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To Whom it May Concern,

Submission - Draft Alice Springs Water Allocation Plan

Thank you for the opportunity to make comments on the draft plan.

For the reasons and objections outlined below this is a very concerning plan which I object to in its current form.

There is still an opportunity to proactively address the issues with the plan. This requires ongoing public involvement via a Water Advisory Committee in finalising the plan.

In considering the submissions please recognise that the existing plan is the product of ongoing collective community investment and commitment. I feel there has not been sufficient respect paid to the existing plan settings, which have been carefully developed and evolved. Any changes should therefore build upon the current arrangements rather than degrade them.

1. Process

The draft plan was prepared without a Water Advisory Committee (WAC). There does not appear to have been any meaningful alternative mechanism to invite public input during the development of key aspects of the plan, e.g. objective setting, trade-offs and risk evaluation.

I strongly object to this because:

- Not convening a WAC is inconsistent with the recommendation and overriding theme of the previous WAC (Alice Springs Plan Review Water Advisory Committee).
- Does not honour commitments made in the Territory Water Plan to build 'Trust and Confidence' - 'Engage Territorians in water management and decisions to build confidence and foster a shared understanding'[1].
- A WAC is the best approach given the complexity of this plan with so many aquifers. This makes it better suited to being worked through in a committee situation.
- The draft proposes substantial changes in approaches, priorities and allocations from the current plan.

[1] https://watersecurity.nt.gov.au/_resources/documents/territory-water-plan.pdf (refer p15)

- Not convening a WAC invites inconsistency with National Water Initiative guidance which emphasises the importance of public involvement in objective, risk setting and plan development stages:
  'The development of a water plan is a joint responsibility between the relevant agencies, users of the plan and the general public. Stakeholders should be consulted during all aspects of the development of the water management plan, particularly during the setting of objectives (and the trade-off assessment) and the risk identification/evaluation.

  Clear communication, information availability and documentation of the consultation process should be features of the risk assessment and management plan development.'[2]

I am also concerned by the Department's claim that there was no community interest in a Water Advisory Committee. When the opportunity was advertised on social media I contacted the department and did not receive any follow up. I understand three people put themselves forward. The failure of the department to reach out to former WAC members attests that the department's efforts were not proactive.

The fact at least 60 people attended a public meeting at short notice, shows this community has an abiding interest in water allocation plans.

It is clear there was insufficient time at the community meeting for the public's many questions to be raised, let alone answered. My perception of the tenor of the meeting, which was corroborated by everyone I spoke to after the meeting, was that there was considerable concern with the draft plan and that the concerns were not allayed by the information provided.

Many people also indicated that they found the issues difficult to understand sufficiently enough to give informed feedback.

It was disappointing that the Department in its social media framed this public meeting as an effective consultation and made light of the issues raised by focusing on things like the age of attendees, rather than acknowledging that there was considerable community concern, which was reflected in the large attendance.

2. Mistakes and and confusion during consultation

The plan contains many mistakes and what must be acknowledged as controversial changes (e.g. dropping groundwater management zones), which have not been vetted by any informed stakeholders prior to release.

This all puts an avoidable and upsetting burden on the public to make submissions. It is also hard to comment on a plan with unknown elements and potentially inappropriate changes that could have been curtailed by an advisory committee prior to release of the draft.

[2] https://www.dcceew.gov.au/water/policy/policy/nwi/guidelines-water

Examples of mistakes in the draft that went out for comment/ seemed to change along the way, making it hard to comment include:

- Water for Aboriginal Economic Development being erroneously calculated based on a fraction of the total consumptive pool not the smaller pool of water allocated for licensed economic use. This means the public is considering a very different proposition (i.e that a higher fraction of water allocated for licensed economic uses will be available exclusively for eligible Aboriginal people than is actually the case.) This has different social and political implications to allocations of water for general economic use, so it will affect the feedback that is received.
- Town Basin
    - Incorrectly includes 1000 ML/yr allocation of water for public water supply, which was retracted on the night of the public meeting (avoiding stronger criticism) but subsequently reinstated as 800 ML/yr allocation for industry.
    - A large and obviously incorrect allocation for aboriginal economic development 700 ML/yr.
    - ESY is unclear as it seems to be reverse engineered to accommodate desired allocations to consumptive uses, rather than working forward from what is available after sustaining key environmental and cultural values and considering the aquifer's capacity.

To address the issues raised in (1) shortcomings in (2) there is an urgent need to set up a WAC to advise on responding to submissions on the draft and finalising the plan.

