Jacqueline Arnold
PO Box 9124
Alice Springs
NT 0870
Email: jacqueline.arnold77@gmail.com

16/12/2022

To Whom it May Concern,

I submitted my survey response to the Georgina Wiso Water Allocation Plan on Friday 16/12/2022. I indicated in the survey that I would provide some of my responses in an email. Please find these below.

I appreciate the opportunity to comment.

Regards,
Jacqueline Arnold

Background Report

1. I identify as an interested NT resident.

Given the previous NT Minister for Environment and Water Security's response to my concerns relating to the Western Davenport Water Allocation Plan I do not trust that my 'interest' in this plan as an NT resident will be fairly considered.

I ask the recipient of this survey to respond to my concerns with an outline of how the categories presented above will be used to inform the NT Governments response to this survey.

2. Which of the following describes how you access water in the plan area?

I access the water that flow through the plan area as:
- A resident of country intimately connected to the plan area
- A regular visitor to Roper and Flora Rivers and Mataranka and Bitter Springs. I have been visiting for more than 40 years, these places are extremely important to me.
- A member of the public (and therefore lessor) of pastoral lands

Access to this water provides me with:
- Provisioning services - traditional food and medicines
- Cultural services - identity, cultural diversity, knowledge systems, educational values, inspiration and spiritual fulfilment, aesthetic enjoyment, social relations, sense of place, cultural heritage and recreation.
- Supporting services - assimilation or accumulation and cycling of energy and nutrients

5. Did you find the Background report easy to understand?

- It would have been easier to understand if all three 'core documents' were contained in one plan rather than separated. This format, which requires going back and forth between them, is messy.

- The grammatical errors were distracting.

- The poor referencing limited my ability to verify a lot of the information
    - Many claims not referenced
    - Some references not correct e.g. the date for Short, M is 2019 not 2018
    - At least one reference is not available e.g Maggu et al 2022
    - At least one references does not yet exist e.g. Maggu et al 2022 (in progress)

6. Do you have any feedback you would like to provide about the background report?

- The cover should not depict the private commercial interests of one stakeholder. This is a public document, it should depict public interests (culture and environment) or at least all interests. This image favours one group and is unnecessarily divisive.

1. Overview
- It seems the term 'Aboriginal Land' is used in the report to describe Aboriginal Free hold land "approximate 13% of the plan is recognised as Aboriginal Land". I understand all land where native title exists is legally Aboriginal Land. I also consider all of Australia, which has not been ceded, to be Aboriginal Land. The limited use of the term in this report needs explanation in order to be acceptable.

- Where is the evidence / references for the claim that "approximately 56,000 ha of versatile lands in in the Dunmarra and Barkly North are appropriate for a range of broad-acre irrigated agriculture"? (The number 52, 000 is used in section 6.5).
  Publicly available documents state:
    - 14 831 ha has been deemed suitable in the Dunmarra District
    - the Barkly North soil and land suitability assessment has not been completed / published

  If there is evidence for this claim it needs to be published so it can be verified.

2.1 All three 'core documents', including the 'background information' should be incorporated into the WAP – see answer question 13 below.

2.2
- Is Newcastle Waters in the Georgina or Wiso Basin (the report states the town is in both)?

- Why are industrial / colonial (pastoralism and mining) land uses the only land uses described in this section?

3. Water Resources
Overview
- Foundational data and knowledge about the water resources in the plan area is clearly lacking. This needs to be improved before, not after, the plan is approved.
- Even though there are no perennially flowing waterways within the plan area, the groundwater feeds perennially flowing waterways outside the plan area. The impact on these should be made available for consideration. The Roper and Flora River and Mataranka and Bitter Springs are very important places for me. It's clear from 3.6.1. that this plan will impact them. These impacts should be properly described.

3.2.1 Information on how climate change will impact consumptive and non-consumptive water requirements (will they increase as it gets hotter?) needs to be included.

4. The key environmental values to be maintained and managed should occur before the plan is put in place, not during the implementation of the plan.

The background report gives no real information on which to assess risks, let alone how these will be mitigated.

5. Work to identify cultural values and sites must be completed before the plan is put in place.

5.1. The sentence "industrialisation of the Northern Territory has the potential to lead to rapid and significant loss of traditional Aboriginal ecological and cultural information" ignores the massive loss that has already occurred due to industrialisation. This loss (which this plan builds on) should be acknowledged in this document.

