



Statement of response

This statement is a summary of the Department of Water's responses to comments received on the Draft Carnarvon Artesian Basin Water Management Plan. All comments were considered when finalising the Carnarvon Artesian Basin Water Management Plan.

Executive summary

An invitation to comment was advertised in state and local newspapers, and distributed to 60 interested parties. The plan was open for public comment for a period of six weeks. Four responses were received, covering a variety of issues including licensing and monitoring requirements, water availability and security, and the importance of managing impacts on the water resource.

Figure 1 shows the interests of respondents and the number of responses that commented on the plan from each interest group. Table 1 summarises the main issues raised in comments.

	Number of responses
 Agricultural/pastoral	0
 Environmental	0
 Industrial	0
 Local government	0
 Local resident	1
 Other state government	3
 Public water supply	0

Figure 1 Interests of respondents to the Draft Carnarvon Artesian Basin Water Management Plan



Comments received

Table 1 Comments received on the Draft Carnarvon Artesian Basin Water Management Plan

Comment	Department of Water response
Bore construction	
<p>It was recommended that all wells be constructed to a minimum standard and that drilling of bores be supervised by someone nominated by the department.</p>	<p>The Department of Water requires bores to be constructed to a minimum standard as defined in Section 5.4 of the Carnarvon Artesian Basin (CAB) Water Management Plan. This section on minimum bore construction standards/requirements has been updated for the final plan. One addition is that authorised department staff will randomly supervise the drilling of new bores. It is required that before drilling, applicants and drillers contact the department's Mid-West Gascoyne Regional office to confirm drilling and construction requirements.</p>
Water use efficiency	
<p>It was suggested that open bore drains should not be licensed as water is lost through seepage and evaporation.</p>	<p>Some water distribution systems on pastoral stations still contain open bore drains. The department recognises this practice is not water efficient and that phasing out identified in Section 5.4 must occur. This phasing out has been given five years for completion.</p> <p>Additionally, the use of licence condition S126 that addressed open bore drains has been removed from this plan and the policy states that new proponents will not be able to use open bore drains.</p> <p>Another way the department is contributing to water efficiency of CAB water is through the CAB Rehabilitation Project. This aims to decommission or rehabilitate bores to progressively eliminate free-flowing bores.</p>
Water trading	
<p>The lack of reference to tradable water rights in the draft management plan was queried in light of the department signing the 2006 National Water Initiative, in which this is considered as a requirement. It was also suggested that further information on tradeable water rights and the implications for licence holders in the region should be included in the final plan.</p>	<p>There is water available in the CAB resource and therefore trading is unlikely in the near future. However, trading is a possibility, hence the reference to the <i>State-wide Policy No. 6 — Tradeable (Transferable) Water Entitlements</i> in Section 5.6.</p> <p>The state-wide policy and Section 5.6 are considered sufficient for the CAB.</p>



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Social values and tourism pressures

One response provided information to update the plan on how CAB water is used by the respondent, who indicated the importance they believe these activities are in maintaining social values.

It was noted that no reference was made to the settlements of Nanga and Monkey Mia as significant contributors to tourism and therefore the importance of CAB water to these towns. It was also suggested the plan recognise a greater significance of impacts of an expanding tourism industry in the region and for the department to consider the future water needs for tourism.

Information in regard to water use and reference to settlements was updated in the plan (Section 4).

The department recognises the value of these towns and will ensure they have a secure future water supply for clean drinking water. The forecast drinking water demands for these towns will be included in the CAB groundwater model. This ensures that the potential water supply for these towns is not impacted on when new licences are granted (Section 5.4).

Water security for pastoral and diversification activities

There was some concern for the availability of water for pastoral and diversification activities and it was indicated that this concern was shared by pastoralists. It was also noted that diversification provides pastoralists with a higher level of financial security and suggested the department take care in allocating and monitoring CAB water to ensure future business activity is not impeded.

The Department of Water will manage water to ensure that existing users are not unacceptably impacted by new operations (Section 5.4). The department will also ensure that cumulative use by mining, horticulture, agriculture, town water supply and pastoral use does not result in unacceptable impacts on potentiometric heads of the water resource, which supports pastoral and other activities (Section 5.1 and 5.2).

The department will operate a first-in-first-served policy for water allocation (as described in Section 5.3). Reserves are only made for public water supply to ensure drinking water is available into the future. The department does not reserve other waters for mining, horticulture or pastoral use beyond what is already allocated.

If allocation limits are reached there is the potential to purchase tradeable water entitlements to support diversification.

Mining expansion

It was indicated that there may be an increasing pressure from mining activity, which will increase demand for water. The main concern and advice was for the department to closely monitor and manage the impacts of mining on water availability.

Mining operations are typically large water users and therefore are required to provide significant levels of information about their impacts. Section 5.4 and the *State-wide Policy 19 — Hydrogeological Reporting Associated with a Groundwater Well Licence* ensure that stringent modelling, management and monitoring requirements are applied to all significant operations.



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It was also noted that the significant mineral sands operation in Coburn has not commenced. It was suggested that quantities of water required by the mine should be included in the plan, as they may become a significant user of the CAB.

Allocation figures within the CAB plan will not include potential water requirements by the planned minerals sands mine. The department does not identify unapproved allocations. Reviews of this plan will account for changing water use and departmental systems will carefully account for and manage any new significant licences.

Monitoring by licensees

Clarification was requested on whether a groundwater monitoring regime is a requirement for all licences or only licences over 50,000 kL/year and also if it applies to existing licences.

