

Hunter Valley Water Users Association

President
Arthur Burns

Secretary
Scott Wheatley

Submission on Regulation Review Hunter River Salinity Trading Scheme.

Hunter Valley Water Users Association is pleased to have the opportunity to comment on the HRSTS and the review of that regulation. We have been heavily involved in the original design and continued operation of the scheme since its inception.

We have been generally satisfied with the results of the scheme to date and agree that the points raised in the comprehensive discussion paper is well presented and make the following initial reaction.

Of the issues tackled in the proposed remake of the regulation it is important to ensure the original aims of the scheme are not lost or compromised. Of particular concern is some suggestion that the current standard at Singleton (and other points) should be altered to allow more opportunity for discharges. Whilst it is recognised that rising background salinity MAY be reducing opportunities for discharge I believe it would be better to attempt to reduce those background levels and in particular seepages from ground water in areas disturbed by mining. Similarly the effects of mining and discharges into tributaries not covered by the scheme must be controlled to protect the scheme but more importantly to protect the Hunter River and its alluvia's.

Another point that could be considered in any remake is to provide for control of pollutants other than salt to be included if and when further studies identifies them.

To address the issues raised in more detail;

- We consider the current targets must at least be maintained and not lowered.
- More consideration needs to be given to effects of mining and discharges, both directly and indirectly, be better managed and monitored particularly as to the Goulburn River and other areas outside the scope of existing regulation.
- Similarly better monitoring of groundwater throughout the Valley is needed to better understand the cumulative effects of land disturbance.
- Further work needs to be done to protect the Hunter from pollutants other than salt.
- Consideration of additional sensors on existing monitoring stations to monitor PH & TDS & other pollutants
- Any changes to discharge opportunities must ensure no negative downstream effects
- There is room with existing technology to make the scheme more transparent to interested parties, particularly down stream water users. Perhaps summation of mines required reporting on pollution levels could readily available on a central webpage.
- The current restrictions on use of excess auction funds should in the first instance be used for the improvements to the scheme but should also be available for the improvement of the Hunter catchment environment by other means including attention to issues other than salinity, improvement in diffuse pollution, education regarding the scheme but should not be available for unrelated purposes
- Continual use of technology to reduce operational costs of the scheme whilst ensuring certainty in its effectiveness.
- We support consideration of expansion/revision of the Operations Committee but would require full consultation before final recommendations are made

Again many thanks for the opportunity to comment on the discussion paper and we look forward to further comment when the draft regulation goes on exhibition.

Arthur Burns
President
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