

[REDACTED]

From: Richard and Phillipa Schultz [REDACTED]
Sent: Thursday, 2 July 2020 9:26 PM
To: NRC
Subject: Review of the Water Sharing Plan for the Richmond River Area....2010

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To whom it may concern,

I am one of 26 property owners in the community water scheme at [REDACTED] (WAL number [REDACTED]), which is governed by the Water Sharing Plan for the Richmond River. My role (on a voluntary basis) is to manage the water scheme, which entails maintaining the equipment, and ensuring compliance with the regulations. Since the Plan is due for review, I wish to make the following submission.

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 at any time of day or night. 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 (due to the remote nature of the pump) 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 for the opportunity to contribute to the development of the new plan.

Regards

Richard Schultz
[REDACTED]