

Consultation Summary Schedules

Mataranka Water Allocation Plan 2024-2034

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1.0	4 July 2024	External consultant	Review responses and prepare draft
1.1	12 July 2024	Water Resources Division	Review of draft
1.2	19 July 2024	Committee	Provided to committee

Acronyms	Full form
AA	Announced Allocations
Act	<i>Water Act 1992</i>
AWR	Strategic Aboriginal Water Reserve
BOM	Bureau of Meteorology
Controller	Controller of Water Resources
DR2	Daly Roper model
ESY	Estimated sustainable yield
FPIC	Free, Prior and Informed Consent
GDEs	Groundwater Dependent Ecosystems
Minister	Minister for Environment, Climate Change and Water Security
NLC	National Land Council
NT	Northern Territory
NTG	Northern Territory Government
NWI	National Water Initiative
PEA	Protected Environmental Area
RGRC	Roper Gulf Regional Council
RDZ	Roper Discharge Zone
TLA	Tindall Limestone Aquifer
TO	Traditional Owners
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples

Acknowledgement of Country

The Department of Environment, Parks and Water Security respectfully and proudly acknowledges the Northern Territory's Aboriginal people and their rich cultures. We pay respect to Elders past and present.

We acknowledge Wubalawun, Yangman, Mangarrayi and Jawoyn people as the Traditional Owners and custodians of the lands and waters of the Mataranka Allocation Plan area. We recognise the intrinsic connection of Traditional Owners to Country and value their ongoing contribution to managing the lands and waters.

We support the need for genuine and lasting partnerships with Traditional Owners to better understand cultural connections, and we will work to establish lasting partnerships to manage water together, now and into the future.

Schedule 1: Mataranka water advisory committee meeting feedback and outcomes

The water advisory committee meeting records are available on the [Mataranka Tindall Water Advisory Committee](https://depws.nt.gov.au/boards-and-committees/water-advisory-committees/tindall-mataranka-daly-waters-advisory-committee)¹ webpage.

Meeting	Date	Key information	Feedback and outcomes
Meeting 1	19 July 2017	Introduction, workplan and timelines	<p>Committee members were provided with:</p> <ul style="list-style-type: none"> a draft plan of work to guide the work of the department and the committee over 12 to 18 months a background brief document providing an overview of the water allocation planning area and the future planning process.
Meeting 2	29 September 2017	<p>Overview of the Tindall Limestone Aquifer Mataranka</p> <p>Overview of water monitoring programs in the Tindall Mataranka Daly Waters Water Allocation Plan area</p> <p>Update on Strategic Aboriginal Water Reserve Policy</p>	<p>The department provided a background on groundwater basics, distribution of the Tindall Limestone Aquifer, hydrogeological processes including recharge, flow, and discharge, and how the modelling would work.</p> <p>The department provided an overview of water monitoring programs and why water monitoring was being undertaken, the use of the data, and the equipment in use. This overview also included a discussion on other projects in the area and some of the challenges.</p> <p>Members were advised that Office of the Solicitor for the NT provides advice on all significant Water Policy including underutilised water and recouping of unused water.</p>
Meeting 3	22 March 2018	<p>2017 NT Water Licensing Review</p> <p>New NT water policies</p>	<p>The Tindall Mataranka to Daly Waters Water Advisory Committee recommenced work with the department on the development of a water allocation plan for the region. Completion of the Plan is anticipated by May 2019.</p> <p>The Committee provided input on the design and implementation of new NT Government water policies – namely the Strategic Aboriginal Water Reserve Policy, the draft Management of Unused Water Entitlements Policy and the draft Trading Licensed Water Entitlement Policy - in the context of implications for the Mataranka-Daly Waters water allocation planning process.</p> <p>The Committee was briefed on the outcomes of the 2017 Water Licensing Review and implications for water resource planning in the region, including measures to improve transparency in licensing decisions. Suggestions and further advice were provided by the Committee around ongoing implementation and improvements to licensing arrangements.</p> <p>The Committee utilised its broad representative base to document how water from the Tindall Limestone Aquifer was used to support livelihoods, cultural traditions, ecosystems, primary industries and communities, and the water resource conditions crucial to the sustainable management of these values.</p>

¹ <https://depws.nt.gov.au/boards-and-committees/water-advisory-committees/tindall-mataranka-daly-waters-advisory-committee>

Meeting	Date	Key information	Feedback and outcomes
Meeting 4	1 May 2018	Water resource values workshop Plan objectives and management principles	<p>Water values workshop focussed on two groups (business/industry and social/cultural/ environment), to identify future changes, and what could be done within the Plan to manage these changes.</p> <p>The Committee suggested revisions to the draft 2011 water allocation plan objectives with more focus on maintaining and protecting healthy aquatic ecosystems and processes.</p> <p>A number of risks and recommendations were discussed pertaining to the Final Report of the Scientific Inquiry into Hydraulic Fracturing in the NT.</p>
Meeting 5	22 June 2018	Finalisation of feedback on draft water policies Tindall Limestone and the Beetaloo Sub-Basin – Implications for Water Allocation Plan boundary	<p>The Committee considered a draft statement of their feedback to government on the Unused Water and Water Trading policies.</p> <p>Concerns from Committee were raised that removal of a water entitlement would be like removing a business asset and that this would reduce commercial confidence.</p> <p>It was noted that there had been uncertainty among Northern Territory Cattlemen's Association members, as there was no precedent for how responses to unused water letters would be handled by the department.</p> <p>Feedback to the department that recipients of unused water letters are struggling with what the letter means and how to make their case, in particular, with regard to what is a 'genuine' reason for underutilisation of a water entitlement.</p> <p>Members were provided with a Discussion Paper on a proposed revision to the boundary of the Tindall Mataranka-Daly Waters water allocation plan area.</p> <p>The NT Government agreed to implement all recommendations of the Final Report of the Scientific Inquiry into Hydraulic Fracturing in the NT. Planning for the implementation of these recommendations had commenced.</p> <p>The Committee was asked to provide advice on the proposal to amend the southern boundary of the Plan area, and to provide feedback on the suitability of the boundary alignment. The Committee supported the use of hydro-geological features to determine a new Plan boundary.</p> <p>The Committee understood the proposal for three separate, but neighbouring water allocation plans in the region – Mataranka, South Beetaloo sub-Basin and North Beetaloo Sub-Basin (now Georgina Wiso plan)</p> <p>Members were provided with a map of the current petroleum exploration licences and no-go zones.</p>
Meeting 6	21 August 2018	Changes to water allocation plan boundary Water allocation plan objectives Recap on Water Advisory Committee progress to date	<p>The Committee requested better clarification on current licence applications and where they stand while the water allocation plan is in preparation.</p> <p>Plan boundaries – the Committee generally agreed the revised boundary should follow hydrogeological features/boundaries and requested a revised recharge information session based on the new boundary.</p> <p>The Committee requested further technical information on how climate change is considered in the Plan.</p> <p>Consultation with other groups such as Jilkminggan was considered essential.</p>

Meeting	Date	Key information	Feedback and outcomes
Meeting 7(a)	25 October 2018	<p>Plan objectives</p> <p>Information sessions on:</p> <ul style="list-style-type: none"> update on Roper River fish management study <p>Tindal Mataranka groundwater quality survey</p>	<p>The Committee contributed to the drafting of four key Plan objectives.</p> <p>Preliminary conclusions of the Roper River fish management study were discussed.</p> <p>The Committee requested a summary of all available Tindal Mataranka groundwater quality survey data.</p> <p>The management zones proposed (including mapping and rationale) were supported by the Committee, however, the Committee requested future opportunities to review the zoning once water balance figures were available.</p>
Meeting 7(b)	6 December 2018	<p>Update on progress since previous meeting and future consideration of estimated sustainable yield and water sharing arrangements</p>	<p>Water management zones - department had updated spatial data to reflect the new Plan boundary and the three agreed water management zones.</p> <p>Water balance figures for new Plan area and management zones - water resource assessment and water balance were updated for the new Plan area and zones.</p> <p>Progress on Aboriginal water reserve - the policy was applied to each zone to calculate the percentage of eligible land in each zone.</p>
Meeting 8	13 March 2019	<p>Natural water balance of the Mataranka Tindall Limestone Aquifer</p> <p>Proposed water sharing arrangements for Mataranka Tindall Plan - Setting environmental/cultural water requirements and the estimated sustainable yield.</p> <p>NT Water Regulatory Reform</p>	<p>Groundwater of the Tindall Limestone in the plan area is directly connected to stream flow along the entire length of the Roper River. The Committee acknowledged this connectivity and the dependence of downstream river ecosystems on the dry season baseflows which originate as groundwater from the Plan area.</p> <p>The Committee asked the department to explore options for future of expansion of the Plan area to include the Roper River corridor, with the aim of transitioning to an expanded plan as part of a scheduled review of the declared Plan.</p> <p>The Committee discussed the use of annual aquifer recharge as a surrogate for total groundwater availability in the Mataranka Tindall groundwater resource. The Committee considered advice on the use of 'median' rather than 'mean' values for calculating annual recharge, agreeing to the use of 'median' values on the basis that the figure was a better representation of typical annual recharge, not skewed by infrequent extremes of rainfall as would be the case with a 'mean' value.</p> <p>The Committee considered statistical matters in relation to the timespan (years) on which 'median' values would be based, expressing a strong preference for use of the longest data set available i.e. modelled values for recharge, discharge etc. for the period 1900 to present. The Committee believed this approach would result in water-sharing arrangements that better facilitate long-term water security for all water users, including the natural environment.</p> <p>The Committee discussed climate change predictions for the Top End and how this should be incorporated into hydrologic modelling and the determination of water-sharing arrangements for the Mataranka region. The Committee asked the department to undertake some modelling to improve understanding of how the groundwater resource and Roper flows might be affected by consecutive years of below average rainfall.</p>

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			<p>The Committee received a highly informative presentation from department on the natural water balance (aquifer inflows and outflows) of the Mataranka Tindall Plan area and management zones.</p> <p>The Committee had substantial discussions about the classification of different climate conditions for the Plan area, and subsequently how water sharing arrangements might be adjusted under different conditions. The Committee considered the over-arching principle of adapting the estimated sustainable yield to climate conditions and requested further information and analysis of the characteristics that define each category of climate condition.</p> <p>The Committee emphasised throughout the meeting the importance of comprehensive and meaningful engagement with Aboriginal stakeholders and was supportive of further efforts by the department and members to continue this work, noting the engagement activities already being undertaken by the Water Planning team.</p>
Meeting 9	21 and 22 May 2019	<p>Open discussion of water issues important to local stakeholders</p> <p>Community engagement update</p>	<p>Use of median values for recharge over the full climate period (i.e. from 1900 to present) as the starting point for determination of the estimated sustainable yield was discussed.</p> <p>A stable and conservative estimated sustainable yield was established.</p> <p>Establishment of a groundwater discharge protection zone and the proposed 1500 m buffer around discharge features was discussed. The Committee requested further consideration of community feedback on the zone and management arrangements that apply to before finalisation.</p>
Meeting 10	24 October 2019	<p>Update on scenario modelling and analysis</p> <p>Update on setting of estimated sustainable yield</p> <p>Update of application of the Plan's estimated sustainable yield arrangements to downstream baseflow extraction.</p> <p>Aboriginal engagement and cultural values mapping</p> <p>Building the profile of the Plan's objectives with water users in the surrounding region</p>	<p>Nine different water extraction scenarios had been modelled for the Mataranka Tindall planning process. The data outputs for each scenario were analysed and the results were summarised in a meeting paper for Committee consideration.</p> <p>The department developed a contour map of depth to groundwater within the Plan area to add further scientific rigour to the spatial extent of the groundwater discharge protection zone.</p> <p>Legal clarification was sort on whether the estimated sustainable yield arrangements established by the Plan could be legitimately applied to the extraction of Roper River baseflow outside the Plan area and inside the water control district. This legal clarification meant that the planning process could move forward with certainty.</p> <p>Liaison with the Northern Land Council advanced efforts to ensure that Aboriginal groups with cultural connections to the Plan area had the opportunity to contribute to the planning process.</p> <p>The department provided input to the assessment of water licence applications and environmental management plans for agricultural, petroleum and mining developments in areas neighbouring the Plan area. This was important for building the profile of the Plan, and for ensuring the fullest possible consideration of potential risks to the Mataranka Tindall Limestone Aquifer.</p>

Meeting	Date	Key information	Feedback and outcomes
Meeting 11	12 August 2021	<p>Update on the progress on the water allocation plan Water management tools and adaptive management measures</p> <p>Water Regulatory reform</p> <p>Water resources programs underway</p> <p>NOTE: Committee membership reviewed with four new members appointed and eight members reappointed</p>	<p>The department provided an update on progress to the Plan including:</p> <ul style="list-style-type: none"> • upgrade to the Daly Roper model • Mataranka Tindall natural water balance report revised • outputs for scenario modelling analysed • estimated sustainable yield settings • protecting groundwater dependent ecosystems • Aboriginal engagement and cultural values mapping. <p>The Committee raised the need to better understand the assumptions and limitations of the modelling and water management tools.</p> <p>The department advised of the water regulatory reform and the changes to the Water Act that affect water allocation planning.</p> <p>The Committee were informed of water resource programs running in parallel with the water allocation planning process – the Strategic Regional & Environmental Baseline Assessment, the Roper River Water Resources Assessment and the Geological and Bioregional Assessment.</p>
Meeting 12	28 October 2021	<p>Process to finalise the Water Allocation Plan</p> <p>Work undertaken and planned to define environmental limits to change</p>	<p>The Committee reiterated the importance of the modelling process aligning with current Bureau of Meteorology and CSIRO advice.</p> <p>The limits to change approach and associated research was well supported.</p>
Meeting 13	16 February 2022	<p>Application in the Roper River for Ilmenite mining operations</p> <p>Aboriginal Water Reserve</p> <p>Application of unused water policy in the region</p> <p>Discussion on how to manage uncertainty associated with climate change and modelling</p> <p>Cultural values – limits to change</p> <p>Sustainable regional economic development</p>	<p>In 2021 draft regulations were provided to all four land councils as part of the consultation process to finalise the regulations. An independent barrister had been engaged to consider the legislation and draft changes based on the feedback. The department went back to the land councils with that feedback and proceeded toward resolving the regulations.</p> <p>Given the situation and effects of covid-19 the department decided not to actively pursue unused water in 2021. This was rescheduled for 2022.</p> <p>It was commented water licenses should not be locked in for long periods (5 and 10 year periods being appropriate) because of climate change.</p> <p>The Committee discussed licence holders needing some level of certainty in relation to security of water in order to finance etc. and raised that it was incumbent to allocate water in a way which considered the needs of industry, by enquiring and working out what industry needs.</p> <p>Northern Land Council advised it was working with the Committee members who represent Aboriginal interests to identify possible cultural values or sites of cultural significance and the expectations for these. This work was limited to the areas where Committee members could talk for Country (i.e. around</p>

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			<p>Jilkminggan and the Mataranka areas of the plan) and focused on locations where there was existing water flow and groundwater monitoring data.</p> <p>Making water available from the Aboriginal water reserve was flagged as a priority value. It was noted that since the Committee documented its values, provisioning the Aboriginal water reserve had been recognised on a hierarchy above other non-priority consumptive uses.</p> <p>Condition of Elsey National Park was also flagged as a priority value.</p>
Meeting 14	19 and 20 July 2022	<p>Update on Water Resources business</p> <p>Estimated sustainable yield</p> <p>Applying a precautionary approach in the Mataranka Tindall Water Allocation Plan</p>	<p>The Committee requested clarification on recent media on arid zone /top end classification. ABC media had claimed the planning process was rushed, and there had been no consultation and an absence of science. Members were advised that the department had refuted the claims and provided talking points on the matter to the ABC however the department’s response had not been reflected in the published article.</p> <p>A four stage process was outlined for establishing an estimated sustainable yield:</p> <ol style="list-style-type: none"> 1. understand the resource, the potential water available from the resource 2. identify water values and water requirement that depend on the water resource 3. consider limits of change through options to provide water to these values and 4. establish a estimated sustainable yield to provide water for extraction. <p>The importance of considering current water quality and not impacting on this was emphasised.</p> <p>Current use in South Mataranka was having an impact, indicating there was a potential for higher levels of management. This was not seen in North Mataranka and Larrimah.</p> <p>The department proposed to simplify the plan and adopt a common template for all future plans. The new format would address the resource, legislation, estimated sustainable yield and “rules” within the plan with supporting detail in a background document. A third document would address implementation and accessible reporting details, for public accountability. All three documents would be provided for public comment.</p>
Meeting 15	28 September 2023	<p>Consideration of draft plan</p> <p>Natural water balance information</p> <p>Ecological values and protection measures in the plan</p> <p>Measures for protecting non-consumptive values</p> <p>Proposed estimated sustainable yield</p> <p>Consideration of implementation actions</p>	<p>Recognising the natural variability in the system was considered important context for achieving the objective of balancing the retention and preservation of the environment with the benefits of water use.</p> <p>The environmental protection area was considered an important tool for protecting natural values.</p> <p>Building awareness and increasing acceptance that entitlements are maximums, not minimum entitlements was emphasised.</p> <p>The Committee emphasised the need for confidence in the application of water policies and considered that the plan would only work if these policies were properly enforced.</p> <p>The requirements for plan review and additional triggers for review in public communications was emphasised.</p>

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			<p>It was advised that communication needed to be explicit about the mechanisms for increasing the availability of water in the Aboriginal water reserve through the recovery of unused water.</p> <p>Committee sought further information on modelled impacts in consecutive dry years.</p> <p>The Committee was tentatively supportive of proceeding to consultation before the 2023, however, the Committee requested further detail from the department on the key concepts and issues raised at meeting 15. The Committee requested explanations and examples of:</p> <ul style="list-style-type: none"> • the assertion that climate variability, not extraction, was the driver of change in the system • how the management arrangements set limits on extraction and maintains the natural pattern of system variability • how the flow thresholds operate for announced allocations, and to give further consideration to any possible perverse outcomes of these arrangements. <p>The majority of members supported the release of the Plan for consultation; however, this position was not unanimous.</p> <p>There was an expectation in the community that the plan would be precautionary. With the benefit of the department's explanation, the Committee was more aware of how the Plan delivered this, however, this needed to be more explicit in the plan documents and further explained in factsheets/FAQs.</p> <p>The plan should emphasise how the estimated sustainable yield and management arrangements work together to achieve appropriate protections for natural and cultural values.</p> <p>Careful consideration should be given to differentiated access to water between existing licenced users and Aboriginal water reserve holders, given water may not be available for the Aboriginal water reserve in some management zones.</p>
Meeting 16	23 October 2023	<p>Clarified issues raised in Meeting #15</p> <p>Draft Mataranka Plan Explanatory Note</p> <p>Impact of extraction plots</p> <p>Announced Allocations</p> <p>Release of draft plan for public consultation</p>	<p>Members agreed that including the graph and explanatory notes were necessary in the Background Report to provide confidence in the model, as well as to cover a broader range of target audiences. The provision of detail supported transparency and builds trust. The Committee suggested that the histogram and supporting explanation be included in the Background Report, noting that the histogram represents a reduction in flows prior to any other management arrangements being applied.</p> <p>The Draft Mataranka Plan key messages explained how Aboriginal cultural values were considered in the plan and acknowledged that feedback from Aboriginal partners on the draft plan documents was limited. It was hoped that this would be addressed and rectified during the public consultation period.</p> <p>The Committee reiterated the need to emphasise in the key messages that the estimated sustainable yield works together with the management actions (including announced allocations, flow thresholds and review mechanisms) to protect the resource and prevent breaches of minimum flow rates.</p> <p>Members raised concerns about the effects of climate change and lower rainfall and the implications thereof for licences. The department used the dry year announced allocations case study, to explain this recognising that the highly variable flow rates were part of the natural cycle which occurred even before</p>

