

rely on this method as there is currently no means of accurately measuring the volume of water extracted through floodplain harvesting.

Trading zones and prohibition of trade between zones is to be supported if this leads to greater regulation of extraction and more surety when it comes to provision of water for the environment. It is essential that areas of high environmental value are protected from over extraction. This includes protecting Held Environmental water from extraction.

We cannot, however support the proposed replication of unregulated river account management rules (3 year rolling average.) Access to floodplain harvesting in unregulated rivers should be restricted to annual access rules to maintain consistency with rules across all river systems in the Gwydir catchment,

As stated above, ECCO supports these rules in part with some serious reservations. We still object to the fact that Government has seen fit to control floodplain harvesting by allowing it to continue. We feel that the main thrust of the rules are for the benefit of those who seek to exploit and control water which should be for the environmental health of the river system. We are also concerned that the rules appear to promote water as a commodity that can be traded, bought and sold , rather than a scarce resource that belongs to us all. We also ask that there should be an embargo on all floodplain harvesting until proper infrastructure to monitor and measure the amount of water extracted from the practice is installed.

Yours sincerely
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Secretary, ECCO