A WAC could reach agreement on a final plan quite quickly. Establishment of a WAC would recognise the care and concern that has always been shown for water in the Plan area and the importance of water to people living in arid and semi-arid areas.

3. Neglects the recommendations of the previous water advisory committee

Please see a copy of the minuted recommendations of the previous Alice Springs Plan Review Committee (Attachment 1). The following recommendations have not been heeded.

No.	**Recommendation**	**Comment**
2	Quality of drinking water is not adequately protected	Refer parts 4, 5, 6. While water quality is acknowledged in the risk assessment I argue risk are increased through merging and loss of groundwater management zones, increased allocations and failure to implement concrete measures to protect water quality now.
3	Wanngardi and Town Basin environmental values and ES are not adequately defined and there is concern about over allocation	Refer parts 4 & 5
6	A water advisory committee is needed On an ongoing basis	Refer parts 1 & 2

	With no long gaps between meetings	
7.	The plan should provide a decision making framework t assist the Controller in decision making. It needs to identify the values and priority weightings and be based on cost benefit analysis and modelling .	This is urgently needed and not supplied. By merging management zones in the Amadeus Bas there is even greater uncertainty for the Control and greater reliance on section 90 consideration
12	Formal representation of water advisory committees in the development and implementation of water security policies and in preparation and renewal of the plan to ensure local and regional variances, issues and concerns are incorporated.	Refer part 1 & 2

4. Shallow aquifers - Town Basin

Broad recommendations

- ***I dispute the rationale behind the proposed ESY.***
- ***A modest ESY is the principal way to protect GDEs. The proposed ESY is too large. It is historically without precedent and has been derived using a flawed and unconvincing rationale. The water available for licensed extraction under an ESY should be no more than 1000ML/yr. Any more will lead to greater risk of harm to GDEs, including sacred sites and will cause water quality problems. Increasing the ESY removes the signal that groundwater use at the golf course is excessive and should be being reduced, not increased.***
- ***While the fundamental protection should be via sustainable allocations as we never know when the river will next flow, the 8 mBGL depth to groundwater conditions (or with bespoke variations to match GDE needs) is required on extraction entitlements wherever these draw from shallow groundwater. This condition is needed to protect all groundwater dependent trees not just rivergums and not just along Lhere Mparntwe.***
- ***Water for Aboriginal Economic Development as already noted is incorrectly calculated. Once corrected this should be shown as 'Notional' given the system has been identified as over-allocated. Note also there are challenges in accessing groundwater in the Town Basin given it is a densely populated area, the aquifer yields and quality are variable and there are multiple known contamination plumes.***
- ***Management of buffel grass and other threats (e.g. loss of surface flows to coolibah areas) like Ankerre Ankerre are also needed if efforts to protect GDEs and cultural values are to be successful.***

I expand on these points below.

4.1. Dispute the rationale for defining the estimated sustainable yield

The account for how the Town Basin ESY is calculated, is described in the background report as follows: 'The Town Basin ESY is set using a conservative water balance approach, adjusted to safeguard ecological assets (river red gums), cultural values, and water quality **[objection 1]**, while recognising the need for controlled drawdown in an arid zone supply system **[objection 2]**. Long-term monitoring of water levels (since 1952) informed understanding of recharge responsiveness and ecological thresholds **[objection 3]**.'

I outline the reasons for my three objections to this description below.

Objection 1 'adjusted to safeguard ecological assets (river red gums), cultural values, and water quality'

Ecological assets are not protected by the proposed ESY. The existing level of extraction already exposes them to risk. (Discussed more below and in my comments on the risk table.)

There is nothing to protect water quality. Salinity is greater towards the margins. The strategy of controlled drawdown and increased extraction will pull this groundwater in.

Water quality is not accounted for. The plan does not address the risk of drawing the known hydrocarbon plumes towards extraction areas (refer figure[3]).

