

AUSTRALIAN[®] WATER

ASSOCIATION

4500+

*individual
members across the
whole
water cycle*

600+

*corporate members
including utilities,
large water
users contractors,
consulting firms,
research
and suppliers.*

100+

*water utilities
servicing 20+
million customers*

50+

*years servicing the
water sector.*

10 July 2015

Des Yin Foo
Senior Manager Water Assessment
Department of Land Resource Management

c/- Des.Yinfoo@nt.gov.au

Dear Des,

Re: Draft National Groundwater Strategic Framework 2015-2025

The Australian Water Association Northern Territory Branch would like to thank the Department of Land Resource Management for the opportunity to provide comment on the issues identified in the National Groundwater Sub-Group Overview Paper 2015 – Key groundwater issues. The Australian Water Association has also provided comment to the Commonwealth Department of Environment, and this has been attached for your reference.

The Association commends the interim National Water Reform Committee on this initiative to provide a strategic vision for a nationally coordinated approach to better understand, manage and secure Australia's groundwater systems. This initiative is important in consolidating the considerable accomplishments that have already been made under the National Water Commission's National Groundwater Action Plan and pursuing the necessary reforms to ensure sustainability of the resource under future challenges and demands.

Please find below some comments against each objective.

Objective 1 – Sustained Extraction and Optimal Use

Conjunctive Use

The Association agrees that water ownership and property rights are an important issue, especially regarding investment in aquifer recharge. Cost recovery of operations is growing in importance and it is critical that the Framework addresses how we can enable cost recovery of this investment to make aquifer recharge a more viable option for investors.

Often lower quality water and wastewater resources are underused in the Northern Territory and it would be beneficial for the Framework to build on examples of Managed Aquifer Recharge (MAR) schemes in other jurisdictions. For example, the model used in Western Australia in relation to recharging key aquifers, and how important management of resources (both good quality and of lower quality) is vital.

It is also important that the Northern Territory Government enforces measurement and reporting on water extraction to better understand the Territory's aquifer systems and how much is being extracted, however, equally important to data collection and reporting is the water management plans in place.

Driving Australia's prosperity through water information, expertise and collaboration

Level 6, 655 Pacific Hwy, St Leonards NSW 2065 | PO Box 222, St Leonards NSW 1590 | (02) 9436 0055 awa.asn.au

AUSTRALIAN[®] WATER

ASSOCIATION

4500+

*individual
members across the
whole
water cycle*

The Association would like to emphasise the importance of collecting data for the specific needs identified in management plans and detailing how this new data will be incorporated into plans.

There are many fractured aquifers in the Northern Territory which are not well suited to MAR systems. More scientific information is needed about Northern Territory aquifers and their conjunctive use, especially in remote areas that cater for small systems where there is an immediate risk to the sustainability of these aquifers.

Objective 2: Providing Investment Confidence

Mining and energy

The Framework currently refers to coal seam gas, and no other unconventional gases. As the Northern Territory has shale gas resources and no known viable coal seam gas resources the Framework would benefit from including other unconventional gases and the challenges they pose to groundwater.

It would also be beneficial for the Framework to recognise that confidence in the management of groundwater through this Framework is needed by a broader audience of water users such as agriculturists and pastoralists.

Objective 3: Planning and managing now for the future

Surface-groundwater connectivity

We acknowledge the importance of the proper specification and accounting for water entitlements between connected groundwater and surface water systems. The Framework would benefit in drawing on lessons learned from other models and trading schemes to avoid making similar mistakes, such as the double accounting of water resources in one form (such as surface water) and another (such as groundwater)

The issues identified above are critical to understanding surface-groundwater connectivity. As such, we would like to understand how these important technical issues will be implemented. There must be a continuum between science, planning, implementation, monitoring and regulation.

Groundwater dependent ecosystems

The Association supports the importance of understanding and reducing the accumulative environmental impact of many actions on groundwater dependent ecosystems. We support the priority areas for resolving uncertainty; however we believe it is also important to understand how systems will respond to different extractions. Not many studies have been done in the Northern Territory, so we agree that future work is needed to resolve uncertainty in this area.

We commend the Bureau of Meteorology's work on the development of the Groundwater Dependent Ecosystems, Groundwater Explorer and Insight and National Groundwater Information System, and encourage the Northern Territory Government to continue to collaborate with the Bureau on these important products.

50+

*years servicing the
water sector.*

100+

*water utilities
servicing 20+
million customers*

600+

*corporate members
including utilities,
large water
users contractors,
consulting firms,
research
and suppliers.*

Driving Australia's prosperity through water information, expertise and collaboration

AUSTRALIAN[®] WATER

ASSOCIATION

4500+

*individual
members across the
whole
water cycle*

In addition to the specific comments under each objective above, an overarching comment is that the public perception of the value of water needs to be improved. This could be achieved through community engagement programs, and we would like the Framework to consider the value of public communication and participation to improve understanding and create positive culture around looking after our groundwater resources.

The Association would be pleased to further consult on the issues raised.

Yours sincerely,

600+

*corporate members
including utilities,
large water
users contractors,
consulting firms,
research
and suppliers.*

Kathryn Fuller

NT Branch President

Australian Water Association

100+

*water utilities
servicing 20+
million customers*

50+

*years servicing the
water sector.*

Driving Australia's prosperity through water information, expertise and collaboration