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## Richmond-Wilson Water Sharing Plans and Other Matters

Dear Vanessa,

We wish to convey our members' concerns pertaining to the operation of *cease-to-pump* (CTP) rules in the Richmond-Wilson Catchment. Our members believe that there are communication and information issues surrounding the declaration of cease-to-pump/commence-to-pump rules that are unclear and poorly implemented.

In the past decisions for CTP were made in close consultation with the local Water User Groups, and through whom the information was communicated to all water users. This previous arrangement has been replaced in the Water Sharing Plan (WSP) that instead applies environmental metrics in declaring CTP to which all water licenses on unregulated rivers are subjected. Applying and implementing this new framework pose major challenges with respect to the criteria and communicating the CTP events.

### *Criteria for CTP and their application*

The WSP prescribes the threshold for CTP based on the salinity of the river measured at a specific point. For the Richmond-Wilson catchment, the metric used is a salt concentration of 0.2 parts per thousand (ppt) measured at Tatham Bridge for the Richmond River and at McInnes Lane for the Wilson River<sup>1</sup>. However, these have created problems in terms of:

1. The use of *ppt* unit is not consistent with conductivity units used in most commercial sensors that our members use. The commercial sensors use conductivity units of  $\mu\text{S}/\text{cm}$  that are also used in many of the DPIE-Water publications such as the Water Sharing Plans<sup>2</sup>.
2. The threshold of 0.2 ppt is quite low and unjustifiably restricts our members ability to adaptively optimise on-farm water management, especially during extreme weather conditions such as prevailing at present. This 0.2 ppt is just about 314  $\mu\text{S}/\text{cm}$ , which is well below the 800  $\mu\text{S}/\text{cm}$  maximum considered quite safe for cropping and protection of soil health<sup>3</sup>.
3. Both Tatham Bridge and McInnes Lane are way downstream and located in the creeks where they are prone to seawater intrusion during high tides when salinity rise rapidly above the threshold value at these monitoring points, while the river upstream would be unaffected and still suitable for irrigation with minimal environmental risk.

<sup>1</sup> [http://www.water.nsw.gov.au/\\_data/assets/pdf\\_file/0006/548097/wsp\\_richmond\\_background.pdf](http://www.water.nsw.gov.au/_data/assets/pdf_file/0006/548097/wsp_richmond_background.pdf)

<sup>2</sup> [https://www.industry.nsw.gov.au/\\_data/assets/pdf\\_file/0007/192337/draft-namoi-alluvium-wrp.pdf](https://www.industry.nsw.gov.au/_data/assets/pdf_file/0007/192337/draft-namoi-alluvium-wrp.pdf)

<sup>3</sup> <https://www.gbcma.vic.gov.au/downloads/ssdp/GroundwaterGreen.pdf>

### *Communicating the cease-to-pump events*

The former community-based Water User Groups were critical to declaring and communicating CTP conditions to all members. The new arrangement in the WSP does not clarify the entity (WaterNSW or DPIE-W) responsible for declaring, and ensuring compliance with, CTP conditions. Notifications of CTP solely through the DPIE's website remains an issue for the target audience in rural areas. Internet connectivity can be unreliable and also the alerts are not readily found on the DPIE's website. Alerts through mobile phones, although may be late sometimes, should be encouraged by providing clear instructions on where and how to register.

Our members are often unable to identify the appropriate division and/or individual within DPIE-W to contact for useful and timely assistance when they are faced with uncertainties on navigating issues pertaining to CTP rules and their application.

### *Breach of CTP rules*

NSWIC has become aware of the perception amongst certain sections of our membership on the coast that water take might be occurring when CTP rules are supposed to be in place. We ask the DPIE-W or NRAR to investigate every suspected illegal behaviour and to take necessary action. Our Council has strong policy on the law and rules being followed and enforced. We do not tolerate any behaviour that violates the rules and conditions attached to licenses and smear the good name of the industry.

### *Identifying the correct agency and personnel responsible on issues*

Our members find it generally difficult and frustrating to identify the appropriate agency (DPIE-Water, NRAR or WaterNSW) or a unit or individual within an agency, to approach for advice or action when issues arise.

### *Conclusions*

Some of these issues were raised at River Operations Stakeholder Consultation Committee (ROSCCo) meeting attended by our members on 10 December 2019 at Casino<sup>4</sup>. We asked that DPIE-W as a matter of urgency address the following:

- Clarify the criteria for declaring *cease-to-pump* in the light of the seemingly low salinity threshold and inconsistent units,
- Develop and implement communication arrangement to efficiently alert our members and license water users on CTP and other events,
- That the issues pertaining to CTP are addressed in the new WSP to be developed for the Richmond-Wilson water sources, and
- Provide contact details of WaterNSW staff that can provide meaningful and timely assistance for our members in time of need, and how they can easily be contacted.

We look forward to your timely feedback on these matters.

Yours sincerely,

**Luke Simpkins**

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<sup>4</sup> [https://www.waternsw.com.au/data/assets/pdf\\_file/0003/152895/Richmond-River-Toonumbar-ROSCCo-Notes-10-Dec-19.pdf](https://www.waternsw.com.au/data/assets/pdf_file/0003/152895/Richmond-River-Toonumbar-ROSCCo-Notes-10-Dec-19.pdf)

Chief Executive Officer