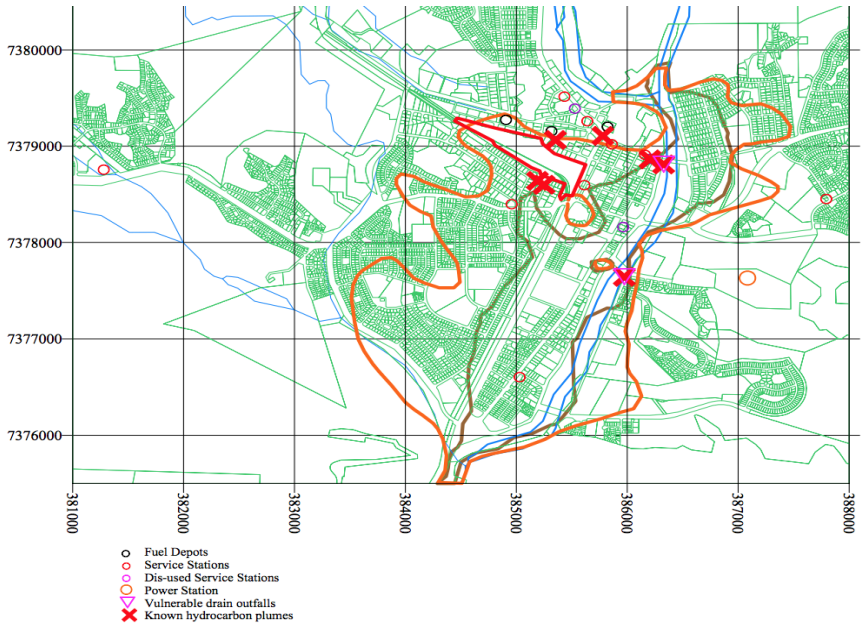

Figure 22 Hydrocarbon storages and plumes

Objection 2 claim ESY recognises the need for controlled drawdown in an arid zone supply system'

Controlled drawdown is inappropriate in a shallow alluvial aquifer which has been subjected to ongoing extraction for many decades, with limited storage and is replenished by occasional river flows.

Objection 3 Claim **'**Long-term monitoring of water levels (since 1952) informed understanding of recharge responsiveness and ecological thresholds'

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3 https://environment.nt.gov.au/media/docs/strategy/alice-springs-water-resource-strategy/WRA03042-AS-Town-Basin_.pdf

Long-term monitoring as described in the Draft Alice Springs WAP Background Report states *'Although major recharge events in 2001, 2011 and 2017 produced temporary rises of 2 to 5 m,* ***water levels have shown an overall declining trend since their peak in the mid-1970s*** *following an exceptionally wet climatic period (Figure 6).'*

An overall declining trend' is no reason to increase the ESY!

4.2 What the ESY should be

There is every reason to suggest current extraction is too high and that there is no room to increase the ESY.

1. Alice Springs Town Basin, Review 2003 Report No.: 42/2003A[4] shows the proposed ESY of about 3,000 ML/year, greatly exceeds historical use, which peaked at around 1300 ML/yr prior to transition of the town water supply to the Roe Creek borefield.

Historical pumping:

