

SHADOW SCRUTINY PANEL
Draft Water Resources (Jersey) Law
Comment on 'Final Submission on Behalf of E&PSC

This document deals with a number of issues raised at the Shadow Scrutiny Panel hearings. I believe the following comments may be appropriate:

Water Scarcity Issue

My spoken comments to the Committee were based on a qualitative inspection of the list provided. The 'entirely **new**' comments could only be made following analysis of the web site from which the table originated which provides the origin of the tabulated numbers and which was not provided by E&PSC.

These tabulated numbers are based on a water use pattern based of 69% agricultural, 8% domestic and 23% industrial usage into which the only input number is 100 l/head/day domestic usage. They suggest a total annual water use for Jersey of just over 40 million cubic metres.

The actual use pattern for Jersey (from the BGS reports) is close to 64% domestic (at 200 l/head/day), 17% agricultural and industrial and 19% hotels and services. These indicate a total annual water usage of just over 10 million cubic metres.

This latter figure is consistent with Jersey New Waterworks Company supply figures of close to 7 million cubic metres per year.

E&PSC neither discuss nor rebut this point nor does Mr Evans. I fully concur with Mr Evans point that there is 'no room for complacency'.

Water from France and Deep Groundwater

I believe that this issue can only be resolved by study and investigation and I do not accept that the 23 line 'Technical Analysis' presented in the BGS Overview Report constitutes a summary of such a study.

The 1991 BGS Report presents a listing of 138 boreholes and an estimate of their 'discharge', 16 of these are more than 60m deep. No further information or analysis is presented. Nor is any assessment of the chemical data in the context of borehole depth or construction made (there may not be sufficient data to permit this).

The 1998 Report (p9) dismisses deep flow paths in a single paragraph and states that no evidence is presented by Baudins et al (1993) to support the statement that there are 'many such sources'

The Scrutiny Panel will hear the views of the 1994 Groundwater Review Group on October 14

I believe that on these issues the 'jury is still out' and if the Scrutiny Panel regards them as relevant to the need for water resources management legislation then they should be investigated further.

SSP Letters

The Trinity Catchment Study, as reported in the BGS 1998 Report, increased the estimate of natural recharge from the equivalent of 48mm/year to 132 mm/year in an average rainfall year. This effectively reduces baseflow and use demands from close to 100% of average annual recharge to just under 50%.

The latest BGS Report (for 2002) shows no long term evidence of falling groundwater levels or declining water quality.

It is perhaps in the context of these data that the proposed legislation and its prioritisation should be considered.

Stuart Sutton