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			<p>extraction commenced. The Plan recognised that similar low flow rates might occur in the future, and included management arrangements to protect flows if such a dry period returns.</p> <p>Some members suggested the estimated sustainable yield should be reduced in the South Mataranka zone to be more precautionary for climate change effects and increased use by industry. It was suggested that a lower estimated sustainable yield should be considered as a starting point and then increased over time (using monitoring) instead of using announced allocations to limit extraction annually. It was suggested that the proposed estimated sustainable yield effectively creates more uncertainty for existing licence holders, whereas a lower estimated sustainable yield would improve certainty year on year.</p> <p>The Committee noted that there should be more emphasis on the importance of all management measures, and how they work in combination with the estimated sustainable yield settings.</p> <p>Members emphasised a need to apply the precautionary principle when considering uncertainty associated with climate change and the model.</p> <p>The Committee noted that the risk of not having a plan in place is concerning and noted that the plan is very complex and requires good communication to make it accessible to the wider community, and also highlighted the importance of engaging Aboriginal communities.</p> <p>The Committee endorsed the release of the draft plan for public consultation.</p>

Schedule 2: Mataranka water allocation plan stakeholder engagement activities

Meeting details	Purpose	Information and feedback
23 January 2024 Katherine Town Council	Provide briefing on the plan to the Council	No specific issues were raised.
24 January 2024 Roper Gulf Regional Council (RGRC) Finance and Infrastructure Committee	Provide briefing on the plan to the Council Committee	Attendees commented that the Plan information is important and needs to be shared with all communities in the region.
6 February 2024 Jilkminggan Local Authority	Meeting with 13 people including Traditional Owners, Local Authority members, RGRC Councillors, RGRC staff and one individual from Protect Big Rivers	Attendees informed the department that they believe that the plan is dictated by science and not traditional knowledge of the resource area passed on through generations. Traditional Owners would like the government to take on board their feedback and feel they should be informed of development in the area.
6 February 2024 Mataranka Local Authority	Meeting with 10-12 people including Local Authority members, the RGRC Mayor and one individual from Protect Big Rivers	Questions were raised regarding how extensive water monitoring in the plan area would be and how water is prioritised for people before corporations. Feedback was provided on illegal bores and water extraction within the plan area. The following concerns were raised by attendees: <ul style="list-style-type: none"> • impact of fracking in the Beetaloo in Mataranka area • salt creeks connection to Roper River and the impacts of alkalinity • the two types of cotton farms, one grown during the wet and other during the dry season • PFAS Attendees requested a public forum on the water allocation plan so community members could be consulted.
7 February 2024 Jawoyn Association	Meeting with 40-50 people including Traditional Owners, interested Aboriginal people, Jawoyn staff and board members	<ul style="list-style-type: none"> • Concerns were raised that Traditional Owners had not been consulted on mining and economic development projects. • Feedback was given around Indigenous people aspiring for their own water strategies and the disregard for Aboriginal lore in the water allocation plan. • Concerns were raised noting that the water advisory committee was not representative of the people i.e. incorrect people consulted in the plan. • Strong concerns were raised for the lack of communication and delayed consultation with insufficient time to provide feedback. • Members requested that communication should take place with local communities using interpreters rather than via land councils due to a lack of trust, specifically with the Northern Land Council (NLC). Concern was raised that the information was not being passed on to Traditional Owners correctly or in full which provided a poor representation of certain groups in the NLC.

Meeting details	Purpose	Information and feedback
		<p>Members requested that documents be translated into local language for community members to understand. There were discussions regarding delayed communication and consultation, and requesting consultation be undertaken with the Barunga, Beswick and Ngukurr communities. Attendees also felt that there was insufficient time to provide feedback on the plan.</p> <p>Clarification was sought and provided on:</p> <ul style="list-style-type: none"> • how numbers were decided for the Aboriginal water reserve • is the Elsey Homestead the old homestead in the plan area • contamination to aquifer from industry pollutants, chlorine, PFAS and more • water licences in the area. <p>Feedback provided included the disregard for Aboriginal lore in the water allocation plans and Indigenous people are aspiring for their own water strategies and Traditional Owners need to be consulted on mining and economic development projects.</p> <p>Attendees would like the opportunity for Aboriginal representation on the water advisory committee and an Aboriginal advisory group with rangers to monitor the resource and provide data to committee and their group. Members requested that the Jawoyn Healthy Country Plan be considered.</p>
<p>12 February 2024 Environment interest groups</p>	<p>Scheduled meeting with the department representatives from each of Arid Land Environment Centre, Environment Centre NT and EDO</p>	<p>The department provided an overview of the draft plan in terms the climatic context and key messages.</p> <p>Some members of the group raised concerns about the communication of the key concepts in the plan, approach to management based on the understanding of the resource and the lack of knowledge of the environmental and cultural water requirements.</p>
<p>13 February 2024 Northern Land Council (NLC) facilitated consultation, Katherine</p>	<p>Meeting with 6 people, NLC staff and representatives from two top end farms</p>	<p>Discussions were had regarding:</p> <ul style="list-style-type: none"> • measures taken to protect all aquatic life along the system • the need to protect scared sites • water available for the Aboriginal water reserve • Aboriginal water reserves being used to assist Aboriginal communities in other locations where there is a shortage of drinking water (e.g. in the desert) • advocacy for World Heritage listing of the Roper River area • concept of allowing “down time” for the Roper River to recover after dry periods • plan’s resilience to climate change’s impact on plants • consultation related to pastoral lands • salt build-up resulting from farm irrigation • requirement for water licences to undergo an annual review • recognition of Aboriginal thinking and knowledge was emphasised, particularly for Traditional Owners.

Meeting details	Purpose	Information and feedback
		Attendees were keen for direct consultation between the government and Aboriginal people including rangers and Traditional Owners being involved in water monitoring, noting this process would deliver economic benefits and sharing of water knowledge.
14 February 2024 Northern Land Council (NLC) facilitated consultation, Barunga	Meeting with 11 people, NLC staff and representatives from two top end farms	Attendees requested that the department visit community regularly to talk about water, run education programs for young people and get the community involved in monitoring. The idea for a school program, part of the NLC's 'Learning on Country,' was raised that would allow rangers to take children out for monitoring and water education. Strategies were explored to incorporate Aboriginal perceptions of the system's condition as observations by community members contradicted the scientific understanding that the system had become wetter; creeks appeared to dry up more frequently during the dry season. Community members expressed concern about road construction crews accessing water from springs, soaks and sacred sites. The crews were advised to use water from road bores only. The protection of sacred sites along Beswick Creek was also emphasised. Interest existed regarding the allowable water extraction amounts from different areas and the Aboriginal water reserve might be available for use but there was recognition that leaving water in the environment was more valuable as some individuals felt conflicted as they would be unable to use the Aboriginal water reserve if they believed it would harm the environment. The community sought information about hydrogeology in the Barunga area and its connection to the Mataranka plan area and expressed eagerness for the department to revisit Barunga to continue discussions about water and address additional questions.
15 February 2024 Northern Land Council (NLC) facilitated consultation, Mataranka	Meeting with 8 people, including two past water advisory committee members, NLC staff and representatives from two top end farms	Some members of the group expressed concerns about South Mataranka's potential over allocation though the estimated sustainable yield remained unchanged in the proposed plan, despite suggestions to reduce it. However, the proposed estimated sustainable yield for Larrimah received support. Discussions were had on extraction and the water table dropping and reversing groundwater flow away from springs. Some believed that geological high points "underground hills" could block groundwater flow if the water table dropped significantly. Pumping water from billabongs to fill turkey nests could potentially damage the billabongs and the feasibility of constructing dams or large turkey nests to store surface water within the protected area and other plan areas. However, Traditional Owners expressed strong reservations about constructing a dam or turkey nest for the Ilmenite Mine and its impact on the river. Goose lagoon, an important hunting site north of Roper and Red Lily lagoon, experienced excessive drying and was suggested to hold more water. The importance of water for fish was acknowledged, and river channels historically used for fishing were observed to be drying up, with some filling with sand or sediment. Concerns were raised that plan rules might restrict the Aboriginal water reserve use on Jilkminggan land due to its location within the proposed environmental protected area. Aboriginal ranger groups were recommended for monitoring, including photo documentation to facilitate discussions with older Traditional Owners about observed changes over time.
10 April 2024 Arid Land Environment Centre, Environment Centre NT	Follow up meeting with the department and representatives from Arid Land Environment Centre, Environment Centre NT	The department provided an overview of the knowledge and understanding of the resources where the plan recognises climatic variability. In managing water, it is not just about the estimated sustainable yield but equally the management arrangements (i.e. announced allocations or AAs) and location of water take (i.e. water extraction assessment upon receiving an application for take) that determines impact of extraction. The plan deliberately constrains water use near

Meeting details	Purpose	Information and feedback
		<p>Roper River recognising high cultural and social value but makes more water available where no groundwater dependent ecosystems and negligible impact on Roper River flows. Evidence that extraction started in 2000s, minimal impact relative to rainfall since then demonstrates climatic variability and that the determinant for Roper River dry season flows not water extraction. It is also known that extraction nearest the river has the biggest impact – not from locations at distance away from river and certainly not from the Larrimah zone; management arrangements that have been developed to protect these sensitive areas.</p> <p>Arid Land Environment Centre raised questions about the following and committed to reading the plan prior to making their submission:</p> <ul style="list-style-type: none"> • how information was communicated • drawdown from Larrimah estimated sustainable yield • models sensitivity to determine impact of extraction • using historic climate condition and not Erskine (2003) rules for management arrangements • ecological condition not used to set environmental.
<p>23 April 2024 Northern Land Council (NLC) Ranger Coordinator in Ngukurr</p>	<p>Meeting with Ranger Coordinator</p>	<p>Discussion on the management of the water resource:</p> <ul style="list-style-type: none"> • additional understanding regarding key species of importance in the Roper River, including bull sharks. • A low flow indicator should be algal growth on Roper Bar, and ensuring enough fresh water flows over it in the wet season to washing away the algae and salt after king tides • the health of the Roper after Ngukkur, noting the Roper has additional springs downstream, that keep the river functioning • porpoises were sighted last year after a prolonged absence, yellowfin tuna was observed 15 km downstream from Ngukkur, and oysters regularly grow approx. 20 km downstream • it had been observed that rivers are getting wider, shallower, and losing their banks and that water flow will be important for keeping sediment pushing through to the mouth • spots with important species were discussed, suggesting a potential NLC project for anthropological cultural mapping • reduced rainfall affected fruit production, with fire management playing a role in seed release • fire management strategies, including saving the canopy and recognising fog's importance in fire control, and the impact that climate change is having on these fire practices. <p>Support was sought from NLC for cultural knowledge dissemination included teaching children about available food, bee nests, bush medicine, and the "Learning on Country" program and annual training for Traditional Owners ranger groups.</p> <p>The department clarified the role of the Controller of Water Resources and discussions moved to water extraction licences including the need for accessible information about significant licenses in the area and informed involvement in water licenses and future strategies.</p> <p>The community would like Aboriginal representation on boards and committees, advocating for Aboriginal voices to speak for the Country or the area.</p>

Meeting details	Purpose	Information and feedback
<p>7 May 2024 Jilkminggan and Mataranka Local Authority</p>	<p>Local Authority meeting</p>	<p>Discussions with members included water concerns with ensuring adequate water availability. This included:</p> <ul style="list-style-type: none"> • agricultural and community water requirements was highlighted, prompting questions about the substantial demand as water primarily served agricultural purposes (crops and stations), but there was a desire for increased access for gardens, parks, and general use • clarity on the reasons behind high water usage for future population growth, housing, and other needs • considering both historical challenges and future planning • explanation on declining water levels and the reasons behind it • comprehensive monitoring approaches and bore monitoring should occur in the dry and wet season. <p>Access to land was discussed and members emphasised adherence to proper protocols in relation to sacred sites. Members stated that clear information and transparency would assist in understanding the plan.</p>
<p>8 May 2024 Larimah/Daly Waters Local Authority</p>	<p>Local Authority meeting</p>	<p>The department provided information on the Aboriginal water reserve and the government's role facilitating trade within different zones. Members acknowledged that Aboriginal people could engage in trading.</p> <p>Members expressed that water concern are:</p> <ul style="list-style-type: none"> • calcium content, with acceptance as long as water came from the tap • environmental impact of water extraction • water licenses exceeding the allocated amount • promoting economic activity. <p>Participants expressed uncertainty about information seen on Facebook and appreciated in person discussions with the ability to ask questions and seek explanations and although initial complexity existed, understanding the water plan increased confidence.</p>
<p>10 May 2024 Cotton Australia</p>	<p>Meeting with NT Cotton Australia representative; and Better Cotton Initiative representative (worldwide)</p>	<p>The department provided an overview of the draft plan and the feedback received, to date. Additional information on water management in the Territory and how this is complemented by a water plan was also discussed including: the grant/decline of water extraction licence applications, adaptive management, and the department's regulation and compliance framework.</p>
<p>15 May 2024 NT Farmers</p>	<p>Meeting with NT Farmers CEO and NT Farmers Policy Officer</p>	<p>The department provided an overview of the draft plan. The discussion focused on water availability in the three water management zones, providing certainty for water extraction licence holders, and the future development of the agricultural precinct within the plan area.</p>
<p>27 May 2024 NLC facilitated consultation, Jilkminggan community</p>	<p>Meeting with Jilkminggan community</p>	<p>Discussions centred on water quality testing being completed at the end of both wet and dry seasons and the importance of water monitoring and assessment; is there an opportunity to collaborate with NLC rangers for this purpose.</p> <p>The NLC committed to monthly water quality testing and reporting as the community observed the kids' water hole, which had previously been clear but was now muddy. It was noted that river are not as full and in Larimah, a swamp dried up in 2020 and still remained that way.</p> <p>Black root rot was also observed affecting cabbage palms at their base and they are showing signs of distress.</p>

Meeting details	Purpose	Information and feedback
<p>27 May 2024 Amateur Fishermen's Association NT</p>	<p>Meeting with AFANT CEO</p>	<p>Department staff provided information and data that clearly refutes Environment Centre NT baseless claims that the plan could cause groundwater flow reversals and that extraction is impacting flows in the Roper River and its springs.</p>
<p>28 May 2024 Northern Land Council (NLC) facilitated consultation, Minyerri</p>	<p>Meeting with 6 people at Minyerri</p>	<p>Participants emphasised the river's significance, including the water goanna's role in ceremonies with discussions covering animals and environmental indicators listed in the plan.</p> <p>Concerns arose about water licenses granted at the Little Roper River.</p> <p>During a three day Indigenous Land Use Agreement project meeting in Minyerri, land management was discussed, but the water plan was not mentioned. Traditional Owners expressed a preference for comprehensive information rather than fragmented discussions.</p> <p>The group requested that the department provide an update on the water plan's outcome during the Local Authority meeting.</p>
<p>29 May 2024 Northern Land Council (NLC) facilitated consultation, Roper Gulf Community Hall</p>	<p>Meeting with 4 people at the Roper Gulf Community Hall</p>	<p>Environmental water requirements were discussed, in particular, the fork-tailed catfish and the four types of turtles in the river and the presence of red lilies on the edge of the Roper discharge zone. Water inclusion in the Indigenous Land Use Agreement was proposed.</p> <p>Attendee suggested that pastoralists should seek permission before drilling bores and advise of changes in bore usage. NLC could engage with pastoralists and license holders to understand water usage and land activities.</p>
<p>30 May 2024 Mataranka Community Hall, open meeting</p>	<p>Meeting with 9 local residents including 2 Jilkminggan representatives and representatives from the Big Rivers Protect</p>	<p>The department informed participants of the classification of a Top End and Arid Zone and advised of the wet season versus the dry season policy, and that the plan is focused on the dry season.</p> <p>Participants felt that existing data did not adequately reflect the lived experiences of people in the area and requested a shift from relying solely on scientific data to considering physical evidence. This is due to observations indicating changes at 2-Mile Creek, which was previously deep and now the creek allows walking across during the dry season, with altered vegetation patterns.</p> <p>Over time, water levels have decreased significantly and what was once bank to bank height now required walking a considerable distance to reach the river. In addition, some springs, which were once considered medicinal, were now turning green.</p> <p>The department explained groundwater dependent ecosystems.</p> <p>Participants would like more engagement with a local translators regarding decisions that affect their communities.</p>

Schedule 3: Alignment of submissions to themes

Submissions 1 – 46 represent the detailed and unique responses to the plan (inclusive of unique comments attached to a campaign template submission).

Submissions 47 - 962 represent the campaign templated responses to the plan. These responses presented a consistent array of comments that have been grouped together here. Submissions 963 - 972 represent the survey responses to the plan. These comments should be read in conjunction with the demographic responses and feedback described in Schedule 4.

The names of organisations and individuals who provided detailed written feedback via have your say and gave permission to be identified have been identified below.

Submission	Comment	Theme
Detailed submissions		
1	The plan employs ESY and Announced Allocations to maintain minimum flows in "dry years" and excess flow from "wet years" is contained in the Roper River.	2a and 8a
	The SAWR allows an additional 1GL in Mataranka South. Apart from this, there are no other additional water allocations added for Mataranka North/South. These allocation allowances are supported.	3b and 3c
	Education for stakeholders around AA's being applied at Mataranka North/South zones to ensure understanding that these are not to be used in only exceptional circumstances.	8a and 4b
	Addition of a trigger in the Water Allocation Plan to conduct a review if water levels along the Mataranka South and Larrimah zone boundaries do not follow modelled expectations.	8e
	The draft plan is an important step towards protection and groundwater management in the region.	9a
	Attention should be focused on monitoring water levels.	8d
	Caution advised if the region experiences a persistent drier than normal climate which could cause challenges to meet stakeholder expectations - specifically in the Mataranka North/South zones.	1b
	Every opportunity should be taken to reinforce the need for community and industry involvement in overseeing water allocation planning and review.	4b
	Implementing the Water Allocation Plan with minor amendments is more beneficial than proceeding without the Water Allocation Plan to guide allocations.	3b
	Involvement of the community and key stakeholders are essential for planning and management.	4b
	It is essential to consult with key stakeholders and the community to build and maintain trust if increases in water extraction were to occur.	4b
	It will be essential to gauge impact of climate and further ground truth the modelled assumptions at the 5-year review.	8e
	Limit the extraction of water that sustains surface flow and GDEs to a minimum.	3b
	Ongoing ground truthing and a commitment to correcting course if the assumptions made are challenged by measurements following the commencement of significant water extraction.	8d
	Opportunities to expand Elsey National Park or enter into conservation agreements with surrounding land holders should be pursued.	5d
Reviews of the plan should be considered if Larrimah zone development was to occur rapidly.	8e	
Specific monitoring of boundary water levels as an implementation action with a trigger should be included in the Water Allocation Plan. This trigger would cause review of ESY, and any future allocations should include water level changes that have been outside the predicted levels.	8e	

