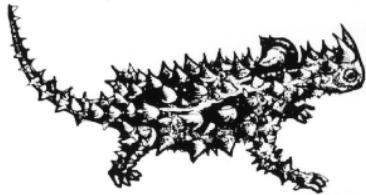


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Alice Springs Water Advisory Committee Submission to the Draft Water Allocation Plan April 2015

The Arid Lands Environment Centre (ALEC) is the peak regional environmental organisation servicing Central Australia. ALEC's vision for 'healthy futures for arid lands and people' is supported through its work on community education, strategic policy advocacy and developing local initiatives to support local sustainability and biodiversity conservation. ALEC welcomes the opportunity to make comment on the Draft Alice Springs Water Allocation Plan.

ALEC has been involved in water policy and licensing through making numerous submissions to the development of the Alice Springs Water Resource Strategy and the subsequent drafting of the Water Allocation Plan (the Plan). ALEC was also a partner in the development and implementation of the Alice Water Smart initiative and an active member of the Alice Springs Water Advisory Committee (ASWAC). As such, ALEC has a number of concerns about the Plan as it was presented to the ASWAC in March including:

- The lack of integration of the Plan within a Territory-wide water policy and planning framework.

It is understood that the NT is currently developing a Water Policy and a 50 Year Plan which is expected to include matters of water stewardship, water security, as well as guiding the economic uses of the NT's water resources. Decisions that have the potential to impact on the long term water security for Alice Springs should not be made until the NT's policy position is clear and stakeholders have had adequate and appropriate opportunity to inform it.

Recommendation: That the draft Alice Springs Water Allocation Plan not be finalised until it can be considered as part of the long-term water policy and plan for the Northern Territory.

- The lack of community consultation in the development of the Plan.

The recent ASWAC meeting was clearly non-representative of the community with some attending members no longer representing key organisations and bodies, others absent and the reluctance of DLRM staff to put the heavily revised plan to the public was clearly stated. Conflicts of interest with the applicant for a significantly increased extraction licence from Rocky Hill being present around the table,

particularly as the application is under consideration by the Water Controller is unsatisfactory.

Recommendation: That the Alice Springs Water Advisory Committee be refreshed to ensure diversity and that current representatives from key stakeholder groups, organisations and agencies are included.

- Industrial allocations from the Mereenie Aquifer system (Roe Creek) will shorten the life of the public water supply and reverse savings made through previous demand management projects.

The inclusion of industrial allocations in the Plan reduce the consumptive pool and undermine water savings being made as a result of the Alice Water Smart program. The inclusion of industrial allocations will hasten the need to move to Rocky Hill to maintain water quality and supply.

Recommendation: That the NT Government prioritise investment in monitoring the health of the Mereenie Aquifer to ensure its modeling is accurate and the process for planning the transition from Roe Creek to Rocky Hill is robust.

- Lack of accurate throughflow data and hence modeling of Rocky Hill water balances.

The Plan does not demonstrate any consideration of the drawdown effects of extraction from Roe Creek on the throughflow to the Rocky Hill management zone. This means that the long-term planning for Alice Springs' public water supply (post-Roe Creek - sometime between 2015 and 2050 but before 2070) is currently based on inaccurate data and hence an incomplete model. This is compounded by a pending application for increased extraction within the Rocky Hill Management Zone of up to 3125ML/pa. The challenge for water planning at Rocky Hill is that the current allowance of 3595ML/pa for agriculture cannot distinguish nor determine whether this would result in water of <500mg/l being extracted for agriculture rather than being saved for future water supplies. There is no indication that the DLRM currently has the means to measure or ensure that only lower quality water was used for agriculture. The risk for the NT Government is that once a licence is granted, it could be difficult to reverse or amend a decision without compensation being paid to the licensee.

Recommendation: That the NT Government prioritise investment in monitoring the impacts of drawdown on the water gradient and determine accurate throughflow rates to the Rocky Hill Management Zone.

Recommendation: That the monitoring of the Rocky Hill Management Zone to establish a baseline takes precedence to any increased water allocation for Rocky Hill.

Recommendation: That water extraction rules are established for the Rocky Hill Management Zone to reflect the anticipated NT Water Policy and 50 year plan.

General Comments on the Licensing Framework and Water Trading Rules

- The Licensing framework is being developed outside of the proposed NT Water Policy and 50 Year Plan - it should be part of the Territory-wide policy and planning framework

2. *At the discretion of the Water Controller* - all Licensees should be reporting, not just at the discretion of the Water Controller

5. This could lead to perverse outcomes of water dumping rather than encouraging water efficiency.

7. This should apply to all licence applications including existing licensees seeking to increase extraction levels.

Water Trading

Trading of a common pool resource that is essentially granted to a licensee for free is not in the interest of the general public. ALEC has serious concerns about this provision and requests an official explanation as to how this benefits the public interest.

18. Leakage and demand reduction measures should also be the condition for extraction from aquifers that are the source of public water supply.

24. What is the process for determining whether licensees can safely apply chemical and fertiliser injection systems?

Assignment of risk

The Plan does not adequately reflect current threats to the aquifer system supplying water to Alice Springs. There is an acknowledgement of long-term changes in climate which will significantly impact water use in a warmer Alice Springs. However, given the fact that mining and petroleum activities are exempted from the *Water Act*, it is critical that this risk to water quality is acknowledged. The fact there is inflow into the system demonstrates that seemingly distant operations could impact the health of the aquifer.

Recommendation: That any current or future Alice Springs Water Allocation Plan acknowledge current and future risks to both the quality and supply of water to Alice Springs

Specific points:

- Town Basin p15 -Maximum Available Yield - 1000, though below Industry allocated 1262ML

- Pictorial representation of the location of all basins, not just the Wannardi would improve the Plan
- Need to focus modeling on the next 50 years not 270 years.
- Monitoring needs to be directed towards the future water needs of Alice Springs to ensure that modeling used in subsequent plans is accurate to ensure a robust and integrated planning process.

Thanks for the opportunity to comment on this important Water Allocation Plan. I hope that these comments are helpful and that the recommendations are considered before any moves to finalise the Plan are made.

Kind regards

Jimmy Cocking
 Director
 Arid Lands Environment Centre

RECOMMENDATIONS:

- ***That the draft Alice Springs Water Allocation Plan not be finalised until it can be considered as part of the long-term water policy and plan for the Northern Territory.***
- ***That the Alice Springs Water Advisory Committee be refreshed to ensure diversity and that current representatives from key stakeholder groups, organisations and agencies are included.***
- ***That the NT Government prioritise investment in monitoring the health of the Mereenie Aquifer to ensure its modeling is accurate and the process for planning the transition from Roe Creek to Rocky Hill is robust.***
- ***That the NT Government prioritise investment in monitoring the impacts of drawdown on the water gradient and determine accurate throughflow rates to the Rocky Hill Management Zone.***
- ***That the monitoring of the Rocky Hill Management Zone to establish a baseline takes precedence to any increased water allocation for Rocky Hill.***
- ***That water extraction rules are established for the Rocky Hill Management Zone to reflect the anticipated NT Water Policy and 50 year plan.***
- ***That any current or future Alice Springs Water Allocation Plan acknowledge current and future risks to both the quality and supply of water to Alice Springs.***