

Nambucca Water Users & Management Group

19 Cooper Street
MACKSVILLE, NSW, 2447

Facsimile: 02 6568 4415

7th December, 2004.

Mr A J Cox,
Acting Chairman
IPART
PO Box Q290
QVB POST OFFICE, NSW, 1230.



Dear Sir,

Re: Review State Water Operating Licence

In general, our the Nambucca Water Users & Management Group support the submission by the Coastal Valleys Customer Service Committee, however, our main concerns centre around unregulated water users.

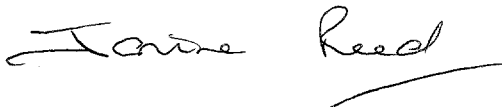
It was IPART who originally and wisely deemed that customer services committees would provide a vital link between licensed irrigators and the then Department of Land and Water Conservation. Therefore, we believe that IPART have an obligation to see that this form of communication be maintained, whether the unregulated systems remain with State Water or revert back to DIPNR.

We make the following points.

- 1 Due to our past and ongoing experience, we would prefer unregulated rivers, etc stay with State Water
- 2 However, if separated from State Water, a similar consultative system to that which presently exists be established with DIPNR – that is a Coastal Valleys Customer Services Committee rather than a North Coast or South Coast committee.
- 3 Consideration is given to the difference with Eastern Fall water at all times.
- 4 Special recognition or classification given to Small Farm Dams. Presently these are classed as unregulated rivers and, by default, would attract a fee eventually aiming for full cost recovery, when, in fact, once a dam has been installed, DIPNR take no further role in the management of this resource. (We have always maintained a user pays system, whereby those installing new small farm dams, over 7 megalitres, pay a fee on approval of the works to DIPNR to cover their costs in such approval.)

- 5 While regulated water users occasionally receive over allocations, with Small Farm Dams and the present harvestable right formula, no system exists whereby irrigators can avail themselves of abundant water supplies during times of excessive rainfalls. (This could be done using the three year rolling average.)
- 6 We are concerned about the lack of resource management with our unregulated river system. Since the establishment of the Coastal Valleys Customer Service Committee, we have endeavoured to determine what resource management is undertaken for our rivers – without success. Recent drought periods demonstrate this lack of management. Irrigators, with establishing crops have had their water access completely restricted without any phasing in or out periods.
- 7 Before considering full cost recovery for unregulated rivers, the claimed costs be substantially verified and, if necessary, audited.

Yours sincerely,
Nambucca Water Users & Management Group,

A handwritten signature in cursive script that reads "Jane Reed". The signature is written in dark ink and is positioned above a horizontal line that serves as a separator.

Secretary.