Submission	Comment	Theme
	Support for the allocation to SAWR.	3c
	The cumulative ESY in the Draft Water Allocation Plan are conservative compared to the 80/20 contingent rule.	2a
	The Department should investigate options to limit land clearing and to prioritise the preservation of GDEs within the PEA.	8b
	The development proposals for RRDZ and PEA are positive actions and implementation must be robust and monitored for effectiveness.	8b
	The draft plan outlines a reasonable way forward to guide water allocations over the next 10 years.	3b
	The PEA should include clear conservation objectives and monitoring of performance. If the RRDZ management settings, and its water trading rules, be determined as insufficient to achieve PEA objectives, this should be able to trigger a recommendation to the Minister to consider a review the Water Allocation Plan.	8b
	The proposed extraction limits are conservative compared to the default rules in the Water Allocation Plan Framework.	3b
	The proposed PEA should include multiple measures to cap extraction at the current entitlements within the RRDZ.	8b
	The Roper River has become increasingly popular with recreational fishermen due to Barramundi populations.	9a
	The Roper River receives most of its known dry season flows from the TLA is of key importance to recreational fishers.	7b
	The wet season drives productivity of the fishery and flow in the dry season is sustained by the TLA and maintains habitat and refugia.	1c
	There is community concern for the proposed annual extraction of 35,238 mL from the Larrimah zone could impact surface water flow in the Roper River.	3b
	To distinguish the Mataranka North/South and Larrimah zones as significantly different makes sense from a hydrological perspective.	2b
2	The Mataranka Water Allocation Plan could explain its reasoning regarding water values and demonstrate a comprehensive understanding of the complex groundwater dependant ecosystems.	5b and 4c
	The Mataranka Water Allocation Plan could improve its openness and transparency for how decisions were made.	5b and 4c
	Commonwealth resources, including water, create high risk for the public from third parties trading licensing for profit.	9a
	Concern that the Mataranka Water Allocation Plan is not looking at Mataranka holistically but divides the aquifer into a number of areas with different amounts being extracted. This could cause flow to change and move away from critical ecosystems.	2b
	Long term results of water extraction will create a negative outcome for population, productivity and the environment.	7c
	Public concern over the proposed Water Allocation Plan for Mataranka.	9a
	Request for the model that the government assessed potential impacts of water extraction to be released for public and scientific discussion.	2c
	Request that the balance between shared resources and cost benefits are considered.	9a
	Strong concern for lasting impact that decisions in the Water Allocation Plan will cause.	9a
	The community should be better informed.	4e
	The Water Allocation Plan has no benefit for community and brings significant risk of over allocation.	9a
3	Engage thorough consultation processes with the Northern Territory Farmers Association and the affected members to explore viable alternatives that balance environmental and cultural priorities with the economic sustainability of the local farming community.	4e
	Implement a phased approach to the Water Allocation Plan, allowing farmers sufficient time to adapt to the new regulations.	8d

Submission	Comment	Theme
	Offer incentives and support for farmers to adopt innovative water-saving technologies and practices that align with the environmental goals of the Mataranka Water Allocation Plan.	7b
	Provide compensation to farmers who will be adversely affected by the new water restrictions. Compensation should reflect the investments made by these businesses and the economic losses they are likely to incur.	7b
	The proposed Mataranka Water Allocation Plan prioritises environmental and cultural considerations but presents limitations on water use that will have implications on the community members to sustain and expand their operations.	6e
	The Water Allocation Plan threatens established farming enterprises.	7b
	Water allocations restrict businesses the ability to plan for the future, expand operations and contribute to the local economy.	7b
5	Expand the PEA to protect Bitter Springs while establishing ongoing management bodies to oversee the whole catchment area.	8b
	Request for the Government to change direction and support community led decisions impacting water across the Romper River catchment.	4d and 2d
	Request for evidence that environmental and Indigenous cultural values are protected and made into law.	5d and 6a
	A review of current water licences should be undertaken, with a pause on any new licence being issued until this review has been conducted, and community views and scientific evidence incorporated.	1d
	Actively avoid outcomes similar to the Murray Darling Basin.	9a
	Adopt a precautionary, values-driven approach as stated by the CSIRO Roper River study by managing the Roper Catchment according to "community and government values".	4d
	Commitment to no more water allocations beyond current extraction levels. This should include a ban on increased water extraction, licenses, surface water harvesting and new dams.	3b
	Community requests from along Roper River for water extraction to stop.	3b
	Consult all communities of the Roper River in decision making.	4d
	Develop refreshed policies in partnership with communities that will give long-term protection to local rivers.	9a
	Endorse and implement tangible steps in response to the Roper River Water Statement.	8d
	Ensure entitlements under the SAWR can be met without a net increase in the amount of water licenced through reallocation of unused entitlements.	3c
	Lack of clarification and detail on proposed protection measures would secure environmental values across the catchment and how a RRDZ would prevent and reduce negative environmental impacts.	8b
	Prevent environmentally destructive types of activities being carried out in particular identified areas or across the Roper River catchment.	5d
	Reject the draft Water Allocation Plan.	9a
	Request to commit to no more water allocations being made for the Roper River due to visible impacts already being made. This request includes a ban on further water extraction, licenses and surface water harvesting.	3b
	Roper communities, including those downstream, to be included in all water joint-decision making.	4e
The draft plan does not consider cumulative impacts of water extraction from the Tindall aquifer affected by the Georgina Wiso Water Allocation Plan or what could occur through diversion of water from Roper River Catchment under Northern Territory's Surface Water Take - Wet Season Flow policy.	3f	
The Minister to consider establishing meaningful consultations with TOs, representative bodies and communities to ensure FPIC on ways to give management effect to declaring the entire Mataranka Water Allocation Plan Area and PEA under s36 and s37 of the Environmental Protection Act 2019.	8b	

Submission	Comment	Theme
	The modelling of Water Allocation Plan only includes data from 1970 onwards. During this 50-year period has been the five largest re-fill events in an otherwise dry century.	1f
	The recent interim report from the Productivity Commission into compliance with the NWI highlighted multiple areas in which the NTG is non-compliant with agreed standards in water planning.	2d
	The Water Allocation Plan is inconsistent with community values and has no social license.	4d
	The Water Allocation Plan is not consistent with key requirements under the NWI.	2d
	Traditional Owner groups across Roper River catchment call for water to stop being extracted and demand better protection of cultural values and increased roles with decision-making power for issues impacting water across the catchment.	4d
6	Support for the Groundwater Discharge Protected Area. There are more than 80 sacred sites in this protected area, with more than 60 having a dependence on groundwater.	6b and 5b
	Support for ongoing monitoring and modelling in the plan.	8d
	Support for the new Water Allocation Plan as it recognises the outstanding cultural value of the Roper River and tributaries in the Mataranka area and its unique environmental values.	6a
	The plan includes the declaration of an Environmental Protected Area in the Elsey/Mataranka area in 2024 which will restrict certain activities.	8b
	The Plan recommends not allowing any new groundwater extraction within the Protected Areas and recovering the remaining unused allocation (reducing the licensed volume to the current actual volume) would enable the Roper River and tributaries to return as much as possible to a naturalised state, in recognition of its outstanding environmental and cultural values.	8b
	The protection of Aboriginal sacred sites in the Roper River catchment is recognised by the NTG and broader Territory community as an important element in the preservation of the Territory's cultural heritage for the benefit of all Territorians.	6b
7	Strongly supports protecting the sustainability of water resources.	5d
8	Avoid risk of underground water supply being impacted by water allocation.	3b
	Strongly supports protecting the sustainability of water resources.	5d
9	Concern for the additional water promised to local cotton and fracking industries under the Mataranka Tindall Water Allocation Plan.	3b
	Increased extraction could have impact on water supply at Ngukurr causing bodies of water to become dry earlier in the season impacting wildlife and cultural activities.	2a
	Increased extraction could have impact on water supply at Ngukurr increasing fire risk and impact dry season flow to Roper River.	5c
10	Strongly supports protecting the sustainability of water resources	5d
11	Concern for lack of understanding from Government on long-term impact for Mataranka TLA Water Allocation Plan.	5d
	Strongly supports protecting the sustainability of water resources.	5d
12	Request that communities along the Roper catchment, especially downstream, are to be included in all decisions regarding water allocations and extraction.	1h
	Concern that the Water Allocation Plan doubles the amount of water licenses that are currently in place.	2b
	Concern that the Water Allocation Plan will allow six times the number of water licenses that have currently been allocated.	2b
	Strong concern that the Water Allocation Plan and the Georgina Wiso Water Allocation Plan will allow for 265 billion litres of water to be allocated and removed annually.	2b

Submission	Comment	Theme
	Request for a number of commitments to be made within the Water Allocation Plan to prevent an increase in water allocations include (1) ban on all further water extraction and licenses and (2) surface water harvesting in the Roper catchment including groundwater and floodplains.	2c
	The Surface Water Take allows floodplain harvesting and development of dams on rivers such as the Roper River (Wet Season Flow Policy and Interference with a Waterway Guideline). Request that the risks associated with harvesting and dam development is considered in future iterations of the Water Allocation Plan.	2d
	Concern that the Water Allocation Plan will allow quadruple the number of water licenses given within the Larrimah area.	6f
	The effects of water extraction that currently occurs in the Mataranka zone and across the NT have caused noticeable impacts.	6f
13	Concern for extreme environmental damage to the Mataranka TLA and loss of employment, both from the Water Allocation Plan.	7b
	Concern for lack of listening and implementing change for local communities.	4d
14	Concern for the health of Mataranka and Bitter Springs with implementation of the Water Allocation Plan.	5d
15	Actively avoid outcomes similar to the Murry Darling Basin.	5d
	Strong concern the Water Allocation Plan is to accommodate for surrounding industries over the local communities.	7a
16	Concern for water flow throughout the catchment.	2b
17	Actively avoid outcomes similar to the Murray Darling Basin.	5d
18	Strong concern for the health of the water supply of the Roper catchment and its surrounding areas.	7a
19	Strong concern for the future health of the rivers and floodplains.	5d
20	Concern for water security.	7a
21	Actively avoid outcomes similar to the Murry Darling Basin.	5d
	Concern for environmental protection.	5d
22	Concern for lack of protection and preservation of waterways.	5d
23	Concern for impact on biodiversity and recreational fishing.	5d and 7b
	Concern for allowing excessive water to be removed from the aquifer and impacting the catchment.	3b
	Concern for impact on biodiversity and species extinction.	5a
	Concern for impact on water supply and increases in salinity for downstream communities such as Ngukurr.	5c
	Concern for the impact on NT rivers from the Water Allocation Plan with the combination of the Governments Surface Water Harvesting plan.	3f
24	Concern for the large water allocations in the Water Allocation Plan when considered alongside the Georgina Wiso Water Allocation Plan, floodplain harvesting and dams.	3b and 3f
	Strong concern for ecological and cultural impacts and increased risk of drought and bushfires from reduced flow for the catchment.	5d and 6a
	Request to a ban new or increased water extractions and surface water harvesting from the Roper River.	3b
	Require decisions on water management to be made with full participation of affected communities across the Roper River catchment.	4e
	Strong community request for stopping water extractions from the Roper River.	4d

Submission	Comment	Theme
25	Concern for impact on water supply and increases in salinity for downstream communities such as Ngukurr.	5c and 7a
	Concern for impact on water supply and increases in salinity for downstream communities such as Ngukurr.	7a
	Concern for the impact on NT rivers from the Water Allocation Plan with the combination of the Governments Surface Water Harvesting plan.	3f
	Concern for water flow throughout the catchment.	2b
26	Concern that the Water Allocation Plan will negatively impact ancient culture and natural heritage and lead to consequences felt by all of Australia.	6a and 7c
	Actively avoid outcomes similar to the Malley and the Murry Darling Basin.	5d
	Concern as Australia experiences extreme climate conditions which may not be taken into consideration in the Water Allocation Plan.	1b
	Concern for climate change to cause extreme hot and arid conditions with excess removal of water.	1b
	Concern for lack of positive effects on soil, water, ecosystem and cultural integrity.	5d
	Concern for the cotton industry that will be supported by the Water Allocation Plan as it does not enhance or maintain environmental or cultural integrity.	5d and 6a
	Concern for the Water Allocation Plan and Georgina Wiso Water Allocation Plan will allow 265 billion litres of water to be taken each year for cropping and mining.	3b
	Concern of who the Water Allocation Plan with benefit within and outside of Australia.	9a
	Other states, such as Western Australia, are experiencing climatic changes with increased heat stress and lower rainfall. There is concern this will also impact the NT.	1b
	Strong concern for impacts on ecosystems that are cleared for irrigated agricultural programs that lead to salinated land.	5d
	Strong concern for the future of the Roper River catchment and industries that rely on consistent access to high amounts of water.	7b
The plan does not include the added risk posed by the Surface Water Take - Wet Season Flow Policy and Interference with a Waterway Guideline plans which allows floodplain harvesting and dams on rivers such as the Roper.	3f	
27 Professor Matthew Currell and Professor Sue Jackson	Lack of sufficient measurable targets and thresholds for protection of environmental values along with no evaluation on water use impacts.	1c and 2e
	Ensure further research into the ecological and cultural values is conducted in collaboration with TOs, their representative organisations and relevant stakeholders.	6a and 2e
	Request to set more conservative ESY values across Larrimah and Mataranka North/South zones and recognise the aquifer's connectivity.	2a and 2b
	Request to reduce reliance on AAs as a management tool and compare to setting conservative ESYs.	8a
	The approach used to scenario test and assessed impact is not transparent.	2c and 4c
	Extraction rates will increase in the Larrimah zone which will impact the groundwater flow path that fills Mataranka springs and Upper Roper GED.	3b and 2b
	The Water Allocation Plan, including the management objectives, licencing system, approach to zoning land and water use within the plan area, are not sufficiently robust to protect the Roper River, Mataranka springs and other GDEs, and the values attached to these.	5d
	Indigenous people residing in the Water Allocation Plan area have not had sufficient opportunity to identify the cultural significance of features in the area, did not endorse the plan's release and are unlikely to receive economic benefit from the extractions.	6a and 4b
	Greater reliance on measurable targets and indicators should be used to measure the success of strategies to achieve the plan's objectives.	8b and 8d
	Analysis of bore and climate data from the BOM since 2010 indicates that extraction in Mataranka South zone has been causing declines in groundwater levels near the springs in the aquifer sustaining them.	1d

Submission	Comment	Theme
	Commit to monitoring of groundwater levels, springs and river flow rates through an intensive and transparent research program to improve the understanding of water level requirements and limits of change for GDEs before permitting increases to ESY values.	8d
	Concern over separating the plan area and calculating zone ESYs using different methods as this is not consistent with sound groundwater management principles.	2b
	Concern that the plan's proposed rules will put long-term health and viability of the Mataranka Springs and other GED of the Upper Roper River at serious risk.	
	DEPWS has overlooked observation data of current groundwater usage and has not taken into consideration a decline in groundwater levels (relative to rainfall trends) in bores at the edge of Elsey National Park, since large groundwater licences were granted south of Mataranka in 2013.	1c
	Ensure that the SAWR can be met with the proposed Water Allocation Plan.	3c
	Existing approved groundwater extraction south of Mataranka springs is not adequately acknowledged in the Water Allocation Plan.	1d
	It has not been demonstrated that the Water Allocation Plan would be sustainable in maintaining ecological, cultural and economic values of the GED.	1c
	It is requested that an objective of equitable sharing amongst users is added to the Water Allocation Plan.	3a
	It is requested that groundwater extractions are reduced due to the high value of the ecosystem and current knowledge gaps.	3b
	It is requested that measurable indicators should be used as trigger levels for reducing seasonal allocations rather than model-stimulated river flows.	8a
	Modelling used in the Water Allocation Plan has not been made available for independent analysis.	2c
	Request for the model in the Water Allocation Plan to be made available for independent analysis.	2c
	Request to consider increased extraction in the Georgina Wiso Water Allocation Plan and its effect on regional groundwater flows when assessing appropriate ESY values.	2a
	Request to determine the effects of licensed extraction in the Mataranka South zone on groundwater levels and its dependent ecosystem.	1d
	The AA mechanism lacks transparency and is dependent on modelling, rather than measurable environmental thresholds.	8a
	The approach used to scenario test and assessed impact is not transparent.	2b
	The Plan does not consider cumulative effects of allowing a substantial increase of extraction in the Larrimah zone under the proposed ESYs.	2a
	The plan is based on partial knowledge of ecological water requirements.	1c
	The Plan is unable to fully provision the SAWR and to do so from unused water licences may place the Roper River and associated GDEs at further risk.	3c
	The use of AA's addresses only short-term climatic variability, not long-term cumulative impacts.	8a
	The use of AAs to reduce extraction rates focuses short-term climatic variability, but does not address regional, long-term groundwater flows that sustain the ecosystem.	3f
	The Water Allocation Plan misrepresents the local groundwater system as it does not treat the catchment as one zone.	2b
	The Water Allocation Plan's objectives are narrowly defined, and its proposed management actions are based on inadequate understanding of the water requirements of ecological and cultural values of significance.	3h
28 Des Barritt	Concern for companies that use excessive water and are not sustainable will be given licenses over tourism and the pastoral industry.	7b
	Strong concern over water allocation increases threatening current lifestyles of the communities.	7c
	Strong concern the Water Allocation Plan will accommodate for surrounding industries over the local communities.	7b

Submission	Comment	Theme
29 Dr Ross Brodie	Using groundwater storage as a management metric is inappropriate, unconventional, and not useful for protecting key environmental assets. The underlying message is that unsustainable dewatering of the aquifer is the anticipated outcome of the Water Allocation Plan.	1a and 1f
	Concern over using incorrect metrics to identify impact. Use of average rather than flow does not identify critical dry periods which would impact key aquatic specie.	1a and 5b
	Suggestion to use the range of baseflow metrics across the 50-year period to understand the magnitude and duration of critically low flows. This knowledge should be applied with addition of key aquatic species tolerance to low flow.	1a and 5b
	Suggestion for the Mataranka North/South zones to have extensive assessment of impacts of extraction occurring since 2013 to review ESY.	1d and 2b
	Comparing the magnitude of the reduction (3.8 m) at the zone boundary with the existing water table gradient of ~10m across the Larrimah zone (Schedule O), shows just how significant this level difference is. It highlights the risk of Larrimah pumping capturing a component of the northerly groundwater flow into and within South Mataranka, and ultimately to the Roper River.	1f and 2b
	Concern for lack of evidence within the Background Report.	1g and 4c
	Climate variability warrants a conservative approach to estimating recharge.	1d
	Concern for lack of evidence within the Water Allocation Plan and statements made that contradict data provided.	1g
	Concern for statements contradicting data presented within the Background Report, specifically in regard to the impact of extraction since 2013.	1d
	Concern for the Water Allocation Plan to be using groundwater level data from the start and end of a 50-year model period as it does not indicate any impact between data points.	1a
	Concern of a lack of transparency with the release of the draft Mataranka Plan.	4c
	Concern over no estimates of critical water budget components present in the plan.	1d
	Concern that a conservative approach is not being taken when there is a lack of understanding of karstic carbonate aquifers, recharge variability and connectivity to groundwater systems that fuel key ecological assets.	1g
	Concern that drawdown of water table levels in the Larrimah zone could propagate across zone boundaries and have broader negative impacts has not been identified or addressed in the Water Allocation Plan.	1a
	Data from the Daly catchment show that the wet conditions observed over the last 40 years are not consistent with the previous 600 years.	1b
	Data used in the report for rainfall records is simple and statistically invalid linear trends and analysis on cumulative residual errors between 1900 and 2022 should be used instead.	1b
	Groundwater flow models such as the one used for the Plan (DR2 model) have great difficulty in incorporating fracture and conduit flow. This limitation is acknowledged in the model report, stating that "the model is not designed to examine localised (<10-20 km) flow paths".	2c
	Insinuation that dries season flows will continue to increase in the future is not valid.	1a
	Lack of evidence in the Background Report supporting statements in regard to groundwater level trends and their impact.	1a
	Lack of information on how key parameters in the Water Allocation Plan have been decided in regard to river flow thresholds.	1b
Modelled data has not reflected historic data for Mataranka North/South and Larrimah.	1a	
Potential for groundwater extraction in the Larrimah zone exceeding recharge causing lower groundwater levels, flow direction changes or increase in speed is not discussed.	1a	
Strong concern over the replenish amount suggested being too large in the Water Allocation Plan from the modelled data.	2c	

