
From: REDACTED INFORMATION

Sent: Thursday, 20 January 2022 10:42 AM

To:

Subject: Water sharing plan objection

I am writing in complete objection to the proposed water sharing plan.

This new proposed water sharing plan will not share water to the bottom end of the river if your plan is to use the Faulkland gauge as the bottom end of the river will not get any water in low flow times as the two big users of the water are below that gauge and the other big user is above the gauge . If the Faulkland gauge is used at the 6 meg or greater by the time the water flows down past the two big users there will be no water getting to the bottom end users .

The only way the new water sharing plan will work and be fair to all the water users on the river is to adopt the current plan that is in place that has been working with cease to pump at 1 megalitre and recommence to pump at 2 megalitre using the bottom gauge .

Regards

David Reeves

REDACTED INFORMATION

Sent from my iPad

From: digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au
<digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au> **On Behalf Of**
digital.services@squiz.dpie.nsw.gov.au
Sent: Wednesday, 16 February 2022 2:43 PM
To: Water Lower North Coast WSP Mailbox <lowernorthcoast.wsp@dpi.nsw.gov.au>
Subject: Submission for the draft remake water sharing plan Lower North Coast

Permission

I would like my submission to be treated as confidential? No

I would like my personal details to be treated as confidential? Yes

Your details

Are you making a submission as an individual or on behalf of an organisation? Individual

Which of the following best describes the kind of stakeholder you are? Community member

If you selected other, please state:

Email address: _____

Question 1.1

Do you have any comments on this aspect of the draft plan?:

Question 2.1

Do you think this is appropriate? Why / why not?: Part 4 Division 2 LTAAEL The usefulness of this method seems limited in a high rainfall catchment where off river storages are limited to nonexistent. This method is more suited to inland irrigation areas where there is widespread use of off river storages. May just be an unnecessary complication to allow uniformity across the State?

Question 2.2

Do you think this is appropriate? Why / why not?:

Question 3.1

Changing flow reference point for lower Barrington Management zone The proposal is to change lower Barrington Management zone from Gloucester at Doon Ayre 208003 to Barrington at Relfs Rd 208031. 208003 uses data from 1945 (65 years) to sometime in 2009(?) - when the WSP was set and 208031 uses data from September 2010 to present (12 years). I can see this new flow reference point is ideal however using two different time periods with this flow reference site and all other flow reference sites makes it like comparing apples and oranges. I have attached a detailed response in attached document

Do you have any comments on this aspect of the draft plan?:

Question 4.1

Do you have any comments on this aspect of the draft plan?:

Question 5.1

Do you have any comments on this aspect of the draft plan?:

Question 6.1

Do you have any comments on this aspect of the draft plan?:

Question 7.1

Do you have any comments on this aspect of the draft plan?:

Question 8.1

Do you have any comments on this aspect of the draft plan?:

Question 9.1

Do you have any comments on this aspect of the draft plan?:

Part 8 Trading rules In the areas where this has been implemented this has caused a bias to high value crops such as cotton and fruit at the expense of other production such as rice. We now import rice. A balance should be struck to ensure Australia is self-sufficient for food production for the National interest. Also this has led to foreign ownership of our water, how is our National interests to be protected?

Question 10.1

Do you think this is appropriate? Why / why not?:

Question 11.1

Comments on any aspect of the draft plan:

Whole of water extraction management, further detailed comment is contained in attached document

Question 11.2

Upload a submission or any supporting documents:

WSP comment submission.pdf, type application/pdf, 95.6 KB | Manning river flows.xlsx, type application/vnd.openxmlformats-officedocument.spreadsheetml.sheet, 1.9 MB

Changing flow reference point for lower Barrington Management zone further information to response 3.1

The proposal is to change the flow reference point for the lower Barrington Management zone from Gloucester at Doon Ayre 208003 to Barrington at Relfs Rd 208031. 208003 uses data from 1945 (65 years) to sometime in 2009(?) - when the WSP was set and 208031 uses data from September 2010 to present (12 years).

I can see this new flow reference point is ideal however using two different time periods with this flow reference site and all other flow reference sites makes it like comparing apples and oranges.

It appears generally the Dept has used a CTP of 98%ile and recommence at 97%ile. However the proposed values used appear less than the 97 and 98%iles and don't contain a reference as to their origins for the proposed change.

The period 1945 to 1978 is generally a flood dominated period of high flows, while the period 1979 to present is generally a drought dominated period with low flows. And the period between 2014 and 2020 in particularly a very dry period. So using one CTP from the period 1945 to 2009(?) and another from the period September 2010 to present you get totally different values for the CTP. For example if we use data from 1945 to present the 97%ile flow is 73ML/d (with 98ML/d used in the 2009 WSP) at Killawarra, if we use data from September 2010 to present the 97%ile flow is 31ML/d at Killawarra. So using the current CTP the Manning management zone will have longer days with a CTP compared to the Barrington management zone. Using the 2019/20 drought, Manning Management zone will experience 207 days with a CTP based on 98ML/d while Barrington Management zone will experience 54 days with a CTP based on 10ML/d as proposed. If the Barrington Management zone were to use Gloucester at Doon Ayre as the flow reference point, 97 days would be with a CTP.

I get the following percentile flows based on the different data sets:

	Manning at Killawarra (98/97%ile)	Barrington at Relfs Rd (98/97%ile)
Graeme data 1945 to 2022	73/106	NA
Graeme data 2010 to 2022	13/31	12/17
WSP 2009(?)	98/137	27/40 at Doon Ayre
WSP 2022 proposed	98/137	10/15

In low flow periods (<100ML/d), flow at Killawarra in the Manning is almost totally derived from the Barrington River ie almost one hundred percent. Other river systems at the time of low flows at Killawarra would have already reached a CTP or stopped flowing completely including the Gloucester River above Gloucester. So low flows between Barrington and Manning are very similar and it would be expected that similar days of CTP to occur.

The issue is a lack of equity and changes in river flows based on extending the data source from 2009(?) when the last WSP flow values were set to include all flows up to 2022. I am not advocating a CTP on Manning of 13ML/d, the use of the different time periods by the dept is causing the inequity. Why start the new WSP on a false value, it has already increased just by using data up to February 2022 from when it was prepared in 2021. This only creates complacency for users in the Barrington management zone. We need to be fair to everyone.

Whole of water extraction management further information to response 11.1

Like most governments we tend to fragment management and allow departments to say it's the other department's responsibility. In 2019/20 during the worst drought on record, the CTP's in the current WSP were not used (with the exception of the Karuah river source) and extractors used their own adopted CTP's, which were a lot lower than the values in the WSP or continued to pump till there was nothing left. With a State wide drought it was hard to get any response from the NRC, they had no representative's onsite and relied on community members reporting and the NRC appeared to provide no compliance. The NRC appears to be limited with compliance personnel and may rely on phone calls (this was even limited trying to phone someone) and significantly rely on emails to manage incidents of non compliance. How is compliance going to be achieved as a whole of water extraction management in the future to provide better implementation of the WSP?

It was mentioned in the webinar 9 February 2022 that penalties would consist of one part paying for value of water stolen, I was expecting to hear deterrent like figures of up to \$250,000 for individuals and up to \$1M for corporations. At the penalty of the value of water it's one of the greatest bargains of the twenty first century to steal the water. Is my understanding correct? Someone from the NRC should have been at the webinar, rather than this fragmented approach.

From: digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au
<digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au> **On Behalf Of**
digital.services@squiz.dpie.nsw.gov.au
Sent: Saturday, 19 February 2022 7:07 PM
To: Water Lower North Coast WSP Mailbox <lowernorthcoast.wsp@dpie.nsw.gov.au>
Subject: Submission for the draft remake water sharing plan Lower North Coast

Permission

I would like my submission
to be treated as No
confidential?:

I would like my personal
details to be treated as No
confidential?:

Your details

Are you making a
submission as an individual Individual
or on behalf of an
organisation?:

Which of the following best
describes the kind of Irrigator/farmer
stakeholder you are?:

If you selected other, please
state:

Email address:

Question 1.1

Do you have any comments
on this aspect of the draft
plan?:

Question 2.1

Do you think this is
appropriate? Why / why
not?:

Question 2.2

Do you think this is
appropriate? Why / why
not?:

Question 3.1

Do you have any comments
on this aspect of the draft I support the changes to the lower Barrington/Gloucester River Water Source being
plan?: 10ml/day CTP and 15ml/day recommence at Relf's Road to Rocky Crossing, Lower

Barrington River, The 6mg/day CTP above Faulkland Crossing and the 8ml/day recommence on the Upper Gloucester River Water Source.

