

The Wakool Landholders Association represent 350 Landholders in southern NSW . The Landholders in the Wakool District are predominantly irrigators, and water is supplied from Murray Irrigation Limited and the Wakool, Niemur and Edward Rivers.

The Wakool area has had a history of high water tables, in 1960 there was 7200 ha with water tables within 2 m of the surface and by 1975 this had increased to 47,500 ha at risk of high water tables. The Wakool Tullakool Sub Surface Drainage Scheme commenced operations in 1982 to combat the threat of salinity in the district and to minimize the effects on downstream users and the environment.

The Wakool Landholder Association appreciates the need to formalise a water Sharing Plan for the Lower Murray Shallow Groundwater Source; however we have serious concerns about the potential risks associated with the new fees and charges placed on the shallow groundwater pumping.

It is well documented about the effectiveness of the Wakool Tullakool Sub Surface Drainage Scheme (WTSSDS) in controlling water tables in the area. Areas have come back to life and Landholders have been given a second chance to farm on land that was once decimated by salinity.

The Wakool Land and Water Management Plan identified the beneficial effects of groundwater pumping on the shallow regional water tables. There was even an incentive scheme introduced to encourage Landholders to pump from these shallow bores. The consultants that put together our sub surface drainage report proved the relationship between shallow pumping and the impacts on water tables as one for one, that is; pump one meg from the shallow aquifer is one meg out of the water table. The water in the Wakool District is generally of poorer quality; therefore to encourage Landholders to use these bores would benefit the region.

Flooding has been identified in our Land and Water Management Plan as the major contributor to water table rise. We must not fall into the trap of a false sense of security; the recent floods have had a marked impact on water tables already. The Basin Plan and the watering of all these environmental assets will create an enormous pressure on our water tables. For example the watering of the Koondrook Perricoota forest will have a larger effect than would be the

case under a natural scenario. We are sure this hasn't been considered in the risk profile of the MDBA, to flood these vast areas unnaturally must increase the potential water table rise and hence salinity in the future.

The present energy costs to operate these bores create enough hardship at present, any further costs or potential cost would undermine the potential advantages of shallow groundwater pumping.

Our Association would be supportive of a scheme that exempts these shallow bores in our area from fees and charges, similar to the exemption provided to MIL for the WTSSDS.

We must not get complacent, water tables and salinity will rear its ugly head again and every effort to combat these effects must be encouraged.

To achieve a common sense approach to water table control the Wakool Landholder Association appeal to the ACCC to consider scrapping the fees and charges on these shallow bores.

Yours faithfully,

David May (Chairman)