

## Email submission to Review (personal details redacted)

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G'day Reviewer

I ask you to consider the following critique of the February 2019 "Initial report on the Independent review of the impacts of the bottled water industry on groundwater resources in the Northern Rivers region of NSW" by the NSW Chief Scientist & Engineer.

1. the report is biased as are many NSW-centric reports in branding our region as high rainfall. No, this region has the normal rainfall it's always had (plus or minus a little for climate change). It is blessed through that with a cleaner and wetter environment than average NSW. That is not a reason however for this region to give up more of its water than is environmentally sustainable. That amount could be zero. Despite the false notion of this area being "wet", sustainable flows and sustainable groundwater volumes have not been adequately investigated.
2. the question of environmental sustainability is deferred to our Water Sharing Plans, documents derived under government driven skewed criteria and with insufficient data on the water resources and on environment. I was on committees that derived such plans at the turn of the millennium. Similar committees derived parallel plans in western NSW, leading to the running of those rivers to nearly dry (like the Darling River).
3. the Terms of Reference are alluded to in the Executive Summary at paragraph 2 but should be published at the front of the document. The non-publishing of ToR's is standard but poor practice.
4. the Alstonville Plateau has been treated in the past the same as Australia's Great Artesian Basin. It is now heavily depleted and probably remains over-licensed. Nobody has properly investigated the environmental impacts, like those of the depleted dry weather flows in creeks draining the Plateau. The Plateau actually needs a Restoration Plan. Rous Water also hold licences giving it priority, probably over any environmental limits.
5. the Executive Summary lists observations including Key Issue 1 that extraction for bottled water is only 0.5 percent of the water licensed to other extractors (or 0.9 percent if current DA's were approved). This is the standard 'pirate' argument "I only want a tiny bit so it's OK".
6. it is not good enough to compare regional and localised extraction. We value our water environment more than that.
7. will the industry cease extraction in drought years? Can it survive on that basis?
8. Key Issue 2 says truck movements will grow from the current 128/week (or about 230/week if current DAs were approved) but this is a regional

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figure. Language around these issues is unsympathetic and dismissive of local impacts. If we always sacrifice some local areas "for the greater good" there will one day be no local area left.

9. Key Issue 3 (plastic bottles) is dismissed with "there are no viable alternatives". This reflects a very narrow sighted NSW Chief Scientist & Engineer. They must both have blinkers on. There is at least one alternative in the re-filling of own bottles. There is a huge movement in this area in that direction.

10. Key Issue 4 is about metering but fails to ask the question of who will administer the metering. The state needs to step up, except that we don't trust those bureaucrats (they sold out the Darling River).

Cheers, Duncan  
(Civil Engineer, hydrologist)