Question 4.1

Do you have any comments on this aspect of the draft plan?:

Question 5.1

Do you have any comments on this aspect of the draft plan?:

Question 6.1

Do you have any comments on this aspect of the draft plan?:

Question 7.1

Do you have any comments on this aspect of the draft plan?:

Question 8.1

Do you have any comments on this aspect of the draft plan?:

Question 9.1

Do you have any comments on this aspect of the draft plan?:

Question 10.1

Do you think this is appropriate? Why / why not?:

Yes no effect to volume as water doesn't runoff into dams during drought conditions

Question 11.1

Comments on any aspect of the draft plan:

Question 11.2

Upload a submission or any supporting documents:

No file uploaded

From:

Sent: Tuesday, 22 February 2022 9:11 AM

To: Water Lower North Coast WSP Mailbox <lowernorthcoast.wsp@dpi.nsw.gov.au>

Subject: Water Sharing Plan - Manning River

We hold 2 WAL on Manning River totalling 439 mgs.

In response to call for input on new water sharing arrangements we are quite content with the recommendations agreed to in 2016.

This scheme was managed by our local committee that imposed many pumping restrictions, at various times as needed. These restrictions were adhered to by all licence holders and the scheme worked very well.

We see no reason to depart from a formula that has proved satisfactory to ALL users.

A J and C Perrin

Mount George 2424

From: digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au
<digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au> **On Behalf Of**
digital.services@squiz.dpie.nsw.gov.au
Sent: Wednesday, 23 February 2022 1:51 PM
To: Water Lower North Coast WSP Mailbox <lowernorthcoast.wsp@dpie.nsw.gov.au>
Subject: Submission for the draft remake water sharing plan Lower North Coast

Permission

I would like my submission to be treated as confidential?: No

I would like my personal details to be treated as confidential?: No

Your details

Are you making a submission as an individual or on behalf of an organisation?: Individual

Which of the following best describes the kind of stakeholder you are?: Irrigator/farmer

If you selected other, please state: NSW

Email address:

Question 1.1

Do you have any comments on this aspect of the draft plan?:

Question 2.1

Do you think this is appropriate? Why / why not?:

Question 2.2

Do you think this is appropriate? Why / why not?:

Question 3.1

Do you have any comments on this aspect of the draft plan?: I support the changes to Lower Barrington Management Zone and the upper Gloucester River Water Source

Question 4.1

Do you have any comments on this aspect of the draft plan?:

Question 5.1

Do you have any comments on this aspect of the draft plan?:

Question 6.1

Do you have any comments on this aspect of the draft plan?:

Question 7.1

Do you have any comments on this aspect of the draft plan?:

Question 8.1

Do you have any comments on this aspect of the draft plan?:

Question 9.1

Do you have any comments on this aspect of the draft plan?:

Question 10.1

Do you think this is appropriate? Why / why not?:

Question 11.1

Comments on any aspect of the draft plan:

Question 11.2

Upload a submission or any supporting documents:

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<digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au> **On Behalf Of**
digital.services@squiz.dpie.nsw.gov.au
Sent: Wednesday, 23 February 2022 2:47 PM
To: Water Lower North Coast WSP Mailbox <lowernorthcoast.wsp@dpie.nsw.gov.au>
Subject: Submission for the draft remake water sharing plan Lower North Coast

Permission

I would like my submission to be treated as confidential?: No

I would like my personal details to be treated as confidential?: No

Your details

Are you making a submission as an individual or on behalf of an organisation?: Individual

Which of the following best describes the kind of stakeholder you are?: Irrigator/farmer

If you selected other, please state: NSW

Email address:

Question 1.1

Do you have any comments on this aspect of the draft plan?:

Question 2.1

Do you think this is appropriate? Why / why not?:

Question 2.2

Do you think this is appropriate? Why / why not?:

Question 3.1

Do you have any comments on this aspect of the draft plan?: I support the changes to the lower Barrington & upper Gloucester water source rules.

Question 4.1

Do you have any comments on this aspect of the draft plan?:

Question 5.1

Do you have any comments on this aspect of the draft plan?:

Question 6.1

Do you have any comments on this aspect of the draft plan?:

Question 7.1

Do you have any comments on this aspect of the draft plan?:

Question 8.1

Do you have any comments on this aspect of the draft plan?:

Question 9.1

Do you have any comments on this aspect of the draft plan?:

Question 10.1

Do you think this is appropriate? Why / why not?:

Question 11.1

Comments on any aspect of the draft plan:

Question 11.2

Upload a submission or any supporting documents: No file uploaded

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<digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au> **On Behalf Of**
digital.services@squiz.dpie.nsw.gov.au
Sent: Thursday, 24 February 2022 4:02 PM
To: Water Lower North Coast WSP Mailbox <lowernorthcoast.wsp@dpie.nsw.gov.au>
Subject: Submission for the draft remake water sharing plan Lower North Coast

Permission

I would like my submission to be treated as confidential?: No

I would like my personal details to be treated as confidential?: No

Your details

Are you making a submission as an individual or on behalf of an organisation?: Organisation

Which of the following best describes the kind of stakeholder you are?: Rural industry group

If you selected other, please state: NSW

Email address:

Question 1.1

Do you have any comments on this aspect of the draft plan?:

Question 2.1

Do you think this is appropriate? Why / why not?:

Question 2.2

Do you think this is appropriate? Why / why not?:

Question 3.1

Do you have any comments on this aspect of the draft plan?: I support the changes to the Lower Barrington River Management Zone of the Lower Barrington/Gloucester River Water Source and the Upper Gloucester River Headwaters management zone of the upper Gloucester River Watersource.

Question 4.1

Do you have any comments on this aspect of the draft plan?:

Question 5.1

Do you have any comments on this aspect of the draft plan?:

Question 6.1

Do you have any comments on this aspect of the draft plan?:

Question 7.1

Do you have any comments on this aspect of the draft plan?:

Question 8.1

Do you have any comments on this aspect of the draft plan?:

Question 9.1

Do you have any comments on this aspect of the draft plan?:

Question 10.1

Do you think this is appropriate? Why / why not?:

Question 11.1

Comments on any aspect of the draft plan:

Question 11.2

Upload a submission or any supporting documents:

No file uploaded



22nd February 2022

Regarding: Proposed Water Sharing Plan – Lower North Coast

To Whom it May Concern:

Started in 1980, the Mid Coast Dairy Advancement Group was founded to support the farmers who sought to improve themselves and their farms through innovation, education, and collaboration through a farmer-led association dedicated to 'advancement'. The Association continues to support our dairy farmers on the Mid North Coast through industry liaison, farmer led micro-groups and youth engagement.

The Mid Coast Dairy Advancement Group is supportive of advancing the dairy interest in the north coast area and has concerns that the proposed water sharing plan for the lower north coast will have a detrimental impact to water users, in particular dairy farmers.

We understand the current cease to pump is 31 ML/day at Killawarra bridge, and was the level agreed to in 2016. The new plan has this level increasing to 98 ML/day. Currently water users can begin to irrigate again when the level reaches 50 ML/day but the new plan doesn't allow irrigation to commence until 137 ML/day. To put this into perspective, over the last dryish 10 years irrigators were unable to irrigate from the river for 140 days, under the new proposed levels water users would have not been able to irrigate from the river for over 400 days, which would have significantly impacted business continuity during a period which already saw the loss of many farms.

The dairy industry and associated businesses have suffered from the impacts of COVID, drought and flood in the last couple of years and the resilience of business and local community will be further tested should the proposed changes be implemented.

There appears to be no valid or scientific reason why this change must occur. In the proposed water sharing plan irrigators located in the other sections of the Manning River would not be impacted – as a result of the proposed changes we would have upstream irrigators being allowed to irrigate whilst water users in the lower Manning would not. Additionally, low flows between Barrington and Manning Rivers are similar, which would correlate to an expectation of having similar days of CTP for both systems. This is not the case with the proposed water sharing plan. We believe these examples are not equitable nor fair and reasonable.

In addition, there is concern at the modelling and what information was used to determine CTP. If modelling was used over a 10-year period and it included the 2019 drought (1 in 100-year drought), the outcomes will be distorted. Conversely if there was a very wet period the numbers would also be distorted. It appears appropriate for use of consistency over the timing of the modelling and common data across the catchment.

The Mid Coast Dairy Advancement Group supports the advancement of the dairy industry. The consequences of the Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources (Draft on exhibition) for the economic viability of farmers, ancillary businesses and local communities in our region are of concern. We support the Manning Water Users in their quest for sustainable access to use water for dairy production, growing crops and maintaining businesses which employ locals contribute to state and national food supply.

Yours sincerely

[LUKE CLEARY \(Feb 24, 2022 15:40 GMT+11\)](#)

Luke Cleary

Chair – Mid Coast Dairy Advancement Group

SUBMISSION

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Sources 2022

By

Bradley Johnson

Gloucester Grass Fed meats

Gloucester Angus

Public Exhibition

February 2022

I am concerned with the impact that these restrictions will place on my family ,my business, the businesses of other local community members . I have recently purchased a property that has a water licence for the purposes of growing crops and ensuring that I am able to produce grass fed beef butcher grade for the local community , also including regions, mid north coast, hunter and Sydney.

