Adrian Tomlinson
PO Box 9124
Alice Springs
NT 0870

3 October, 2025

Andrew Johnson

Controller of Water Resources
Via email:water.licensing@nt.gov.au

Dear Andrew,

Objection to renewal of Groundwater Extraction Licence – Rocky Hill Table Grapes J A Hayes Land Pty Ltd, 3125 ML/yr , Alice Springs Water Allocation Plan area

I am writing to request that you do not renew the above licence which expires on 6 October, 2025 and that you also recommend that this water be re-allocated to public water supply when the Alice Springs Water Allocation Plan is updated.

The reasons for my objection are as follows:

1. Unacceptable interception of throughflow and depletion of finite stored groundwater that is needed for Alice Springs' drinking water.

Notwithstanding the ethical, cultural, environmental and intergenerational inequity issues associated with mining stored groundwater, Alice Springs' town water supply relies upon the same Amadeus Basin aquifer that this licence draws from.

This source is rapidly diminishing. This licence has, and will, take from the water available for drinking water supply. This means the public will wear the major cost of extending groundwater scheme assets and developing new sources of drinking water sooner.

Public water supply is clearly a more important consumptive use than marginal agricultural activity. Given the public water supply will be exhausted within a century the entire groundwater resource should be allocated for public water supply, not just a fraction of it. This will hopefully be confirmed when the Alice Springs Water Allocation Plan is renewed.

Compared to when the original decision was made, it is also now clear from groundwater levels that groundwater flow at this site is towards the Roe Creek borefield and the future (even closer) Rocky Hill borefield. This knowledge makes stopping this extraction in this area more important then when the initial licence was issued. It is inappropriate to base your decisions on allocations in the water allocation plan when it is clear the assumptions upon which these were founded no longer apply.

2. Water quality impacts

Studies[1] have shown that infiltration of irrigation water at Rocky Hill Grapes will flush salts stored in

[1] https://fac.flinders.edu.au/items/6e0b5815-15be-4cfd-93b0-5fbaf3e6c392

the vadose zone to the groundwater table. Also salts left behind by irrigation will concentrate and risk also being flushed to the groundwater system.

Whilst contaminating freshwater groundwater resources is always objectionable this is particularly reckless upgradient from a rare arid zone public drinking water source.

3. Pattern of unused entitlements

I understand that the licenced entitlement has never been fully used. I'm unsure why the unused water entitlement rules have not been applied. In making your decision please consider the fact that this valuable entitlement has not been used. This suggests it offers a negligible benefit to the licence holder, a resource that is desperately needed for drinking.

4. Accessing <500mg/L water which should have been set aside for drinking water.

I understand the original intention of the entitlement was for it to only extract groundwater of quality less than 500mg/L total dissolved salts. This is a fanciful condition because it is unenforceable. The fact it is being breached means that the best quality potable water in the Mereenie Aquifer is being taken for a marginal agricultural activity.

5. The initial licence expected unknown risks to be considered prior to renewal

The original licence was initially issued for a 10 year period, with the decision made in the absence of important data. It was recognised that the short duration limited these risks. If the risks from this licensed activity were not appreciated before, it is now abundantly clear now that the risks to volume and quality of groundwater needed for drinking water are major and unacceptable.

Thank you for your consideration.

Kind regards,

Adrian Tomlinson