



Department of Industry – Water



Wednesday 17 July 2019

Comments on Draft Namoi Alluvium Water Resource Plan

The Inland Rivers Network (“IRN”) is a coalition of environment groups and individuals that has been advocating for healthy rivers, wetlands and groundwater in the Murray-Darling Basin since 1991.

IRN welcomes the opportunity to provide comments on the Draft Namoi Alluvium Water Resource Plan (draft WRP).

Background

IRN submitted substantial comments to the Status and Issues Paper on the Namoi Alluvium Water Resource Plan released in 2017.

We noted with concern that recovered groundwater levels have declined from the pre-development levels and that rules for reducing extraction in the Lower Namoi Alluvium were not being met.

The decision that ‘*groundwater levels can stabilise at a lower level under a new pumping equilibrium*’¹ has not been discussed in the draft WRP.

The draft WRP is based primarily on the attempt to match water sharing plan rules with the requirements of the Basin Plan without recognising that groundwater levels in some places have already permanently declined from the pre-development levels.

IRN considers that the proposed introduction of a ‘variable’ rule for extraction limits in the Lower Namoi, Upper Namoi and Peel Alluvium groundwater sources will cause the continued decline in recovery of groundwater levels in these aquifer systems. This is not sustainable water management.

¹ Namoi Alluvium Status and Issues Paper p20

The draft WRP states that the long-term average annual extraction limits (LTAAEL) specified in the Namoi Alluvium Water Sharing Plan (WSP) *represents a fraction of this water in these groundwater sources*.²

However, this does not explain why there has been a permanent drawdown of the water levels in the Namoi Alluvium caused by over-extraction.

The fact that the Sustainable Diversion Limit (SDL) in the Basin Plan for the Namoi Alluvium is equal to the LTAAEL in the WSP requires a strong set of management rules to prevent further permanent drawdown of the groundwater sources and loss of planned environmental water.

Groundwater Dependent Ecosystems (GDEs)

The Namoi Alluvium has been assessed to support high and very high value GDEs.

These include a high number of threatened flora and fauna species and high habitat diversity for a range of species, especially of birds and mammals.

The Lower Namoi Alluvium area is dominated by river red gum riparian and coolabah-river coobah-lignum woodland wetlands GDE communities. These communities are generally characterised by having a high number of threatened species, endangered ecological community, extensive connected riparian corridors and basin target vegetation species (MDBA, 2014) of coolibah, lignum and river red gums.

We do not support the direction being taken with proposed rule changes in the WSP. These will not protect the level of groundwater in the aquifer system identified as environmental water or prevent drawdown near high priority GDEs.

The 'variable' rule will impact on planned environmental water (PEW) near GDEs during dry times. This may have long term impacts on the health and resilience of these significant ecosystems.

Connectivity

The Namoi Alluvium resource description recognises the high level of connectivity with surface waters in most of the alluvium zones.

The Peel Regulated River Alluvium, Cockburn River Alluvium and Goonoo Goonoo Creek Alluvium management zones of the Peel Valley Alluvium as well as the Namoi and Manilla Regulated Rivers Alluvial Management Zone in the Manilla Alluvium are considered to be highly connected to their associated creek and rivers.

Depending on geology, topography, and local conditions these systems are likely to change between losing and gaining conditions.

The high level of hydraulic connection is recognised in the WSP rules. However, there is no consideration of rules to protect Held Environmental Water (HEW). The rules limit the extraction of groundwater but increase the reliance on surface water to meet the groundwater allocations.

² Namoi Alluvium Water Resource Plan p 35

The proposed rule change to ‘variable’ rules allowing 120% SDL extraction in the Upper Namoi and Peel Alluvium groundwater sources is likely to cause greater drawdown of surface water in lengths of the river systems that have losing conditions.

This will have an impact on PEW in the surface water sources and will not meet the Basin Plan objective of no net loss of PEW.

The remainder of the management zones in the Manilla Alluvium and Peel Valley Alluvium and as well as the Upper Namoi Tributary Alluvium are also considered highly connected to surface water however these systems are not managed as highly connected in the WSP because they are ephemeral.

These systems are likely to be further impacted in dry times with no rules to protect surface water connectivity.

Parts of the Upper Namoi Alluvium and Lower Namoi Alluvium are in varying degrees of hydraulic connection to surface water and are currently managed independently of the surface water sources.

However, it is noted that, if assessed, necessary local scale management options can be applied via Section 324 of the Water Management Act 2000 to address impacts on surface water from groundwater extraction.³

IRN considers this to be an inadequate response to the objectives of the Basin Plan.

The proposed rule change to ‘variable’ rules allowing 120% SDL extraction in the Upper Namoi and Lower Namoi does not recognise the fact that during dry times areas with hydraulic connections are likely to impact on surface water flows and the use of HEW to manage fish habitat and other purposes.

This proposed rule change will not protect groundwater PEW, connected surface water PEW or the use of HEW through hydraulically connected systems.

Risk Assessment

We note that the Lower Namoi Alluvium has a high risk to structural integrity, a high risk of groundwater extraction inducing connection with poor quality aquifers, a high risk of local drawdown reducing access by consumptive users and a high risk of groundwater extraction causing local drawdown impacting GDEs and instream ecological values.

The proposed rule changes in the WSP will not mitigate these risks but will further exacerbate them.

This is also the case for the various high and medium risks identified for the Upper Namoi and Peel Alluvium.

The proposed ‘variable’ rule does not reserve all water above the LTAAEL for the environment as PEW.

³ Namoi Alluvium WRP: resource description p 35

IRN does not consider these risks to be tolerable because the proposed mitigation measures and proposed rules in the WSP are not consistent with the objects of the Basin Plan.

The impacts of over-extraction of the Namoi Alluvium must be recognised and mitigated in the WRP.

Water Quality

The Water Quality assessment identifies that the Lower Namoi and Upper Namoi Zones 3,4,5 and 8 are at high risk of extraction causing a change in the beneficial use category, while the Peel Alluvium and Upper Namoi Zones 1,2 6 & 9 are at medium risk.

The measure for mitigating this risk is to limit seasonal drawdown in high risk areas.

A water management action and mechanism is to reserve all water above the LTAAEL for the environment as PEW.

The proposed 'variable' rule will achieve neither of these measures.

We note there is a knowledge gap for management of nutrient mobilisation, pesticides and other contaminants including pathogens entering the groundwater source.

There are no measures identified in the WRP to improve knowledge of these key water quality issues. Assessment of contamination by pesticides in the highly concentrated areas of irrigated cotton should be a key measure to improve knowledge of risks to water quality in the Namoi Alluvium.