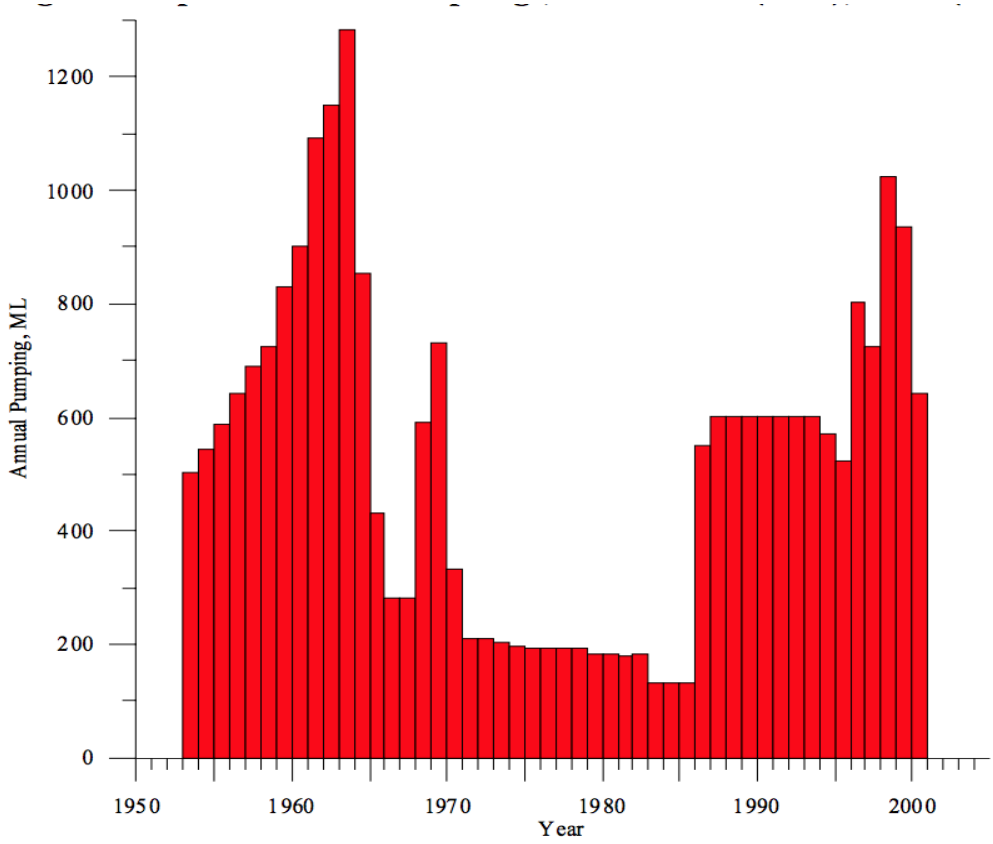

Figure 9 Pumping from the Town Basin

4 https://environment.nt.gov.au/media/docs/strategy/alice-springs-water-resource-strategy/WRA03042-AS-Town-Basin_.pdf

2. The same report highlights that in the past aquifer recharge may have been subject to aquifer replenishment from public water supply and sewerage system leakage.

The report states '*PWC is not able to account for 2000 ML/year pumped into the town area. Much of this may be due to problems with meters, but if say one quarter of it is leakage this would represent a large increase in recharge to the Town Basin.'*

3. Alice Springs Town Basin Water Availability Final Report - June 2020 was prepared in response to concerns that groundwater extraction was excessive

This report included the recommendations:

- *Consider reducing the total amount of water ASGC can extract from the Town Basin, subject to groundwater modelling, and provide a subsidy to support the Golf Club supplement its water needs by purchasing potable water from PWC.*
- *Consider increasing the supplementation or completely replacing the non-potable Town Basin water supply with potable water from Roe Creek during periods of extended drought when water levels in the basin within the Todd River Corridor approach the 8 mBGL threshold.*

4. The Alice Springs Plan Review Committee was concerned that the ESY was too high (see Attachment 1).

The ESY should be absolutely no more than it is currently set at (adjusted for changes to unlicensed use estimates). It is safe to say existing extraction levels have been cause for concern, and that the aquifer has been consistently regarded as probably over-allocated.

4.3 Groundwater dependent ecosystems (GDEs)

GDEs occur beyond the river corridor and often have the same environmental and cultural significance. The depth to gw threshold should be applied to protect these ecosystems as well.

As previously noted, the depth threshold is a secondary protection to a safe ESY. We do not know when the rivers flow and levels will continue to decline even without pumping.

I am also concerned that in future years rates of decline in aquifer levels should be expected to increase due to climate change and associated increases in evapotranspiration losses.

4.4 The draft plan fails to consider water requirements of groundwater dependent vegetation in residential areas

It appears to me that residential plants are also sometimes groundwater dependent (e.g. jacaranda trees and eucalypt/corrymbia species like lemon scented gums) and this contributes to urban amenity. This vegetation frequently thrives in shallow groundwater areas and I believe exhibited the same signs of stress in 2019-2020

Increasing extraction therefore also places these domestic plants at risk. From my own perspective as a land holder this is very concerning that if aquifer levels or groundwater quality were allowed to decline, the enormous *Corymbia citriodora* in our front yard's health would be diminished and it could completely fall or drop limbs on our house.

4.5 GDEs are already under stress

It is widely recognised (e.g. Lhere Mparntwe Management Strategy) that rivergums are in poor condition and being damaged by buffel grass and or fire. We do not need further causes of decline in ecosystem health.

4.6 Unsuitability of much of the aquifer for extraction and Aboriginal Economic Development

All reports on the Town Basin aquifer show that much of the aquifer contains groundwater of lesser quality and is low yielding and away from the central areas. The aquifer and its situation within an urban setting are not suited for significant expansion of extraction. I am concerned that the opportunities for Aboriginal Economic Development are being overstated and unreasonable expectations may be created.

The Strategic Aboriginal Water Reserve Policy framework should be applied in accordance with the policy - i.e determined as a fraction of the allocation for economic development and shown as notional until water is recovered from licensed entitlements to with the ESY.

5. Shallow aquifers - Wanngardi and Inner Farm Basin

The Inner Basin and Wanngardi Groundwater Management Zones should be retained with the same ESY and amount of water available for extraction current plan.

