than 60-years of experience in helping to protect the natural environment through an active program of walks and outings, work parties, participation in Parkcare activities, publications, public meetings and conferences, advocacy, and support for scientific research.

### Overall opinion

It is encouraging to see that so many facets of water management are considered in this strategy. The vision and associated aspirational statements certainly paint an idyllic picture of water use in the ACT. However, the true test of this strategy will be in how the vision is realised through the implementation plans. These plans will require teeth. Actions will require measurable goals and mechanisms to ensure accountability. It is also important to emphasise that the success of this strategy, and the provision of all the co-benefits discussed, rely on the government's capacity to provide appropriate funding.

Canberra is the largest, wealthiest and most educated city in the Murray-Darling Basin. The ACT Water Strategy should be ambitious, science-based and accountable. It should set the standard that other jurisdictions follow. The draft as written falls well short.

### General comments

These comments relate to specific aspects of the 'Draft ACT Water Strategy 2024-44 Striking the Balance' which concern the interests of the NPA ACT.

- The most important single element of any ACT water strategy must be the protection of the Cotter River Catchment. Canberra's location was selected largely because of the abundant water that comes out of the Brindabellas, and the ACT border follows the catchment boundaries. It has been a protected area since 1914, when the Cotter River Ordinance was enacted, and extended in 1984 with the creation of Namadgi National Park. This strategy (and its implementation plans) should prioritise conservation of these areas and seek to improve their condition through actions that foster increased resilience to stochastic events.

- Beyond the Cotter Catchment, other protected areas and undeveloped land west of the Murrumbidgee are vital contributors to Canberra's water supply. These should be recognised in the strategy, particularly with growing pressure to convert rural land into suburbs.
- The strategy should make a greater commitment to engaging with the climate and water science community in developing and evaluating implementation plans.
- Our rapidly heating planet means that any water strategy must have an inbuilt adaptive mechanism. Assumptions will be proven wrong. Forecasts will veer off track. There will be black swan events. The five-year review cycle for implementation plans should be a maximum, with space for more frequent reviews when the situation changes.
- The strategy fails to recognise the magnitude of climate risks. The Murray-Darling Basin Authority predicts reductions in average catchment run-off of between 20% to 40% in the coming decades. Temperatures are rising fastest in the mountains, suggesting Canberra will need to plan for droughts that are more severe and frequent than the Millenium drought.
- The strategy has an aspirational target that it will have enough water for a rapidly growing population in a drying climate. Hoping that there is enough water is not a strategy. Forecasts of future population are notoriously inaccurate. In 2007, the Chief Minister's Directorate predicted Canberra's population would reach 500,000 by 2050. In 2021, that same Directorate increased the estimate to 700,000. While acknowledging the challenge of a rapidly growing population and declining catchment yield, the strategy seems to rely on ICON being able to deliver more water. Water security needs to be treated with greater importance in this strategy than is currently achieved with the aspirational statements. Water security is essential, not optional and it is a fundamental responsibility of government.
- The strategy notes that under current projections, the ACT may need a new water source by 2040 and that ICON is considering potential sources including new surface water options. All options should be stated. Is the Tennent dam back under consideration, or a dam and treatment plant on the Murrumbidgee? Does it mean water recovery from sewage? Does it mean desalination and solar pumping of water from the artesian basin or the ocean?
- Future water options are likely to be far more expensive than those already in place. Massive cost blowouts such as those that occurred on the enlarged Cotter Dam project and are currently occurring on Snowy Hydro 2.0 should be a warning. The strategy should recognise the growing financial risks associated with providing water security to a rapidly growing city. The low hanging fruit has been picked.

- Outcomes one and two in the strategy should refer to key parameters and how they are trending. These could include overall water usage, per capita usage, Waterwatch catchment health indicator reports, how much we will need every year, and some 2044 scenarios based on projected population. How does this fit with limitations imposed by the Murray-Darling Basin Authority? Some hard numbers in this strategy would help paint the picture with a bit more clarity.

Yours sincerely,

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