Submission	Comment	Theme
	Strong concern that the Water Allocation Plan is omitting important information and data.	1f
	The Background report states that the most conservative estimate of recharge was used, as provided by the DR2 model. This is not the case as the DR2 model can be applied in more conservative (and appropriate) ways.	2c
	The DR2 model can be used to deliver sophisticated impact assessments. Learnings about eco-hydrological relationships are not specifically incorporated into the Plan and replaced by a simplistic categorisation of climate conditions.	2c
	The DR2 model update report used a longer model period (1900-2019) resulting in an average annual recharge of 211.3 GL/yr. The Plan Background report concluded that climate variability has the greatest impact on groundwater storage and flows in the Roper River.	2c
	The Larrimah zone has been labelled as an "Arid Zone" which allows for aquifer dewatering and has not focused on the consequences of these actions.	2b
	The Larrimah zone is characterised as an arid zone where recharge to water resources is episodic, and aquifers must be relied upon to sustain life.	2d
	The report modelling is based on using a relatively wet climate period between 1970-2020. The sustainable yield is over four times the modelled average recharge when the recharge estimates for the 70 years prior to 1970 are also incorporated.	2c
	The Water Allocation Plan uses the assumption that wet climate conditions will continue creating episodic recharge events.	1b
	There is an absence of available monitoring data on the plots presented from the model output.	1f
	There is concern that using an annual average as a key metric is not an accurate representation of the flow or the system.	1a
	Usage of the DR2 model with a wet climate generates optimistic recharge estimates for the Water Allocation Plan.	2c
	30 Andrew Smith and Carol Randall	The Mataranka Water Allocation Plan could be improved in a number of ways, openness and transparency in terms of how decisions were arrived at, demonstrating robust logic and reasoning, regarding water values and demonstrating a comprehensive understanding of the complexity of GED.
Strong concern for the risk of water allocation in the Water Allocation Plan.		3b
Commonwealth resources, including water, create high risk for the public from third parties trading licensing for profit.		7b
Concern for long-term impact resulting in a negative outcome for population, productivity and the environment in regard to the Water Allocation Plan.		7c
Lack of clarity regarding the data and modelling relied on to make these decisions regarding the ESY.		2a
Request that the balance between the demands on shared resources and the cost benefit for removing resources from local community is investigated.		2e
Request to release the model that was used to assess potential impacts of water extraction for public and professional study.		2c
The plan divides the aquifer into zones with separate amounts being extracted from individual areas without acknowledgement of the aquifer as a whole.		2b
32	Water being removed from one zone in the catchment will result in increased flow into that zone and away from critical ecosystems that rely on the flow from the "whole".	2b
	Concern for Aboriginal people's ability to rely on these water sources will cease.	5d and 6a
	Lowering the water table will cause loss of flora and fauna biodiversity and habitat.	5d and 6a
	A precautionary approach must be used.	2a
	A previous report from the NT Government indicates that recharge is already very limited in this catchment.	1a
	Allocation of water beyond recharge capacity will lower the water table reducing available water for iconic wildlife, vegetation and humans.	3b
	Alternative development that is not water dependent has not been considered.	7b
Biodiversity at risk due to land clearing, loss of habitat and invasion of exotic species.	5d	

Submission	Comment	Theme
	Clean air, fresh water and food sources are maintained from a healthy, biodiverse environment and there is concern that the Water Allocation Plan puts the catchment at risk.	5d
	Concern for the high amounts of water needed for major projects around the catchment.	4b
	Concern that water allocations will not be focused on use by the local community.	3a
	Emphasis put on the need for innovation to improve water practices and develop projects that are not water intensive.	3a
	People across the NT are already experiencing the effects of poor, inadequate or non-permanent water supply.	7a
	Protecting water resources should be considered as part of the Water Allocation Plan.	3b
	Request that the Water Allocation Plan is assessed with great rigor by independent experts on all aspects of water supply.	1f
	Strong concern for land salination.	5d
	Strong concern for the amount of water will be allocated from the Roper River.	3b
	Strong concern as the previous Water Allocation Plan was criticised by independent scientists.	4d
	Strong concern for water allocation licenses being granted beyond the recharge capacity.	3b
	The dry nature of the NT is not suitable for water allocation development.	1b
	The Water Allocation Plan allocates water from the aquifer beyond the recharge capacity.	3b
	The Water Allocation Plan should also contain requirements for how water will be used and cleaned for reuse to minimise damaging effects on land and wildlife	5d
	This Water Allocation Plan will create over-allocation of water and must be reassessed.	3b
	Underground water from the Roper River catchment supports tourist attractions, surrounding lands, flora and fauna species and their habitat.	5d
Water is an important resource for NT ecology.	5d	
33 Northern Land Council	Strong concern for lack of knowledge of staff in regard to current rates of extraction from the plan area.	1d and 4a
	Concern with using selective modelling tools that utilises only 50 years of rainfall data.	1f and 2c
	Strong concern for a lack of transparency.	1f and 2c
	Reduce reliance on AAs as a management tool and set conservative ESYs.	2a and 8a
	The NWI Agreement allocates water to native title holders for traditional cultural purposes but there is concern this will be considered after the Water Allocation Plan is finalised.	2d and 3c
	Information relating to the SAWR was misleading.	4b and 3c
	Relevant TOs should be consulted on the plan and requested to monitor and evaluate it.	4b and 8d
	Strong concern TOs are not being consulted and listened to.	4d and 4b
	The risks to cultural values must be considered in a transparent and structured way when evaluating the risks to cultural sites and values from consumptive water use. In addition, the development of a new Water Allocation Plan provides an opportunity to align with the proposed objectives of the future NWA which places emphasis on cultural values.	6a and 2d
The Water Allocation Plan states that cultural values are important, without explicit inclusion in the allocation process, the plan is inconsistent with the Act, the NWI or the proposed objectives of the NWA.	6a and 2d	

Submission	Comment	Theme
	The risk assessment methodology described in the Consequence table provides a qualitative descriptor matrix outlining the potential ecological and water quality impacts, as well as the potential socio-economic impacts. However, the table does not provide a similar framework for assessment of risks and impacts to cultural sites and values	6a and 2e
	Request that Indigenous water rights are properly recognised including a ban on further water extraction, licenses and surface water harvesting, cultural and environmental values protected in law, required communication with downstream communities to be consulted in the Water Allocation Plan process and cultural and scientific knowledge of Country to be included in consultation.	4b and 6c
	Include an implementation activity to undertake studies and monitoring to assess and understand the impact of water extraction on saltwater intrusion into the Roper River and surrounding environment for the purposes of plan adaption to mitigation as required.	8d
	Aboriginal Ranger Groups should monitor the Roper River, including flows and water quality.	8d
	Allocation of a consumptive pool in the absence of this information compromises the ability to protect cultural values through water management decisions.	6a
	Categorisation of risk should follow international risk standards and the precautionary principle.	2e
	Concern for misleading information provided by the DEPWS to assert the low risk of the Water Allocation Plan without complete information during presentations with local government authority and local stakeholder groups.	4b
	Concern for separating the catchment into zones and not using management principles for the area as a whole.	2b
	Concern that cultural values have not been taken into consideration during the development of the plan.	6a
	Concern that current licence holders will be able to increase extraction through previously unused water allocations while Aboriginal people wait to be allocated licences.	3c
	Concern that greater water extraction and licensing will be allowed as the catchment has been classified as an Arid Zone.	2b
	Concern that the weather conditions over the past 50 years not providing accurate climatic conditions of the area. Consideration of weather over the past 100 years may result in alternative management recommendations.	1b
	Consider and account in the Water Allocation Plan for the impact of potential increased extraction in the Georgina Wiso plan area and its relation to regional groundwater flows into the plan area.	3e
	Consider the Georgina Wiso plan that is further south and connected to from the Mataranka Water Plan aquifer in the Water Allocation Plan.	3e
	Constituents of the plan area and downstream have had limited opportunity to provide feedback on the draft Water Allocation Plan with prior and informed consent.	4b
	Cultural use is considered a beneficial use of water under the Act and needs to be considered as part of the draft and final Mataranka Water Allocation Plan.	6a
	Develop detailed culturally appropriate consultations materials that outlines key Plan details including risks and benefits of the Plan, complete scientific evidence and independent evidence.	4b
	Develop joint monitoring programs and community feedback as implementation actions in consultation with TOs.	8d
	Ensure that the Mataranka Water Advisory Committee consider this submission in its entirety, and provide feedback to TOs	4a
	Extend the draft Plan consultation period to enable a forum for affected TOs to meet as a group to provide feedback.	4e
	Furthermore, even the “statutory” element is non-binding on decision-makers as illustrated by the Supreme Court decision in relation to the Singleton water licence. This directly contradicts explicit requirements of the NWI to provide ‘a statutory basis for environmental and other public benefit outcomes in surface and ground water systems to protect water sources and their dependent ecosystems’ (NWI pt. 25(ii)) (NWI, 2004) and further undermines the confidence of TOs and Aboriginal people.	2d

Submission	Comment	Theme
	Include specific implementation actions to support Aboriginal culture knowledge transfer to young generations when undertaking activities related to the plan.	8d
	Investigate and update the draft plan to account for current and future effects of licenced extraction in the Mataranka South zone on groundwater levels and the ecosystem.	1d
	Lack of support for the Water Allocation Plan draft.	4e
	Need to understand GDE requirements through monitoring before increasing ESY.	2a
	NLC have raised concerns about the presentation of highly technical information without the clear articulation of key points.	4b
	Rangers and NTG should report back to community/senior TOs regularly about their findings for two-way knowledge-sharing and learning.	4e
	Recommendation to use measurable indicators as trigger levels for reducing seasonal allocations, rather than model-simulated river flows. Specifically, use dry season groundwater levels at key bores and observed Roper River flows at the Mataranka and Elsey Homestead gauging stations.	3f
	Reduce the proposed groundwater extraction volumes in the planned Upper Roper Discharge zone.	3b
	Request that Rangers and NTG should conduct water monitoring twice a year.	8d
	Request to lower the ESY value in Mataranka South and Larrimah zones in recognition of the Cambrian Limestone aquifer connectivity.	2a
	Request to release the model used to assess potential impacts of water extraction scenarios for public comments.	2c
	Staff from the DEPWS have stated that if this plan does not go ahead, double the amount of water could be extracted under different rules, this plan protects the environment. Strong concern over staff influences over impartial consultation processes.	4b
	Strong concern as the water management and economic development focuses on western practices.	6a
	Strong concern that access to all information within the Water Allocation Plan has not been released and adequate feedback cannot be provided.	4c
	Strong concern that the DEPWS was unable to meaningfully engage with the TOs prior to drafting the Water Allocation Plan.	4a
	Strong concern that the risk assessment process for cultural values and sites included in the Water Allocation Plan is harmful to Aboriginal rights and interests.	6a
	Strong concern that TOs are not being supported by NLC and representatives.	4d
	Strong concern TOs have not had their concerns listened to about the impact on Country.	4d
	The current departmental model of engagement only allows input from a WAC to be considered. This "Inform-Consult" approach (not documented in Plan details) relegates input of any ARG/WAC to the implementation phase.	4a
	The disparity issue is most apparent in the Mataranka South Zone where Aboriginal land constitutes 74% of the Mataranka South water management zone. In the South Zone, 30% of water is available for Aboriginal economic development as per the Aboriginal water reserve policy cap.	3c
	The identification of cultural sites and determination of their requirements is a critical step in the protection of cultural values.	6a
	The NLC recommends that NTG consider the information included in this submission and provide an updated draft for further community consultation.	4e
	The NLC requested a role in the development of the Water Allocation Plan to contribute to a robust plan but have been requested to use this platform to provide feedback and suggestions.	4b
	The ongoing Water Advisory Committee or Aboriginal Reference Group for the Mataranka Water Allocation Plan area should be comprised of TOs representing the three water zones (North, South, Larrimah) as well as Roper River downstream.	4a
	The proposed ESY for the Larrimah region represents a large increase in current licence use and does not reflect a precautionary approach.	2a

Submission	Comment	Theme
	The requirements of cultural values and sites should be defined and properly characterised prior to the approval and implementation of the Mataranka Water Allocation Plan.	6a
	The timelines of the proposed implementation actions associated with the protection of cultural aspects are either not time-bound or are beyond a reasonable period to allow meaningful engagement and influence in management decisions at the five-year review.	8d
	The Water Allocation Plan does not contain targets or a timetable to recover sufficient water for the Reserve.	3c
	The Water Allocation Plan does not include recognition of TOs and their relationship with water.	6a
	The Water Allocation Plan does not protect cultural values in relation to Aboriginal people's rights, interests, values, and aspirations.	6a
	The Water Allocation Plan should provide documentation to support transparent governance of the ARG or appropriate mechanism.	4a
	There is significant concern that unused entitlement water is recovered and made available for use, increased extraction may adversely affect the Roper River.	3c
	Undertake comprehensive consultation to develop implementation actions in relation to monitoring requirements as identified by TOs.	8d and 4e
	Where cultural information is not available, the categorisation of risk is commensurate with the level of uncertainty of the information.	6a
	Where implementation actions are proposed to reduce risks to cultural values, further detail is required in the Water Allocation Plan outlining how implementing these actions will ensure the cultural objectives of the Water Allocation Plan will be met.	8d
35 Libby Larsen	Lack of effective consultation of First Peoples in the Draft Plan process.	4b and 4a
	First Peoples and stakeholders should be consulted early in the planning process and continuously throughout its development. At all times, clear and transparent communication should be maintained.	4b
	The Draft Plan risks impacting places of significance due to inconsistencies between the plan and existent scientific and First Peoples' knowledge.	6b and 4b
	Australia is a signatory to UNDRIP, which includes the right to FPIC regarding projects affecting the lands, waters and resources of all Indigenous Peoples and which includes Australia's First peoples. The principles of FPIC require that First Peoples are given the opportunity to approve or reject Water Allocation Plans affecting their lands and resources before any action is taken in relation to their Country. This process needs to be better included in the Water Allocation Plan.	4b
	Building trust and support with First Peoples in the Draft Plan area should be a priority before the Final Plan is implemented.	4b
	Concern for a lack of transparency from the Water Advisory Committee in regard to modelling used which prevents replication of key calculation by the public and a lack of error bounds of the estimates of recharge rates.	2a
	Concern that the planning process fails to treat the three regions as one connected bio-physical groundwater system. Without planning and managing flows, extractions and recharge as a connected system, the Water Allocation Plan causes uncertainty for future water sustainability.	2b
	First Peoples within the Draft Plan area have not been adequately consulted and involved in the Draft Plan's development.	4b
	Further explanation on the principles and methods used to derive the ESY is requested in the Water Allocation Plan. Specifically, the modelling and computation of recharge is not provided in the Water Allocation Plan or support documents.	2a
	Request for more information about the methods and modelling used to determine the ESY for the three zones within the planning region to understand how the ESY were determined.	2c
The 2004 NWI published key principles to guide water planning and management in Australia which includes: ensuring holistic management is used to consider the interconnectedness of surface and groundwater systems, ensuring transparency in decision-making that provides First Peoples and stakeholders access to information and opportunities to participate and establishing partnerships with First Peoples communities to co-manage water resources and include their knowledge and perspective in water management. The Water Allocation Plan needs to consider these key principles.	2d	

Submission	Comment	Theme
	The Draft Plan proposes a large increase in the ESY across the Draft Plan area, approximately doubling the current extraction rates.	2a
	The principles of FPIC require that First Peoples are given the opportunity to approve or reject Water Allocation Plans affecting their lands and resources before any action is taken.	4b
	Water planning processes must consider the interests of all stakeholders to ensure that the diverse needs and rights of all voices are integrated into water management strategies.	4b
36 Professor Anne Poelina Ngajanyoo Yi-Mardoowarra	Cumulative impacts of the development must be written so that stakeholders of the Roper River Catchment understand and are able to monitor the short and long-term impacts.	8d
	A fully resourced plan implemented for 3 years is needed.	8d
	Concerned that the plan will allow serious damage to TOs, Territorians and Australians as the NTG's responsibilities regarding human rights and duty of care are not lawfully evident in the plan.	7c
	Investment from the Territory and Commonwealth governments is required to design a governance model for the management of the Roper River Catchment as one watershed.	2b
	It is important for the government to examine the feedback from key experts to ensure the plan provides opportunities for investment, and entrepreneurship alongside sustainability.	4d
	Separating the water management zones into three distinct areas does not align with TOs understanding of the Roper River Catchment.	2b
	The NT Government and the Commonwealth government have a duty of care to read, understand and act on the plan feedback provided by lawyers, scientists, conservation groups, and other business groups.	4d
	The plan lacks commentary on cultural, social and environmental impacts. Without this explanation, readers cannot give FPIC for the Roper River catchment planning, regulation and/or development.	1f
	The plan must include the whole Roper River Catchment.	2b
The science in the plan, inclusive of Indigenous science and local knowledge must be written for a range of diverse audiences.	4c and 4e	
37 Colton Perna	Concerned that the connectivity of the aquifer system is not fully understood and any drawdown to the undelaying aquifer, Tindall, may have a lowering or draining effect on the shallower aquifers that the GED are dependent upon.	1a and 5b
	Changes in hydraulic head, also known as the water level, occur faster than the movement of groundwater.	1a
	Concerns certain differentiation are unsupported by the data.	2b
	Increased observations of groundwater levels are warranted, given the complexities of a karst system and the discussion on Adaptive Management in the Implementation Actions document.	8d
	Increases in the water levels are reflective of the past two years of above average rainfall in the region and not reflected in long-term trends where water levels in all regions are decreasing overall.	1a
	Permitting an 80% allocation of storage over a century does not adequately consider the significance of drawdown relative to volume. Aquifers may collapse and lose storage capacity due to excessive extraction at this level.	2a
	Supports the statement in the Key Messages Document outlining that groundwater flows slowly, however, noting this statement does not account for changes in hydraulic head which is largely determined by water levels which can cause faster movement in groundwater.	1a
	The majority of the community are in opposition to this development.	4d
The number and location of monitoring bores should be increased to detect mentioned impacts caused by increased extraction.	8d	

Submission	Comment	Theme
	The plan does not address the impacts of water that will be extracted, used to irrigate crops and returned to the ground or river.	1c
	There are karst limestone aquifers within the plan area, the nature of these systems fosters increased water flows.	1a
38 Dr Dylan Irvine and Dr Keller Kopf, RIEL CDU	Concerns extraction will cause impact along the flow path.	5b and 2b
	Increased observations of groundwater levels are warranted, given the complexities of a karst system and the discussion on Adaptive Management in the Implementation Actions document.	8d
	Logger data differ from the field observations. These datasets make it difficult to determine the long-term trends in hydraulic heads at the springs.	1a
	The plan describes the North and South Mataranka Zones as Top End systems, this implies that the Arid Zone rules should apply to the Larrimah zone. This approach appears unjustified based on the rainfall data, and the location of the Larrimah region within the Top End water allocation zone.	2b
39 Kat Taylor	The allocation limit/ESY is too high.	2a
40 Keep Top End Coasts Healthy	The plan fails to consider the cumulative impacts of water extraction.	5c and 2d
	The plan fails to consider the impact on important downstream environments like the Limmen Bight Marine Park.	5c and 2d
	The plan is not consistent with the requirements of the NWI.	5c and 2d
	Groundwater extraction poses a threat to fishery productivity and biodiversity.	5d and 7b
	Best practice models of river governance and compliance with the NWI should be adopted.	6a and 2d
	Tangible steps in response to the Roper River Water Statement should be implemented.	6a and 2d
	A review of current water licenses should be undertaken, with a pause on issuing new licenses until this review is completed. The review should incorporate community views and scientific evidence to ensure sustainable water management practices.	1d
	Alterations in flow regimes can have severe consequences for species such as banana prawns, barramundi, threatened species like dugong, turtles and sawfish, and various migratory birds that depend on specific flow conditions for their life cycles.	5c
	Current extraction levels should be maintained and increased water extraction licenses, surface water harvesting, and new dams should be banned.	3b
	Detailed protection measures are not provided for the PEA for Mataranka and Bitter Springs.	8b
	Indigenous people from the plan area have not been afforded sufficient opportunity to identify the needs of culturally significant features and did not endorse the plan's release.	6a
	Instruments underpinning the Mataranka and Bitter Springs zone should be clearly defined.	8b
	Lack of comprehensive engagement and consultation with communities undermines the legitimacy of the water allocation plan and its ability to meet the needs and values of all stakeholders.	4b
	Meaningful consultation with TOs and their representative bodies is needed to ensure Free, Prior, and Informed Consent on water management decisions.	8d and 4e
Monitoring data should be publicly available to ensure transparency and accountability in water management decisions.	4c	
More robust scientific data and comprehensive understanding of the ecological water requirements is needed to make informed decisions about sustainable extraction levels.	2c	
Need to consider the interconnectedness of surface water and groundwater systems, as well as the cumulative impacts of water extraction across different regions.	2b	