My reasons are as follows:

- Removal of groundwater management zones creates unacceptable risks to groundwater dependent ecosystems. In Wanngardi, the large trees in White Gums are environmentally significant and revered for their majestic beauty. The area does not have access to reticulated supply. Although there are few extraction licenses, many people have domestic bores. Some groundwater users already need to cart water when aquifer levels are low. It should be recognised that the Wanngardi Management Zone has been important in ensuring groundwater use and land development is compatible with groundwater availability.
- In Inner Farm Basin, Ntaripe, Heavitree Gap is described as second in importance (of the sacred places) in the area[5]. I understand many of the groundwater dependent river gums are registered sacred sites. The Pitchi Richi Sanctuary is also located in an area where vegetation is groundwater dependent.
- Removal of the Inner Farm and Wanngardi zones as well as creating an expectation of more groundwater licenses, could lead to more subdivisions with associated unlicensed use.

[5]Brookes, D. *A Town Like Alice - A guide to the Dreaming tracks and sites of Alice Springs* https://www.iadpress.com.au/products/a-town-like-mparntwe

- Removal of the Inner Farm and Wanngardi zones could also lead to incompatible land use planning. Land use plans can give effect to plans and policies made under the Water Management Act but are limited to include water resources considerations where these are not expressed in water legislation or policy.

Water Quality Risks

Inner Farm Basin - I am concerned about water pollution risks from the Alice Springs tip, wastewater treatment plant (WWTP), and persistent irrigation of treated wastewater at Blatherskite Park horse agistment area (this may be concentrating salts in shallow groundwater and I notice eucalypts and corkwoods east of this area look unhealthy) to the Inner Farm Basin and the WWTP to the Outer Farm Basin also.All these sites warrant investigation and ongoing monitoring.

Wanngardi - There is a diversity of industrial activity occurring on rural lots as well as sand mining operations. Contamination in this area could impact Mereenie Aquifer via Roe Creek contamination as well as contaminate alluvial and underlying aquifers.

The need to protect shallow groundwater quality is another reason to retain the Wanngardi Basin Groundwater Management Zone.

6. Amadeus Basin aquifers

6.1. Opposed to merging management zones, aquifers and water quality partitions into one allocation

I am concerned that:

- Combining the Roe Creek and Rocky Hill Groundwater Management Zones into one management zone;
- Removing individual aquifer allocations for each of the three main aquifers;
- Removing the strategy of reserving the best quality water for public water supply; and
- Increasing the ESY to accommodate more economic use;

will all serve to reduce the security, cost and quality of public drinking water supplies.

For this plan the absolute priority must be recognition that groundwater accessed by the Roe Creek and future Rocky Hill Borefields is extremely rare and vital to Alice Springs. This groundwater is:

- Fresh;
- Close to Alice Springs;
- Drawn from unusually high yielding part of the aquifer;
- Drawing upon historical groundwater storage that is being rapidly depleted

Giving this water away for other licensed uses and exposing the aquifer to associated contamination risks is an irresponsible folly. It is neglectful treatment of stored groundwater that has been in place for thousands of years. This groundwater should be preserved in the same quality and to the greatest extent possible for future generations.

Allocating water for lesser uses will also increase public water supply costs.

Furthermore, the Department has not

- demonstrated that the three aquifer systems Mereenie Aquifer System, Pacoota and Shannon/Goyder are significantly connected close to the Roe Creek Borefield (in particular);
- Completed its aquifer protection strategy;
- Sought the advice of a water advisory committee, or it seems even the water utility in changing an established approach to groundwater allocation.

I therefore seek a retain the old management zones and allocation approach

This plan should also be used as an opportunity to set aside all of the water for public water supply.

6.2 Risk of additional groundwater extraction from Amadeus Basin aquifer from outside of the new Mereenie Management Zone

It appears that the Mereenie Aquifer groundwater management zone as proposed does not cover the full extent of the plan area which is occupied by Mereenie/Hermannsburg, Pacoota and Shannon/Goyder aquifers. (These aquifers extend southwards across the syncline.) While the proposed management zone appears to include the shallowest and highest yielding parts of the aquifer, the management zone needs to cover the entire aquifer system to ensure the integrity of the allocation strategy and avoid risks from unexpected licence applications. As this is all the same system in which public water supply is the priority no additional groundwater should be available from the aquifers in these areas.