Our Agri business is reliant on the crop production on our farm for turning out butcher grade grass fed beef. The business 'Gloucester grass fed meats ' will be unable to produce these type of butcher grade beef bodies without quality pastures.

One aspect of the business supports many businesses in the district. We transport cattle with the help of a local livestock carrier to be harvested, these cattle are then processed at the local abbottoir in Wingham. The bodies of beef are then transport by local refrigeration transport contractors to the local butcher. The local butcher employs about a dozen butchers that help cut the bodies up into boxes to be sold . These boxes are then sold to the local community. Just alone in this process there are 4 local businesses that we engage which also employ many Taree/ wingham residence.

The farming of the property also engages other numerous local businesses. The local petrol station is essential for the community and we support it by purchasing our diesel there. This small business has just re-opened also which is a big plus for locals. It means the little business owners can survive without all the big businesses like woolworths and coles taking over then rising prices for supermarket items like what happened to Gloucester. The agricultural seed companies that supply products so that we can plant and fertilise our paddock, fencing contractors for fencing and repairs.Truck and tractor repair centres, local tyre businesses . The list does continue.

These small farming acreages need to run very efficiently to be able to survive. If these regulations are implemented all the farms will be bought and used as weekenders which will dramatically impact communities. Small supermarket stores/ petrol stations, local schools would all cease to trade, It will force people to sell and the local areas will become run down and encourage undesireables.

If we are unable to run our beef production on the manning river with this irrigation we would be forced to find another source of income. The sale of our boxed meat is the only way we are able to keep farming. This small meat box business was started 3 years ago and we were lucky enough to still be able to survive the drought .The drought was extreme, we were lucky to have paddocks that went into drought later and out earlier and were still able to have water for our livestock. The water sharing should not be based on this one occurance as all farmers extensively limited water usage over this period. The cattle prices were at rock bottom during the drought which forced many primary producers extreme hardship. We are hoping this does not happen again with the impact of these new regulations to limit our water.

Endorsement of MWUA Submission

In addition to providing my personal feedback on the Lower North Coast Unregulated and Alluvial Water Sharing Plan and how it affects me, I would also like to endorse the submission made by Manning Water users which addresses many issues.

Issues

Inconsistency - Modelling and Data - Cease to Pump

We are concerned at the modelling and the data used to determine CTP. If modelling was used over a 10-year period and it included the 2019 drought (1 in 100-year drought) the outcomes will be distorted. Conversely if there was a very wet period the numbers would also be distorted. We seek the use of common data across the catchment – my view is there is no consistency over the timing of the modelling and data used across the catchment. I believe the most up to date data needs to be included – I don't believe this has occurred as I am unable to confirm if 2019/2020 data has been used.

Consultation

Public consultation and stakeholder feedback are a crucial component in developing an appropriate WSP. Given that WSPs set the rules 'for how water is allocated for the next 10 years', it is vital that we are given a reasonable amount of time to provide informed feedback on a complex regulatory instrument.

As a volunteer participant with a business to operate, it is crucial we have sufficient time to analyse the materiality of each of these changes and assess the modelling data used.

I am concerned by the inadequate consultation on the water sharing plan. I believe this had led to misinformation about, and misunderstanding of, the water sharing plan.

Water Sharing Plan Objectives

I note the objectives of the Draft Plan —the Act, s 35(1)(b) The objectives of this Plan are as follows— (a) to protect, and where possible enhance and restore, the condition of the water sources and their water-dependent ecosystems, (b) to maintain, and where possible improve, access to water to optimise economic benefits for agriculture, water-dependent industries, and local economies,

I welcome the confirmation from DPIE in the December 2021 webinar that the risk rating for the Manning River health has improved. We note farmers have long been environmental custodians on the Manning.

Economic Impact

I believe there has been inadequate investigation into the economic impact of the proposed water sharing plan on businesses and local communities – see (b) above

I am concerned I have not been able to identify this in a socio-economic study from the department.

It is my view there has been inadequate investigation into the socio-economic impacts of the proposed changes

Impact Reliability

We also note the need to have no net negative impact reliability of entitlements to water users.

Conclusion

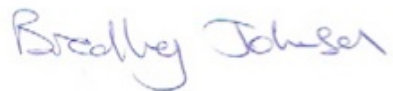
I believe the proposed water sharing plan is inequitable and unjust to the Manning Water Users members.

My view is that the information and data used in the modelling/methodology is inconsistent across the catchment and needs to be consistent.

I recommend the 2016 recommendations be implemented in the 2022 plan.

We would welcome face to face discussion to arrive at an improved water sharing plan.

I hope that this Submission and that of MWUA provides valuable insight that assists with the creation and implementation of the proposed Water Sharing Plan for the Lower North Coast 2022.



Bradley Johnson

From: digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au
<digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au> **On Behalf Of**
digital.services@squiz.dpie.nsw.gov.au
Sent: Friday, 25 February 2022 5:32 AM
To: Water Lower North Coast WSP Mailbox <lowernorthcoast.wsp@dpie.nsw.gov.au>
Subject: Submission for the draft remake water sharing plan Lower North Coast

Permission

I would like my submission to be treated as confidential?: No

I would like my personal details to be treated as confidential?: No

Your details

Are you making a submission as an individual or on behalf of an organisation?: Individual

Which of the following best describes the kind of stakeholder you are?: Irrigator/farmer

If you selected other, please state:

Email address:

Question 1.1

Do you have any comments on this aspect of the draft plan?:

Question 2.1

Do you think this is appropriate? Why / why not?:

Question 2.2

Do you think this is appropriate? Why / why not?:

Question 3.1

Do you have any comments on this aspect of the draft plan?: We support the changes to the Lower Barrington & the Upper Gloucester rivers Management zones

Question 4.1

Do you have any comments on this aspect of the draft plan?:

Question 5.1

Do you have any comments on this aspect of the draft plan?:

Question 6.1

Do you have any comments on this aspect of the draft plan?:

Question 7.1

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Question 8.1

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Question 9.1

Do you have any comments on this aspect of the draft plan?:

Question 10.1

Do you think this is appropriate? Why / why not?:

Question 11.1

Comments on any aspect of the draft plan:

Question 11.2

Upload a submission or any supporting documents:

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<digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au> **On Behalf Of**
digital.services@squiz.dpie.nsw.gov.au
Sent: Friday, 25 February 2022 7:16 AM
To: Water Lower North Coast WSP Mailbox <lowernorthcoast.wsp@dpie.nsw.gov.au>
Subject: Submission for the draft remake water sharing plan Lower North Coast

Permission

I would like my submission to be treated as confidential?: No

I would like my personal details to be treated as confidential?: No

Your details

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If you selected other, please state:

Email address:

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Question 2.1

Do you think this is appropriate? Why / why not?:

Question 2.2

Do you think this is appropriate? Why / why not?:

Question 3.1

Do you have any comments on this aspect of the draft plan?: i support the changes to the lower Barrington river management zone of the lower Barrington/Gloucester river water source.

Question 4.1

Do you have any comments on this aspect of the draft plan?:

Question 5.1

Do you have any comments on this aspect of the draft plan?:

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Do you have any comments on this aspect of the draft plan?:

Question 10.1

Do you think this is appropriate? Why / why not?:

Question 11.1

Comments on any aspect of the draft plan:

Question 11.2

Upload a submission or any supporting documents:

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SUBMISSION

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Sources 2022

By

Christopher John Watson

Kimbriki Angus

Public Exhibition

February 2022

Introduction

We are the owners of Kimbriki Angus at REDACTED INFORMATION. We breed Angus cattle primarily for the seedstock market and to a lesser degree commercial beef production. Our property is approximately 54 hectares and our northern boundary is the Manning River.

We have owned the property since 2003 and run the farm as a family enterprise. We take great pride in our agricultural efforts and we feel that the Kimbriki community is a close one that is of great resilience considering the impacts of recent drought, bushfires and flood. Our entire family have always been alert to the issues of climate change and have always worked to advance and protect the environment in the best way we can.

Whilst we live in Sydney, Kimbriki Angus is a very serious business that we run with a great amount of enthusiasm and effort. All our contractors, staff, resources, and materials are purchased locally, primarily with the benefits of the local community in mind. The Manning River is the "great lady" of the valley, she is awesome in many ways; terrifying when she is raging but usually beautiful when she is placid provide life to everything near to her.