Water Sharing Plan Objectives

IRN supports the broad environmental objective of the Namoi Alluvial Groundwater Sources WSP to protect the condition of the groundwater sources and their groundwater-dependent ecosystems over the term of the plan.

This support includes the targeted objective to protect the extent and condition of high priority groundwater-dependent ecosystems that rely on the groundwater sources. Also to maintain salinity levels and protect the structural integrity of the aquifers.

The performance measures need to include the maintenance of the structural integrity.

A targeted objective to contribute to the maintenance of the structural integrity of the aquifer should also be included in the economic, social and cultural objectives.

Proposed Rule Changes

1. Variable rule

The Fact Sheet on proposed changes to the Namoi Alluvium WSP indicates that:

‘The annual permitted take for the Lower Namoi, Upper Namoi and Peel Alluvium groundwater sources is the sustainable diversion limit, modified each year based on rainfall at Narrabri, Gunnedah, and Tamworth respectively. The amount of actual rainfall is compared to average annual rainfall at each of those locations, and used to vary the annual permitted take by up to twenty percent of the sustainable diversion limit. In general, extraction exceeds the sustainable diversion limit in dry years and is below it in wet ones, and the variation aims to manage this effect.’

IRN understands that this rule change will allow for 120% of SDL to be extracted in dry years and 80% of SDL to be extracted in wet years.

However, this proposed new rule does not appear to be included in the draft Namoi Alluvium WSP on public exhibition for comment.

This proposed rule change occurred in Part 6 under the clause titled ‘Assessment of compliance with Basin Plan long-term annual diversion limit’, in the draft Murrumbidgee Alluvium WSP, draft Lachlan Alluvium WSP, draft Gwydir Alluvium WSP and the draft Macquarie-Castlereagh Alluvium WSP.

IRN has objected to this complex arrangement of climate adjusted annual permitted take because we consider it is not in keeping with the concept of LTAAEL and SDL and the protection of planned environmental water.

The proposed rule change that does not seem to appear in the draft Namoi Alluvium WSP, allows for a greater level of extraction during dry times, an action that paves the way for further permanent drawdown in the Namoi Alluvium.

The draft WRP claims that rules in the water sharing plan will manage high and medium risks in the Alluvium⁴. However, permanent drawdown of the water source is a direct reduction in planned environmental water.

This risk will not be managed through the implementation of the ‘variable’ rule in the Namoi Alluvium.

This proposed rule change has major implications on the availability of planned environmental water to support GDEs during dry times.

As noted above, the Lower Namoi Alluvium has a significant number of high risks including structural integrity, induced connection with poor quality aquifers and local drawdown impacted on consumptive users, GDEs and instream ecological values.

The measure for mitigating the risk of a change in the beneficial use category is to limit seasonal drawdown in high risk areas. The proposal to increase extraction beyond the SDL during dry times is counter to this mitigating measure.

The ‘variable’ rule will also not manage the risk of climate change. If there are an increasing number of dry years, the extraction of SDL plus increased take will become more the norm than the exception.

This rule relates entirely to irrigator behaviour between wet and dry years and has no role in managing risk or protecting planned environmental water in the Namoi

⁴ Namoi Alluvium Water Resource Plan Table 3-2 p 32

Alluvium. The water is generally not needed in wet years but must be shared carefully in dry years.

The application of the variable rule in the Namoi Alluvium is likely to increase a range of identified high risks, as outlined above.

IRN strongly objects to this proposed climate-adjusted annual permitted take because it will not meet objectives to protect environmental water or the integrity of the aquifers.

The annual permitted take for the entire Namoi Alluvium water source must remain at the SDL.

The variable rule is insupportable.

2. AWD Upper Namoi Zone 1

IRN is concerned that a local water utility has forfeited town water supply to be used for annual extraction at levels above the rules for other water sources in the Namoi Alluvium.

The severity of the drought and impact on town water supply (that has a higher priority under the NSW Water Management Act 2000) is a key issue for human critical needs.

IRN does not support the proposed rules in the WSP that allow for a unit share of 2.3ML and carry over up to 4.6ML in the Upper Namoi Zone 1.

This is not sustainable use of a scarce water resource.

3. Removal of protection of recharge

IRN does not support the proposed rule change for the protection of planned environmental water. The protection of recharge inflows to alluvial aquifers was a subject of great importance when the first water sharing plans were being developed.

The fact that the Lower Namoi Alluvium has been impacted by a permanent drop in water levels heightens the importance of protecting recharge. The actual volume of planned environmental water has already decreased in these groundwater systems.

The timing of the availability of planned environmental water is critical during dry periods and the protection of a percentage of recharge is an important factor in protecting the integrity and water levels in alluvial aquifer systems. It is also critical for supporting high priority GDEs.

4. Increase in time period for LTAAEL compliance

IRN does not support the proposal to increase the time period over which compliance to the LTAAEL is assessed, to provide consistency across water sources. It is proposed to increase the compliance period from three years to five years

The Namoi Alluvium has a high level of risk across a number of criteria and needs to be monitored for compliance to rules more regularly, not less.

This proposal is particularly concerning in light of the proposed variable rule.

IRN considers that consistency of compliance to LTAAEL should be a three year rolling average across all water sources.

This will give much greater assurance that planned environmental water is protected.

We do not support the Department of Industry proposal that LTAAEL compliance be standardised to a five-year rolling average period in all Murray–Darling Basin water sharing plans.⁵

This should be standardised to a three-year rolling average period.

5. Compliance triggers

IRN does not support the current triggers for requiring action to ensure compliance with the long-term average annual extraction limit:

5% for the Upper and Lower Namoi groundwater sources,
10% for the Manilla Alluvial, Quipolly Alluvial, Currabubula Alluvial and Quirindi Alluvial groundwater sources, and
15% for the Peel Alluvium groundwater source.

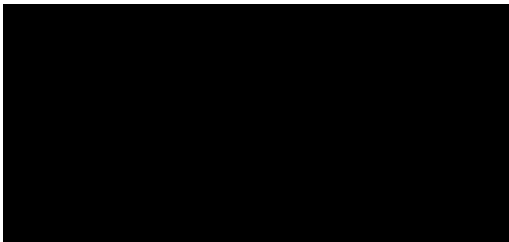
The trigger should be 5% in all water sources to ensure compliance with the SDL.

Conclusion

IRN does not consider that the draft Namoi Alluvium WRP will meet the requirements of the Basin Plan.

The proposed changes to WSP rules will not protect planned environmental water, achieve management of risk, or improve water quality.

For more information please contact:



⁵ Frequently Asked Questions Fact Sheet p 2

Draft Namoi Alluvium Water Resource Plan

The NSW Government is committed to delivering its obligations under the Murray-Darling Basin Plan, and is developing 20 water resource plans across the state. The drafting of water resource plans has drawn on feedback received through stakeholder advisory panels, and now broader input is sought through the public exhibition process.

