



# Peel Valley Water Users Association Inc

The only organisation that represents the Irrigation Industry in the Peel Valley

---

PO Box 952 Tamworth NSW 2340

[peelvalleywaterusers@bigpond.com](mailto:peelvalleywaterusers@bigpond.com)

Submission to Department of Planning and Environment  
On the Draft NSW Groundwater Strategy

Lodged on behalf of the Peel Valley Water Users Association Inc

Prepared August 2022

## **Introduction**

The Peel Valley Water Users Association is a non-aligned entity representing the interests of about 400 irrigation licence holders in the Peel Valley. The Peel Valley is a comparatively small (but highly productive) valley located in the district surrounding Tamworth. Irrigation in the Peel Valley is used to support a variety of agricultural businesses – principally a fodder industry based on quality lucerne hay and other fodder products, a long-established dairy industry, a burgeoning equine industry, a large and expanding poultry industry, and fodder production for various livestock and stud stock enterprises. Several commercial businesses in the Tamworth area are dependent on the irrigation industry, particularly during dry times.

We are grateful for the opportunity to respond to the Draft NSW Groundwater Strategy, and we offer the following contribution as a means of providing a customers' view on the draft strategy.

### **Comments:**

#### **1. The time frame allowed for a response is too short**

Water users have been allowed 2 weeks to respond to the draft groundwater strategy. Given that the strategy will be implemented for the long term, and given that there are complex issues involved, we submit that a 2 week period for responding to the strategy is too short.

Groundwater users in the Peel Valley were not invited to participate in the development of the draft strategy, so the contents of the strategy document and it's supporting documents are new to us.

Groundwater users in the Peel Valley are not generally able to sit in front of a computer screen and read hundreds of pages of online documentation in a short time frame, because they normally have farming business operations to attend to throughout each day.

We submit that for a document of this nature, a response period of at least 4-6 weeks would have been reasonable for groundwater users.

#### **2. Managed Aquifer re-charge**

The strategy includes a proposal to adopt 'managed aquifer re-charge', whereby water from sources such as stormwater run-off are intended to be pumped into an aquifer for re-use at some future date.

We have serious concerns with this proposed practice, for the following reasons:

- (a) We have been provided with no evidence that this practice would actually work in the Peel Valley alluvium. For example, hydrologists have previously indicated that the groundwater in the Peel alluvium is constantly gradually flowing downstream. If that is the case, water that is pumped into the alluvium may not be available for re-use at a later date, so the practice may not achieve its intended outcome. More consultation between the proponents of this proposal and the impacted groundwater users is required before the proposed practice can be accepted by the impacted parties.
- (b) Groundwater users in the Peel Valley are dependent on the water quality of the resource for stock and domestic purposes, as well as irrigation. Several large intensive poultry farms and other livestock enterprises in the region rely exclusively on groundwater as their only source of water for their stock. We have been provided with no evidence that appropriate standards for treating the water used for re-charge purposes will be either established or monitored on a regular basis.

- (c) We are therefore seriously concerned that there is a high probability that the adoption of 'managed aquifer re-charge' will inevitably lead to the contamination of the aquifer. Such contamination would not only render the water source unsuitable for stock and domestic purposes, and possibly also the irrigation of stock feed, but it may also irreversibly damage the myriad of micro-organisms that are known to exist within the various layers of the Peel alluvium.
- (d) We are therefore of the opinion that the 'managed aquifer re-charge' proposal is contrary to the strategy's "Strategic Priority 1" – namely to "*Protect groundwater resources and the ecosystems that depend on them*".

### **3. Possible reductions in Available Water Determinations (AWD's)**

The strategy outlines the possibility of reductions in groundwater AWD's in certain circumstances.

We are not aware of any information in the strategy which applies to the Peel Valley groundwater source, and therefore we are concerned that there could be unforeseen consequences in this region.

It would be appropriate for the Department of Planning and Environment to actively consult with groundwater users in the Peel Valley on any proposed changes to AWD's prior to any proposed changes being implemented.

### **4. Implementation of the NSW Groundwater Strategy**

We urge the Department to consult with groundwater users more actively during the implementation of the strategy, and to make access to information more readily available to all groundwater users on an ongoing basis. Currently, groundwater users – including fractured rock licence holders – experience difficulty when seeking information or responses to queries relating to licencing issues, or obtaining relevant facts from hydrologists in the Department. This is further complicated by the involvement of both Water NSW and Departmental staff in many of the licencing functions, and there is an absence of consultation and transparency during this process.

In addition, the provision of the Strategy document and two other supporting documents in an electronic form only, without the provision of printed documents, makes a review of the draft documents difficult and tedious. We recommend that a printed version of all detailed documents of this nature should be provided in addition to any online electronic versions.

## **Conclusion**

Whilst we welcome the intentions of the Department of Planning and Environment to more closely manage the groundwater resource, we recommend that regarding the Peel Valley, further detailed consultation with groundwater users and their representative water user groups should be undertaken before the implementation of any proposed changes such as 'managed aquifer re-charge', or changes to the existing calculations of groundwater AWD's.