Also raised was that the responsibility of licensees to have to provide information to demonstrate if another user is impacting on their water supply is an unreasonable burden on existing users.

A suggestion was made for the possibility of meters to be read by the land user and submitted to the Department of Water with periodic checks.

Since the CAB is considered as a complicated artesian aquifer with little information and little known recharge, it must be managed carefully by monitoring changes in the water resource (particularly pressure, see Sections 4.1 and 5.2). Those that benefit from using the resource also have a responsibility to help manage the water, hence the position of all water users (including existing users) being required to comply with a groundwater monitoring regime established through licence conditions.

All water users must record the outputs of monitoring and metering activities (as prescribed on their licence) and submit them to the department as per Section 5.5. As this information is a requirement of water users, it is not unreasonable for this information to be used to prove impact of another user.

Information indicating impacts should, in most cases, already be held by the department through licensee reporting requirements. A comparison of the monitoring information of the two potentially interfering bores, and consideration of their drawdown indicated by the groundwater model, will be used by the department to determine impacted and impacting licensees. The department will identify the impacting activity and take appropriate action.

If information from required monitoring does not demonstrate impacts, the complainant will be required to further prove impacts by providing other monitoring data and analyses (see Section 5.2). More regular sampling and recordings by water users may provide clearer information about impacts of other or new users.

Monitoring impacts

One respondent noted their concern for the appropriateness of the method of monitoring and allocation outlined in the draft plan. The respondent suggested that impact management through increasing the allocation limit as licences are approved, and monitoring for any

The processes outlined in the plan include assessment of each new proposal (see Section 5.3) and monitoring required by licensees (see Section 5.5). These are in place to help ensure that no adverse impacts occur (that is, there is no overexploitation).

During assessment of applications, all proponents must provide



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impacts, would seem to expose the CAB resource to a high risk of overexploitation. They also noted that a reactive monitoring system, based partly on industry estimates of resource availability, would appear to be an inappropriate monitoring system for the CAB.

To protect existing users, another respondent recommended the department ensure that monitoring and logging of all data related to the use and availability of water is continued as indicated by the plan.

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information to the department that indicates their proposal will not unacceptably impact on the artesian pressure required by existing users to distribute water via efficient stock watering or irrigation systems (see Section 5.2).

Allocation limits are not the only way to manage water resources. If an allocation limit does not exist, it does not necessarily mean that the resource is not managed appropriately.

The department does not have a comprehensive monitoring network established in the CAB. Therefore, information provided to the department by all licensees, whether industry estimates or monitoring data at each draw point, is invaluable for managing the resource. More comprehensive monitoring will be considered as indicated in the review and implementation of the plan (see Section 6).

Establishment of an advisory group

One respondent recommended the establishment of a Gascoyne advisory group be a priority.

At this stage, the department has decided not to establish a Gascoyne advisory group. It is currently not a priority because licensing issues in the CAB are isolated enough to be dealt with by the department through the management and licensing process outlined in the plan.

The department will consult appropriately on significant activities, including licences and future planning and if the need arises will reconsider the need for an advisory group.

There is, however, a CAB Rehabilitation Project Advisory Group to assist the implementation of phase two of the rehabilitation project.

Plan implementation timeframe

One respondent was concerned about the timeframe of implementation and questioned the value of a six-week public review of the draft plan in relation to the public comment period.

The draft plan stated that the plan will take effect after a six-week period of public review of the draft plan. This six-week public review was referring to the public comment period and was not referring to a six-week implementation period.

The final plan, updated subsequent to public comment, will take effect as soon as it is released. Implementation of the plan will occur until an updated or new plan is released.



Questions raised

1. Will subartesian bores be included in Stage 2 of the CAB rehabilitation project? If not, why not?

No. Subartesian bores are not included in Stage 2 of the CAB rehabilitation project. With available resources, rehabilitation of subartesian bores is not a priority at this stage. The department will license all bores as defined in the plan (see Sections 4.2 and 6). However, the priority has been established that bores from the rehabilitation program will be licensed first. When the plan is reviewed, the department will review the progress against full licensing and consider the requirement of rehabilitating subartesian bores (see Section 6).

2. Will bores that are not rehabilitated be licensed?

Yes. All use (including stock and domestic) from an artesian/confined aquifer requires a licence under the *Rights in Water and Irrigation Act 1914* (the RIWI Act) (see Section 5.3). All bores in the CAB will be licensed progressively. Only stock and domestic use from water table aquifer bores on pastoral leases do not require a licence. Please refer to the plan for further information (see Sections 1.5 and 5.3).

3. Will bores not rehabilitated attract a licensing administrative fee even if use is only for stock and domestic?

Licence administration fees are being proposed to improve the administration of water resources (see Section 5.4). Licence fees apply to water licences greater than 1,500 kL per year, which should cover stock and domestic water use. The expansive area of the CAB alone indicates that licensing has some cost. There are also annual and other fees. Further information and the fee schedule are available on the department's website (www.water.wa.gov.au) by clicking on Licences and industry support — Licensing — Fees.

List of respondents

Department of Environment and Conservation

Gascoyne Development Commission

There were also two individuals who responded



What next?

These responses and comments were considered when finalising the Carnarvon Artesian Basin Water Management Plan. The plan is available from the department's website (www.water.wa.gov.au). It provides information on how the Carnarvon Artesian Basin water resource is managed by the department through licensing, assessment, reporting and policy.

Further Information

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