Submission	Comment	Theme
	Ongoing management bodies should be established to ensure effective protection of the Mataranka and Bitter Springs social, cultural, and environmental values.	8d
	Reduced freshwater flows can lead to lower primary productivity, affecting the entire food web and commercial fisheries.	5c
	Robust monitoring programs should be implemented to track groundwater levels, spring and river flows, and the health of groundwater-dependent ecosystems. Make this data publicly available to ensure transparency and accountability in water management decisions.	8d and 4c
	The cultural significance of the Roper River and its associated ecosystems, including the Limmen Bight Marine Park located at the mouth of the Roper, cannot be overstated.	6a
	The Draft Mataranka Plan fails to set appropriate trigger limits and management rules to protect environmental and cultural values.	8b
	The entire Mataranka Water Allocation Area should be declared a PEA with clear mechanisms for consultation.	8d
	The plan does not adequately account for the potential cumulative impacts of groundwater extraction under the Georgina Wiso Water Allocation Plan and other surface water take policies.	3f
	The plan fails to engage meaningfully with TOs.	4b
	The plan fails to protect cultural water requirements.	4b
	The plan is inconsistent with the stated values and positions of many groups across the plan area and beyond.	4d
	The plan lacks information on how the "Roper Discharge Zone" will prevent and mitigate negative environmental impacts from extraction in other parts of the plan area.	8b
	The plan relies heavily on modelling predictions without sufficient transparency or independent verification.	2c
	The plan's methodology ignores the high degree of connectivity within the aquifer.	2b
	The plan's separation approach could lead to ecological disruptions, including reduced flows to the Roper River and Mataranka Springs.	2b
	The plan's separation into different zones undermines sound groundwater management principles.	2b
	41 Vanessa Spinelli	Traditional Owner groups from the Roper catchment have called for 'no more water out' and better protection of cultural values.
Widespread community opposition to the plan reflects a lack of social licence for increased water extraction.		9a
Aboriginal communities have cultural and spiritual rights that spread across the Beetaloo basin area.		6a and 4b
Adequate consultation with Aboriginal families and communities in the Beetaloo Basin was not undertaken regarding how reduced recharge capacity will affect this landscape.		6a and 4b
The livelihoods of local aboriginal communities rely on the cycling of water between the major river systems and aquifers and the water allocations proposed severely jeopardise this.		7c
The Beetaloo basin aquifer is relied upon by both first peoples and settler communities, as well as the tourism market.		7b
The NTG has invested in tourism and if these ecosystems are damaged from a changed water recharge condition, the economic impact will be widely felt across the region.	7b	
The water allocations from the Mataranka and Larrimah areas, need to be considered in conjunction with the newly approved Georgina Wiso Roper River surface water allocations.	3f	

Submission	Comment	Theme
42 Territory Rivers: Keep 'Em Flowing Alliance	Modelling for the plan constitutes only the last 50 years of available data from 1970 onwards, which includes five of the largest recharge events in an otherwise dry century.	2c and 1f
	A review of current water licences should be undertaken, with a pause on any new licence being issued until this review has been conducted, and community views and scientific evidence incorporated.	1d
	Allows for a doubling of water currently licensed across the plan area to 62.5 GL a year.	3b
	As currently drafted, this plan threatens key environmental, social and economic values across the plan area and beyond across the entire Roper River catchment.	7c
	Concerns were raised regarding the water allocation volumes for dams.	3b
	Endorse and implement tangible steps in response to the Roper River Water Statement.	8d
	Meaningful consultations with TOs, representative bodies and communities is required to ensure FPIC prior to declaring the Mataranka Water Allocation Area a PEA.	8b
	No specific protection measures are provided for the "PEA" in the Roper discharge zone.	8b
	Ongoing management bodies with responsibility and oversight for decisions across the whole catchment area should be established to protect environmental and social values for the long term.	8b
	The draft plan fails to consider the cumulative impacts of water extraction in the same Tindall aquifer affected by the Georgina Wiso Water Allocation Plan.	3f
	The draft plan fails to consider the cumulative impacts which may occur through the diversion and capture of water from the Roper River Catchment under the Territory's Surface Water Take - Wet Season Flows policy.	3f
	This plan is an opportunity to adopt and facilitate the establishment of new best practice models of river governance through a renewed National Water Agreement.	2d
43 Adrian Tomlinson	Predicted reductions in dry season flows in the Roper and tributaries in South Mataranka consistently exceed 20%, as do declines in flows in springs.	1e and 2c
	The plan does not leave enough water to sustain environmental values within and downstream of the plan.	5c and 5a
	1960s data is unsuitable due to climate change.	1b
	Groundwater level thresholds in the Larrimah zone could be used to assess extraction proposals or be applied to the Annual Announced Allocations to restrict groundwater use in dry periods.	8a
	Groundwater vents in Elsey Creek and livistonia palm and melaleuca areas rely on shallow groundwater.	5b
	If aquifer levels are reduced by a couple metres in the Larrimah Zone, the result may be a major reduction in flows into South Mataranka.	2b
	It will be too late should risks to the sawfish is not identified until applications for groundwater extraction entitlements are received.	5a
	Modelling shows the likelihood of recurring years with good flow conditions is reduced under the proposed extraction scenarios.	5a
	No information is provided on year-by-year groundwater fluxes from Larrimah to South Mataranka.	2b
	Provide a basis for assessing the acceptability of groundwater extraction proposals in the Larrimah zone and neighbouring Georgina plan area.	3h
	Provide clarification as to whether the Mataranka Tindall Water Advisory Committee is aware of how rapidly extraction in Larrimah could impact sensitive receptors (based upon modelling).	4a
	Sawfish recruitment is highly dependent on river flow.	5a
Sawfish stocks have reduced since the 60s and the population is less resilient to withstand low flow conditions.	5a	

Submission	Comment	Theme
	The Announced allocations approach will not be triggered in enough years because the threshold for dry conditions is set too low.	2b
	The annual groundwater flux into the South Mataranka zone should not be reduced by more than 20%.	2b
	The complexity of annual fluxes is evident in the information presented to the committee.	2b
	The ESY in Larrimah is too high, unsubstantiated and lacks enforceable thresholds.	2a
	The ESY in Larrimah poses risk to sensitive environmental receptors and culturally important water sites in South Mataranka.	2a
	The ESY should be set based upon resource capability not entitlements.	2a
	The Georgina Wiso Water Allocation Plan contains no thresholds or guidance which could limit the size of groundwater extraction proposals.	2e
	The Mataranka Tindall Water Advisory Committee needs to seek independent advice as to whether the allocations and plan settings are sufficient to protect the EPBC Act listed long-tooth sawfish.	4a
	The plan does not provide a pathway to redirect existing use in South Mataranka to better locations.	3d
	The plan lacks groundwater level thresholds in the Larrimah zone.	1a
	The plan must maintain groundwater level thresholds in Larrimah to maintain flows towards South Mataranka and stop losses from Larrimah to Georgina Water Allocation Plan area. This is especially important as the Georgina Wiso Water Allocation Plan contains no thresholds or guidance which could limit the size of groundwater extraction proposals.	2a
	The proposed ESY in South Mataranka is too high.	2a
	There is no justification to take 100% of recharge plus historic storage increases.	2a
	There is uncertainty about interactions between the Larrimah and South Mataranka zones which overlay the same aquifer and groundwater flow path.	2b
TOs have expressed concern about current levels of use which the plan fails to acknowledge.	4d	
44 Protect Big Rivers	Large water licences are being renewed in the face of drying floodplains and damaged springs.	1d and 4d
	Communities have been saying the water is going down, their billabongs are drying out, and that there has been a loss of GED since intensive irrigation began around Mataranka.	1d and 5b
	People of the Roper can all see the drying up of rivers and places where ecosystems have died over the last 10-15 years.	1d and 5d
	Areas where underground water meets the Roper River are considered culturally significant.	1d and 6a
	The floodplains surrounding Red Lily, Goose and McCracken lagoons used to provided traditional foods, however, these areas are now drying out.	1d and 6a
	The flow between the Punchbowl and Elsey Creek went dry in 2023 which was unexpected given this only occurs when there are a series of poor wet seasons.	1d and 6a
	The Jungle is the place where people across the board reference the reduced flow of the river as the river there narrows to a single channel.	1d and 6a
	The river is running low, so the rain isn't spilling over into the billabongs, such as Red Lily, Goose and McCracken, like it used to.	1d and 6a
	The Two Mile is the shallowest it has been in living memory.	1d and 6a
	TOs have noticed a decline in the flow of Blue Water over the last 10-15years and recently witness a green algae bloom, suspected to be eutrophication, which has never been seen before.	1d and 6a
	Limited flow from the Mataranka Water System was observed this year.	1d

Submission	Comment	Theme
	Modelling presented to the Mataranka Water Advisory Committee in 2022 depicts a very dry year such as 2019 and predicts the following under the extraction rate proposed in the Mataranka Water Allocation Plan; Bitter Springs stops flowing as early as May, the little Roper stops flowing by June, Sawfish and barramundi become severely compromised and shallow root balls of the jungle palms dry out and become prone to fire.	2c and 5b
	In 2022 a 10 GL water licence at Larrimah was overturned because the system was fully allocated, and further extraction carried the risk of reversal of the gradient of the aquifer.	3d and 2b
	Concerns raised that not endorsing the plan will result in the loss of the Aboriginal water reserve.	4b and 3c
	A far more precautionary plan, as discussed and noted in Water Advisory Committee minutes should be developed once further science is completed and consultations are conducted.	2a
	Advertisement of community consultation was flawed.	4b
	Alternative opinions are largely disregarded.	4d
	Concern that statements relating to cease flow events in the Roper have been designed to absolve the government of responsibility to use precautionary principles.	1a
	Concerns raised regarding the risks to springs and rivers have been disregarded.	2e
	Concerns raised that signing this plan mobilises an additional 30 billion litres per year for consumptive purposes than is currently available.	3b
	Concerns that the application of the arid zone rules to the Larrimah area has enable greater water extraction.	2b
	Concerns the loss of water will result in the loss of towns and communities.	7a
	Concerns there was no assigned note taker in consultation meetings resulting in ad hoc notes.	4b
	Disconnect between the bore data spoken about during consultation sessions and publicly available bore data.	1a
	Existing water extraction occurring at the melon farm is impacting on cultural values.	1d
	Loss of confidence in the process due to resignations in the committee.	4a
	More emphasis on the impacts of climate change is required.	1b
	Not enough opportunities were taken to engage with communities.	4b
	Protect Big Rivers are concerned about more water being taken from the Cambrian Limestone Aquifer.	3b
	Similarities to the Murry Darling Basin are points for concern.	5d
	Springs, waterholes and sinkholes in the Mataranka area are considered culturally significant.	6a
	The 'Key Messages' information for Kriol language speakers excluded some key point which were included in the English text version.	4b
	The consultation process for the recent Mataranka Water Allocation Plan was considered flawed.	4a
	The main beneficiaries of the Mataranka Water Allocation Plan are very limited and lie exclusively in the Larrimah Area.	7b
	The plan does not benefit the people of the region, yet the risks their springs, culture, businesses and futures.	7c
	The science appears incomplete.	1g
	The Strategic Water Allocation Framework requires amendment to overcome overextraction.	3b
	There is a deep fear among Aboriginal residents that overextraction in the region will harm cultural values.	6a
	Water from the Mataranka South Zone does not impact the Springs as all water for the springs comes from the Mataranka North Zone.	2b

Submission	Comment	Theme
45 Jawoyn Association	Buffalo are disturbing the water and billabongs at Beswick which has removed people and cultural practices from these areas.	1d and 6a
	Waterways and aquifer that provides water to springs are culturally significant.	6a and 6b
	The cultural importance of water is not considered.	6a
	Rivers and creeks are drying up and introduced feral animals such a buffalo and pigs have stopped people from being able to access important water places.	6b and 1d
	Communities are concerned about the ongoing availability of safe drinking water.	6a
	Community is worried about drinking water availability.	7a
	Concerns separating the water management zones into three distinct disregards the understanding that all the water is connected.	2b
	Concerns that as places of cultural significance dry up, people connected to those places will get sick.	6a
	Cultural values must be considered when development pressure is threatening the health of water.	6a
	King River at the bridge on the Stuart Highway is shallow and doesn't fill up anymore.	1d
	Most water sites are culturally significant.	6a
	The community doesn't want any more water to be taken out of springs and rivers.	3b
	The doubling of water extraction, as set out in this Plan, threatens water values for Aboriginal People.	4b
	The plan failed to adequately consult with Aboriginal People.	4b
	The rivers, billabongs and springs are important places for fishing and hunting which Aboriginal people use to connect to Country and continue to pass cultural practice to the next generation.	6a
4 and 46 Environment Centre NT	The Waterhouse River has been drying up over the last 5-6 years, but recently it dries very quickly.	1d
	Traditional food sources that are important to Aboriginal culture are being impacted, including fish and turtles.	6a
	Data from the 1960s onwards is outdated and misrepresents the relationship between rainfall data and groundwater levels.	1b and 1d
	There is a clear correlation between groundwater level decreases and the increase in water extraction rates from 2013.	1b and 1d
	Environmental and cultural values in the plan area are at risk.	1c and 2e
	Resources in accordance with NWI principles of cost recovery must be obtained to develop a better scientific basis for determining sustainable yields for groundwater.	2e and 2d
	The cumulative impacts of water extraction in the Roper River catchment must be assessed.	2e
	The Water Allocation Plan does not include sufficient detail to enable the Water Controller to understand the environmental and cultural impacts of increased water extraction in the Roper River catchment.	1c
	The plan facilitates groundwater depletion that will endanger key environmental and cultural dependencies.	5d and 6a
	The Background Report does not outline the impact water extraction will have on Aboriginal cultural values.	6a and 6c
	Resources should be dedicated to developing extensive baseline data and monitoring programs for all Water Allocation Plans.	8d and 1g
	A consultative committee for river catchments and future Water Allocation Plans should be established.	4b
SAWRs should be implemented prior to the completion of Water Allocation Plans to avoid water over-allocation.	3c	
All modelled scenarios have negative impacts on barramundi and sawfish.	5a	

Submission	Comment	Theme
	All scenarios resulted in negative drawing down of the water table in shallow GED.	5b
	Annual announced allocations are not a suitable protection mechanism.	8a
	Applying different allocation criteria to different portions of an aquifer is inconsistent with proper groundwater management.	2b
	BOM data indicates that since 2010, this extraction has been causing declines in groundwater levels near the springs in Mataranka.	1b
	Critical sawfish habitats must be protected from over-extraction.	5a
	Despite occasional rebounds in groundwater levels due to heavy wet season rains, the end of dry season groundwater levels has been steadily declining since 2013.	1b
	Detailed modelling should be undertaken to show how extraction at different proposed ESYs would alter groundwater conditions.	2c
	Engagement with TOs has been limited.	4e
	First Nations people have had limited input into the Mataranka Water Allocation Plan.	4a
	Impact of water extraction on environmental and cultural values must be investigated.	5d and 6a
	Interconnected groundwater and surface water systems underpin Northern Australia's economy, social and cultural livelihood.	7b
	Issuing water licences inside and outside Water Allocation Plan areas should be stopped until data on groundwater-surface water interactions and the water requirements of ecological and cultural values have been obtained.	3d
	Key limits to change for palms, springs and flows in Eley Creek in the South Mataranka zone are already exceeded.	5b
	Minimum flows and the impact of extraction on dry season flows should be an important factor in determining sustainable levels of extraction.	1c
	No information is provided to justify the conclusion that water level reduction in the South Mataranka zone would have minimal impact on the Mataranka Springs.	2e
	Not enough information available to support claims that the groundwater extraction under the plan is sustainable.	2a
	Protected area should be expanded.	8b
	Recent modelling on the Roper River suggests significant levels of drawdown and wide-ranging regional impacts.	3b
	Scientific evidence suggests significant negative impacts on regional groundwater which has not been discussed in the plan.	3b
	Significant Aboriginal cultural values are located in the plan area.	6a
	Significant extraction in the Larrimah zone could result in the reversal of flow of the aquifer, with negative impacts on aquatic ecosystems like Bitter Springs, and the Roper River itself.	2b
	The Background Report does not assess the impacts of water extraction on the Gulf Snapping Turtle.	5a
	The Background Report does not detail the impacts of increased groundwater extraction/reduction on sawfish or barramundi.	5a
	The Background Report does not outline risks or impacts to listed threatened species.	5a
	The Background Report does not outline the impacts identified by the limits to change research.	1e
	The combined effects of the proposed extraction rates must be analysed before the plan is finalised.	1d
	The cumulative impact of the Mataranka plan, the Georgina Wiso Water Allocation Plan and the Surface Water Take policy on the Roper River catchment should be considered.	3f
	The Currell Report urges the NT Government to take a precautionary approach to water management in the Roper River catchment.	3b

Submission	Comment	Theme
	The Department must be transparent about the risks of groundwater extraction.	4c
	The impact of groundwater extraction on the key species must be modelled prior to the release of the plan.	5d
	The Implementation Plan commits to determining the specific groundwater requirements of key terrestrial, aquatic and subterranean species by 2029.	5d
	The plan must consider climate change.	3b
	The plan must not allow extraction at a greater rate than the aquifer recharges.	3b
	The plan must not allow for additional water to be taken out of the Roper River catchment.	3b
	The plan must provide a basis for the calculation of the ESY.	2a
	The plan provides minimum flow thresholds which will negatively impact sawfish.	5a
	The plan risks the environmental and cultural values of the plan area and the Roper River.	5d and 6a
	The plans proposed ESY is too high.	3b
	The NTG should consider co-governance models to facilitate Indigenous aspirations for new sustainable economies.	3a and 4e
	The plan disregards the recommended flows at Elsey Homestead.	5a
	The plan does not abide by the requirements of the NWI.	2d
	The plan does not achieve “sustainable water use” in a potentially over-allocated or stressed water system.	2d
	The plan does not allocate water to an ESY to beneficial uses as required by the Act.	2a
	The plan does not apply the best available scientific knowledge.	2d
	The plan does not consider the impact of extractions zones on the remainder of the aquifer and its ecosystems.	2e
	The plan does not consider the potential impacts on GED.	2d
	The plan does not determine the water requirements of ecological values.	5d
	The plan does not have a binding legal effect on the management of water resources.	2d
	The plan does not identify the risks and impacts of extraction on environmental and cultural values in the plan area.	2e
	The plan does not identify the risks and impacts of extraction on environmental and cultural values in the Plan area.	2e
	The plan does not meet the requirements of the Act.	8c
	The plan does not mention key aquatic ecosystems and threatened species.	5a
	The plan has not analysed the cumulative impacts of extraction in a catchment-wide assessment.	3f
	The plan implies that current extraction will not impact the groundwater dependent values in the plan area, however, this does not align with current data.	1d
	The plan is one of three water policies released in the past six months, allocating over 280 billion litres of water from the Roper River catchment.	3b
	The plan must provide an understanding of the impacts of current licenced use. This would suggest that current levels of extraction may not be sustainable, let alone a doubling of permitted extraction in the plan area.	1d
	The TLA is divided as partly 'top end' and partly 'arid zone' which disregards the interconnectivity of the aquifer and allows for an unsuitable ESY.	2a
	The Top End contingent rules should be applied to the Mataranka TLA.	2b