Since commencing the business in 2003 we have ensured that our access to the Manning River has been one that has protected that rich resource. Straight away in 2003 we implemented a riparian zone along our river boundary and ensured that all our stock were trough watered and had no access to the river or creeks on our property. We have a water program that is 100% reliant on rainfall catchment from sheds and our farmhouse, together with pumping from the river to fill our tanks at regular intervals. In the 2019 drought we did not pump water and we purchased water both for stock and our domestic consumption.

My experience with the local landholders and the use of water from the Manning is that they have always been acutely aware of not abusing the access to that resource. Leon Andrews (former Kimbriki dairy farmer), for example, would ring me and tell me what the latest directive was and that was followed to the letter. Farmers in general protect such rich resources as the Manning.

We are a family of four. Audrey, myself, Alex our son (16) and Ellen our daughter (15) we all actively participate in the development and running of the property in a way that ensures environmental practices that advance sound eco systems protection. We do not treat the water we obtain from the Manning as a bottomless resource. We understand that water is precious, and we use it as is necessary. We wish to see an appropriate system of access and usage that is determined on an accurate form of assessment.

We are in agreement with the submissions made by the Manning Valley Water Users Association "MVWUA". The MVWUA addresses a myriad of issues that need some clarity and further investigation prior to any settled policy being implemented.

Cease To Pump

We are concerned at the modelling and the data used to determine Cease To Pump "CTP". If modelling was used over a 10-year period and it included the 2019 drought (1 in 100-year drought) the outcomes will be distorted. Conversely if there was a very wet period the numbers would also be distorted. We seek the use of common data across the catchment – my view is there is no consistency over the timing of the modelling and data used across the catchment. I believe the most up to date data needs to be included – I don't believe this has occurred as I am unable to confirm if 2019/2020 data has been used.

Consultation

Public consultation and stakeholder feedback are a crucial component in developing an appropriate Water Sharing Programs "WSP". Given that WSPs set the rules 'for how water is allocated for the next 10 years', it is vital that we are given a reasonable amount of time to provide informed feedback on a complex regulatory instrument.

As a volunteer participant with a business to operate, it is crucial we have sufficient time to analyse the materiality of each of these changes and assess the modelling data used.

I am concerned by the inadequate consultation on the water sharing plan. I believe this had led to misinformation about, and misunderstanding of, the water sharing plan.

Water Sharing Plan Objectives

I note the objectives of the Draft Plan —the Act, s 35(1)(b) The objectives of this Plan are as follows— (a) to protect, and where possible enhance and restore, the condition of the water sources and their water-dependent ecosystems, (b) to maintain, and where possible improve, access to water to optimise economic benefits for agriculture, water-dependent industries, and local economies,

I welcome the confirmation from DPIE in the December 2021 webinar that the risk rating for the Manning River health has improved. We note farmers have long been environmental custodians on the Manning.

Economic Impact

I believe there has been inadequate investigation into the economic impact of the proposed water sharing plan on businesses and local communities – see (b) above

I am concerned I have not been able to identify this in a socio-economic study from the department.

It is my view there has been inadequate investigation into the socio-economic impacts of the proposed changes

Impact Reliability

We also note the need to have no net negative impact reliability of entitlements to water users.

Conclusion

I believe the proposed water sharing plan is inequitable and unjust to the Manning Water Users members.

My view is that the information and data used in the modelling/methodology is inconsistent across the catchment and needs to be consistent.

I recommend the 2016 recommendations be implemented in the 2022 plan.

We would welcome face to face discussion to arrive at an improved water sharing plan.

I hope that this Submission and that of MWUA provides valuable insight that assists with the creation and implementation of the proposed Water Sharing Plan for the Lower North Coast 2022.

Chris & Audrey Watson

Kimbriki NSW 2429



Chris & Audrey Watson

Kimbriki Angus

SUBMISSION

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Sources 2022

By

KENNETH F and PAMELA M SQUIRES

REDACTED

INFORMATION

MT GEORGE 2424

Public Exhibition

February 2022

Introduction

- The farm came into my family in 1970 as a working Dairy Farm. We took over the farm in 1985 as partnership of KF and PM Squires – this continues to this day.
- We have a current license of 205ML. We grow Lucerne, rye, clover, and kikuyu for grazing and hay silage. We have underground irrigation infrastructure sufficient to irrigate 28 hectares.
- MY COMMUNITY
- We raised 3 children at the farm and my wife and I still reside on the farm and work it.
- We employ local farm labour when required and support Agricultural Machinery businesses from Wingham and Taree.
- We are both involved in local activities at the hall, particularly charity functions. We were instrumental in obtaining television reception for the village under the government Black Spot TV program.

Endorsement of MWUA Submission

In addition to providing my personal feedback on the Lower North Coast Unregulated and Alluvial Water Sharing Plan and how it affects me, I would also like to endorse the submission made by Manning Water users which addresses many issues.

Issues

Inconsistency - Modelling and Data - Cease to Pump

We are concerned at the modelling and the data used to determine CTP. If modelling was used over a 10-year period and it included the 2019 drought (1 in 100-year drought) the outcomes will be distorted. Conversely if there was a very wet period the numbers would also be distorted. We seek the use of common data across the catchment – my view is there is no consistency over the timing of the modelling and data used across the catchment. I believe the most up to date data needs to be included – I don't believe this has occurred as I am unable to confirm if 2019/2020 data has been used.

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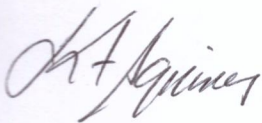
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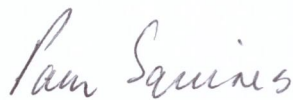
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KEN SQUIRES



PAM SQUIRES

FEBRUARY 26 2022

SUBMISSION

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Sources 2022

By

Peter and Julie Hook

Public Exhibition

26th February 2022

To the Director of the Water Sharing Plan for the Lower North Coast,

We chose to move to the fertile Manning Valley to seek a property on the Manning River with the vision to be able to irrigate pasture and fodder crops to support the production of high-quality angus cattle. We purchased this property at Wingham as it has the fertile soils and a reliable water source that we dreamt of. We have built our enterprise over the past two years and have endured the recent floods and bounced back.

We have invested in world leading genetics from America to be able to produce high quality angus beef. We did this based on the knowledge that we have a reliable water supply which would prevent us losing our genetics during dry periods as we would not have to destock or send to slaughter.

We have recently upgraded our irrigation system to be more water efficient and have produced high volume crops that supports our beef production. Under the current Water Sharing Plan for the Lower North Coast, we can produce silage which helps us to make our operation viable, as we are able to sell our bales to produce income for our enterprise. The proposed changes would jeopardise our lively hood as it would no longer be profitable.

Our enterprise supports local businesses as we choose to seek the majority of our resources locally. We employ local contractors to cut and produce our silage and use local agriculture services when needed. Our family regularly uses local businesses, and our children attend school and participate in sporting activities in the area. As a whole, we are heavily invested in the community and feel that if there is a change to the Water Sharing Plan for the Lower North Coast, we may have to cease our operation and move. For us this would be devastating.

Our family strongly opposes the changes to the Water Sharing Plan for the Lower North Coast and feel that this would destroy our local community and farming enterprise that rely on the river.

Endorsement of MWUA Submission

In addition to providing my personal feedback on the Lower North Coast Unregulated and Alluvial Water Sharing Plan and how it affects me, I would also like to endorse the submission made by Manning Water users which addresses many issues.

Issues

Inconsistency - Modelling and Data - Cease to Pump

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I hope that this Submission and that of MWUA provides valuable insight that assists with the creation and implementation of the proposed Water Sharing Plan for the Lower North Coast 2022.

Peter and Julie Hook

REDACTED INFORMATION

Wingham NSW 2429

Mobile Number: REDACTED INFORMATION

25 February 2022

Lower North Coast WSP Replacement
Department of Planning and Environment -Water
Suite 5, 620 Macauley Street
Albury NSW 2640

Ref: 000/000/XX
Enquiries: REDACTED

Re: Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022

To whom it may concern,

MidCoast Council (Council) is pleased to be able to provide feedback on the Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022 (the WSP).

This submission has been prepared by Council first and foremost as a Local Government Water Utility. Council also plays a role as custodian of the local natural environment and an enabler (or supporter) of economic development in the MidCoast area. We have no objections to the overall intent of the WSP, improved management of environmental flows and support for a better understanding of river system science and an evidence-based approach towards decision making.

The WSP covers the Manning, Great Lakes and Karuah catchments, and covers all of Council's raw water sources, excluding the Nabiac and Tea Gardens Coastal Sands Aquifers. These water sources provide town water for the growing MidCoast area, underpinning the regional economy, which relies on the area's amenity and water assets. Waterways in the region hold significant social, economic and cultural values to the Worimi and Biripi peoples.

We are committed to protecting the environmental values and ecosystem services provided by the Manning, Karuah and Great Lakes water sources; noting that these are core to the social and economic sustainability of our community.