(Note the risk of groundwater being sought from the aquifers outside the proposed management zone is significant given application of Northern Territory Water Allocation Planning Framework could allow major water licenses to be approved in the same aquifer system, the Territory does not charge for groundwater taken for private use and there is enormous global demand for groundwater and phenomenon of loss of aquifer water to the oceans[6].)

Recommendation

The full spatial and depth extent of the Mereenie/Hermannsburg, Pacoota and Shannon/Goyder aquifers within the Alice Springs Plan Area should be in the groundwater management zone(s).

6

https://www.livescience.com/planet-earth/climate-change/like-a-creeping-mold-thats-spreading-across-the-landscape-separate-dry-areas-around-the-world-are-merging-into-mega-drying-regions-at-an-alarming-rate-study-finds

6.3 Source protection/groundwater pollution risks

This plan is not doing all it can to protect the quality of the vital groundwater in the Amadeus basins. While the aquifers are comparatively deep, they do receive some recharge and are therefore vulnerable to contamination.

Aquifer remediation in this setting is not an option. The plan must therefore do all it can to protect drinking water now.

This requires:

- **Avoiding incompatible land uses in recharge areas including the alluvial aquifers (Inner farm, Outer farm and Wanngardi Basins)**
- **Water Act amendments to provide for drinking water source protection measures are urgently needed.**
- **Not allocate water for incompatible beneficial uses**
- **Proactive monitoring and management of high risk land activities**

I expand on each below.

Avoiding incompatible land uses in recharge areas, including the alluvial aquifers (Inner farm, Outer farm and Wanngardi Basins)

Risk avoidance is the best form of source protection. Unfortunately the opportunities to restrict land uses are weak because the NT does not have public drinking source protection legislation. The Mparntwe/Alice Springs Aquifer Protection Study, while helpful is not sufficient in itself to protect aquifers from pollution.

I am concerned that development 'South of Gap' is concentrating incompatible land uses (i.e. industry) and building people pressures within these recharge areas.

An all of Government prioritisation of the need to protect Mparntwe's drinking water sources and recharge areas from contamination is urgently needed. Compatible land uses described in the Northern Territory Planning Scheme.

Water Act amendments to provide for drinking water source protection are also urgently needed.

Not allocating water for incompatible beneficial uses where the water is needed for public water supplies.

Water should only be allocated for the beneficial use of 'public water supply' in the capture zone of existing and future borefields. As well as making rare arid zone water last longer, it reduces the risk of contamination from irrigated agriculture (contamination, mobilisation of salts from unsaturated zone, recirculating and concentrating salts in irrigation water, inducing ingress of brackish groundwater from further afield.)

I am very concerned by the Rocky Hill Table Grapes operation and recent licence renewal (which I opposed). Depletion of groundwater levels to the west has led to reversed groundwater gradients (refer Schedule F of the background report). This means this activity is now not only mining groundwater needed for public water supply, with no royalty, but also that any groundwater contamination it causes will move towards existing and future public water supply borefields. This is a huge risk to the entire resource with no upside for the public interest. This groundwater entitlement needs to be returned for the benefit of the public and future generations urgently.

Allocations to the beneficial uses like industrial and Petroleum Activity should also not be provided for from the Amadeus Basin aquifers for the same reasons (i.e. contamination risks and water needed for public water supplies).

Proactive monitoring and management of high risk land activities

Soil and groundwater monitoring of existing contamination risks and greater attention to on site activities are needed. This is critically needed at the airport and raceway.

6.4. Confused use of the term Mereenie Aquifer System

In the plan and background report the interchangeable use of Meerenie Aquifer System to refer to the Mereenie/Hermannsburg aquifer and elsewhere the three aquifers is confusing.

6.5 Misleading Framing

The FAQ document reports that '*the Mereenie Aquifer System will be reduced by approximately 2% over 100 years'.*

This claim can only be sustained by increasing the size of the management zone covering the Roe Creek borefield and merging groundwater quality categories used in calculating groundwater storage. However it does not change the fact that aquifer levels are steadily declining in public water supply borefield.

Even more alarmingly the FAQ document in response to its question 'Is water use in Alice Springs sustainable?' states 'Yes'.

Clearly groundwater extraction from the Mereenie Aquifer is not sustainable. The closest, freshest, highest yielding water is being taken. This groundwater is not being replenished at anything like the same rate as it is being taken and aquifer levels are already profoundly reduced.

Claims like this are inaccurate and unhelpful to attaining informed feedback on the plan. The claim muddies the messaging about the importance of the need for frugality water use. They disrespect the intelligence of the public and do nothing to build trust.

