

SUBMISSION – WATER SHARING PLAN – TWEED RIVER AREA UNREGULATED & ALLUVIAL WATER SOURCES (TWSP).

INTRODUCTION

The purpose of a Water Sharing Plan is to prescribe how water is to be managed, firstly for the environment and also to support social and economic outcomes.

The TWSP prescribes the provisions to guide the management of the Tweed water sources under *Cl.9-Vision Statement* and *Cl.10-Objectives* which is supported.

For the TWSP to contribute to achieving sustainable environmental, social and economic outcomes and meet its Objectives there are other areas of the plan that need to better reflect Cl.9 and 10.

Cl.4-Application of this plan

It is of vital importance this plan better reflects the surface water and groundwater are inextricably linked and water systems need to be considered in their entirety.

The current status is there is insufficient baseline data, data on groundwater conditions, including hydraulic conductivity, hydraulic gradients and connectivity of aquifers to the listed water sources Cl.4, s.1. Thus, (a) and (b) needs to be removed from Cl.4, s.4 to better reflect the Objectives.

While it is acknowledged there is also the WSP for *North Coast Coastal Sands Groundwater Sources* and *Fractured and Porous Rock Groundwater Sources*, along with the provisions within Licences, to benefit this plan and meet its Objectives this plan needs to consider the whole of ecosystem functions of the entire water sources.

Cl.14-Climate Variability

This part needs to be strengthened to better recognise the extremes of Climate Change to general long-term variabilities with further review to reflect extreme low flow events from Climate Change impacts to better manage the water resources into the future rather than methodology only using long-term averages.

Cl.43-Access Rules for Taking Surface Water

Implementation of cease to pump needs to be more definitive with clearer roles of responsibility to meet the Objectives of this plan and needs to also include groundwater as it is of significant importance to the whole ecosystem function of the water sources.

Priority order for cease to pump rules need to be identified as set out under the as per the provisions of the Objectives with the extraction of groundwater for commercial bottling to cease in the first instance when there is no benefit to the Tweed River area economically.

5/7/20