Submission	Comment	Theme
	The use of the Arid Zone contingent rules for the Mataranka TLA is not sustainable.	2b
	The Act should be amended to ensure Water Allocation Plans and ESYs are considered by the Water Controller before licensing decisions are made.	3h
	TOs must be able to maintain ongoing stewardship of rivers in the NT.	5d
	Treating the three management zones as separate water storages is not an accurate representation of how the aquifer operates.	2b
	Water Allocation Plans should be legally binding on decisions of the Water Controller to issue water licences.	8c
Campaign templates		
47 – 962 Campaign template submissions	Increased extraction could impact water supplies and cause wetlands, billabongs and cultural places to dry up earlier.	5c and 6a
	Billions of additional litres of water have already been allocated to the cotton and fracking industries.	3b
	Communities must be listened to.	4d
	Concerned about the future of the Territory's rivers.	5d
	Decision makers need to learn from the mistakes of the Murray Darling Basin.	5d
	Do not release the plan as currently drafted.	4d
	Effects of water extraction at Mataranka and across the Territory are already being observed.	1d
	Extraction in the Roper River catchment has increased to over 280 billion litres every year.	3b
	Increased extraction could increase fire risk and impact dry season flows to the Roper River.	5d
	No more water out of the Roper.	3b
	Protection of rivers, floodplains and aquifers must be prioritised.	3b
	Protections for river systems must be prioritised.	4d
	The plan could have negative consequences on places of value.	1g
	The plan allocates six times the water currently used in the plan area.	3b
	The plan doubles the water currently licensed in the plan area.	3b
	The plan quadruples the licensed amount in Larrimah.	3b
	The Water Allocation Plan is not backed by science.	1g
	Territory rivers underpin the lifestyle, tourism industry and cultural heritage of people living in the Territory.	7b and 6a
	Combined with the Georgina Wiso Water Allocation Plan, the plan allows for 265 billion litres of water to be taken each year.	3b
	Concerns the increased extraction will result in increased salinity of drinking water for downstream communities like Ngukurr.	7a
Further water extraction, licences and surface water harvesting in the Roper catchment should be banned.	3b	
Risks associated with Surface Water Take is not considered.	3f	
Roper communities, including those downstream, should be included in all water related decision making.	4e	
Wetlands, billabongs and cultural places are drying up earlier which is impacting on wildlife and cultural activities.	1d	
The plan poses risks to the ecological balance of the whole system.	5d and 7c	

Submission	Comment	Theme
	Cumulative effects of increased water extraction, land clearing and infrastructure developments could significantly degrade the Roper River.	5d
	Degradation of sawfish habitat will push them closer to extinction.	5c
	Further increases in water extraction from the Roper River catchment must be prohibited.	3b
	Impacts to the Roper catchment threaten the receiving environments in Limmen Bight Marine Park.	5c
	Mud crab and prawn fisheries are supported by the Roper catchment and Limmen Bight Marine Park.	5c
	Roper communities, including those downstream, should be included in all water related decision making.	4b
	Seagrass meadows, turtles and dugongs depend on healthy river flows.	5c
	Strengthened protections for river systems should be implemented to protect against large-scale land clearing, infrastructure developments, dams and water extraction.	5d and 7b
	The Draft Mataranka Water Allocation Plan proposes to extract 62 billion litres from the underground aquifer system.	3b
	The river system and seagrass meadows are home to turtle, dugong, sawfish and spear tooth shark.	5d
	The Roper River and Limmen Bight Marine Park are considered cornerstones of natural heritage.	5c
Have your say survey comments		
963 – 972 Have your say survey	Baseline data for the Water Allocation Plan is flawed.	1c and 2a
	The plan creates a substantial risk to overallocation of water.	1c and 2a
	The plan has been criticised for not attempting to understand the ecological or cultural values associated with the plan area.	1c and 2a
	The risk mitigation strategies outlined in the plan do not address the known and unknown risks adequately.	1c and 2a
	The risks identified in the plan are too optimistic.	2c and 4d
	The effects of an overallocation on tourism and the local ecology are not adequately addressed. The Little Roper and Bitter Springs/Hot Springs have significant cultural, ecological and tourism values.	2e and 6a
	The Little Roper and Bitter Springs/Hot Springs have significant cultural, ecological and tourism values.	2e and 6a
	The plan does not adequately address the value of the water flows in Mataranka for recreational purposes and environmental protection.	2e and 6a
	A reduced water flow in the Roper River and its tributaries could impact on Barramundi and sawfish populations.	5a and 5d
	The cumulative environmental impacts will have serious cultural impact for the local community.	5a and 5d
	The impact of groundwater extraction on GDEs in the area is uncertain.	5b and 1d
	The plan should start with a lower ESY and move to higher ones if monitoring indicates no impact.	5b and 1d
	Changes in flow regimes in the Roper River will impact on valued aquatic species.	5d and 1c
	This proposal is going to have a negative impact on social, cultural and environmental factors.	6a and 7b
	The plan disregards cultural and environmental value.	6c and 5d
	A greater emphasis on the spiritual importance of the waterways is needed.	6a
A precautionary approach to water allocation is needed.	2a	
Allocations made to large commercial farming operations will have negative impacts.	3a	

Submission	Comment	Theme
	Beneficial uses should include a safeguard mechanism for environmental flows of tributaries and the Roper River.	3a
	Climate change impacts the environment.	1d
	Climate change will impact on the future environment.	1b
	Commercial allocation is too high.	3a
	Existing businesses are unable to access water to grow their business.	3c
	First and foremost, water in the Mataranka area belongs to the local Aboriginal owners. Without FPIC, none of the uses the plan proposes should be considered.	4e
	Fracking should not be considered a beneficial use.	3a
	If landholder entitlements are fully utilised and an allocation of less than 100% is announced, where will the water come from to prevent food shortages?	7b
	If the allowable take will be allocated to the strategic water reserve for businesses that may never even exist, this is then environmental flow or recharge that is unaccounted for annually.	3c
	Irreversible ecological changes could occur before a monitoring plan is in place.	5d
	Irrigators and frackers are being prioritised over the economic interests of the community.	3a
	It is the interaction of a declining water table and increasing fire frequency that could result in negative impacts as well as water extraction.	5a
	Land clearing for industry impacts the environment.	1d
	Outcomes for land, animals and vegetation that will be affected by lowering of the water table are not considered.	1a
	Risks have not been reduced adequately.	2e
	SAWR allocations should address if the land is arable, if the land is clearable, if not for agriculture, will the proposal be in a sensitive area.	3c
	The assumptions that underpin the modelling are not clearly justified or explained.	2c
	The cabbage palms are susceptible to drops in the water table, decreases in soil moisture and warmer temperatures.	5a
	The cabbage palms in Elsey National Park were extensively damaged by fire in the very dry year of 2019.	5a
	The plan area should be considered as land of the TOs.	6c
	The plan does not account for drier years.	1b
	The plan does not adequately consider the impacts of an overallocation on communities, fisheries and fauna and flora.	3a
	The plan does not consider future climate change scenarios.	1b
	The plan does not consider the accumulated effects of the Georgina Wiso Water Allocation Plan and the Surface Water Take policy on the Roper River.	3f
	The plan does not protect environmental and cultural water requirements.	4d
	The plan does not reflect the region's environmental, cultural or economic values.	2e
	The plan has no benefit for community.	3a
	The plan is detrimental cultural values.	6a
	The plan needs to consider current uses and realistic base data to avoid overallocation.	1c
	The plan uses outdated data.	1g

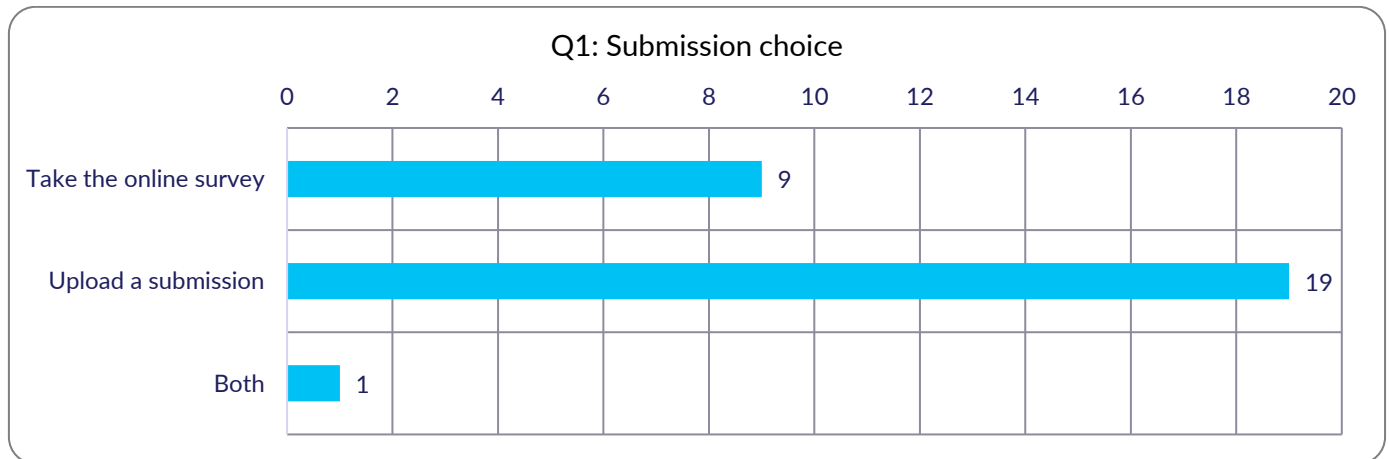
Submission	Comment	Theme
	The plan will lead to large-scale ecological collapse.	5c
	The report has not explained the land suitability criteria and assessment for the Strategic Water Reserve.	3c
	There is high level of uncertainty as to how the TLA will respond to an increase in groundwater extraction.	2b
	There is no consideration of climate change or land use change in the scenarios underpinning the plan's recharge modelling.	2c
	There is no latitude for agriculture to access water in a drier year if allocations are reduced.	7b
	There is very little detail as to what the monitoring plan will look like.	8d
	There will be no community benefits as a result of the plan.	3a
	Toxic wastewater must be managed.	5d
	Water intensive agriculture should not be considered a beneficial use.	3a
	Water resources will be misused.	3a
	What impacts will land clearing will have on future water security?	7b

Schedule 4: Survey responses

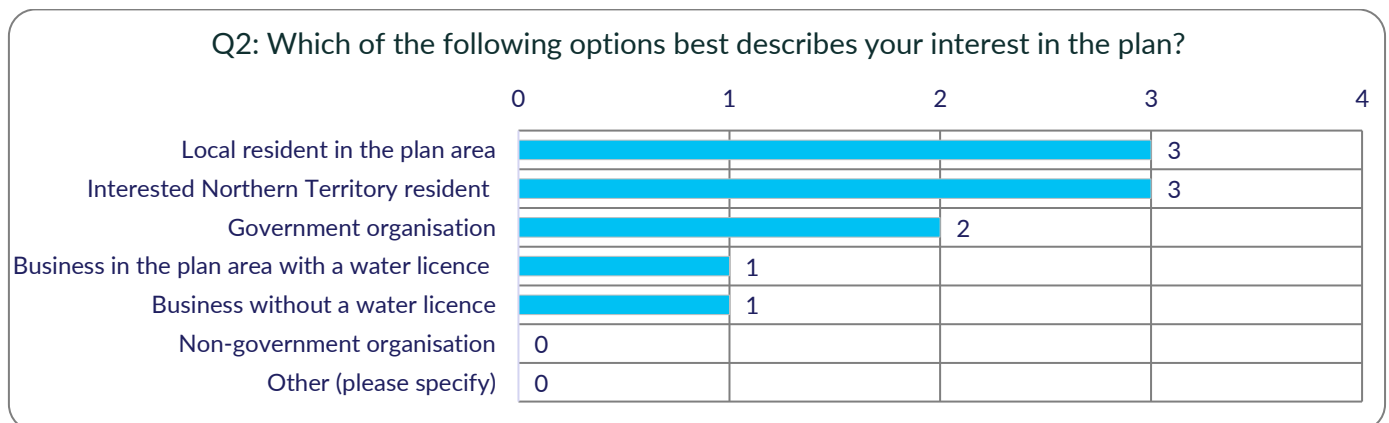
An overview of the survey submission received via Have Your Say is provided below. Responses to the survey were also incorporated into the summaries of feedback themes above.

Demographic responses

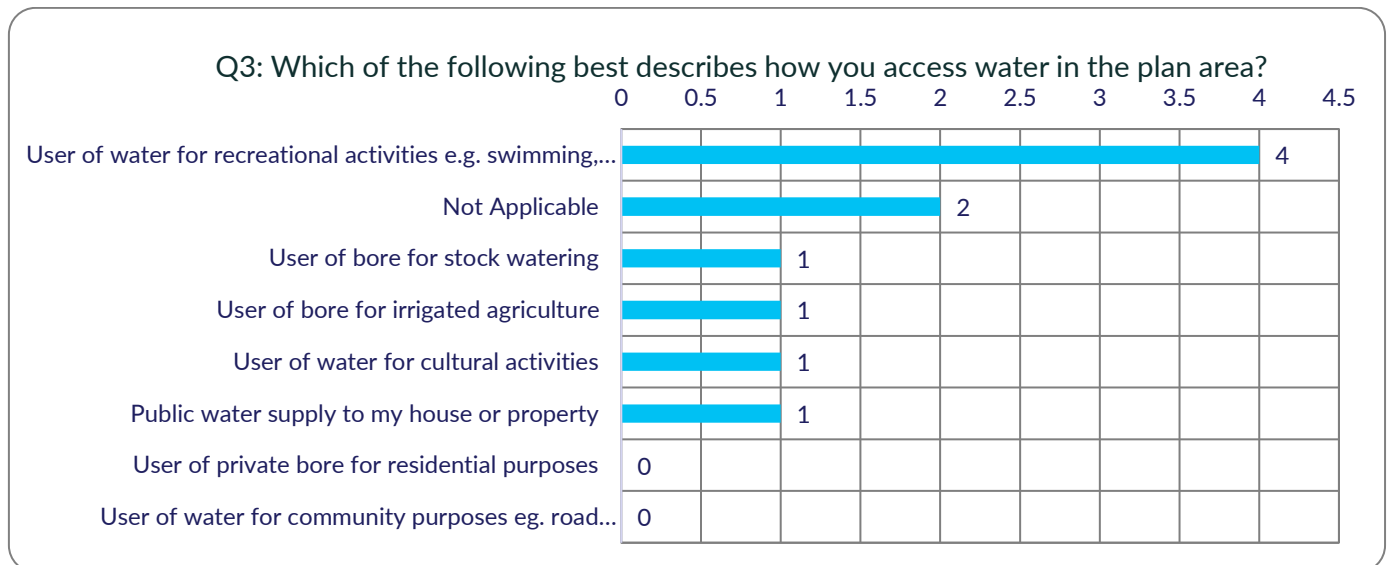
The Have Your Say survey had 29 respondents. One respondent completed the survey and submitted a written response, 19 respondents used the survey to submit a written response only and 9 completed the survey questions only (**Question 1**). The survey responses of the ten survey submissions are presented in the figures below.



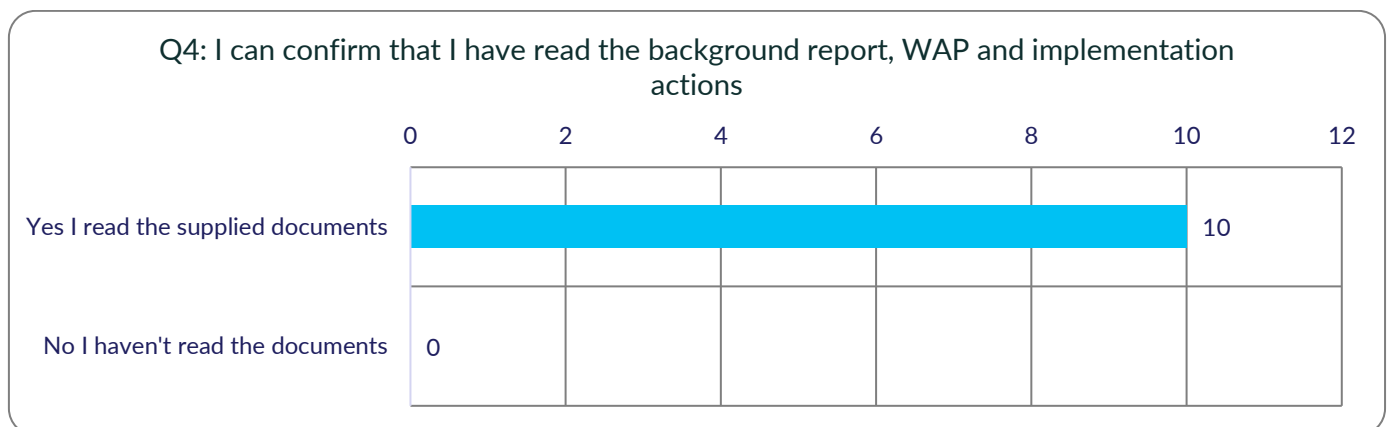
Half of the survey participants advised of their interest in the plan with three being local residents in the plan area. Three were interested in the plan because they reside in the NT. One participant was interested in the plan in its capacity as a government organisation. One participant was interested as they have a business in the plan area with a water licence. One participant was interested in the plan as they have a business without a water licence (**Question 2**).



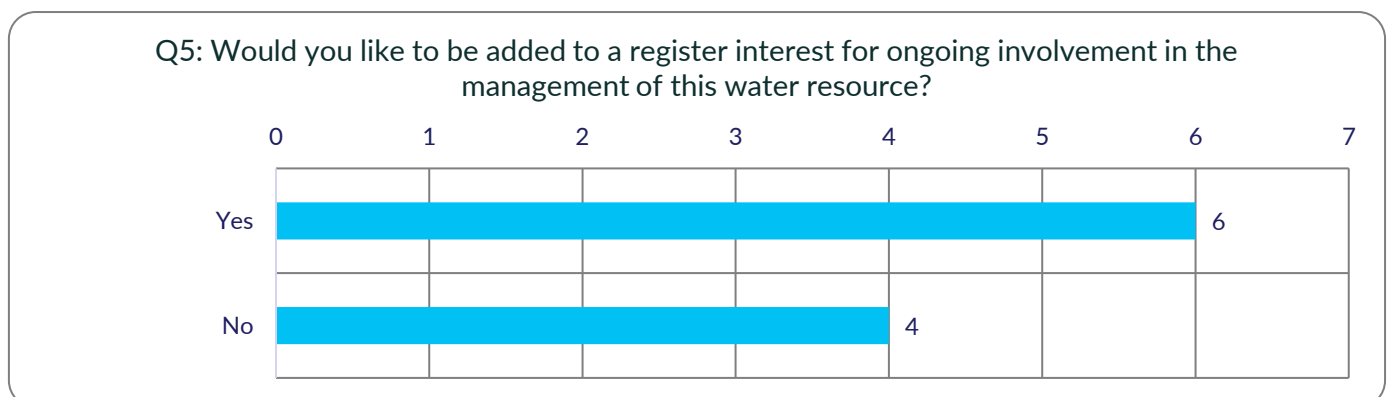
Two said that access to water in the plan area was not applicable. One participant advised that they accessed water via public water supply as a user of a bore for stock watering purposes. One participant answered that they accessed water via public water supply as a user of a bore for irrigating agriculture. One participant advised that they accessed water via public water supply as a user of a bore for cultural activities. One participant advised that they accessed water via public water supply to their house or property (**Question 3**).



