

NSW Department of Climate Change, Energy, the Environment and Water

Our ref: OUT26/1850

Emma Barnet
Planning Group
NSW Department of Planning, Housing and Infrastructure
Email: emma.barnet@dpie.nsw.gov.au

19 March 2026

Subject: MidCoast Regional Organics Facility (SSD-84090218) – Environmental Impact Statement

Dear Emma Barnet,

I refer to your request for advice sent on 18 February 2026 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

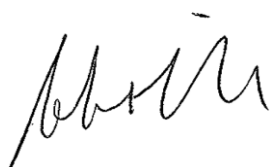
The NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and makes recommendations to:

- Quantify the construction water demands and confirm a viable water source is available.
- Confirm if additional water supply works are required.
- Clarify the requirement to intercept groundwater and quantify the water take volumes.

Please see Attachment A for further detail.

Should you have any further queries in relation to this submission please do not hesitate to contact the DCCEEW Water Assessments team at water.assessments@dcceew.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Rob Brownbill".

Rob Brownbill,
Manager, Water Assessments, Planning and Knowledge Division
NSW Department of Climate Change, Energy, the Environment and Water

Attachment A

Detailed advice to DPHI Planning & Assessment regarding the MidCoast Regional Organics Facility (SSD-84090218) – EIS

1.0 Water supply, take and licensing

1.1 Recommendation – pre-determination

That Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to:

- Quantify the maximum annual construction water demands.
- Confirm a viable supply is available via an indication of an agreement from a water supplier, access to existing authorised water supply works or demonstrating sufficient entitlement can be obtained.
- Confirm if additional water supply works are proposed to access a water supply, and if required provide an impact assessment of their construction and operation.

Explanation

The proponent has not quantified the maximum annual amount of water required for construction or identified viable water sources to meet the anticipated demand. If accessing a water supply requires obtaining a water access licence the proponent should demonstrate it is able to obtain sufficient entitlement unless an exemption applies. Should this water be sourced from third parties the proponent should confirm that they have consulted with those parties and that sourcing the volume required is possible and appropriately authorised.

Should the proponent require the use of existing or additional water supply works (e.g. bores or pumps) to meet the demands, these should be identified and the impacts assessed to understand the potential impacts and to confirm water supply availability for the project. This information is also required for the water supply works to be eligible for s4.41 of the EP&A Act 1979 to not require additional approvals under the *Water Management Act 2000*.

1.2 Recommendation - pre-determination

DPHI requests the proponent to:

- Clarify the potential for aquifer interception due to the project.
- Where take is required, quantify the maximum annual volume of water take due to aquifer interference activities during construction and operation.
- Demonstrate the ability to obtain sufficient entitlement unless an exemption applies.

Explanation

Insufficient information has been provided to confirm the potential for groundwater interception and take due to the project. Based on the cut and fill diagrams and descriptions of groundwater depth there is the potential for groundwater interception, however this has not been stated. Further clarification and assessment of inflow volumes if relevant is therefore required. Please see the following links for guidance: [Groundwater assessment toolbox for SSD/SSI](#) and [Minimum requirements for building site groundwater investigations and reporting](#).

Where water take is required, the proponent needs to demonstrate the ability to obtain a water access licence with sufficient entitlement unless an exemption can be identified. Exemptions are listed under Schedule 4 of the Water Management (General) Regulation 2025.

2.0 Groundwater impacts and dewatering requirements

2.1 Recommendation – pre-determination

If the take of groundwater is found to be greater than 3 ML per year, DPHI should request the proponent to assess impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). Please refer to the following documents:

- <https://publications.water.nsw.gov.au/watergroupjspui/bitstream/100/2618/1/NSW%20Aquifer%20Interference%20Policy.pdf>
- <https://www.water.nsw.gov.au/sites/default/files/2025-07/Aquifer-Interference-Assessment-Framework.pdf>

Explanation

As per Recommendation 1.2 above, the EIS has not provided a volumetric quantification of groundwater take. Additionally, the EIS has not provided an assessment of impacts to groundwater due to construction or operation of the project. NSW DCCEEW Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume and assess the impacts.

End Attachment A
