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**From:** Dr James Cowley [REDACTED]  
**Sent:** Friday, 19 June 2020 12:31 PM  
**To:** NRC  
**Subject:** Submission for 2020 review of Water Sharing for the Richmond River Area Unregulated and Alluvial Water Services 2010.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

We are residents and holders of [REDACTED] of a community of licence holders in the community water scheme at [REDACTED] NSW [REDACTED]. I respond to your request for submissions for the planned review of the *Water Sharing for the Richmond River Area Unregulated and Alluvial Water Services 2010 (the Plan)*.

We are not in a position to answer detail required for your first four questions as all of us are homeowners who rely upon water for our homes and small acreages rather than larger licence holders.

However we submit the following for your note and consideration for the future so that when you make decisions you take into account smaller licence holders and the implications of such decisions

**What changes do you feel are needed to the plan to improve outcomes?**

It is not so much changes that we require; rather we ask that in your discussions you could be aware and conscious of how decisions can disadvantage the smaller licence holders.

1. We are satisfied with current licence management and volumes allowed and the licence holders follow this responsibly. We would however find it very difficult if there was a decision to lower our licence volumes as the homes here rely on this water for the maintenance of the environmental habitat, household and residential property needs. Many grow their own food, as they have done since the scheme started, and do this with responsible use of water including domestic consumption and vegetable production for domestic usage. We have no town water in this area with little access to water other than rainfall into property tank storage. Please could you ensure in any changes that we are not disadvantaged due to being small licence holders? We also feel that the any consideration to amalgamate the two zones on the Alstonville Plateau Ground Water Services may be of a disadvantage to the residential clients of [REDACTED].

2. We are conscious that from time to time extraction for the purpose of bottled water has been proposed within the licence area. We would ask you to strongly reject any such requirements, as this will impact water available for farmers in an area that is critical in Australia for agriculture as well as the risk of lowering the water table and the possible incursion of ground minerals/salts. Looking into the future we need to prevent this. The extraction of water just to supply bottled water somewhere else is not acceptable or even logical in a country with good quality water supplies for community use.

3. We are conscious of the good management of this scheme over the years. However occasionally disadvantaging changes can be introduced due to much decision-making being in major cities. If policy planners have never lived in

regions, have always had water available from the tap, then it is very difficult to understand the impact decisions can have on rural communities.

4. We have heard that some instrumentalities are considering digital telephone signal meters which in our location have vagaries of signal strength and reception as many householders have telephone booster on the dwellings to secure in house mobile reception. In a rural area the cost for a household to install such, particularly the power line which would be needed to connect them (which could be 100s of meters from the nearest power); the difficulty in heavily treed gardens for the digital signal to connect (already seen with some solar meters) can create a huge cost to individual homeowners.

A decision such as digital metering can be taken for efficiency. However we ask that you look at the impact of decisions on rural homes, which are configured quite differently than in towns and cities. If digital meters were needed it would only be equitable if Government:

-Paid for the meters and installation; Government paid for the electrical line to the meter)(across maybe 5 hectares) and Government also found a solution to all properties which could not produce a digital signal from the meter location, so as not to unintentionally disadvantage people. A cost benefit analysis of such a proposal may be uneconomic for all concerned unintentionally disadvantaging domestic rural land holders. Given the above management of this metering including its ongoing maintenance in our community may be an added cost impost.

A rural area has many residents in the later parts of their careers or into old age and it is particularly important that they are not subjected to stress from any such decisions. Water and other basics in life become even more important.

5. We would ask your Department to actively oppose any Coal Seam Gas fracking within the area of the water table as the wider regional community here has expressed its total opposition to that and its impact on water quality.

Thank you for your efficient management of the water resources to date which we appreciate.

Kind regards

James & Annette Cowley



[Redacted]

**From:** Dr James Cowley [Redacted]  
**Sent:** Thursday, 2 July 2020 10:31 AM  
**To:** NRC  
**Subject:** Re: Submission for 2020 review of Water Sharing for the Richmond River Area Unregulated and Alluvial Water Services 2010.

Hi Sofya,

Could you add this to our submission please...

I forgot: our Water Access Licence (WAL) No. is [Redacted] and this covers 26 properties with a combined allowance of 26,000 litres per day

and the solution that the community would like in order not to cause inequity :

"Section 81 of the 2010 sharing plan deals with the requirement for logging of pump flows. We are a not for profit small water usage group. Our total licence allocation is a modest 26kL per day and is distributed to our members for domestic use only. Our system is set up to automatically pump water up to a header tank from which water is distributed to all our members. The pump will at times of high usage operate several times a day. Since the system is automatic and remote, it is not possible to manually keep records of the times and volumes used, as described in Section 81. The only other compliance option is for electronic data logging. This would be a huge financial and logistical burden to install. My understanding is, that following numerous submissions on this issue of data logging, government has committed to no compliance action for some users for the time being. I would suggest that although data logging may be appropriate for large volume and commercial licences, there should be provision in the plan for low volume users to continue to periodically record volumes manually as has been the case in the past. To leave such a clause unchanged, while offering no action on compliance, leaves users with uncertainty and possibly subject to prosecution should government policy change."

thank you,

James

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]