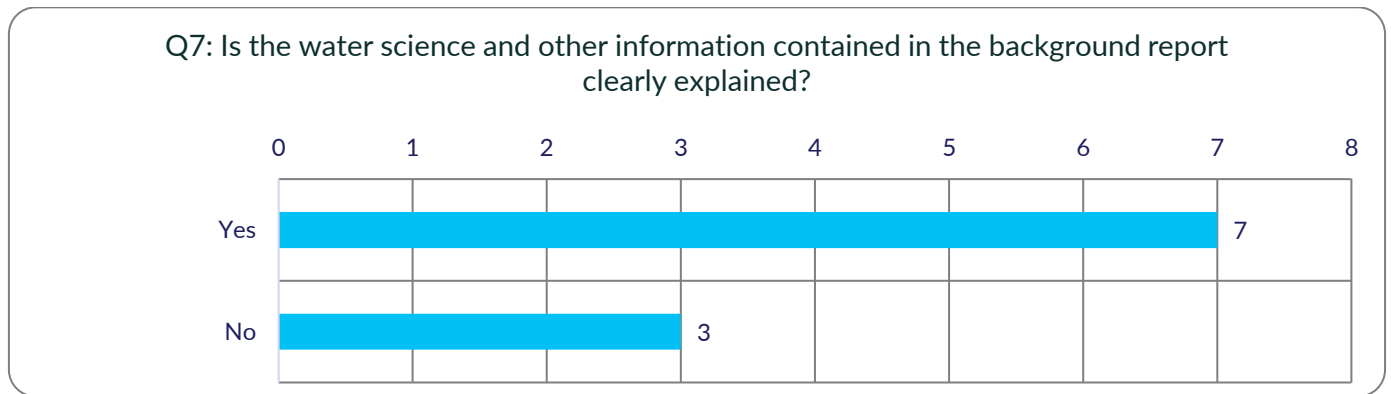
All of the participants advised that they had read the background report, Water Allocation Plan and implementation actions (10) (**Question 4**).



More than half of the participants requested to be added to a register interest for ongoing involvement in the management of this water resource (six). Four answered that they would not like to be added to the register (**Question 5**).

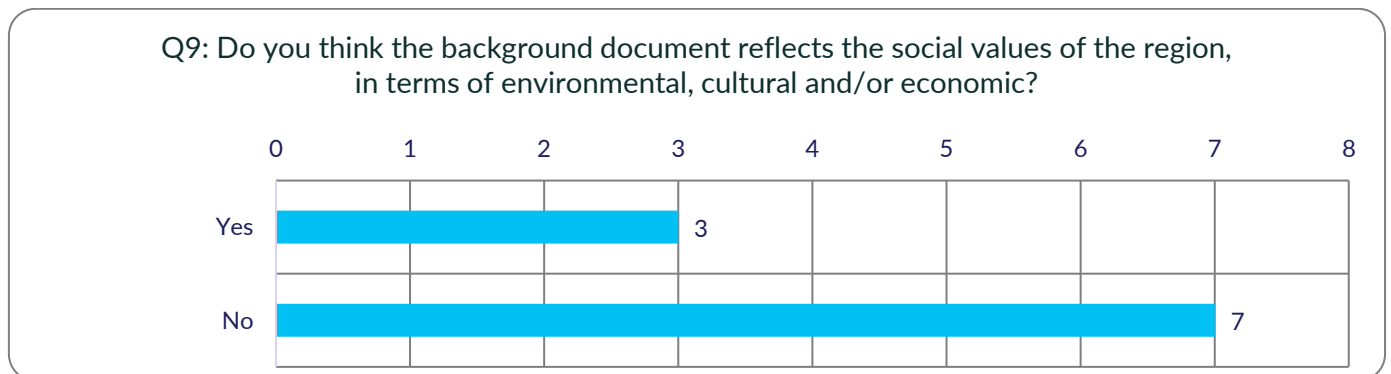


More than half of the participants said that the information contained in the background report was clearly explained (seven). Three of the participants said that the information was not clearly explained (**Question 7**).



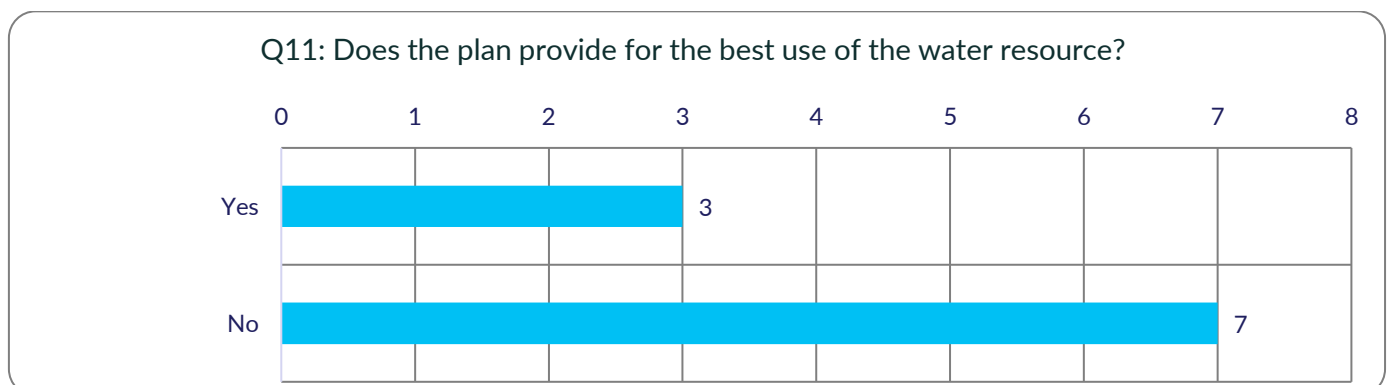
Three participants provided further explanation on what could be improved (**Question 7**). One commented that the plan has not conducted a review of land suitability criteria, such as whether land can be cleared or is arable, for land under the SAWR. Another commented that it was not clear how the TLA will respond to increased extraction and that it is risky to consider the aquifer as three separate zones. They recommended starting the plan with a lower ESY and increasing if monitoring suggests no impact. The final comment suggests that assumptions underpinning modelling were not explained or justified.

Most of the participants did not think that the background document reflected the social values of the region, in terms of environmental, cultural and/or economic (seven). Three answered that the background document did reflect these social values (**Question 9**).



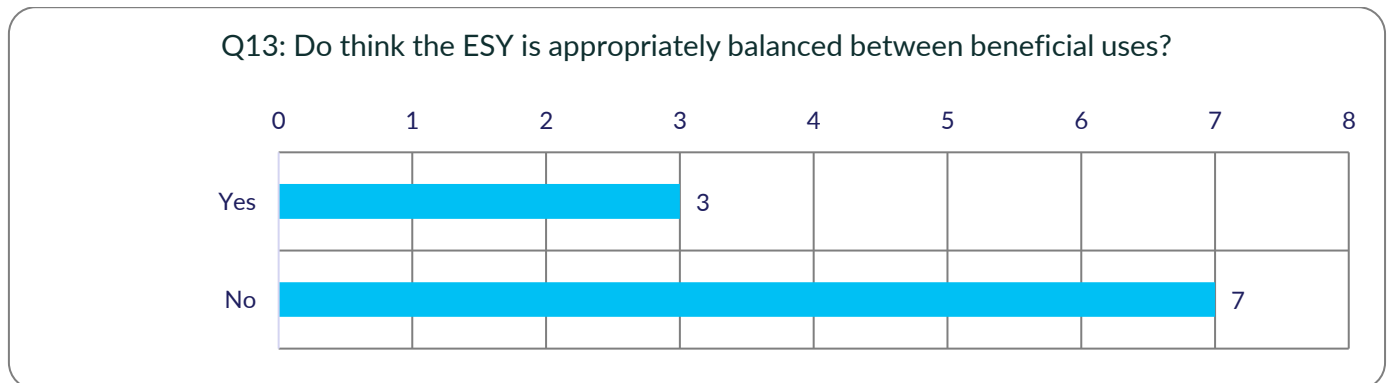
Seven participants provided further explanation on what values may need to be included (**Question 10**). One criticised the SAWR suggesting it will take water from existing businesses. Others suggested that the plan should place a greater emphasis on cultural, recreational and environmental values, such as tourism and spiritual value of waterways. Others did not specify values to be included by criticised the plans consideration of all values.

Most of the participants did not believe the Water Allocation Plan provides the best use of the water resource (seven). Three of the participants agreed that it was the best use of this water resource (**Question 11**).



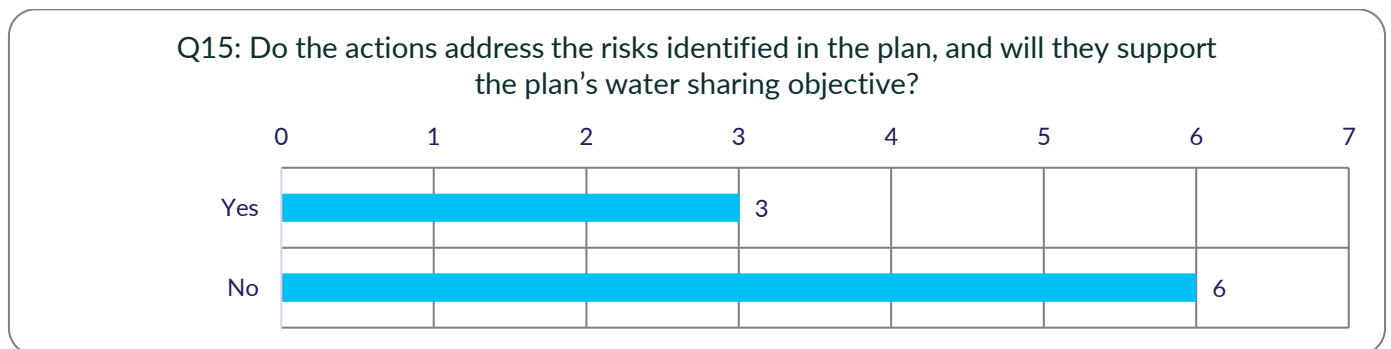
Seven participants provided further explanation on what further benefits and outcomes need to be included (**Question 12**). These included accounting for how drier years could impact agricultural enterprises, while other comments called for more protection of cultural and environmental values. Some comments were displeased that water could be used by commercial farming enterprises.

Most of the participants did not believe that the ESY was appropriately balanced between beneficial uses (seven). Three believed that it was appropriate (**Question 13**).



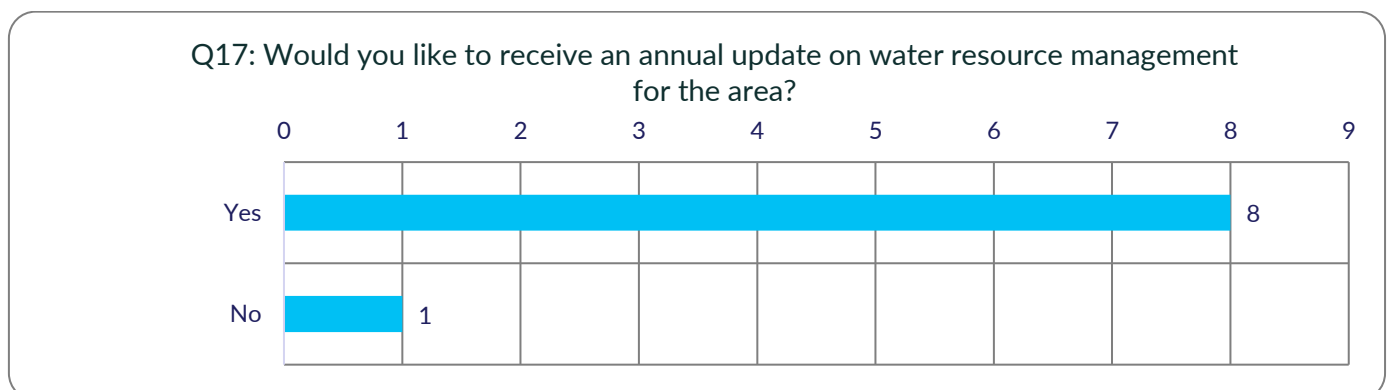
Seven participants provided further explanation on which beneficial uses need to be included or changed (**Question 14**). This included suggestion that tourism revenue could be lost, and recreational use of the Roper River could be impacted, while farming and mining will benefit.

More than half of the participants believe the actions do not address the risks identified in the Water Allocation Plan and that they will not support the plans water sharing objective (six). Three participants believed they did address the risks and they do support the plans water sharing objective (**Question 15**).

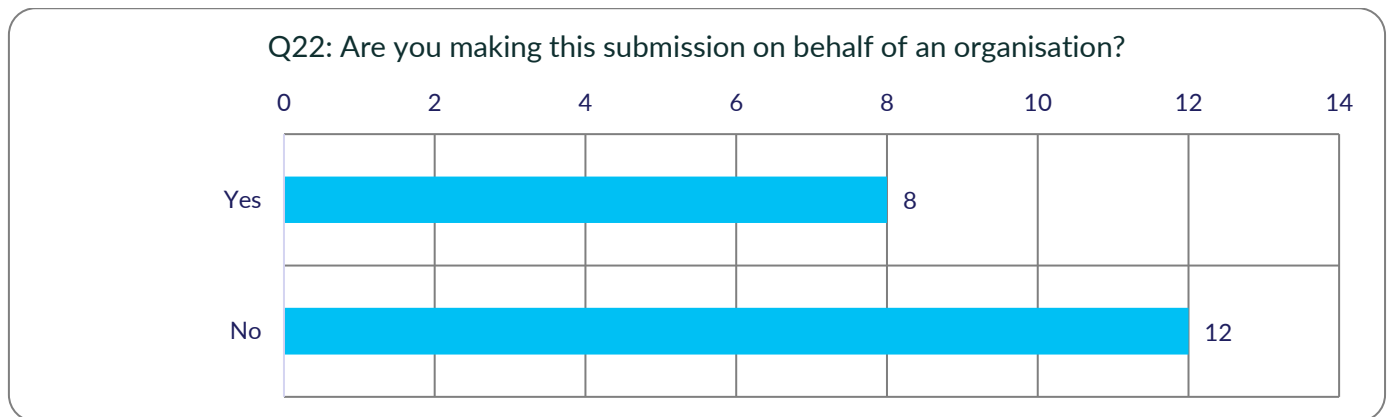


Six of the participants identified which risks or actions need to be included or changed in the Water Allocation Plan (**Question 16**). These included a mechanism for agricultural enterprises to access water in drier years, management of polluted wastewater, more details in the plan on monitoring actions, including reporting and acting on adverse impacts. A comment suggested that the plans water sharing objectives will not be met based on the current plan.

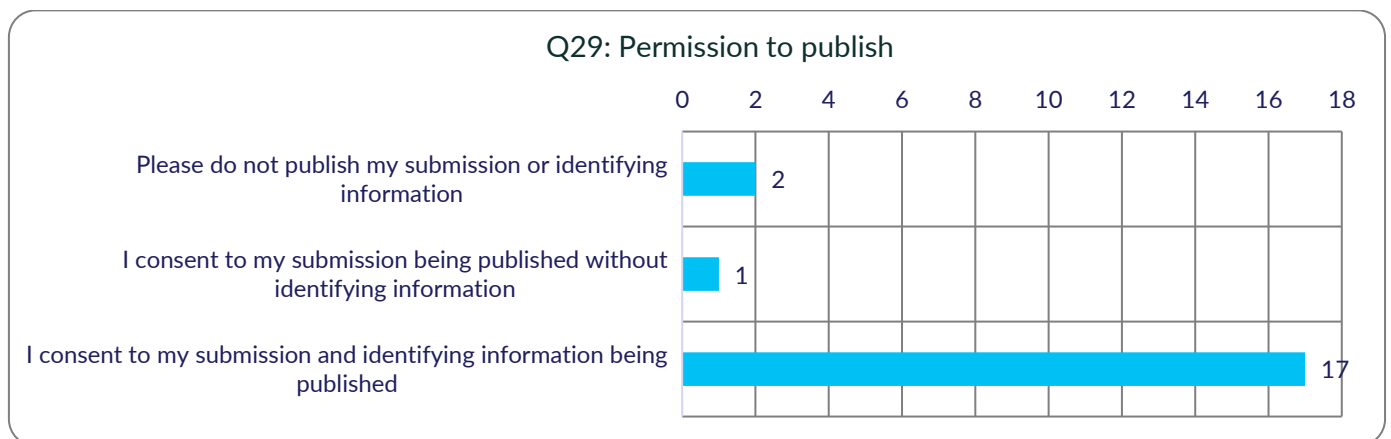
Most of the participants said that they would like to receive an annual update on water resource management for the area (eight). One participant would not like to receive an annual update (**Question 17**).



More than half of the participants said that they were not making the submission on behalf of an organisation (12). Eight of the participants confirmed they were submitting on behalf of an organisation (**Question 22**).



Majority of the participants consented to publishing their submissions along with identifying information (17). Two requested to not have their submissions published or identifying information. One participant allowed for their submission to be published without identifying information (**Question 29**).



Consultation Summary

Mataranka Water Allocation Plan 2024-2034

Document title	Consultation Summary
Contact details	Department of Lands, Planning and Environment Water Resources Division, WaterResources.DEPWS@nt.gov.au
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Version	Date	Author	Changes made
1.0	4 July 2024	GHD	Review responses and prepare draft
1.1	12 July 2024	Water Resources Division	Department's response
1.2	19 July 2024	Water advisory committee	Further amendments based on Committee advice

Acronyms	Full form
Act	<i>Water Act 1992</i>
Controller	Controller of Water Resources
ESY	Estimated sustainable yield
GDE	Groundwater dependent ecosystems
Minister	Minister for Water Resources
NT	Northern Territory
NWI	National Water Initiative
PEA	Protected Environmental Area
Reserve	Aboriginal water reserve
SREBA	Strategic Regional Environmental and Baseline Assessment

Acknowledgement of Country

The Department of Lands, Planning and Environment respectfully and proudly acknowledges the Northern Territory's Aboriginal people and their rich cultures. We pay respect to Elders past and present.

We acknowledge Wubalawun, Yangman, Mangarrayi and Jawoyn people as the Traditional Owners and custodians of the lands and waters of the Mataranka Allocation Plan area. We recognise the intrinsic connection of Traditional Owners to Country and value their ongoing contribution to managing the lands and waters.

We support the need for genuine and lasting partnerships with Traditional Owners to better understand cultural connections, and we will work to establish lasting partnerships to manage water together, now and into the future.

The Department of Lands, Planning and Environment (the department) engaged GHD to prepare a Consultation Summary Report of feedback received in response to the draft Mataranka water allocation plan (draft plan) to provide a status update on the key feedback and changes or otherwise as a result of the process.

This report and its associated schedules have been prepared by GHD for the department and may only be used and relied on by the department for the purpose of summarising records of community consultation for the Mataranka Water Allocation Plan.

GHD otherwise disclaims responsibility to any person other than the department arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to the analysis and summarisation of consultation records provided to GHD by the department. The Feedback and Resolution sections were prepared by the department.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

GHD has prepared this report on the basis of information provided by the department who provided information to GHD, which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.



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1. Executive summary

This summary provides an overview of the consultation undertaken, the feedback received, and how the feedback has been considered in the final Mataranka Water Allocation Plan 2024–2034 (the plan). Some of the feedback is beyond the scope of the plan and will inform future water planning and management more broadly across the Territory.

Consultation occurred via three main mechanisms:

- advice from the Mataranka water advisory committee (committee) between 2017 and 2023
- stakeholder meetings and information provided during 2024
- public comments received between 28 March and 6 June 2024, while the draft Mataranka Water Allocation Plan 2024-2034 and its associated background report and implementation actions were released on the NT Governments Have Your Say Northern Territory website.

The following themes were raised during the review of consolidated submissions on the plan:

- science underpinning the plan
- approach in the plan
- how water is shared
- how people were engaged
- protection of ecological values
- reflection of aboriginal cultural values
- understanding of social and economic values
- management of the water resource.

In response to the consultation, the Department of Lands, Planning and Environment (the department) provides the following summary in relation to the plan, and made the following changes to the supporting documents:

Water allocation plan

- The objectives of water sharing reflects input from Mataranka water advisory committee (the committee), which was balanced with providing consistency in water planning across the Territory.
- The estimated sustainable yield reflects extensive consideration and discussion by the committee, with more than half the committee meetings spent engaging this topic. In particular, the focus was placed on the restriction of water availability in North Mataranka and South Mataranka zones to current licenced entitlements, while facilitating the Aboriginal water reserve within these limits.