Council makes the following specific comments.

Cease to Pump Rules and Exemptions

We note that Schedule 2, Table B provides for exemption from the cease to pump rules for the following Council owned water offtakes:

- Stroud Water Treatment Plant (WTP) offtake,
- Lansdowne Weir,
- Bulahdelah WTP offtake,
- Bootawa WTP offtake, and
- Gloucester WTP offtake.

Council supports changes to cease to pump rules in the Karuah River during spring and summer to protect the migration of the Australian bass.



We support the thresholds for environmental flow provisions being based on ecological studies that have been undertaken in the various management zones. We question the application of statistical methods in absence of evidence based ecological studies.

Changes to flow classes and flow reference locations

We do not object to the changes to flow classes and flow reference locations.

In-river dams

We note that in-river dams are prohibited on third-order or higher streams in some water management zones (s45); however, the Manning Estuary Tributaries water source is not listed. This water source appears to contain Peg Leg Creek. We seek confirmation of this and that the draft WSP therefore does not prohibit future construction of a dam on Peg Leg Creek.

Council supports prohibiting the construction of new in-river dams on third order or larger streams in the Dingo Creek water source to protect its high instream values. Dingo Creek is confirmed habitat for threatened and flagship species including Manning River Turtle, Platypus, Spiny Crayfish, Giant Barred Frog, Catfish and the Southern Myotis. Modelling confirms that refuge pools in the Dingo Creek system play an important role as drought refugia for aquatic species, protecting biodiversity during drought. (Powell, DPIE 2020).

Diversion from Barnard River Dam

We note that the same extraction limits have been applied to the Barnard scheme (i.e. avg. diversion of 20 ML/year, only divert on 80th percentile flow, no more than 100,000 ML of 5-year period). The previous trigger for Ministerial amendment (i.e. maintain 80% capacity during worst drought) has been removed. The new trigger is “*suspend or adjust the requirements...emergency or maintenance activity.*” (s35(4)). We have no objection to this change.

Access rules for take of surface water - Exceptions

An exception from access rules for the take of surface water is provided in s32(f) of the WSP. It states that “*under an access licence held by the local water utility for Bootawa Dam arising from entitlement 20SL022548 and specified in Schedule 2*”. However, 20SL022548 relates to an entitlement for the Lansdowne river (at the weir). This point should instead include entitlement 20SL046844 to relate to the current Bootawa Dam offtake on Abbots Rd.

Long Term Average Annual Extraction Limit (LTAAEL)

Council supports provision of LTAAELs for standard flows and higher flows and policy provisions to encourage conversion of licenses from standard to higher flows when evidence demonstrates conversion will protect environmental water volume and connectivity during low flow events.

Council supports introduction of compulsory non-urban water metering by December 2030 to help ensure that water extraction is transparent and accountable.

The inclusion of harvestable rights in the LTAAELs is supported, noting that the increase represents a risk to volume of water that reaches the river for environmental water and extraction. Given the increase in harvestable rights, a method to calculate the additional water extracted under the new provisions should be developed as a high priority, to enable evaluation for the 3-year review. This could be included in a revision of the Monitoring, Evaluation and Reporting plan.

Lower North Coast Coastal Floodplain Alluvial Groundwater Water Source

Council welcomes the inclusion of the Lower North Coast Coastal Floodplain Alluvial Groundwater Water Source covering groundwater resources downstream of the tidal limit, given that tidal groundwater dynamics and hydrochemistry can play important roles in



influencing nearshore ecological and environmental systems. Including this water source will improve management of the resource to ensure widespread Acid Sulfate Soils are not exposed to acid leachate events, and to protect freshwater reaches from saltwater ingress.

We support no new licenses being issued for groundwater sources below the tidal limit, to protect ecosystem function in both freshwater and estuarine systems.

We note that the recommendation of the NRC to identify low and medium priority groundwater dependent ecosystems in the WSP and refer to them explicitly as relevant in any groundwater dependent ecosystem (GDE) protection provisions has not been met. We believe that mapping of GDEs and their protection through the WSP should be improved. Identifying and mapping groundwater dependent ecosystems is one of the actions in the Wallis Lake Catchment and Estuary Management Program.

Water Supply Works Approvals

Council supports rules to protect coastal wetlands, noting that management to protect the ecological values of coastal wetlands is a high priority under the Coastal Management Act 2016 and the Coastal Management SEPP.

Communication

We note that, in the past, licence holders were not notified in writing of the changes that apply to them and this is now being addressed. We encourage greater communication and liaison with license holders in the finalisation of the WSP.

Economic Impact

We question how the economic impact of the WSP has been evaluated with the known historical water use.

Thank you for the opportunity to provide feedback on the draft WSP for the Lower North Coast Unregulated and Alluvial Water Sources 2022. Should you have any queries regarding this submission, please contact **REDACTED**.

Yours sincerely,



Adrian Panuccio
General Manager, MidCoast Council
Email: **REDACTED**



From: digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au
<digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au> **On Behalf Of**
digital.services@squiz.dpie.nsw.gov.au
Sent: Sunday, 27 February 2022 1:44 PM
To: Water Lower North Coast WSP Mailbox <lowernorthcoast.wsp@dpie.nsw.gov.au>
Subject: Submission for the draft remake water sharing plan Lower North Coast

Permission

I would like my submission to be treated as confidential?: No

I would like my personal details to be treated as confidential?: No

Your details

Are you making a submission as an individual or on behalf of an organisation?: Individual

Which of the following best describes the kind of stakeholder you are?: Irrigator/farmer

If you selected other, please state:

Email address:

Question 1.1

Do you have any comments on this aspect of the draft plan?:

Question 2.1

Do you think this is appropriate? Why / why not?:

Question 2.2

Do you think this is appropriate? Why / why not?:

Question 3.1

Do you have any comments on this aspect of the draft plan?: We support the changes to Lower Barrington River Management Zone of the Lower Barrington/Gloucester Rivers Water Source

Question 4.1

Do you have any comments on this aspect of the draft plan?:

Question 5.1

Do you have any comments on this aspect of the draft plan?:

Question 6.1

Do you have any comments on this aspect of the draft plan?:

Question 7.1

Do you have any comments on this aspect of the draft plan?:

Question 8.1

Do you have any comments on this aspect of the draft plan?:

Question 9.1

Do you have any comments on this aspect of the draft plan?:

Question 10.1

Do you think this is appropriate? Why / why not?:

Question 11.1

Comments on any aspect of the draft plan:

Question 11.2

Upload a submission or any supporting documents:

No file uploaded

Lower North Coast WSP Replacement
Dept. of Planning and Environment-Water
Suite 5, 620 Macauley St
ALBURY 2640
NSW

27th February 2022

STROUD ROAD 2415
NSW

Email :

Karuah River Water Source in relation to the Draft replacement of the Lower North Coast Water Sharing Plan

I am an active licenced irrigator on the Karuah River which is used to water improved pastures on our dairy farming enterprise. I Deputy chaired the original LNC Water Management Committee which was tasked with developing the original Karuah River WSP prior to 2000. I was also Secretary of the Karuah River Water Users' Assoc. prior to its abandonment with the implementation of the Plan.

Economic impacts of proposed Seasonal Increase in CtP to 9ML/d

The proposed new CtP trigger levels during Jun / Jul and Oct / Nov each year to facilitate fish passage across the Stroud Weir, will have a negative economic impact to irrigated pasture based systems in times of low flow.

This would be especially evident during the Oct / Nov period, as this period coincides with critical rapid spring pasture growth that underpins pasture based farming systems for the following 12 months. The Jun / Jul period, although also critical to supplement newly established autumn pastures with irrigation if required, does not necessarily seasonally occur as frequent as it does during Oct / Nov.

As an illustration, whilst not necessarily being a consideration every year when river flows are sufficient to support irrigation if required, data I have requested from DPIE (the last 11.6 years under the current 2009 plan) illustrates that there would have been for the proposed Oct / Nov trigger period over and above the existing 3.5 ML/d CtP in :-

- 2013 - an additional 14 days of increased CtP
- 2014 - an additional 10 days of increased CtP
- 2017 - an additional 16 days of increased CtP &
- 2019 - an additional 10 days of increased CtP - *17 if including the Jun / Jul period*

Clearly; the increase in frequency of these proposed elevated CtP conditions if adopted; would pose significant production challenges as well as increasing financial burdens upon farmers during seasons of reduced natural rainfall.

Perceived benefits to Fish Passage over the current 2009 Plan

Any proposed additional access constraints to that of existing CtP levels, should involve extensive localised consultation with licence holders, along with the provision of robust data or studies that have historical relevance in documenting declining fish populations and / or distributions throughout the catchment over time – specifically relating to over extraction during very low flow events.

