

19 February 2020

Ms Vanessa O'keefe
A/Executive Director Policy Planning & Sciences
Water Group, DPIE
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Richmond-Wilson Water Sharing Plans and Other Matters

Dear Vanessa,

This letter is to endorse the concerns of our members in the Richmond-Wilson catchment pertaining to several aspects of the expiring Water Sharing Plan (WSP), which they asked to be addressed in the new WSP expected to come into effect in July 2021. The members detailed their concerns in a letter to the Director of Water Systems Operations at WaterNSW (attached here).

The main specific issues include:

- Self-policing approach to compliance with cease-to-pump (CTP) rules that now requires the water user to monitor salinity, convert units and compare against trigger thresholds published on often inaccessible website. This is a departure from the previous practice that relied on the water user groups determining cease to pump thresholds and informing irrigators. The process also creates problems in terms of:
 - Inconsistencies in the supporting information provided through various sources published by the Department and WaterNSW, and
 - Protocols for salinity measurement involving confusing units and their conversions, while the impact of seawater intrusion at measuring points do have implications for declaring CTP events.
- Errors in the mapping used in the WSP with creeks placed in wrong areas,
- Inconsistencies between wordings on licences and those in the WSP,
- Confusions over policing and enforcement of the rules,
- Failure to acknowledge impacts of changes in water use and irrigation methods in the catchment, and
- Apparent lack of knowledge and history of the WSP amongst employees of the department and agencies.

Given that DPIE is central to these matters, NSWIC asks that you examine the Richmond Wilson letter and advise us on what can be done in order to achieve a better WSP for the Richmond River Area Unregulated, Regulated and Alluvial Water Sources.

I look forward to your views on these matters.

Yours sincerely,



Luke Simpkins
Chief Executive Officer