

Water Forum Response to DHLGH in Relation to Recent Amendments to RBMP (January 2024)

The Forum welcomes the recent engagement with the DHLGH in relation to the recommendations made by the Forum in November 2023. The Forum acknowledges that many of the Forum's recommendations have been incorporated into the latest draft of the RBMP.

The Forum would like to make 5 follow-on comments in relation to this review;

- In relation to Recommendation #2, the Forum would like to strengthen the text around the objective of the sectoral action plans; while the members understand the concern over the wording 'elimination of the sector', as previously recommended, members are of the view that 'significantly reduce the impact of the sector' is somewhat weaker. The Forum recommends the proposed action is re-worded to include 'The objective of all sectoral action plans will be to ensure the sector will no longer be a significant pressure on water status'.
- In relation to Recommendation #3 the Forum supports the Department's proposal for more stringent timelines for the completion of the sectoral action plan templates (Q3 2024) and first draft of sectoral action plans (Q4 2024).
- While the Forum acknowledges that the EPA Distance to Target Document will be published following internal review within the EPA, the Forum would like to note that it is not satisfactory that such a critical document will not be available until after the River Basin Management Plan is published.
- The Forum appreciates that the DHLGH is supportive of the Recommendations #14 (Agriculture), #17 and #18 (Forestry), and #19 and #20 (Urban Wastewater) and understands the challenges of the integrated governance process with the need for approval of the various sectoral bodies. The Forum would request an update from the DHLGH once the relevant actions have been approved, to enable us to fully support these particular actions.
- In relation to Recommendation #10, members queried why Table 7 (Summary of Environmental Objectives for the Plan) only presents the total number of surface waterbodies (4,328) rather than the total number of waterbodies (4,842). The Forum recommends that this table is updated to include expected outcomes for all waterbodies, with a new column to include figures for groundwater.
Furthermore, the Forum recommends that a row is added to Table 7 (see red text below) to increase the transparency around expected outcomes for the 3rd Cycle. While this information may be clear in the EPA Distance to Target document, members are of the view that the public should be clear on expectations for restoration of waterbodies for Cycle 3.

Table 7. Summary of Environmental Objectives for the Plan

	Surface waters (rivers, lakes, transitional, coastal)	Ground Water Bodies
Total Water Bodies	4,328	
Water bodies that achieved their environmental objectives by 2021	2,309 (53%)	
Water bodies expected to achieve their environmental objectives by 2027 based on the current planned Actions for Cycle 3	2,509 – 2,709 (58% - 63%)	
Improvement in status of waterbodies for Cycle 3	200 – 400	
Expected improvement as a % of waterbodies at moderate, poor or bad status (i.e. Expected Restoration for Cycle 3)	12% - 24%	
Remaining water bodies that in the 4 th cycle, will either; (1) require additional targeted actions during Cycle 3 with the aim of achieving their environmental objectives by 2027, or (2) require an extension of time beyond 2027 due to the impact of 'natural conditions' on the rate of recovery, or (3) require a phased recovery over a more sustainable timeframe of one or more river basin management cycles beyond 2027 because it would be technically infeasible and/or disproportionately expensive to achieve any sooner. (Note: this will be the subject of the interim review of progress in 2025)	1,612 - 1,812 (37 - 42%)	
Less Stringent Objectives	7 (related to historic mines)	