The draft Namoi Alluvium Water Resource Plan is on public exhibition from Tuesday, 11 June 2019 until Saturday, 20 July 2019. As the water resource plans are completed, they will be submitted to the Murray Darling Basin Authority prior to 30 December 2019. The Authority will undertake assessment to inform accreditation in 2019 by the Commonwealth Minister responsible for water.

The draft Namoi Alluvium Water Resource Plan covers the groundwater resources of the Namoi Alluvium Water Resource Plan area. This area covers includes groundwater in the main alluvial deposits associated with the Namoi River and its tributaries, extending from north-east of Murrurundi through Narrabri, and west to Walgett.

The Lower Namoi Alluvium, Manilla Alluvium, and Peel Valley Alluvium align to their corresponding groundwater sources, the Upper Namoi Alluvium incorporates twelve groundwater sources, and the Upper Namoi Tributary Alluvium includes three groundwater sources.

There are proposed changes to the water sharing plan rules that may affect you. These proposed changes will have no impact on existing water access licence holders' shares.

Please provide any feedback below that includes any information that could be considered in the final accreditation of the water resource plan or gazettal of the water sharing plans for the Namoi alluvial groundwater sources.

A copy of your submission will be sent to your email address provided in the next section.

Email address *

Name of respondent *

Government organisations

What level of government organisation do you represent?

Mark only one

- Commonwealth
- New South Wales
- State - other
- Local

Peak representative organisations

Who do you represent?

Mark only one

- Environment
- Irrigators
- Indigenous
- Other: _____

Information on confidentiality and privacy

The NSW Department of Industry Water and the inter-agency Coastal Water Policy and Planning Working Group will consider all submissions received. The NSW Government values your input and accepts that

You will get the opportunity to comment on the water sharing plans under the 'Schedules' area of the form.

Any additional information or supporting documents/files to help us understand your view can be sent via email provided at the end of this form.

Water resource plan - main body

After reading the main body of the water resource plan, please provide any general suggestions that may improve the main body of work

Explicitly list the plan's vision and objectives stated in Schedule A in the overall description document

Water resource plan - response per chapter

These next sections of the submission form will give you an opportunity to comment on each chapter of the plan.

Chapter 1: introduction

Chapter 1 is the introduction that outlines the key legal framework for a water resource plan, provides the plan objectives and outlines the consultation undertaken during the development of the draft. This chapter also references the objectives in the draft statutory water sharing plans (Schedule A), and the full consultation report (Schedule C).

Do you have any comments about the consultation process that was used to develop the plan and how it could be improved for the future?

Chapter 3 identifies the risks to groundwater quality, availability for use and for availability for the environment in the water resource plan area, and specifies strategies to mitigate those risks. This is supported by the "Risk Assessment (Schedule D)".

Do you have any comments on the risks identified in this chapter?

Do you have any comments on the strategies to manage the risks identified?

The Namoi is one of the most extensively studied catchments in Australia. But there are still many gaps in our understanding of groundwater which limit our capacity to manage. Saline water overlies the fresh water intervals used for irrigation water in some areas. Some of this saline water approaches sea water salinity levels. Thus high levels of risk for R1 and R2 for the Lower Namoi alluvium seem sensible. Under heavy pumping and in areas where aquifer water head level is declining, the saline water can move towards the fresh water zone. To allow for a better informed discussion on groundwater usage improvements in the science underlying catchment management needs to continue (as a strategy to address the risk).

Do you have any other comments on this chapter?

Areas of rising head levels in the Gunnedah Formation need to be investigated within the context of plan. The Water Sharing Plans for the Namoi have not adequately address areas of rising groundwater head levels. Further work is needed to characterize the extent of rising groundwater head levels, and how to best balance these areas in water allocation decisions.

Chapter 4: environmental water, cultural flows and sustainable management

Chapter 4 specifies the rules for providing and managing water for the environment, priority environmental assets, held environmental water and planned environmental water. This chapter links directly to Parts 4 and 6 of the draft water sharing plan "Schedule A".

Do you have any comments on annual permitted take?

Do you have any comments on sustainable diversion limit compliance?

Do you have any comments on extreme event management and the incident response guide?

Do you have any other comments on this chapter?

Chapter 6: water quality management

Chapter 6 identifies the key causes of groundwater quality degradation and risks to water quality in the water resource plan area and specifies the water quality and salinity targets for the area. These measures contribute to meeting the Basin Plan 2012 water quality objectives and mitigate identified risks. This chapter is supported by the Water Quality Management Plan "Schedule F".

Do you have any comments on the identified risks to water quality?

Changes in water quantity, either by the decrease in groundwater levels through extraction to meet the needs of agriculture or industry, or increases in groundwater levels through land clearing are threats to groundwater dependent ecosystems

Do you have any other comments on this chapter?

There are many unanswered questions about the extent of interaction between surface and ground waters, and the long term trends on water quality and the impacts on the environment. Some ways to address this might be:

1. Measure trends in water quality using the groundwater monitoring network. Although this might take additional resources because each monitoring bore needs to be pumped prior to taking measurements. At least some key locations could be analysed.
2. Geophysical surveying using a combination of temperature and electrical resistivity imaging would highlight priority areas recharge and discharge areas along the rivers and stream for more detailed investigation.
3. Develop a best practice approach to water allocation modelling that incorporates climatic change predictions (ie the future) - not simply use historically biased SDLs

Chapter 8: information used to prepare the water resource plan

Chapter 8 outlines the key methods, models, data sets and guidelines used to develop the water resource plan. This chapter is supported by "Schedule G".

Do you have any comments on chapter 8?

Further responses to schedules and appendices

"Schedule A" refers to the water sharing plans.

Schedule A: The draft water sharing plans for the Namoi Alluvial groundwater sources

Minister's notes in the draft water sharing plan provide additional detail on the proposed changes to the statutory water sharing plan that will be made under the Water Management Act 2000.

The Minister's notes included in the draft Water Sharing Plan for the Namoi Alluvial Groundwater Sources 2019 are shown below, and your feedback is sought.

1. Minister's Note

The groundwater within the Upper Namoi Zone 11 groundwater source is highly connected to surface water, particularly upstream of Elfin Crossing.

There has been a history of concern over groundwater extraction at and above Elfin Crossing on Maules Creek, including the impacts of groundwater pumping on access to domestic and stock basic landholder rights and on the pools adjacent to Elfin Crossing. Historically, to manage the groundwater level decline, the Department has placed temporary water restrictions on groundwater users with aquifer access licences. There have been numerous representations from community members to reintroduce these restrictions in the current drought.