Furthermore, the existence of natural rock cascades and significant riffle sequences both upstream & downstream of the Stroud Weir pool, may or may not naturally challenge the migration of certain fish species, irrespective of the existence or otherwise of the constructed fishway.

After reading through NSW DPI's **Case studies in restoring connectivity of coastal aquatic habitats : floodgates, box culvert and rock-ramp fishway - June 2011**, specifically **Section 4 Case Study 3 : Low-Flow, Partial-Width Fishway Within A Full-Width Rock-Ramp Fishway At Stroud Weir, Karuah River**, the vagaries that surround attaining perceived beneficial outcomes during very low flows become clearly apparent.

As an example, the following excerpt from page 52 of the above document is provided (Please note the reference to *Australian Bass*, as it is relevant in the study's conclusion which also follows) :-

4.3. Methods

The low-flow channel of the fishway was trapped to observe the upstream passage of fish through the fishway over combined diurnal and nocturnal periods¹. Trapping was conducted using a fyke net constructed of 6mm mesh and one 0.4m diameter cone feeding into a closed bag cod-end. Two 5m wide guiding wings (1m drop) were secured to each side of the low-flow channel and weighted to the bottom of the river to guide fish into the cod-end minimise the chance of fish escaping. During each sampling week, the fyke net was deployed for four consecutive 24 hour periods, with trapping alternated between immediately upstream of the fishway exit (Figure 18a) and immediately below the lower cell of the fishway (Figure 18b). This allowed two entrance/exit pairs to be obtained per week of sampling. All together 46 (23 top/bottom pairs) 24 hour samples were collected over two years (2007-2008) between the months of November and April to coincide with the general period of upstream migration of juvenile Australian bass, mullet and smaller species such as gudgeon. All fish trapped were identified, measured (fork length) and inspected for signs of disease before being released upstream of the fishway.

¹*Fish passage at the fishway could be effectively evaluated only whilst flows were constrained within the central low-flow channel (i.e., during flows between 5 and 77 ML.day⁻¹). Due to gear constraints and OH&S procedures, it was not possible to trap the fishway once flows spread along the entire width of the fishway..*

When the above study's stated sampling period is reconciled against actual daily flow data which occurred at the time, it becomes evident that the lowest daily flows briefly occurred on October 18th 2007 with 27ML/d and 18th November 2008 with 21 ML/d.

Yet even at these levels (B Class conditions ie greater than 18ML/d; not even the Very Low Flow Class to which the proposed changes relate; the study concludes on page 62 with :-

The partial-width, low-flow, rock-ramp fishway at Stroud Weir provided passage to a diverse range of species and size classes of native fish and can be deemed to be performing to design specifications during low flow conditions. Passage rates over the flow range sampled are assumed to be higher than what would have occurred in the absence of a fishway where an excessive headloss (up to 1.15m at times) would have prevented any passage. The passage rates observed were higher than those reported for ineffective pool and weir design fishways, but lower than that generally achieved by vertical-slot fishways on coastal rivers. This may however be an artefact of sampling only when flows are constrained to the low-flow partial-width channel. Passage rates may have been higher for some species (such as Australian bass) as discharge increased and the highflow, full-width fishway became inundated or the structure drowned-out (which frequently occurred). However, many other species and size classes may lack the ability to pass this barrier under these elevated flows and the provision of passage for these species and size classes over lower flows will assist with access to upstream habitats. This study did not seek to determine the overall contribution of fishway construction to improve river condition. Future studies need to adopt a BACI-style experimental design to determine larger-scale ecological benefits.

Given the above, it has to be assumed that there must be other studies and data specific to the Karuah River, that more rigorously support the proposed changes through demonstrated justification.

As such, I request that all licence holders along the Karuah River have the opportunity to be briefed on same, before any proposed draft conditions are further considered or adopted.

Licences Exempt from CtP Rules

On looking over the Draft, the listing of Access Licences that are Exempt from CtP Rules (typically Industrial) appears to contain a number that are now redundant, being no longer involved in the production that justified their initial allocation. How are these licences audited for ongoing justification? Does the inclusion of redundant licences within this class have much material effect on very low flow estimates after CtP conditions apply?

MidCoast Council Access to Stroud Weir pool during very low flows

There are at times of very low flow, blatant discrepancies between the right; as per their licence conditions; of MidCoast Council to access water held behind the Stroud Weir during CtP conditions and the overarching obligation on irrigators to maintain environmental flows.

This creates the very frustrating situation where the weir pool has been pumped down to augment MidCoast's off-river storage, which has the direct effect of artificially influencing downstream flows; including across the fishway; and hence readings at the downstream gauging point at Booral.

This drawdown then has the impact of delaying the 'Commence to Pump' trigger on any rising river, as holes downstream of the weir then have to replenish before flows reach the Booral gauge point.

This is extremely frustrating for upstream irrigators, as they have to sit and watch 'valuable' flows run through, which may or may not even reach Booral after firstly having to replenish the weir pool and subsequently the fishway.

It is these situations that question the overall intent of any plans to maintain environmental flows, when maybe the focus should be to financially assist water utilities generally, to expand and further develop their existing off-river water storage infrastructure.

Another complication during low flow sequences that challenges irrigators is the general practice of MidCoast Council to impose blanket levels of restriction across their entire Local Government Area, regardless of catchment.

As MidCoast Council now covers a large geographic area across multiple catchments, this practice in the past, has not accurately reflected an individual river system's ability to support a given level of domestic customer restriction at any given time.

I trust that the above concerns have been articulated sufficiently to stimulate significant consideration relating to actual 'on-ground' impacts and implications verses aspired benefits that may actually not be realistically attained, let alone measured.

As indicated earlier, I feel that no further consideration of the proposed changes should proceed, unless targeted local consultation is undertaken.

I am extremely concerned that very few other licence holders, if any, are aware of the plan's re-development, proposed changes contained within, its impacts as well as the existence of any studies or data that are being relied upon to support same.

I very much appreciate the opportunity to provide input and comment on the Draft currently on exhibition.

Yours Sincerely, _



Rod Williams

From: MARGARET MULDOON

Sent: Sunday, 27 February 2022 3:15 PM

To: Water Lower North Coast WSP Mailbox <lowernorthcoast.wsp@dpie.nsw.gov.au>

Subject: Water Sharing Plan for Lower North Coast Unregulated Sources 2022

G.R.Muldoon

26 February

2022

Dear Sir or Madam,

I am making a submission against the water sharing plan for the Lower North Coast Unregulated Water Sources commissioned by the Department of Planning, Industry and Environment. Firstly I would like to point out that Chinese President Xi Jinping stated that "WE should not Sacrifice growth to protect the environment which is like draining a pond to catch a fish" at the Davos Economic Forum Putting peoples development and livelihood before the environment which this plan does not do.

We have a system where the people elect a committee to administer Dingo Creek and the amount of water to be used for irrigation. This is local people with local knowledge. How can somebody a thousand miles away be making better decisions !

Irrigation was in vogue in 4,200 .BC, if it was not a success then it would not have survived till today. Yet here we have a proposal to severely restrict our ability to irrigate with the aim to send us bankrupt. Back around 2000 the Government took 20% of water allocation away from the farmers. This was the beginning of the end of the dairy industry. We must assure a sufficient supply at acceptable prices of all basic raw materials for the future of mankind.

Environmentalism is just one great lie.

Extinction is part of our system where conservation is not. All species that go extinct are replaced by a higher species in line with Universal Principles based around Energy flux -Density. There are more species today than any time in history. Extinction is a mass event passed extinctions have ranged from 65% to 95% of all species.

These past extinctions have coincided with past ice ages, Yet if we look at the motions of the planet today we are well on the way to the 22degrees mark which is ice age territory.

today's endangered species are threatened more by over zealous people interfering than those who live in the area.

If you people were genuine you would be advocating the need for dams working in harmony with the principles of the universe, in fact your plan is in reverse. In fact this does more to destroy the productive economy.

Nothing breeds the proliferation of tyrannical government more quickly than terrified or stupid people with populist forms of ignorance and narrow minded parochial ideologies

of today's people. what we need is constructive Socratic dialogue.

These meetings should have been open public meetings not over the phone or internet. They needed to be face to face with the people affected allowing them to be able to contribute but instead were put on mute. Covid was a blessing as it allowed you to hide your agenda and no consultation with the people could take place.

We also believe that domestics should be licenced .

What is the total litres allocated for irrigation on the Dingo Creek ?

Yours Sincerely

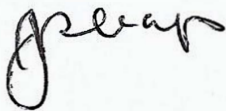
G.R.Muldoon.

