

Friday March 3

Manager, Corporate Licence Development
Department of Natural Resources
Via email:clu@dnr.nsw.gov.au



HEALTHY CATCHMENTS
HEALTHY OCEANS

Dear Manager, Corporate Licence Development

Review of Sydney catchment Authority's Water Management Licence

OceanWatch Australia appreciates the opportunity to comment on the review of Sydney Catchment Authority's (SCA) Water Management Licence. OceanWatch Australia (OWA) is a national environmental, not-for-profit company that works to achieve sustainability in the Australian seafood industry through protecting and enhancing fish habits, improving water quality and building sustainable fisheries through action based partnerships with the Australian seafood industry, government, natural resource managers, private enterprise and the community.

Relevance of Licence to the fishing industry

The SCA's Water Management Licence authorises the SCA to take and use water from water sources and water management works including the Hawkesbury-Nepean River. This has direct impacts on the health of the river and industries dependent on the health of the river. One such industry whose existence is intrinsically linked to the health of the river in terms of fresh flows, water quality and aquatic habitats, is the professional fishing industry (with a highly valuable prawn trawl fishery). The upper reaches of the Hawkesbury prove important habitats for breeding and nursery areas for a number of commercially and recreationally significant species such as prawns Mullet, Mulloway, Eels, Mangrove crabs, Bream and Flathead.

Current health of the river

The health of the Hawkesbury-Nepean River is suffering. Indicators of and symptoms of poor river health include:

- proliferation of aquatic weeds such as *Egeria densa* from Penrith to Lower Portland (submerged in water column), and *Salvinia* which has received most attention, being highly visible on the surface waters;
- QX disease, which decimated the oyster industry 2004-2005. The immune system of the oyster is compromised when subject to sub-standard environmental conditions, increasing the susceptibility of the oyster to disease and parasites such as QX;
- silting of the river due to reduced flows; and



- the failure of many sites in the river to meet water quality guidelines. For example, nearly 50% of the samples at Lower Portland and Wiseman's Ferry exceeded the toxic cyanobacteria guideline values.

Additionally, numerous reports have been produced highlighting the declining health of the river under the current licensing regime eg Healthy Rivers Commission Inquiry into the Hawkesbury Nepean, Healthy Rivers Commission Audit of the Hawkesbury and Shoalhaven Rivers, the Hawkesbury-Nepean River Management Forum's Report etc.

Licensing regime

Under the current licensing regime, there are a number of licences that authorise certain entities to pollute or extract water from the rivers. These include:

- Sydney Water – licensed to pollute the river through discharge of effluent (> 100MI per day);
- Department of Environment and Conservation (DEC) -EPA – licenses entities for point source pollution;
- SCA – licensed to divert, extract water from water sources (managed by SCA, Sydney Water, local councils etc.); and
- (Environmental flows – dealt with in a separate process of water sharing plans).

To meet the objective 1.2 (b) of the SCA's licence:

“Achieve an appropriate balance between water extraction and the environmental requirements of the rivers downstream of the extraction points.”

An assessment of the cumulative impacts of all these licenses in terms of the rivers capability to sustain healthy aquatic systems and a licensing structure that is holistic and reflects the sustainable capacity of the river is required. Currently the extraction activities of the SCA, combined with the amount and quality of effluent discharged into the river system by Sydney Water is unsustainable in the short and long term (modelling completed by the expert panel advising the Forum showed significant environmental gains by the removal of effluent combined with a 95 percentile environmental flows). Following from this, the SCA's licence should be modified such that river health outcomes are achieved, consistent with the objective of the license.

Monitoring to ensure sustainable river health

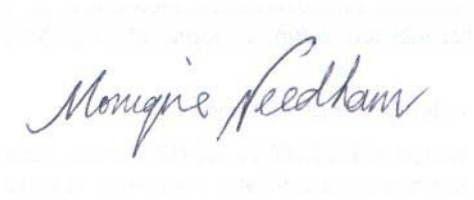
The SCA is required to (objective 1.2 (d)):

“Provide a monitoring and reporting regime to measure the impacts of the SCA's water extraction and associated activities on the long-term sustainable health of the rivers affected by its operations.”

This needs to take into account the impacts of activities on aquatic species such as prawns that rely on natural fresh rainwater events to trigger key lifecycle stages, including as breeding and migration.

Please do not hesitate to contact me on (02) 9660 2262 should you require further information.

Yours sincerely



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