To manage the situation over the long term, the Department proposes to create two management zones in the Upper Namoi Zone 11 groundwater source – upstream and downstream of Elfin Crossing, and to include in this Water Sharing Plan specific access rules in the upstream zone. See Division 2 of Part 8 of this plan.

The detail of the rules will be the subject of discussions with stakeholders during the public exhibition phase of the draft water resource plan and water sharing plan.

Do you have any comments on the Minister's Note?

2. Minister's Note

To assess compliance with the long-term average annual extraction limits in each groundwater source, the average annual extraction over the past five years will be compared with the long-term average annual extraction limits.

This is a change for the Upper and Lower Namoi groundwater sources, which previously had a three-year assessment period. This change provides consistency across groundwater sources. It will provide sufficient flexibility to accommodate climatic variability while still protecting environmental values. No change is proposed to the trigger for requiring action to ensure compliance with the long-term average annual extraction limit.

Your input is sought on this proposed change.

Do you have any comments on the Minister's Note?

5. Minister's Note

The groundwater within the Upper Namoi Zone 11 groundwater source is highly connected to surface water, particularly upstream of Elfin Crossing.

There has been a history of concern over groundwater extraction at and above Elfin Crossing on Maules Creek, including the impacts of groundwater pumping on access to domestic and stock basic landholder rights and on the pools adjacent to Elfin Crossing. Historically, to manage the groundwater level decline, the Department has placed temporary water restrictions on groundwater users with aquifer access licences. There have been numerous representations from community members to reintroduce these restrictions in the current drought.

To manage the situation over the long term, the Department proposes to create two management zones in the Upper Namoi Zone 11 groundwater source – upstream and downstream of Elfin Crossing, and to include in this Water Sharing Plan specific access rules in the upstream zone, linked to access conditions for unregulated river licences in Maules Creek.

The detail of the rules will be the subject of discussions with stakeholders during the public exhibition phase of the draft water resource plan and water sharing plan.

Do you have any comments on the Minister's Note?

6. Minister's Note

Access rules for the Cockburn Management Zone are under consideration. This includes a revised flow reference point and related provisions.

Groundwater access rules in the Cockburn area have recognised surface/groundwater connectivity and the environmental values of the Cockburn River. To date stakeholders have expressed concerns regarding the appropriateness of the current rules. Further studies have been undertaken to inform proposed rules for the replacement plan.

The detail of the rules will be the subject of discussions with stakeholders during the public exhibition phase of the draft water resource plan and water sharing plan. The intention is to align these rules with the revised access rules in the surface water sharing plan for this area.

Do you have any comments on the Minister's Note?

Response to other schedules

Do you have any other comments on "Schedule I" - Information relating to take for consumptive use?

Do you have any comments on "Appendix A" - Water resource plan area description?

Additional information

If you would like to provide any additional information in the form of supporting documents or files to help us understand your view, email namoi.gw.wrp@dpi.nsw.gov.au from the same email you provided above.

All submissions will be posted on the NSW Department of Industry website after the public exhibition period closes.

A copy of your responses will be emailed to the address that you provided

How did you hear about the public exhibition of this plan?

Tick all that apply

Submission – Upper and Lower Namoi Groundwater WRP

I am a ground water licence holder and water user in the Upper/Lower Namoi and I am making this submission as an individual. [REDACTED]

I give permission for my submission to be publicly available on the NSW Department of Industry website - Yes

I would like my personal details to be kept confidential - Yes

Overall statement:

Groundwater management over the last 12 years has allowed the ASGE reform process to roll out and the Namoi Valley is now at a sustainable level of extraction and entitlement.

The WSP has demonstrated that the rules that are currently in place, particularly in the last 2 years of drought, provide adequate protection of the resource and underpin confidence and certainty for the licence holder. Hydrographs have shown good levels of recovery even in consecutive record low rainfall years, and where LTAEL's have breached in Upper Namoi zones appropriate AWD's have been issued to bring LTAEL's back under the rolling average limits.

I ask that the next Namoi Groundwater WSP & WRP is made with the current rules, without change, to allow the plan to see the continued results of the ASGE reform.

Draft Namoi Alluvium Water Resource Plan Consultation :

The consultation process was a single public meeting at the end of the process, it is very difficult as a water user to understand the impact of changes proposed in one meeting that is run in a condensed format. There was no targeted consultation done in the strategy and rule development phase. The WRP development process Figure 1-2 is inaccurate representation of the consultation that occurred in the Namoi.

I would like the department to undertake better consultation by holding workshops prior to the public exhibition period to work through the proposed requirements and review of the previous plan.

The Groundwater status update should have been done in a separate meeting and in more detail. It was rushed through and did not cover enough hydrographs to provide a meaningful update on the groundwater

condition.

The recharge estimates have been removed from the draft Namoi Water Sharing plan. The removal of these historical numbers from the water sharing plan is concerning as it appears to increase the Planned environmental water (PEW). I would like the department to provide a legal response to the Minister as to whether this changes the volume of PEW.

Very few of the substantive issues raised in the technical feedback provided by our peak body Namoi Water have been addressed or included.

As a water user our peak body was asked by members to provide technical review of the department's evaluation of the WSP and risk assessment. This was done by an independent hydrogeologist but there has not been any acknowledgement in these documents of the issues raised.

For example: The WSP is missing a clear definition of **baseline conditions**. The baseline Long term Average annual extraction limits (LTAAELs) were determined in the Macro plan but not included in the WSP except for the recharge numbers, which have now been removed.

There is no specific definition of 'environment' for the Upper and Lower Namoi WSP. What are the final water levels DPI Water are trying to achieve and what is the baseline they are being measured against? This issue came up in all the consultation and it was a judgement call of the hydro about long term trends.

In my view these gaps mean both the WRP and the WSP in the current form are not fit for purpose until these issues are addressed to give water users and the environment confidence in the process under which the resource is being managed. It is no excuse that NSW has run out of time.

Chapter 1: introduction

The WRP introduction covers a wide range of issues, the department staff stated in the consultation that these will not impact the day to day operation of water users as the primary legal instrument remains the Water sharing plan.

The WRP identifies risks but applies this to a whole water resource, it also make these absolute risks when they are relative risks. A good example is Groundwater Dependent Ecosystems (GDE), the underlying work used multiple data sources and has a number of limitations. The map provided in the consultation does not allow me to determine if a GDE is on my farm. It

identifies possible or probably GDE and the department stated this in the consultation. However the mitigation proposed are assessment rules that treat the risk as absolute.

The department staff at the meeting stated they will provide a process to verify the GDE on the ground if it affects trade or a new bore etc, experience tells me that I will be the one that bears the risk of having to disprove a GDE is on my farm. The process to determine GDE should be the departments to prove it physically exists and as per the consultation this should be codified in the plan.

