14 September 2026

Submission on the ACT Water Strategy 2025–2045 - Implementation Plan: Progress and Insights

Introduction

The National Parks Association ACT (NPA) is a voluntary, non-government conservation- oriented organisation with more than 60-years' experience advocating for the protection and scientifically based management of our natural and cultural environment. We have about 500 members and an extensive program that includes work parties and outdoor activities, publications, public meetings, and support for scientific research. Our key concerns are the protection and management of the fauna and flora, scenery, natural features and cultural heritage of ACT parks and reserves.

General comments

In our 2024 submission on the 10-year review of the ACT Water Strategy 2014–2044, we said it was encouraging to see many facets of water management considered. The vision and aspirational statements painted an idyllic picture of water use in the ACT. The true test of this strategy, however, will be in how it is implemented..

The NPA supports the general direction of the first Implementation Plan, as it remains ambitious, science-based and measurable.

While the plan distinguishes between monitoring outputs and outcomes, the milestones in Appendix A focus heavily on outputs; the ecological and environmental outcomes are only indicated by reference to another document. This is a serious oversight and significantly diminishes the credibility of the plan.

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We believe the plan needs stronger actions on landscapes, clearer ecological outcomes, more explicit responses to climate and biodiversity, and firmer arrangements for accountability. We repeat our criticism from 2024 that the plan needs stronger and definite resourcing arrangements.

Comments on key questions

1. To what extent is there general support for the actions identified in the first Implementation Plan?

The NPA supports most of the actions in the plan but notes that they are grouped under outcomes. This results in a huge set of 30 actions for Outcome 1: 'Healthy catchments and waterbodies', and very few actions for the other three outcomes.

Our preference is to group the actions for Outcome 1 under a landscape or region approach to make them easier to find. We would give highest priority to the landscape in the Cotter-Namadgi Catchment. See our comments on the next question.

We are pleased to see support for the Restoring the Upper Murrumbidgee River program included and, as an example, would prefer that the Point Hut Fishway is placed in that landscape group.

2. Are there any key gaps or concerns?

2.1 Cotter-Namadgi Catchment Resilience Program

The NPA previously identified protection of the Cotter River catchment as the most important single element of an ACT water strategy. The proposed implementation plan includes worthwhile individual measures — the High-Country Bogs and Associated Fens Action Plan; Blackfish monitoring at Corin Reservoir; a future Cotter erosion assessment; and revision of the Namadgi Reserve Management Plan — but these do not yet constitute an integrated landscape-scale program for the ACT's principal water-supply catchment.

To that end, we suggest a Cotter-Namadgi catchment resilience program with measurable, upfront environmental outcomes be established. Such a program should integrate drinking-water catchment protection; biodiversity; erosion and sediment control; fire; invasive species; riparian condition; climate adaptation; and ecological

monitoring. Crucially, success should not be measured simply by whether the plans, assessments or restoration projects are completed, but by whether the catchment is demonstrably maintained or measurably improved..

We strongly support the protection of high-country bogs and fens, but comparable landscape-scale protection and restoration are not proposed elsewhere in Namadgi and the Cotter system. Immediate protection and rehabilitation are required in the critically endangered Alpine Ash forests and the high-country Snow Gum woodlands. These environments are critical to the future water harvest in the Cotter system. Their restoration and protection from future damage by fire and drought is essential for future water needs. Potential measures could include rehabilitation of degraded headwater streams and drainage lines; riparian planting and protection; stream bank restoration; and strategically located leaky structures or other nature-based measures where scientifically appropriate.

2.2 Invasive and pest species

Control of invasive and pest species should be explicitly linked to water catchment health. The success of the program should be monitored through environmental responses such as reduced erosion and wetland disturbance, improved riparian condition, and lower sediment disturbance. Measurements, such as numbers of animals controlled or hectares of weeds removed, while convenient for media releases, should be avoided and replaced by environmental outcomes.