Barrington 2422 NSW
27th February, 2022

NSW DEPARTMENT OF PLANNING & ENVIRONMENT
Draft Water Sharing Plans
Lower Barrington/Gloucester River Source

Dear Sir/Madam,

Yes I support the changes proposed to the Lower Barrington/Gloucester River Source being 10ml/day cease to pump, and 15ml/day to recommence to pump above Relf's Road Gauge Gloucester to Rocky Crossing.

A handwritten signature in black ink, appearing to read 'Julie Sleep', written in a cursive style.

Yours Sincerely
Julie Sleep

SUBMISSION

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Sources 2022

By

John (Merv) PRESLAND

Public Exhibition

February 2022

Introduction

Since moving onto our property at Mount George in 2011 we have been producing beef cattle (Stud and commercial) and growing hay for our own use and for sale. The operation supports my wife and myself.

My community

Our farming operation supports the local Mount George and Wingham communities as well as the wider Manning valley community. The income produced stays in the community as we support local businesses in sourcing inputs and other purchases. We supply to Wingham Beef Exports and support local schools in agricultural education.

Endorsement of MWUA Submission

In addition to providing my personal feedback on the Lower North Coast Unregulated and Alluvial Water Sharing Plan and how it affects me, I would also like to endorse the submission made by Manning Water users which addresses many issues.

Issues

Inconsistency - Modelling and Data - Cease to Pump

We are concerned at the modelling and the data used to determine CTP. If modelling was used over a 10-year period and it included the 2019 drought (1 in 100-year drought) the outcomes will be distorted. Conversely if there was a very wet period the numbers would also be distorted. We seek the use of common data across the catchment – my view is there is no consistency over the timing of the modelling and data used across the catchment. I believe the most up to date data needs to be included – I don't believe this has occurred as I am unable to confirm if 2019/2020 data has been used.

Consultation

Public consultation and stakeholder feedback are a crucial component in developing an appropriate WSP. Given that WSPs set the rules 'for how water is allocated for the next 10 years', it is vital that we are given a reasonable amount of time to provide informed feedback on a complex regulatory instrument.

As a volunteer participant with a business to operate, it is crucial we have sufficient time to analyse the materiality of each of these changes and assess the modelling data used.

I am concerned by the inadequate consultation on the water sharing plan. I believe this had led to misinformation about, and misunderstanding of, the water sharing plan.

Water Sharing Plan Objectives

I note the objectives of the Draft Plan —the Act, s 35(1)(b) The objectives of this Plan are as follows— (a) to protect, and where possible enhance and restore, the condition of the water sources and their water-dependent ecosystems, (b) to maintain, and where possible improve, access to water to optimise economic benefits for agriculture, water-dependent industries, and local economies,

I welcome the confirmation from DPIE in the December 2021 webinar that the risk rating for the Manning River health has improved. We note farmers have long been environmental custodians on the Manning.

Economic Impact

I believe there has been inadequate investigation into the economic impact of the proposed water sharing plan on businesses and local communities – see (b) above

I am concerned I have not been able to identify this in a socio-economic study from the department.

It is my view there has been inadequate investigation into the socio-economic impacts of the proposed changes

Impact Reliability

We also note the need to have no net negative impact reliability of entitlements to water users.

Conclusion

I believe the proposed water sharing plan is inequitable and unjust to the Manning Water Users members.

My view is that the information and data used in the modelling/methodology is inconsistent across the catchment and needs to be consistent.

I recommend the 2016 recommendations be implemented in the 2022 plan.

We would welcome face to face discussion to arrive at an improved water sharing plan.

I hope that this Submission and that of MWUA provides valuable insight that assists with the creation and implementation of the proposed Water Sharing Plan for the Lower North Coast 2022.

John Presland



Mount George 2424

SUBMISSION

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Sources 2022

By

Burke Cattle Company, Ivan Burke and Manning cattle
Company

Public Exhibition

February 2022

Introduction

We operate several Farms in the Manning Valley located at Mount George and Cundle Flat both on the Manning River.

- We operate a Beef cattle herd producing live export Wagyu feeder steers for Japan and produce domestically fed steers and heifers for the export markets of the EU.
- Cull animals are processed through Wingham Beef Exports.
- We grow high performance pastures, lucerne and fodder crops for feed and conserved fodder. We rely heavily on irrigation water during spring, summer and occasionally in the Autumn period for crop establishment. The alternate cost of purchasing fodder as opposed to using irrigation water would make our farms unviable.
- We use casual labour and employ 3 permanently. We use contractors extensively during busy times.

My Community

I am currently the chair of the Manning Water Users Association after being a long-time participant in the group through my activities on other leased farms throughout the Manning and Gloucester district. I was an Agronomist in the area for 7 years prior to Managing and subsequently leasing a large aggregation in the Manning exporting over 1000 head of cattle each year. My background is in soil science, high performance pastures, meat science and technology and irrigation engineering.

- My family have a long history in the Manning Valley with my father's farm being in the family over 70 years.
- We have other businesses that are supported by agriculture which rely on agricultural activities being profitable for them to exist into the future.
- We support produce stores, plumbers, electricians, machinery dealerships, irrigation suppliers, accountants, livestock transport operators and many other businesses.

Endorsement of MWUA Submission

In addition to providing my personal feedback on the Lower North Coast Unregulated and Alluvial Water Sharing Plan and how it affects me, I would also like to endorse the submission made by Manning Water users which addresses many issues.

Issues

Inconsistency - Modelling and Data - Cease to Pump

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We would welcome face to face discussion to arrive at an improved water sharing plan.

I hope that this Submission and that of MWUA provides valuable insight that assists with the creation and implementation of the proposed Water Sharing Plan for the Lower North Coast 2022.

Mark Burke, Craig Burke, Ivan Burke

SUBMISSION

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Sources 2

Archinal Farms

Public Exhibition

February 2022

Introduction

We are Bill and Alison Archinal of Archinal Farms,

Bill is the fifth generation (on Mothers side) to farm on our property, a period of 177 years of continuous management.

At the moment we run both cattle and sheep providing Grass Fed Beef and Lamb for customers locally and as far as the Blue Mountains.

Our Business also supplies Wingham Beef Exports and the local Sale yards.

Our direct sales utilise a Wingham Butcher to break and pack.

We support business' in Wingham and Taree for farm inputs as well as personal requirements

Our Business would not have survived the last Drought under the cease to pump arrangements offered by the Draft Water Sharing Plan Proposal for The lower Manning River Water Source

Community Implications

We have two teenage children attending High school in the area, both have part time jobs locally, both are involved in supporting community activities.

Bill is a member of the Mount George recreation reserve Trust and involved with the Mount George Hall Committee.

Bill is a current Board member of Manning Landcare.

Alison is a private Speech Pathologist providing services to an ever increasing case load in the local area.

Endorsement of MWUA Submission

In addition to providing my personal feedback on the Lower North Coast Unregulated and Alluvial Water Sharing Plan and how it affects me, I would also like to endorse the submission made by Manning Water users which addresses many issues.

Issues

Inconsistency - Modelling and Data - Cease to Pump

We are concerned at the modelling and the data used to determine CTP. If modelling was used over a 10-year period and it included the 2019 drought (1 in 100-year drought) the outcomes will be distorted. Conversely if there was a very wet period the numbers would also be distorted. We seek the use of common data across the catchment – my view is there is no consistency over the timing of the modelling and data used across the catchment. I believe the most up to date data needs to be included – I don't believe this has occurred as I am unable to confirm if 2019/2020 data has been used.

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We also note the need to have no net negative impact reliability of entitlements to water users.

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I recommend the 2016 recommendations be implemented in the 2022 plan.

We would welcome face to face discussion to arrive at an improved water sharing plan.

I hope that this Submission and that of MWUA provides valuable insight that assists with the creation and implementation of the proposed Water Sharing Plan for the Lower North Coast 2022.

Name

Alexander William Archinal

Alison Marion Archinal

From:

Sent: Sunday, 27 February 2022 10:02 PM

To: Water Lower North Coast WSP Mailbox <lowernorthcoast.wsp@dpie.nsw.gov.au>

Subject: FW: Barrington Water Users Association Submission

TO WHOM IT MAY CONCERN

The Barrington Water Users supports the changes to the Lower Barrington Water Sharing plan to incorporate the use of the Relf's Road Gauge and adopt a CTP of 10ml/day and a resume to pump of 15ml/day between Relf's Road And Rocky Crossing on the Barrington River.

We have included previous submissions which support this change in the attachments.

Whilst we support this change we are concerned with the consistency and quality of the data used in the modelling and methodology, to determine CTP in the sections of the river above and below the Lower Barrington and particularly the Lower Manning that may impact severely on users CTP in these sections.

We would be happy to further discuss these issues given the limited consultation period and lack of face to face meetings.

Regards

Graham Forbes

Secretary

Barrington River Water Users Assn

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022



Submission form

Office use only		Submission number	
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How to fill out this form

The department is seeking your comments on the draft replacement Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022.