Chapter 2: water resource plan area and other matters

The map represents the groundwater source of the Upper and Lower Namoi. Please refer to my comments on Groundwater Dependent ecosystems in regard to WRP section 2.2. There is limited data informing the connectivity of shallow resources to groundwater dependent assets and their reliance on water resources.

Chapter 3: risks to water resources

There are fundamental and practical problems with the risk assessment report completed by the department. These were provided some 18 months ago yet Namoi Water has advised us the department chose not to use this feedback. We are including the below comments provided by Namoi Water's independent hydrogeologists review of the assessment.

DPI Water state the assessment risk categories are not 'absolute' risk, but are 'relative' risk; yet later in the document the discussion about mitigation talks in terms of the assessment findings being absolute. **This document needs to be amended** to clearly delineate that the progression of 'high' risk as a priority for further assessment needs to determine if it is a relative risk. More detail is required on the 'medium' to 'high' risks as the **solutions propose rule changes** based on information that is acknowledged as not being absolute.

The data/evidence to support the assessment has not been provided, the 'high' risk as a risk pathway is not realistic nor based on measured data. The risk assessment does not talk in terms of intermediate steps between risk assessment and mitigation.

The risk analysis is based on broad categorisation of zones/areas which is extremely concerning as it effectively lumps a whole zone as being one category of risk.

The 'groundwater source' scale datasets rely on appropriate groundwater numerical models to determine current and future impacts on receptors for

each zone. Have all the Numerical Groundwater Models been peer reviewed? I ask that the Peer review is provided to stakeholders prior to this plan being submitted for accreditation.

There is a lack of actual data for the groundwater numerical models, especially groundwater – surface water connectivity studies which is essential for this type of risk analysis. The rating on connectivity for Zone 11 Maules Creek is inconsistent yet the department are now proposing rule changes as a result! If this can happen in Zone 11 it sets a precedent for other areas that are connected to surface water flows.

The Namoi Alluvial Aquifer is assumed to be a singular saturated unit for the risk assessment. The whole of the Namoi Alluvium is considered as one uniform aquifer, which does not allow for unconfined (upper tributary zones 1, 6, 7, 10, 11 and 12), semi-confined (Zones 2, 8 and 9; parts of Zones 3, 4 and 5) and confined (Lower Namoi; and parts of Zones 3, 4 and 5) aquifer conditions within the Namoi Alluvial aquifer sequence. DPI Water recognise this in the report, yet haven't provided a way for it to be corrected. This feedback was given to the department 18 months ago yet no consideration of these issues has been made. It makes a joke of the consultation process and effort by water users to contribute if the department ignores informed feedback.

The approach used by the department in the risk assessment results in the final assessment rating being overly conservative.

Given the timeframes/lack of resources and the priority of 'medium' and 'high' risks there is concern by water users that rules may be proposed/applied in the absence of data and that rule changes are flagged in the WRP so will be implemented by NSW in the WSP after 5 years of the new plan avoiding compensation. For example the Lower Namoi is classed as high risk for structural integrity of the system yet there are many areas that have no risk to the structural integrity of the aquifer. The Upper Namoi has a low risk from growth in mining reducing groundwater availability, this is clearly inaccurate assessment for specific zones and this needs to be reassessed.

Salinity risk is inconsistent and does not reflect reality. Again the broad application of samples across regions/zones is inappropriate.

Until these issues are addressed in the risk assessment and it should not be put forward for accreditation.

If my groundwater zone is classed as 'medium' or 'high' risk does that mean the possible outcome is further rules applied to the

management reducing in groundwater access and reliability? I am concerned that if these supposed risks are in the Water Resource Plan it potentially could be used to negate NSW compensation provisions if changes are made after year 5 of the plan.

Chapter 4: environmental water, cultural flows and sustainable management

The NSW Water sharing plan that was in place at the time of the Basin Plan 2012 provided for assessment and review of the LTAAEL up to the recharge estimates provided in the plan. By removing these it has the effect of increasing PEW under the new plan. We request that the recharge estimates are reinstated in the Water Sharing Plan. The excuse that the legal wording caused issues is highly questionable as it was included in the previous plan without impact and no information was presented on this issue at the consultation meeting.

A question was asked at the consultation meetings: Is NSW Government is taking the Commonwealths view of Planned Environmental Water to construct changes to the Water Sharing Plan? The department responded yes that NSW was taking the Commonwealths view.

This appears to be an impact on my water rights at the behest of the Commonwealth.

Summary of Key issues

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The information provided in table 7-1 does not appear to be accurate for the Lower Namoi and Upper Namoi Groundwater. All Upper and Lower Namoi groundwater users are required to have a meter installed to take water. This data appears to take LTAAT as 'measured' and it is not clear how this figure is calculated. The department should provide the information that supports these figures.

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Regards,

A solid black rectangular redaction box covering the signature area.

Submission – Upper and Lower Namoi Groundwater WRP

I am a ground water licence holder and water user in the Lower Namoi and I am making this submission as an individual

[REDACTED]

[REDACTED]

[REDACTED] permission for my submission to be publicly available on the NSW Department of Industry website * **No**

I would like my personal details to be kept confidential * **Yes**

Overall statement:

Groundwater licence and access is a vital part of my business, any erosion of my property rights, access and reliability is unacceptable. NSW Government should stand up for NSW in the Basin Plan and my water rights. The Basin Plan provides that my rights are defined by the Water Sharing plan that was in place in NSW as at 2012 and what NSW intended this plan to achieve.

The lack of resources for DPI Water being able to undertake core functions such as regular groundwater level and quality monitoring over the last 10 years. This affects the ability for the WSP to be both appropriate, effective and efficient.

Given the current drought overall the groundwater resources appear to be standing up well considering the limited recharge in the last few years. As a water user having regular status updates is important, along with timely information on rolling averages to enable me to run my business and use the resource to achieve the objectives set out in the plan. Being able to trade water is critical to my business and there continues to be areas where transparency and clarity on the criteria used can be improved.

Draft Namoi Alluvium Water Resource Plan

Consultation :

The consultation process was a single public meeting at the end of the process, it is very difficult as a water user to understand the impact of changes proposed in one meeting that is run in a condensed format. There was no targeted consultation done in the strategy and rule development phase. The WRP development process Figure 1-2 is inaccurate representation of the consultation that occurred in the Namoi.

I would like the department to undertake better consultation by holding workshops prior to the public exhibition period to work through the proposed requirements and review of the previous plan.

The Groundwater status update should have been done in a separate meeting and in more detail. It was rushed through and did not cover enough hydrographs to provide a meaningful update on the groundwater condition.

