

S & V Woods
Kootingal. NSW. 2352

August 30, 2019.

National Resources Commission
Have Your Say On Water Sharing Plan
Peel Valley Water Sharing Plan-Fractured Rock Source

Dear Sir:

It has come to our attention as to a serious conflict in dates between today, Friday 30/8/19 and Monday 16/9/19 for possible submission dates in regard to comment on the Peel Valley Water Sharing Plan- Alluvial and Fractured Rock. This submission being specific to Fractured Rock.

As a Result of the above conflict and it being very hard to publicly find these dates the below submission has been drafted with hast and further consultation would be appreciated before determination is made. We would like to hold the right for further input also.

We feel the provisions made within the Plan are adequate for calculation of recharge and allocation of licence as para phrased from both the legislation and the current water plan.

Exert and summary as below,

The Peel Fractured Rock annual recharge [for non-high conservation areas] is 142,435 ml per annum and at 50% gives a LTAAL of 71,218 ml.

We submit this would be way above the licence take of Peel Fractured Water. The WSP states this and suggests water may be available for new access licences. Thus, if agreement is reached for averaging use over three years, there would not be a risk to the environment.

We do feel however that legislation Part 9 Clause 58 (4) as follows

(4) Water allocations remaining in a water allocation account of an access license of the category domestic and stock, local water utility and aquifer (general security) in the Peel Alluvium Water Source and all access licenses in the Peel Fractured Rock Water Source cannot be carried over from one water year to the next.

Is not in line with the overall valleys plan allowing for carry over of water. The minster is allowed to reference a rolling average of 3 years.

Part 7 Clause 41 (3) references the LTAAEL over a three-year period.

The users of fractured rock should be able to apply the same formula to their extraction for this period of time. This argument is further compounded by mention within the Legislation and Water Sharing Plan.

The following exert From the Peel Water Sharing Plan, Water Sharing Rules, Carry Over and Water Accounts, Page 50.

“Available water determinations combined with the carryover will enable license holders to use up to twice their water allocation in a year provided that over a consecutive three-year period they do not exceed the sum of their water allocations for those three years.”

Confirms this argument and inequity. At times this could be critical to outcomes of production.

To reinforce we are asking for your consideration to bring the fractured rock carry over rules into line with other water sources in the valley.

Yours Faithfully
Scott and Vicki Woods
Cockburn Valley Water User Members.