For general background about the draft plan development, proposed changes and the finalisation process please refer to the background and proposed changes documents. For water source specific details including proposed rules, please see the water source report cards.

Key issues and changes have been summarised in this submission form, although comment on all aspects of the water sharing plan is welcome. For water source specific details including rules, please see the water source report cards. More detailed comments are welcomed as attachments.

Send completed submissions to:

Post: WSP Comments for the Lower North Coast Unregulated and Alluvial water sharing plan,
Department of Planning, Industry and Environment
Suite 5 620 Macauley Street
Albury NSW 2640

Email: lowernorthcoast.wsp@dpie.nsw.gov.au

Note: Submissions close 27 February 2022

Information on privacy and confidentiality

Submissions received by NSW Department of Planning, Industry and Environment for the proposed amendments will be considered by the department and the Coastal Water Planning and Policy Working Group to review and inform the draft amendments. The department values your input and accepts that information you provide may be private and personal.

If you would prefer your submission or your personal details to be treated as confidential, please indicate this by ticking the relevant box below.

If you do not make a request for confidentiality, the department may make your submission, including any personal details contained in the submission, available to the public.

Please note that, regardless of a request for confidentiality, the department may be required by law to release copies of submissions to third parties in accordance with the *Government Information (Public Access) Act 2009*.

I would like my submission to be treated as confidential	<input type="checkbox"/> Yes	<input type="checkbox"/> No
I would like my personal details to be treated as confidential	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022



Submission form

How to fill out this form			
Name			
Postal Address			
Telephone			
Email address			
Stakeholder Group <small>(please indicate which of the following best represents your interest by ticking one box)</small>	<input type="checkbox"/> Irrigation Interests <input type="checkbox"/> Fishing Interests <input type="checkbox"/> Local Govt./ Utilities	<input type="checkbox"/> Aboriginal Interest <input type="checkbox"/> Local Landholder <input type="checkbox"/> Other (specify)	<input type="checkbox"/> Environment Interests <input type="checkbox"/> Community Member
If your comments refer to a specific water source, which one?			

Attach extra pages if required

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022



Submission form

New Coastal Floodplain Alluvial Groundwater Water Source

The draft plan proposes to establish the Lower North Coast Coastal Floodplain Alluvial Groundwater Water Source which includes alluvial groundwater below the tidal limit

A new water source is contained in Part 1 of the Plan and in the Lower North Coast Coastal Floodplain Alluvial Water Source report card.

The Lower North Coast Coastal Floodplain Alluvial Groundwater Water Source will be added to the Plan. A long-term limit on extraction is proposed based on a proportion of recharge. Additional water for licensed take could be made available through controlled allocations.

Do you think this is appropriate? Why / why not?

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022



Submission form

Long Term Average Annual Extraction Limit (LTAAEL)

The plan establishes a long term average annual extraction limit (LTAAEL). If there is growth in the amount of water taken in a water source (or extraction management unit) above the LTAAEL, a growth-in-use response may be necessary. The triggers for assessing growth-in-use and the method for responding to this growth are specified in the plan.

These growth-in-use response rules are contained in Part 4 of the Plan.

The replacement plan creates two long term average annual extraction limits (LTAAELs).

- The Standard LTAAEL which sets a limit on extraction from all flows except for higher flows.
- The Higher flow LTAAEL that manages extractions that can only take from higher flows.

The reason for the two extraction limits is to limit extractions from all other flows and encourage extraction from higher flows.

Do you think this is appropriate? Why / why not?

The Standard LTAAEL includes licenced extraction from all flows except high flows and all basic landholder rights extraction including from harvestable rights dams.

If there is a growth in uptake of harvestable rights that increases total annual extraction to above the Standard LTAAEL by more than 5% then there will be reduced water allocated to licenced water users in the following year.

Do you think this is appropriate? Why / why not?

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022



Submission form

Draft access rules for surface water sources

The cease to pump (CtP) rules protect unregulated rivers from risks to the environment from low flows. It is the level on the river/stream at which water users need to cease pumping.

Changes are proposed to access rules in the following water sources:

- Avon River,
- Lower Barrington River Management Zone of the Lower Barrington/Gloucester Rivers Water Source,
- Dingo Creek
- Upper Gloucester River
- Karuah River Water Source

This section refers to Part 6 of the Plan and “Proposed Management Rules” section of the report cards.

How does the proposed CtP level in your water source impact on your current operations?	
Do you think the CtP in your water source is practical to implement? Why / why not?	
Do you think the CtP provides enough protection for low flows? Why / why not?	
The flow reference point is the point at which a CtP will be measured. Do you think this site is appropriate? Why / why not?	

Application for Aboriginal Community Development access licences

It is proposed to permit applications for Aboriginal Community Development access licences in 14 water sources. The plan currently permits applications to be made for Aboriginal Community Development access licences in 6 water sources. Following a review of current conditions and a risk assessment there have been changes to which water sources will permit applications for Aboriginal Community Development access licences.

Further information can be found in Part 5 of the draft Plan

Do you think this is appropriate? Why / why not?	
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Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022



Submission form

Prohibiting in-river dams in Dingo Creek Water Source

The draft plan proposes to prohibit construction of new in-river dams on third order or larger streams in the Dingo Creek water source. This restriction was not previously in place for this water source, however the water source was identified as having high ecological values.

Further information can be found in Part 7 of the draft Plan

Do you think this is appropriate? Why / why not?

Conversion to high flow access licences

It is proposed to allow conversion from a standard access licence to an access licence that can only extract from high flows in 6 water sources. If a conversion is to occur the licence share component would increase by 2.5 times. The plan currently permits these conversions already but there has been a change in volumes available following a review of updated flow data and a risk assessment.

The draft plan has also removed the ability to convert to high flows in the Karuah River Water Source due to their being high ecological values in this water source.

Further information is contained in Part 8 of the draft plan and in the background document as well as the report cards for the relevant water sources.

Do you think this is appropriate? Why / why not?

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022



Submission form

Water supply works approvals

Works such as pumps, pipes, bores and weirs used for extracting water under licence require a water supply works approval. Rules controlling the granting of water supply works approvals or the nomination of water supply works are included in the Plan to minimise impacts on existing extraction and sensitive areas.

These distance rules are contained in Part 7 of the plan.

The plan specifies **distances** from where a new or replacement bore can be located, such as the distance from a contaminated source, a groundwater dependent ecosystem, or a culturally significant site for example.

Do you think these distance rules are appropriate? If not, why?

The plan includes rules that prohibit approval or amendment of approvals for **in-river dams** in water sources with high instream value, or those with high risk to low flow periods.

How would this impact on your current operations?

Works that cause more than minimal impact to coastal wetlands are prohibited under the Plan.

Do you think this is appropriate? If not, why?

Have you noticed any **effects** from extraction on groundwater levels in a water source? If so, please specify.

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022



Submission form

Draft trading rules

Trade rules have been reviewed and it is proposed to prohibit trade into the following water sources:

- Bowman River
- Coolongolook
- Dingo Creek
- Upper Gloucester
- Wallamba
- Myall River
- Myall Lakes
- Karuah River
- Lower North Coast Coastal Floodplain Alluvial Groundwater

Otherwise trade downstream is generally permitted and trade upstream is permitted as long as there is no net increase in share components in the receiving water source

This change aims to reduce potential additional extractive stress to high risk freshwater ecosystems that were identified in the risk assessment undertaken as part of the draft plan development process.

Trading within water sources is also generally permitted apart from some specific circumstances as outlined in Part 8 Division 2 of the plan and individual report cards.

The trading rules are contained in Part 8 of the Plan and in the “Proposed Management Rules” section of the report cards.

Do you have any comment on the propose trade rules in the plan?

Managing the risks of increased harvestable rights

In 2022 the volume of water that can be captured in harvestable rights dams in coastal draining catchments will increase from 10% to 30% of rainfall runoff.

This could impact on the volume of flow that reaches rivers. The plan includes a requirement that the uptake of harvestable rights will be assessed at year 3 and then access and trade rules will be reviewed if the uptake is greater than 10% of rainfall runoff.

The amendment provision can be found in Part 10 of the draft Plan

Do you think this is appropriate? Why / why not?

Draft Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2022



Submission form

Additional feedback

The above sections relate to the key proposed changes from the current water sharing plan. However, comments on all aspects of the plan are welcome and encouraged. Please use the space below, or attachments if required or preferred.

Do you have comments
on any aspect of the
draft plan?

© State of New South Wales through Department of Planning, Industry and Environment 2020. The information contained in this publication is based on knowledge and understanding at the time of writing (December 2021). However, because of advances in knowledge, users are reminded of the need to ensure that the information upon which they rely is up to date and to check the currency of the information with the appropriate officer of the Department of Planning, Industry and Environment or the user's independent adviser.