The recharge estimates have been removed from the draft Namoi Water Sharing plan. The removal of these historical numbers from the water sharing plan is concerning as it appears to increase the Planned environmental water (PEW). I would like the department to provide a legal response to the Minister as to whether this changes the volume of PEW.

Very few of the substantive issues raised in the technical feedback provided by our peak body Namoi Water have been addressed or included.

As a water user our peak body was asked by members to provide technical review of the department's evaluation of the WSP and risk assessment. This was done by an independent hydrogeologist but there has not been any acknowledgement in these documents of the issues raised.

For example: The WSP is missing a clear definition of **baseline conditions**. The baseline Long term Average annual extraction limits (LTAAELs) were determined in the Macro plan but not included in the WSP except for the recharge numbers, which have now been removed.

There is no specific definition of 'environment' for the Upper and Lower Namoi WSP. What are the final water levels DPI Water are trying to achieve and what is the baseline they are being measured against? This issue came up in all the consultation and it was a judgement call of the hydro about long term trends.

In my view these gaps mean both the WRP and the WSP in the current form are not fit for purpose until these issues are addressed to give water users and the environment confidence in the process under which the resource is being managed. It is no excuse that NSW has run out of time.

Chapter 1: introduction

The WRP introduction covers a wide range of issues, the department staff stated in the consultation that these will not impact the day to day operation of water users as the primary legal instrument remains the Water sharing plan.

The WRP identifies risks but applies this to a whole water resource, it also

make these absolute risks when they are relative risks. A good example is Groundwater Dependent Ecosystems (GDE), the underlying work used multiple data sources and has a number of limitations. The map provided in the consultation does not allow me to determine if a GDE is on my farm. It identifies possible or probably GDE and the department stated this in the consultation. However the mitigation proposed are assessment rules that treat the risk as absolute.

The department staff at the meeting stated they will provide a process to verify the GDE on the ground if it affects trade or a new bore etc, experience tells me that I will be the one that bears the risk of having to disprove a GDE is on my farm. The process to determine GDE should be the departments to prove it physically exists and as per the consultation this should be codified in the plan.

Chapter 2: water resource plan area and other matters

The map represents the groundwater source of the Upper and Lower Namoi. Please refer to my comments on Groundwater Dependent ecosystems in regard to WRP section 2.2. There is limited data informing the connectivity of shallow resources to groundwater dependent assets and their reliance on water resources.

Chapter 3: risks to water resources

There are fundamental and practical problems with the risk assessment report completed by the department. These were provided some 18 months ago yet Namoi Water has advised us the department chose not to use this feedback. We are including the below comments provided by Namoi Water's independent hydrogeologists review of the assessment.

DPI Water state the assessment risk categories are not 'absolute' risk, but are 'relative' risk; yet later in the document the discussion about mitigation talks in terms of the assessment findings being absolute. **This document needs to be amended** to clearly delineate that the progression of 'high' risk as a priority for further assessment needs to determine if it is a relative risk. More detail is required on the 'medium' to 'high' risks as the **solutions propose rule changes** based on information that is acknowledged as not being absolute.

The data/evidence to support the assessment has not been provided, the 'high' risk as a risk pathway is not realistic nor based on measured data. The risk assessment does not talk in terms of intermediate steps between risk assessment and mitigation.

The risk analysis is based on broad categorisation of zones/areas which is

extremely concerning as it effectively lumps a whole zone as being one category of risk.

The 'groundwater source' scale datasets rely on appropriate groundwater numerical models to determine current and future impacts on receptors for each zone. **Have all the Numerical Groundwater Models been peer reviewed? I ask that the Peer review is provided to stakeholders prior to this plan being submitted for accreditation.**

There is a lack of actual data for the groundwater numerical models, especially groundwater – surface water connectivity studies which is essential for this type of risk analysis. The rating on connectivity for Zone 11 Maules Creek is inconsistent yet the department are now proposing rule changes as a result! If this can happen in Zone 11 it sets a precedent for other areas that are connected to surface water flows.

The Namoi Alluvial Aquifer is assumed to be a singular saturated unit for the risk assessment. The whole of the Namoi Alluvium is considered as one uniform aquifer, which does not allow for unconfined (upper tributary zones 1, 6, 7, 10, 11 and 12), semi-confined (Zones 2, 8 and 9; parts of Zones 3, 4 and 5) and confined (Lower Namoi; and parts of Zones 3, 4 and 5) aquifer conditions within the Namoi Alluvial aquifer sequence. DPI Water recognise this in the report, yet haven't provided a way for it to be corrected. This feedback was given to the department 18 months ago yet no consideration of these issues has been made. It makes a joke of the consultation process and effort by water users to contribute if the department ignores informed feedback.

The approach used by the department in the risk assessment results in the final assessment rating being overly conservative.

Given the timeframes/lack of resources and the priority of 'medium' and 'high' risks there is concern by water users that rules may be proposed/applied in the absence of data and that rule changes are flagged in the WRP so will be implemented by NSW in the WSP after 5 years of the new plan avoiding compensation. For example the Lower Namoi is classed as high risk for structural integrity of the system yet there are many areas that have no risk to the structural integrity of the aquifer. The Upper Namoi has a low risk from growth in mining reducing groundwater availability, this is clearly inaccurate assessment for specific zones and this needs to be reassessed.

Salinity risk is inconsistent and does not reflect reality. Again the broad application of samples across regions/zones is inappropriate.

Until these issues are addressed in the risk assessment and it should not be put forward for accreditation.

If my groundwater zone is classed as 'medium' or 'high' risk does that mean the possible outcome is further rules applied to the management reducing in groundwater access and reliability? I am concerned that if these supposed risks are in the Water Resource Plan it potentially could be used to negate NSW compensation provisions if changes are made after year 5 of the plan.

Chapter 4: environmental water, cultural flows and sustainable management

The NSW Water sharing plan that was in place at the time of the Basin Plan 2012 provided for assessment and review of the LTAAEL up to the recharge estimates provided in the plan. By removing these it has the effect of increasing PEW under the new plan. We request that the recharge estimates are reinstated in the Water Sharing Plan. The excuse that the legal wording caused issues is highly questionable as it was included in the previous plan without impact and no information was presented on this issue at the consultation meeting.

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[REDACTED]
[REDACTED]

Email address	████████████████████
Name of respondent	██████████
Address	██
Contact phone number	██████████
Are you an individual or representing an organisation	Individual
Information on confidentiality and privacy	
I give permission for my submission to be publicly available on the NSW Department of Industry website	Yes
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Chapter 1: introduction	
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Do you have any comments on the protection of environmental water?

forward for accreditation.