2.3 Climate change adaptive management approach

The proposed Water Resource Assessment and continuing use of NARCliM2.0 are positive, but the key issue is how new climate information will change management decisions and actions. A technical report is an output, not an outcome. The Water Plan must specify how new evidence will alter management approaches in areas such as water allocation, catchment management, drought preparation, restoration priorities or infrastructure planning.

2.4 Water and fire management

The Implementation Plan should explicitly link water catchment management with the ACT Strategic Bushfire Management Plan. The Water Strategy recognises that more frequent and severe fire weather create risks to the quality and quantity of runoff and increase demand on water for firefighting.

In the Cotter and Namadgi, water and fire management should involve protection of riparian areas; bogs and peatlands; forests and woodlands; aquatic refuges and

drinking-water catchments; prevention of avoidable erosion; and rapid post-fire rehabilitation to limit sediment and water-quality impacts. The measure of success should be outcomes such as environmental resilience and recovery, not the existence of documents.

2.5 Restoring the Upper Murrumbidgee River Program

While we are pleased this program is included in the Implementation Plan, we are concerned that there is no mention of the future impact of the Snowy 2.0 program, particularly during drought and, in the longer term, as rainfall in the Tantangara catchment decreases. As Snowy 2.0 is designed to be a key part of the national electricity grid, one can't help but assume this will mean even less water for ecological river flows and to back up Canberra's urban water supply. We therefore recommend that planning for the impact of Snowy 2.0 be a key part of the plan

2.6 Resourcing and governance

It is most important that resourcing matches the strategy's ambition. The Progress and Insights paper is unclear whether the plan contains the actions needed to achieve the strategy, or simply the actions that are currently affordable. The funding status of each action item should be identified as fully funded, unfunded, dependent on future budget decisions, etc. While the paper is clear that routine activity is not included, several actions consist substantially of continuing existing programs. The environmental benefit of those programs should be assessed and reported as an outcome.

This is not to say that unfunded or future funded actions should be removed. It is important that they are present and clearly prioritised and linked to evidence.

Water policy in the ACT depends heavily on other government programs and policies. Governance arrangements need to be in place so to prevent actions being lost in bureaucratic silos or being undertaken without broad consideration across all responsible areas.

3. What further or aspirational actions could the ACT Government consider to delivery of the Strategy and guide future policy direction?

3.1 Water Efficiency Program

The Water Efficiency Program's proposed annual saving of 6.36 GL is welcome, as is the inclusion of demand management in the Urban Water Security Plan. However,

we feel the government should commit to a long-term target for declining per capita potable water use, with annual public reporting. Demand reduction should be treated as a core water security measure before consideration of major new supply infrastructure.

To encourage public support for this reduction, clear outcome reporting should be introduced to allow the community to gauge the effectiveness and impact of various strategies. Strategies include expanded stormwater harvesting and use, outcomes from the surface permeability policy, and promoting the use of recycled water.

4. What indicators would best reflect what matters to the community assessing progress and success under the strategy?

4.1 Clear outcome focus

We believe the Implementation Plan is too heavily focused on outputs and not enough on outcomes. This undermines the credibility of the whole plan. Completing an activity is not evidence that a strategy is succeeding. We suggest:

- rewriting the action table to include measurable outcome targets as well as delivery milestones
- asking how every major environmental action will make a measurable difference
- establishing a concise set of headline indicators such as total potable-water consumption; per capita consumption; catchment yield; Waterwatch/CHIP condition; riparian condition; sediment and turbidity; threatened native fish status; pest fish distribution; environmental flow outcomes; urban stormwater performance; and key Cotter–Namadgi ecological indicators
- using baselines, targets and thresholds
- measuring ecological success, not just project delivery
- using annual report cards to report trends in outcomes, not simply progress against tasks
- requiring management consequences where outcomes are not being achieved

Please do not hesitate to contact us if you wish to discuss or clarify any issues raised in this submission.

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