A comprehensive assessment of the cultural impacts of any water use, including, but not limited to gas industry, must be completed prior to the completion of this plan and any licensing.

6. What is the evidence that supports that claim that 40% of recharge can be taken safely?

6.3. The risks to the Aboriginal Water Reserve or how these will be mitigated should be described.

6.4 This section described current Water use by industry only, it fails to describe cultural and environment uses, as well as use by tourism (i.e. in national parks, at Mataranka and Bitter Springs)

6.5.1 Is 56 000 ha (overview) or 52 000 ha (noted here) suitable?

Why would marginal land even be considered for this purpose? What is the justification for such land use?

General

- The lack of attention to detail does not inspire trust or confidence (which community consultation on the Strategic Water Plan has highlighted is lacking)
    - There appears to be many major gaps in current data and knowledge as acknowledged in the report, for example:

    3.4.3 – "limited…data that is available for the plan area…Further data will be required to establish the baseline…"

    3.6.1 – "recent studies…may provide valuable understanding of these processes"

<u>Water Allocation Plan</u>

7. Do you find the water allocation plan informative?

No.

I understand the argument to pull out background information and place it in a separate report, however the consequence is this plan (the only statutory document involved) is little more than headings, generalised statements and allocation numbers in a single table.

As such the plan provides no actual guidance for predictable, safe management.

The plan is missing major sections that I reasonably expect to see in a water allocation plan under the National Water Initiative, including:

- Water Advisory Committee consultation
- An objective for ecological values
- An objective for cultural values
- Considerations of risk and uncertainty
- Implementation and monitoring plans (including performance monitoring)
- An adaptive management framework

The plan continuously states that information (particularly in relation to environment and cultural impacts) will be collected and made available to the public later (in many cases not for years). This is not acceptable. This information must be made available for the community to consider before the plan is finalised.

8. Do you find the water allocation plan easy to understand?

No, the plan did not provide enough information to support understanding of the rationale for, or consequences of, this allocation.

10. Do you have any other comments about the purpose and objectives for sharing water?
3.1 Environment is defined in the Act as "all aspects of the surroundings of humans" not "aspects of humans". This is quite a significant difference!

3.5. It took me a while to work out that the rural and domestic and public water supply allocations were subtracted from the total allocations before the Aboriginal water reserve was calculated. This should be described so it's easy to understand.

Although it is outside the scope of this plan, I would like to state that:

- *stock should not have a right to water. This is an outdated colonial right that should be abolished.*
- *The right of humans to water should be recognised with reference to sustainable population limits.*

There doesn't seem to be any rationale provided in this 'plan' or the background document to justify the amount allocated to the environment.

12. Do you have any other comments about the estimated sustainable yields and allocations to beneficial uses?
What is the evidence that supports that 40% of recharge can be taken safely?

Rural stock and domestic has only increased by 500 megalitres – how does this estimate fit with plans for significant increase in pastoral production in the region (these increases are used to justify many land clearing licences issued by the NTg in 2022)?

13. Is there anything else you would like to tell us about the water allocation plan to help improve it?

3.3. Cultural values should be documented and protected before the plan is finalised.

5.2 The advice of a Water Advisory Committee representing public interests should be received before the plan is finalised as per the National Water Initiative, which states that water plans are "developed in consultation with all relevant stakeholders'.

At a minimum information much more information is need on:

- environmental and cultural values and impacts and how risks will be mitigated
- management zones that guide where water can be taken, thresholds values that cannot be exceeded and allocations for environment and culture (as it stands this plan seems to make the entire Georgina and Wiso basins one giant management zone, which I trust is not the case).

It seems the NTg is trying to avoid the chance they may have to legally defend this plan by removing almost all content from the statutory plan component. It is very concerning that the NTg does not feel confident that it can defend its decisions. This is not the way to rebuild community trust and confidence.

Implementation Actions

15. Do you have any other suggestions to improve the implementation actions?

All of these actions need to be completed before water is allocated / licences are issued.

Summary

It is reasonable to expect water allocation plans to be prepared in accordance with expectations set out in the National Water Initiative, including advice from a Water Advisory Committee and protection for ecological and cultural values.

The issues with this plan have been clearly and thoughtfully pointed out by leading water experts. The consequences of poorly planned water allocation are widely understood by the Australian public.

For the NTg and DEPWS to recover any credibility the plan must be immediately withdrawn.