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The information presented at the consultation did not provide sufficient detail for water users to make a decision on the most appropriate method for annual permitted take. The Upper Namoi is unlikely to breach using either the simple or the variable take method. The Lower Namoi using the variable method reduces the potential for build up of credit over a longer term period. The Lower Namoi would likely breach if the year of the WRP commences in a dry year and this is likely to result in DOI Water being required to provide assessment of reasonable excuse (this would likely occur under both simple and variable method).

As discussed in the consultation it would be sensible for DOI Water to use both methods and report on the one that provides the most beneficial outcome.

In using both methods of the Annual Permitted Take + 20% and the 10 year rolling average (applying later in the WRP) and using 16 years of physical extraction data the Upper and Lower Namoi continue to be well under the SDL limits.

Do you have any comments on extreme event management and the incident response guide?

The extreme event management and the incident response guide is a reasonable framework. We note that table 1-5 section 10.51 states that subsidence has occurred in the Lower Namoi – the data for this was limited and from more recent projects it appears that there has not been subsidence due to compaction resulting from extraction.

Critical Water Advisory panels must not be agency only, they worked well when there was good linkages and communication with the community. The provision of “increased communication” needs a documented and clear process. CWAP information must be transparently available to the community.

The response for extreme events is often to apply a Section 324's, in the past this has resulted in impacts to access and reliability without compensatory provisions applying. Whilst the framework provides for a process and logical pathway to deliver outcomes in extreme events the example of Zone 11 is the

	<p>transparency and metrics used to determine a critical water shortage versus age and depths of bores and other management measures was not transparent or well managed. The process for assessment is not clearly documented in the response guide and should be included prior to accreditation.</p>
<p>Do you have any other comments on this chapter?</p>	<p>The review of the Groundwater sharing plan has not taken into account water users feedback on trade implications as a result of the existing trade criteria. Namoi Water has asked for this to be reviewed and updated with more accurate data however to date this has not occurred.</p>
<p>Chapter 7: measuring and monitoring</p>	
<p>Do you have any comments on the measuring and monitoring of water resources?</p>	<p>The information provided in table 7-1 does not appear to be accurate for the Lower Namoi and Upper Namoi Groundwater. All Upper and Lower Namoi groundwater users are required to have a meter installed to take water. This data appears to take LTAAT as 'measured' and it is not clear how this figure is calculated. The department should provide the information that supports these figures.</p> <p>Irrigators should not be expected to record instantaneous water use for compliance reasons, the aquifer share, announced availability and trade will dictate water use by individuals on an annual basis as per licence. If NRAR wish to increase monitoring they can do it with their own resources.</p>
<p>Response to Minister's Notes</p>	
<p>Do you have any comments on the Minister's Note?</p>	<p>The government needs to take responsibility for the fact that irrigators in zone 11 have been restricted from accessing water available in their accounts. Those irrigators need to be compensated for loss of production and capital value of their water access licence which occurred after the ASGE process. Contrary to all modelling, sustainability was not achieved in this case and the government had to step in with the section 324 to prevent other water users losing access to the water in zone 11.</p>
<p>Do you have any comments on the Minister's Note?</p>	<p>As above</p>
<p>How did you hear about the public exhibition of this plan?</p>	
<p>Please let us know how you heard about the opportunity to make a submission</p>	<p>communication from other organisations</p>

Email address	[REDACTED]
Name of respondent	[REDACTED]
Address	[REDACTED] y Road
Contact phone number	[REDACTED]
Are you an individual or representing an organisation	Organisation
Organisation or business details	
Name of organisation	People for the Plains Inc
Who do you represent?	Community organisation
Information on confidentiality and privacy	
I give permission for my submission to be publicly available on the NSW Department of Industry website	Yes
I would like my personal details to be kept confidential	Yes
Draft Namoi Alluvium Water Resource Plan	
<p>WSP Zone 11 Response</p> <p>We seek that any changes to the WSP are consistent and equitable, regardless of the type of water user, and that they will create protections for stock and domestic water users, the environment and the health of the aquifer into perpetuity. Thankyou for the opportunity for People for the Plains to provide a submission to the proposed amendments to the Water Sharing Plan for zone 11.</p> <p>CURRENT SITUATION</p> <p>We know that 13 families in the Upper Maules Creek area have been forced to drill new bores in the last 12 months. The bores that they were using for stock and domestic purposes have run dry for the first time, in many cases, for hundreds of years. Yes it is a dry time, no, it is not the only dry time the area has had. When people lose water it is a highly stressful time, where you question your ability to even survive at your home, let alone make a living. It means many of the people suffering their loss of stock and domestic water are not in a position to participate in this consultation process, although they are keen for it to provide some future security for their needs.</p>	

We understand there has been no pumping for irrigations since 2007 (with a little pumping occurring in 2011/2012) in zone 11. The Department stated at the Narrabri Information session that 13 licence holders in the area who “could pump at any time”. These people are not pumping as there is no water available and because the uncertainty with being able to turn on the Section 324 “at the Ministers discretion” means they would be unable to complete a crop. This could mean entire business failure. Uncertainty for their tenure of water has meant they have not utilised their pumping entitlements for almost 12 years. Graphs of Green Gully monitoring bore levels shows a recovery in water levels each time the Section 324 was instigated. This meant that the use of the Section achieved its purpose – water levels fell below trigger levels, Section 323/324 was applied, water levels raised above trigger levels.

When the Section 324 was initiated the reasoning from the Department was that Lochie Leitch’s 6m deep well was creating the impacts to the stock and domestic water impacts 20km up stream in Upper Maules Creek.

This was outlined in a letter to Mr Leitch File Ref: S09/1033 on 2/4/09 from Mr David Harris, Commissioner, NSW Office of Water that stated “The broader issue of your groundwater pumping affecting groundwater levels in an upstream direction is only indirectly related to interference by a drawdown cone. It is however, related to the principle of conservation of mass. For example, if a significant volume of groundwater (say 400-500ML/yr) is pumped from the Maules Creek alluvial aquifer in the vicinity of Elfin Crossing, during a long protracted drought, the drawdown effects are not just local to the pumping site, although these are the most noticeable impacts. The effects of local storage depletion are felt over the whole aquifer as new equilibrium level is approached in the upgrading direction of distances of 15-20 km the pumping effects would be minor in nature”

We now have essentially a 350m well in the shape of a coal mining pit, that continues to draw groundwater out of the aquifers and yet we are expected to believe that it is not creating the impacts to the stock and domestic water users in upper Maules Creek? We feel that this is a concrete example of the inequality of water rules being implemented across different industries.

Around this time Mr Leitch received assurances from the MP at the time, The Hon Kevin Humphries in a letter dated 12th November 2014 (MF14/3855). This letter stated “in regard to the application of the section 323 and 324 water restrictions to Maules Creek Coal mine, I am advised the mine is treated no differently to other licence holders and is required to comply with such restrictions when in force”. Please find this letter attached. Mr Humphries recognised the importance of all water users being treated the same, despite their industry. In response to the proposed amendments to the WSP for Zone 11.....