7. Concerns with risk tables

Risk	Event Scenario/claim in risk table	My concern and recommended response
Reduction in groundwater levels decline below acceptable levels.	Regional loss of key environmental values in shallow alluvial aquifers e.g. river red gums in Town Basin. & Regional loss of key Aboriginal cultural values in shallow alluvial aquifers	I disagree with the claim that 'drought is common and GDEs are adapted'. This is a bold claim, made without evidence. These ecosystems are largely developed with continuous access to groundwater, even in times of drought. As found in the Western Davenport Water Control District, GDE vegetation frequently has larger diameters and older trees, because the presence of shallow groundwater allows this vegetation to traverse drought periods. GDEs also function as ecological refugia in drought times. While the Alice Springs WAP background report reports periods of low groundwater tables ending in the early 70s, it does not demonstrate that these lower levels were not associated with negative impacts on GDEs and tree deaths. Furthermore this water allocation plan should be designed for current ecosystems and conditions, not those from over 50 years earlier. My experience of from a recent drought/ low groundwater period (2018-2020) was that vegetation was becoming stressed/nearly died/and some trees may have died in shallow groundwater areas where the aquifer basement was higher e.g. near the hospital, or where extraction bores were close to more brackish groundwater (Traeger Park). Some older trees were especially vulnerable. Away from the shallow groundwater areas there were widespread tree deaths. In 2019 alone, five percent of Alice Springs' street trees died.[7] Furthermore many rivergums are already significantly stressed for other reasons i.e. frequently being lost to fire due to buffel grass invasion. Removing access to groundwater increases this stress burden. The risk to key environmental and cultural values are

[7] https://www.theguardian.com/australia-news/2019/dec/18/too-hot-for-humans-first-nations-people-fear-becoming-australias-first-climate-refugees

Risk	Event Scenario/claim in risk table	My concern and recommended response
		not mitigated but greatly exacerbated in this draft plan by the removal of the Inner Farm, and Wanngardi GMZs, increased ESY in the Town Basin and failure to include depth to groundwater condition to protect GDEs in all shallow alluvial aquifers. To address my concerns: ● Management Zones are needed for all alluvial aquifers, ● depth to groundwater conditions are required on extraction entitlements wherever they draw from shallow groundwater ● ESYs must be conservative and no more than those in the expiring plan ● Management of buffel grass and other threats in any GDE areas is also needed.
Deterioration of water quality greater than acceptable levels.	'Why it can happen' column underestimates risks from extraction drawing in brackish/saline water in both Amadeus Does not acknowledge the risk pathway that overextraction in alluvial aquifers causes salinisation by drawing brackish water quality. As noted PWC bores have shown salinity can deteriorate in times with low aquifer levels and may already affect health of coolibahs at Traegar Park. Does not consider risks of increased and new extraction sites drawing contamination plumes towards sensitive receptors Does not consider risks from inappropriate land use planning	Loss of management zones in Amadeus reduces controls on where groundwater can be taken Increased extraction in Town Basin invites greater risk of inducing less quality water mobilising brackish groundwater and hydrocarbon plumes of which several are well known. Removal of groundwater management zones invites inappropriate land use planning as land use plans and development assessments can take into account statutory plans and policies made under other legislation (e.g. groundwater management zones and plans which establish an area is fully allocated) but cannot be expected to implement more stringent water resources protections than reflected in water resources policies and plans.
Deterioration of water	The plan increases this risk by	Removal of the management zones

Risk	Event Scenario/claim in risk table	My concern and recommended response
quality greater than acceptable levels - insufficient quality for rural stock and domestic use in shallow alluvial aquifers.	removal of Inner Farm and Wanngardi basins and increasing ESY/opportunity for more licensed extraction for economic uses in the Town Basin	creates a greater likelihood of subdivision removes the opportunity to negotiate compatible land use zones in the NT Planning Scheme. Especially in Wanngardi this means more unlicensed use should be expected because there is no scheme water.
Insufficient quality for public water supplies drawn from deep aquifers.	The stated 'management in place' and mitigations are too vague. 'Power and Water Corporation has a water quality monitoring program and that is shared and reported' is insufficient. When contamination is detected in the borefield in this very deep, slowly recharged aquifer it is too late for remediation.	The implementation actions are vague and do not have any tangible actions. Risk avoidance is the best form of protection from pollution. Unfortunately the opportunities to restrict land uses are weak because the NT does not have adequate source protection legislation. The plan should therefore do everything in its power to avoid incompatible land uses and mitigate contamination risks. This requires: ● Allocating water only for the beneficial use of 'public water supply' in the capture zone of existing and future borefields. ● Soil and groundwater monitoring of existing contamination risks - most notably the airport and raceway. ● Compatible land use planning in the Northern territory Planning Scheme ● Compatible land uses/protection zones in the outer Farm Basin and also Wanngardi Basin.

