LOWER HUNTER AGRICULTURAL WATER USERS ASSOCIATION

Submission on the Hunter River Salinity Trading Scheme

As representatives of the Lower Hunter agricultural Water Users Association (LHAWUA) we thank you for the opportunity to make a submission.

The president & the secretary of the LHAWUA have both been involved in irrigation in the Hunter Valley all our lives. As we are both in "mid life" we are aware of the river pre & post open cut mining.

We are also aware of the conflict between mines & irrigators which gave rise to the Scheme. The objectives of the Scheme to "minimize the impact of saline water discharges from industry on Hunter River water users & the environment" is a laudable objective and one that should be remembered.

Our big issue is that the Scheme seems to operate in the regulated Hunter River without regard to the tidal pool. The highest target in the Scheme is at Singleton at 900 EC – what about below Singleton? There are irrigators there. These irrigators get salt from both directions. On the 4th February 2014 the Ec reading at Singleton was 545Ec & at McKimm's Corner, Maitland, it was 1200. We need to manage that & decision makers higher up the river need to be aware that they are adding to an already salty environment.

Exactly how this "salty environment" operates is the subject of a current estuary study, which is unfortunately not yet ready. We ask that the findings of this study are incorporated into the final deliberations on the Salinity Trading Scheme.

Focus questions 1 & 2 look at the Scheme's effectiveness in managing the impacts on the aquatic ecosystems & the irrigators & other water users.

It appears that the assessment looked at the effectiveness in 3 sections: upstream of Denman, between Denman & Singleton, & between Singleton & Greta…What about the impact below Greta?

The focus question raises the issue of whether the salinity targets should be raised – we say definitely not. It would compound salt issues in the tidal pool. Further, scientific evidence suggests that targets should not be raised.

As to the question of increasing the discharge opportunities – this would not be possible without changing the flow level parameter for discharge. We strenuously oppose changing this parameter.

It is likely that during flood discharges there is no impact on the tidal pool, but there would be an impact during "high flow" discharge.

Our response to the question of low flow discharge is – No & our response to changing the definition of high flow to allow more flows is - No

With respect to the issue of the Goulburn catchment being considered, we believe it should be. It is an area of increased mining & it's geology make it a very saline environment.

With regard to the issue of "other pollutants present in the discharge", it is an issue which is frequently raised by our members. We support the view that further experimental studies would be useful in understanding the environmental effects of different components of saline water discharged into the catchment. Of particular concern are the possibility of heavy metals in the water.

Focus questions 3 & 4 raise issues relating to efficiency & cost effectiveness.

The most important area for us in this area is the flood flows.

a) That the level of discharge does not keep the river higher & longer than necessary…much of the Lower Hunter is flood plain, which means that properties are inundated with water which can not get away until the river goes down.
b) We support the EPA's view that the flood flow exemption should be removed, mainly on the grounds of lacking transparency and devaluing the formal process which needs to be followed at other times.

Focus questions 5 & 6 raise questions of improvements.

We would value transparency with regard to flow events. Scheme participants are informed when a flow event is occurring but irrigators that could be affected are not….we would like to know. Technology is available to make this a fairly automatic process.

Surplus revenues from the auction process should be used to gather as much environmental data as possible to ensure good environmental policies can be formulated & implemented.

General Observations

All the issues relate to saline water discharges by mines. Water is only one of the environmental effects of the mines. There is significant air pollution. Further study needs to be undertaken as to the impact on ground salinity of these particles settling.

For Catchment Health farmers are encouraged to keep 90% groundcover, planning permission has been given so that a significant part of the centre of the catchment along the river is open cut coal mines. This inherently makes the Catchment

unhealthy. Every opportunity should be taken to look at targets for air & water that take into account the bigger picture, which is of an environment that is under threat from mining & urban expansion. Some would say the "tipping point" has already occurred.

Environmental impact statements in the 1970's recognised that mines co-existed with farms & towns. Today an environmental impact statement is unlikely to place any emphasis on farms. The salinity trading scheme is part of the process to enable farms to still be recognised as an important player in the Valley. A player, not only to-day but long into the future after mines have gone. Farming focuses on renewable resources, as opposed to a finite resources.

We do not know the effects of these saline voids which will be left at the end of the mines. We do not know if there is seepage of saline water into the groundwater …there is not enough monitoring points.

It is good that we at least monitor the salinity levels in the river. As irrigators in the tidal pool it is vital decision making information. We are aware that this comes from a number of sources & it is good that the mine discharge is monitored.

Thank you again for the opportunity to make a submission.

Stephen Osborn – President LHAWUA - [redacted]

Julia Wokes – Secretary LHAWUA - [redacted]

6th February 2014