Firstly it must be noted that changes to the WSP for Zone 11, Zone 4 and Zone 5 along with the Gunnedah Oxley Basin must not be finalised until the two current investigations by NRAR are completed. Both the surface water and groundwater investigations into water use by Whitehaven Coal Maules Creek

Water resource plan - main body

Mine have implications for these WSPs. The findings from both of these investigations may well include recommended changes to the WSP to allow for equity across water users in these zones and basins. At the Narrabri DOIW information session in June we were given verbal agreement that the WSP would not be finalised until the outcomes from the NRAR investigations are known and we hope that is the case.

Option One cannot be supported until.....

1. All references are removed to “during irrigation season” giving recognition to water licence holders in the zone who are not irrigators. We understood at the information session in Narrabri that this was one of the factors describing the situation when a permanent Section 324 would be applied.

2. The Department ensures that all changes that need to occur to other legislation happen to allow for the permanent Section 234 to be able to be applied to all water licence users in the Zone – not just those that hold works licences.

3. That there is effective monitoring of in-pit flows from mining. This water should be accurately monitored, openly reported in a timely manner (currently it appears on the Annual Reviews which are very slow to be released – the 2018 Annual Review for Maules Creek Mine is still not available, meaning the January 2017 results are still not known 18 months later). This data should include a nomination of which water source the Mine assumes the water is coming from. This should all be cross checked by government department on a regular basis.

Consider using drone footage to photograph pit water levels at different times. This should also be correlated with the Model assumptions and the Model updated to reflect the recent information in a timely manner. The Model has only been updated once since mining began, meaning results in different climatic conditions are not being inputted on a very regular basis.

4. That all passive take from mining is included in the take register and reported on. It became apparent at the information session held in Narrabri that currently the mine water take was not included in the take register.

5. That the connectivity between the alluvium and the coals seams be better identified (this may be an outcome from NRAR, which again supports the idea that the amendments to the WSP must not take place until the NRAR investigations are completed)

6. That there is a recognition that the interception of surface water by mining operations impacts the recharge of the GW source (this may also result of NRAR investigation)

As the proposed changes stand currently they will offer no solution whatsoever to the stock and domestic water users who have currently lost their water. Should these changes be enacted the situation will remain exactly the same as it is now for those people.

Response to Minister's Notes

WSP Zone 11 Response

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create protections for stock and domestic water users, the environment and the health of the aquifer into perpetuity. Thankyou for the opportunity for People for the Plains to provide a submission to the proposed amendments to the Water Sharing Plan for zone 11.

CURRENT SITUATION

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"Have your say" website

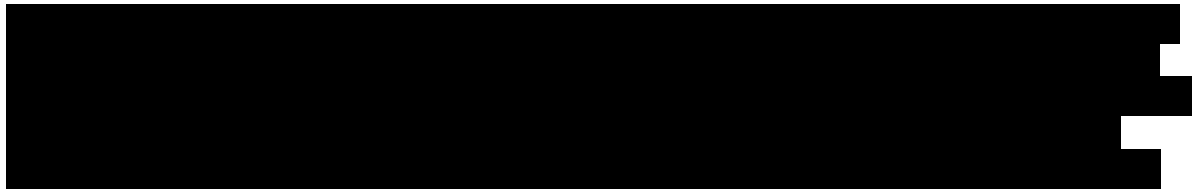
COCKBURN VALLEY WATER USERS AND LANDCARE ASSOCIATION

Submitted by: Cann Pharmaceutical Australia

Please find the attached submission by Cann Pharmaceutical Australia on the draft Namoi Water Resource Plan.

Cann Pharmaceutical Australia (CPA) was the first Australian company to obtain a joint venture with a licensed medicinal cannabis company in Israel - Cann Pharmaceutical Ltd of Israel.

In Australia, our executive leadership, management, board of directors and our advisors consist of proven business, academic and medical leaders with extensive history of achievement in the medicinal cannabis sector, clinical research and biotechnology and successful business development and capital market expertise.



The Cockburn River runs along the south-eastern boundary. The site slopes gradually towards the Cockburn River and it is considered that there shall be minimal amounts of earthworks required to support the development. The existing soils have historically been utilised for agricultural purposes and appear to be stable.

The development includes the construction of a 9417m² greenhouse, 500m² greenhouse and 895.61m² production facility. In particular, the facility shall grow and produce medical cannabis to be distributed throughout Australia. Development works shall also include the construction of two new sheds, new guardhouse, security fencing and monitoring systems, upgrading of Walmar Road and new carparking and onsite manoeuvrability areas.

The development of this agricultural facility will create 50+ job opportunities

Statements: CPA is supportive of the proposed new location for the Gauge Orifice below Mangfall sill in the stable gravel bed. What is known as the relocation of the Kootingal Gauge Orifice is completely supported. We believe there is an error in the fact sheet where it states, “the existing cease to pump threshold of 0.25 metres in the access rules for the Cockburn River Alluvium Management Zone to be 0.3 mega litres”.

CPA suggests that the relocation of the gauge needs to be clarified that the existing cease to pump threshold of 0.25 meters stay in place.

CPA does not support the proposal to link daily access rules for ground water pumping to surface water cease to pump rules with a 28-day delay from when the cease to pump conditions are triggered and applied to surface water. It is suggesting that a more workable solution be applied. As well as, it suggests that a review of the socio-economic assessment be done solely on the Cockburn River. This is very important as we are developing a high technology pharmaceutical industry in the valley that will support a number of high paying technical jobs.

Without adequate water supply, our ability to provide medicine to a large number of patients will be compromised.

Therefore, Cann Pharmaceutical is supportive of the request for a meeting with both Water NSW and DPI Fisheries at the same time prior to any finalisation of the water resource plan.

The Cockburn Water Users Group has been an active workable group for many years and should be consulted in every aspect of any water issues.

Conclusion

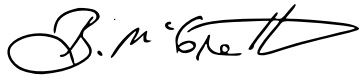
This submission is on behalf of the Cockburn Valley Water Users and Landcare Association on the draft Namoi Water Resource Plan.

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Cann Pharmaceutical does not support the proposal to link daily access rules for ground water pumping to surface water cease to pump rules with a 28-day delay from when the cease to pump conditions are triggered and applied to surface water.

Cann Pharmaceutical is supportive of the request for a meeting with both Water NSW and DPI Fisheries at the same time prior to any finalisation of the water resource plan.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'B. McGrath', with a stylized flourish extending to the right.

Dr Braden McGrath

Chief Executive Officer