8. Water Policy concerns

8.1 Aboriginal Water Reserve calculations

The calculations of the Aboriginal Water Reserve are inconsistent with the methods described in the 2017 Strategic Aboriginal Reserves Policy Framework[8].

As noted already this is disappointing and frustrating as it means consultation has occurred on the wrong proposed allocations.

To minimise the risks from consulting on the wrong allocations any reductions in allocations for Aboriginal Economic Development that are needed to bring them in line with the policy framework should be reallocated for non-consumptive uses (environment).

8

https://nt.gov.au/_media/docs/environment/water/water-management/announced-water-allocations/SWRC-Policy-Framework_A4_V1.pdf

8.2 Trade

I was advised that trade between groundwater management zones in the plan was not allowed. This is supported as it would be extremely problematic if rights holders were to trade entitlements across management zones as each management zone is discrete and managed in different ways.

The plan should explicitly state that trade between management zones is not allowed, as the management zones are for discrete resources; and the Amadeus Basin allocations are already based on mining the aquifers.

8.3 Renewal of extraction licenses when the plan expires

It was very concerning that the Controller of Water Resources approved the largest private extraction entitlement (Rocky Hill Grapes) in the plan area for a full 10 years just prior to the release of this draft plan, despite this entitlement not being fully used and the licence accessing better quality water than its allocation permitted.

This approval is a barrier to refining allocation approaches via this plan.

To avoid this situation happening again the plan should include guidance for the Controller that any extraction licences issued should expire at or before the expiration of this plan and that conditions be placed on entitlements requiring licence renewals upon an update of the water allocation plan.

9. Supporting measures

9.1 Healthy ecosystems need more than access to groundwater. Water dependent ecosystems are threatened from buffel grass, diversion of runoff and sedimentation. The Department should prioritise other actions needed to care for groundwater dependent ecosystems to ensure this plan is effective.

9.2 Demand management - make this rare ground last through complementary strategies to reduce water demand.

Thank you for your consideration. I would welcome the opportunity to discuss the issues raised in this submission.

Kind regards

Adrian Tomlinson
I live on Central Arrernte lands, the sovereignty of which was never ceded.

Attachment Major recommendations of the Alice Springs Plan Review Water Advisory Committee

Twelve major recommendations:

1 Implement mechanisms and stretch targets to achieve demand reduction via /efficiency/water use/re-use to extend the life of the resource, including addressing disincentives to efficiency e.g. licensing caps or "use it or lose it".

2 The quality of the drinking water resource is not sufficiently protected.

3 The Wanngardi Basin and Town Basin environmental values and estimated sustainable yield are not adequately defined and there is concern about over allocation.

4 Surface water resources are not effectively managed. (Environmental values that should be protected should not be limited to river gums in the river corridor.)

5 There is a lack of integration in management activities to protect water resources across government and community. It requires:
   a. communicating a meta narrative (i.e. an overarching account or interpretation of events and circumstances, including connection with past plans and strategies)
   b. a governance structure for these activities
   c. a governance structure for Aboriginal representation in plan implementation
   d. a Water Forum.

6 A water advisory committee is needed:
   a. on an ongoing basis
   b. with no long gaps between meetings.

7 The plan should provide a decision-making framework to assist to Controller in decision making. It needs to
   a. identify of values and priority weightings
   b. be based on a cost benefit analysis and modelling.

8 An overarching "water story" is needed to form the basis of a communication and engagement strategy (including environment, culture and water efficiency and could be in different forms e.g. art).

9 There are gaps in legislation which limit the Controller's ability to achieve the outcomes of the plan (in particular the relation of mining and petroleum legislation and the Water Act was discussed).

10 Licence holders do not feel they have sufficient security and certainty about licence conditions (salinity bands in the Amadeus Basin) and their continued access to their entitlements.

11 Improved confidence in water availability estimates by incorporating the latest science and updating aquifer models is needed.

12 Formal representation of water advisory committees in the development and implementation of water security policies and in preparation for renewal of the plan to ensure local and regional variances, issues and concerns are incorporated.