Supporting documents: background report and implementation actions

- The summary overview information was reviewed, and additional information was included into the background report to clarify the basis of management and respond more directly to the key questions raised during public consultation, specifically:
 - references to the relative impact of climate and water extraction on Roper River flows, as published in CSIRO's content from [Ecological assets of northern Australia](https://www.csiro.au/en/research/natural-environment/water/water-resource-assessment/roper-river-water-resource-assessment/roper-report) and [Roper River water resources assessment](https://www.csiro.au/en/research/natural-environment/water/water-resource-assessment/roper-river-water-resource-assessment/roper-report)¹

¹ <https://www.csiro.au/en/research/natural-environment/water/water-resource-assessment/roper-river-water-resource-assessment/roper-report>

- the protection of the resource particularly in a drying climate, including the use of announced allocations, and other water management activities
 - modelling information that was used to inform the plan, including clarifying the modelled outputs and the climate period used
 - providing additional analyses of long term flow trends for the downstream Roper River and Ngukurr community public water supply, as well as further context regarding the hydrogeological setting, interconnectivity and natural water balance
- updated the implementation actions to enhance the monitoring program between adjacent water allocation plans and the draft plan, as well as between the proposed water management zones of the plan. Actions were also included to clarify ways that people can be involved in the water plan implementation, and to target improved understanding and knowledge of the sites of local importance.

Table 1. Summary of the themes raised during public consultation on the draft plan, and their resolution in the final declared plan.

Theme	Feedback	Resolution
Science underpinning the plan	<p>This theme covered concerns with the data used to inform the plan, particularly deficiencies in the groundwater and river flow data, and climate changes considerations.</p> <p>Additional issues raised included the protection of ecological water requirements and managing the impact of water extraction via the plan.</p>	<p>Extensive scientific work has been carried out within the plan area, which is summarised and referenced in the background report, and is consistent with the recently published Synthesis of existing information on the surface water resources of the Roper River Basin and CSIRO's Roper River water resources assessment.</p> <p>The department has committed to continue building an understanding of the resource, including delivery of the implementation actions, in which progress will be reported annually through status of the resource reporting.</p> <p>In addition, the department is accelerating its existing water science program² to support water resource management and sustainable development.</p>
Approach in the plan	<p>This theme raised concerns that the estimated sustainable yield (ESY) is not appropriately precautionary and that the numerical modelling was not substantiated. Feedback included questions regarding the basis for the water management zones and the consideration of social, cultural, economic and environmental values.</p>	<p>The ESY reflects extensive consideration and discussion including deliberation at half of the committee meetings. The ESY balances the protection of the Roper River with providing a defined volume of water for public drinking water, for stock and domestic take and for licenced use for the economic benefit of the region by:</p> <ul style="list-style-type: none"> • protecting the springs, with less than five per cent of the ESY available from the North Mataranka zone • preserving approximately 88 per cent of the dry season flows to the Roper River • providing the opportunity for water development in the Larrimah zone where water extraction has a lesser impact to the environment. <p>The next iteration of the departments integrated groundwater and surface water model has been funded through the National Water Grid Authority with the recalibration scheduled for completion in 2025, as outlined in the implementation actions.</p>
How water is shared	<p>This theme included comments about how the water is shared between different users, noting not all existing water licences were using their full entitlements, and questioning how this has been represented and/or considered.</p>	<p>The plan is more conservative than generalised water policy and legislative settings that apply across the Territory, taking a precautionary approach to water extraction from the resource. The plan allocates 4,574 ML per year to Aboriginal economic development within the plan area via the Aboriginal water reserve, which is fully provisioned in Larrimah and partially provisioned in North Mataranka and South Mataranka zones.</p>

² <https://nt.gov.au/environment/water/water-in-the-nt/water-science>

Theme	Feedback	Resolution
	<p>There were differing views on the allocation of water to the Aboriginal water reserve and questions about how the plan related to other water allocations plans and NT policy.</p>	<p>This was a deliberate decision in consultation with the committee to set an ESY in these zones to current entitlements to ensure that the take of water in the region is sustainable.</p> <p>The implementation actions describe how further volumes of water will be allocated to the Aboriginal water reserve over time through the application of the Recovery of Unused Licensed Water Entitlements Policy³.</p> <p>All licence information is publicly available via the department's Water Licensing Portal⁴ including the basis of every decision.</p>
<p>How people were engaged</p>	<p>This theme revolved around the view that the planning process did not consult the right people, the plan does not reflect stakeholder or community views, and that the information provided is not transparent.</p>	<p>The department makes the data it has collected through monitoring available through the Water Data Portal⁵. Water assessment and investigation technical reports are published on Territory Stories⁶.</p> <p>The department recognises the need to improve consultation to enable greater participation in water resource management. This includes continuing to clarify and improve consultation processes by:</p> <ul style="list-style-type: none"> • progressively establishing and maintaining committees that prioritise local Aboriginal membership • holding community water forums and responding to the differing views within the community • ensuring information is publicly available and accessible, including resources being translated into language and holding community information forums • establishing dedicated roles with specific engagement skills to improve direct stakeholder engagement.
<p>Protection of ecological values</p>	<p>This theme covered concerns that the plan threatens the ecological values of the resource due to possible impacts on Groundwater Dependent Ecosystems (GDEs) and the downstream environment, or by exacerbating changes in the environment observed in recent years.</p>	<p>The comprehensive understanding of the ecological environment was informed by the recently completed SREBA⁷. The plan identifies the outstanding environmental values in the plan area and sets additional management rules for the Roper Discharge Zone.</p> <p>The potential distribution of terrestrial GDEs across the plan area has been modelled and validated through field work. The background report shows that 13-15 per cent of North Mataranka and South Mataranka water management zones are GDEs, and that <1 per cent of the Larrimah water management zone are GDEs.</p> <p>Ongoing work to further develop and refine the science behind the plan is outlined in the implementation actions. That notwithstanding, as the plan constrains water extraction relative to the general policy that applies across the Territory, not having a plan in place is a far greater risk to the ecological values identified by the commenters.</p>
<p>Reflection of Aboriginal cultural values</p>	<p>This theme covers concerns with the mechanisms for the protection of Aboriginal cultural values not being strong enough, with no specific actions regarding the protection of cultural values, the potential damage to GDEs and the follow on impacts to cultural values at these sites, and risks to the</p>	<p>The department has acknowledged that cultural values are not reflected adequately in the plan.</p> <p>While the process of developing the plan has had some input from local Aboriginal people, ongoing participation of Aboriginal people is a key focus for future work, as outlined in the implementation actions. Implementation actions 4.2.1-4.2.7 focus on addressing the concerns raised under this theme. Furthermore, once the sites and values have been identified, there are mechanisms for their protection able to be introduced into future plans.</p>

³ <https://nt.gov.au/environment/water/management-security/water-policies-and-guidelines>

⁴ <https://nt.gov.au/environment/water/licensing/licensing-portal>

⁵ <https://nt.gov.au/environment/water/water-in-the-nt/water-data-portal>

⁶ <https://territorystories.nt.gov.au/>

⁷ <https://depws.nt.gov.au/onshore-gas/sreba>

Theme	Feedback	Resolution
	landscape that have cultural significance.	The department has also committed to strengthen the plan's monitoring program and will clarify ways that people can be involved in, and integrate cultural knowledge and values into, the planning process.
Understanding of social and economic values	This theme included comments on the security of water supply (including downstream), concerns with existing extractions, and that the plan will cause substantial harm to communities.	<p>The plan includes allocations for public water supply in three communities within the plan area, as well as considering the licence entitlements downstream including the historic public water supply licence at Ngukurr, which now uses groundwater.</p> <p>The department will strengthen monitoring programs by clarifying ways that people can be involved in water resources management to ensure local impacts to sites of social value are effectively monitored. This combination of technical expertise with local observations provides for a meaningful monitoring program for communities within the plan area.</p>
Management of the water resource	This theme revolved around concerns with the reliance on announced allocations, with the implementation actions and the risk assessment considered problematic.	<p>Announced allocations are a proven, flexible and appropriate management approach for a system that is seasonally variable.</p> <p>On-going water reform and policy development and review provides the opportunity to refine the requirements of plans to ensure the Territory has water resource management that supports the future.</p>

The department thanks the committee and those who provided feedback and submissions through the consultation process, which has contributed to the development of the first water allocation plan for Mataranka plan area.

2. Introduction

Water allocation plans set out the volume of water that must be protected to support the environment and ecological functioning of a water resource, and defines how much water can be sustainably extracted for drinking water and other regional economic opportunities. This is known as the estimated sustainable yield (ESY). Water allocation plans also set out management rules for water use, and for trade, within the identified ESY.

The Mataranka Water Allocation Plan 2024-2034 (the plan) applies to an area of approximately 9,282 km², extending about 190 km from north to south, and up to 70 km east to west, as shown in Schedule C of the plan. The plan area includes the towns of Mataranka and Larrimah and the community of Jilkminggan. Pastoral leases cover about 40 per cent of the plan area, with approximately 36 per cent of the plan area recognised as Aboriginal land.

The plan is within the [Daly Roper Beetaloo Water Control District](#)⁸ (the district). The district includes several basins and aquifers. Separate water allocation plans have been declared, or are in development for, different parts of the district.

This is the first water allocation plan to be declared for the plan area with water allocation currently managed under the NT Water Allocation Planning Framework. The plan provides for the protection, allocation and management of the groundwater resource within the plan area. The groundwater resource managed under the plan is the regionally extensive and multilayered Tindall Limestone formation and overlying Cretaceous sediments which are collectively known as the Tindall Limestone Aquifer. The Tindall Limestone Aquifer is a significant water resource that supports the baseflows of the Roper River and its system of springs and creeks.

⁸ <https://nt.gov.au/environment/water/management-security/water-control-districts/daly-roper-beetaloo>

The plan area contains groundwater dependant ecosystems (GDEs) and features of ecological significance; including the Roper Discharge Zone, being identified by the Strategic Regional Environmental and Baseline Assessment ([SREBA](#)) as an area of outstanding environmental value.

The plan will remain in effect for a period as declared by the Minister for Water Resources (Minister) by *Gazette* notice.

Information regarding water allocation plans is available at: [water allocation](#)⁹.

2.1. Water Act

The [Water Act 1992](#)¹⁰ (the Act) sets out the statutory requirements of water allocation plans. The Act requires the Minister to ensure:

- water is allocated within the ESY to beneficial uses, including an allocation to the environment and an Aboriginal water reserve
- the total water use for all beneficial uses is less than the sum of allocations to each beneficial use
- the right to take water under a licence is able to be traded.

Water allocation plans comprise of three core documents:

- Water allocation plan: the statutory document required to be gazetted; describes the ESY for the water resources of the district and apportions water for particular uses.
- Background report: collates the data and knowledge regarding the plan area at the time it is made.
- Implementation actions: outlines the program for the continuous assessment of the water resource and associated understanding.

As part of the regulatory framework, the Controller of Water Resources (Controller) is responsible for granting surface water and groundwater extraction licences. The Department of Lands, Planning and Environment (the department) is responsible for the administration of the Act.

2.2. Water engagement

Effective engagement is the keystone of contemporary water resource management. The department is committed to successful engagement and, as a result, has adopted the International Association for Public Participation model ([IAP2 Spectrum](#)¹¹) for its engagement activities.

The department is committed to involving relevant stakeholders in the water planning process. This document describes the mechanisms in which the department has captured and considered public concerns and aspirations and outlines how this has influenced the plan.

Table 2. Overview the definition of the public participation for engagement activities

IAP2 Spectrum	Inform	Consult	Involve	Collaborate	Empower
Goal of engagement*	Community members are well informed	Community members are well informed and give feedback that government considers	Community members are well informed and actively contribute to government decisions		
			Some say	High level or equal say	Total say

*[Remote engagement and coordination strategy](#)

⁹ <https://nt.gov.au/environment/water/management-security/water-allocation>

¹⁰ <https://legislation.nt.gov.au/Legislation/WATER-ACT-1992>

¹¹ <https://iap2.org.au/resources/spectrum/>

3. Consultation process

There are three main ways to participate in the development of a plan, each with the following levels of participation:

- water advisory committee: inform, consult and involve
- key stakeholders: inform, consult and involve
- community feedback: inform and consult.

The department undertook a stakeholder analysis to identify stakeholders in the plan area and developed an accompanying engagement strategy to identify how to best inform, consult and engage with the community, industry and government stakeholders. Detailed summaries of engagement records can be found in the Consultation Summary schedules.

3.1. Water advisory committee

Section 23(1) of the Act authorises the Minister to establish, and appoint the members of, a water advisory committee (the committee). The committee for the plan was first appointed in 2017 and its membership was renewed by the then Minister for Environment and Natural Resources on 22 February 2021. The membership has changed over time but generally includes representatives from local industry, environmental and recreational interest bodies, as well as an independent chair.

The purpose of the committee is to provide advice to the Minister on the development of a water allocation plan for Mataranka.

Specifically, the committee was engaged to:

- actively and openly participate in the development of a water allocation plan for Mataranka
- bring a diversity of stakeholder and community views to bear on water management advice for the Mataranka and the Roper River catchment more broadly, where directly relevant to the management of the groundwater resource
- identify issues, critically evaluate information and offer advice for water sharing arrangements which maximise opportunities for sustainable water development within acceptable environmental and cultural limits
- provide advice to the Minister on the proposed water sharing and management arrangements in the draft plan.

The Committee has met 16 times between July 2017 and October 2023. A record of meetings is available in the [meeting summary](#)¹² and an abstract of Mataranka water advisory committee meeting feedback and outcomes can be found in the Consultation Summary schedule 1.

3.2. Key stakeholders

The department undertook dedicated engagement with key stakeholders to provide briefings on the draft plan and seek feedback. These meetings were held between January and May 2024.

Feedback received from attendees at these meetings can be found in the Consultation Summary schedule 2.

¹² <https://depws.nt.gov.au/boards-and-committees/water-advisory-committees/tindall-mataranka-daly-waters-advisory-committee/committee-meetings>

In total, 20 meetings were held in 2024 with the following groups:

- Public community meeting held in Mataranka
- Amateur Fishermen’s Association NT
- Arid Lands Environment Centre and Environment Centre NT
- Cotton Australia
- Jawoyn Association
- Jilkminggan Local Authority
- Katherine Town Council
- Larrimah/Daly Waters Local Authority
- Mataranka Local Authority
- Northern Land Council
- the Northern Land Council facilitated 6 dedicated community meetings in:
 - Mataranka
 - Jilkminggan
 - Minyerri
 - Katherine
 - Barunga
- Northern Land Council Ranger Coordinator Ngukurr
- NT Farmers
- Roper Gulf Regional Council

3.3. Community feedback

The draft plan was released for public consultation on 28 March 2024 via the Northern Territory Government’s Have Your Say website. Closing date for submissions was 3 June 2024, however the Have Your Say website was not accessible for a period of time on the 3 June 2024. As such, submissions were accepted until 6 June 2024.

Plan documents published included the [background report](#), [plan](#), [implementation actions](#), [key messages](#) and [key messages Kriol audio file](#)¹³. The plan was downloaded or viewed during the public consultation period 132 times, with the background report being viewed 83 times, and the implementation actions viewed 41 times. The department received a total of 877 responses to the plan. These were made up of:

- 32 detailed written submissions via Have Your Say and email
- 835 individual campaign template submissions and 14 campaign submissions with additional comments
- 10 online survey responses via Have Your Say.

A full list of the comments raised by each submission during the public consultation is provided in Consultation Summary schedule 3. The following organisations and individuals provided detailed written feedback via have your say or director to the department:

- Adrian Tomlinson
- Andrew Smith and Carol Randall
- Colton Perna
- Des Barritt, Little Roper Stockcamp
- Dr Dylan Irvine and Dr Keller Kopf, RIEL CDU
- Dr Ross Brodie
- Environment Centre NT
- Heather Ferguson
- Jawoyn Association Aboriginal Corporation
- Amateur Fishermen’s Association of the NT
- Kat Taylor
- Keep Top End Coasts Healthy
- Northern Land Council
- Professor Anne Poelina Ngajanyoo Yi-Mardoowarra
- Professor Matthew Currell and Professor Sue Jackson, Griffith University
- Protect Big Rivers
- Territory Rivers: Keep ‘Em Flowing Alliance
- Vanessa Spinelli
- Water Justice Hub

¹³ <https://haveyoursay.nt.gov.au/water-management>

Submissions that were authorised, through the public comment process, to be published were released on the Have Your Say website on the 22 July 2024. Two submitters requested that their submission and identity not be published, and another submitter requested that their identity not be published.

4. Summary of feedback and resolution

The following sections summarise the feedback received from the public into themes and discusses how each will be or is being addressed. For ease of access the department's response and resolution to each theme is summarised in .

Further detail on how these themes align to the individual submission can be found in the supporting Consultation Summary schedule 3.

Details of survey submissions received via Have Your Say is provided in Consultation Summary schedule 4.

The feedback includes predominantly negative and some positive comments. All submissions where reviewed and summarised into eight key themes:

1. science underpinning the plan
2. approach in the plan
3. how water is shared
4. how people were engaged
5. protection of ecological values
6. reflection of Aboriginal cultural values
7. understanding of social and economic values
8. management of the water resource.

Note: The information provided in this document are summaries of collected data and is intended for general understanding and accessibility. While efforts have been made to ensure accuracy, data summaries may not capture all nuances or specific details. Users should exercise their judgment when interpreting summarised data. The creators of these summaries are not liable for any consequences arising from their use.

Table 3. Summary of submissions, response and resolution

Theme	Subtheme	Summary of the submission	Response	Resolution
<p>4.1. Science underpinning the plan</p>	<p>1a. Groundwater and river flow data</p>	<p>Submissions criticised the groundwater and river flow data used in the plan, suggesting it misrepresented the hydrological system in the plan area and could not provide thresholds for protecting ecological values. Many submissions suggested that the aquifer systems are not fully understood.</p>	<p>The department’s monitoring program includes 53 monitoring sites in the plan area with flow measurements at the springs and 60 years of flow measurements in the Roper River. This data, combined with additional monitoring sites around the plan area, are used to inform the department’s integrated groundwater and surface water model. The integrated groundwater and surface water model for Mataranka was refined in 2009 for the Roper River and upgraded in 2020. This included multiple independent peer reviews, which assessed as Class 2-3 based on Australian Groundwater Modelling Guidelines and described as “leading example of best practice”. Both the model and the monitoring program provide an in depth understanding of the resource that is verified with measured levels and flows. Furthermore:</p> <ul style="list-style-type: none"> • data from Larrimah water management zone consistently indicates that groundwater levels are increasing • data from North Mataranka and South Mataranka water management zones indicates water levels reflect the natural seasonal variation of the preceding wet seasons, while the end of dry season flow rates are currently 2-3 times higher than that of dry periods in the 1960-70’s. This is despite the commencement of groundwater extraction from 2014 onwards, see background report figures 9-11. <p>The conceptualisation of the hydrogeology confirms that there is a direct correlation between flows during the dry season and groundwater levels. As a result additional groundwater level thresholds are not required since dry season flow thresholds have been set; see background report section 6.4.3.</p>	<p>The plan provides for the protection, allocation and management of the Tindall Limestone Aquifer. It is based on protecting discharge from groundwater to the river to ensure on average 88 per cent of dry season flows to the Roper River are maintained.</p> <p>The three dry season river flow thresholds set in the plan recognise the importance of maintaining flows within the natural variability, which is based on the observed historical flows recorded by the department since 1960’s.</p> <p>Ongoing work to further refine the science is outlined in implementation action 4.1.6, which commits the department to installing monitoring bores and monitoring groundwater levels to further monitor throughflow contributions between the Georgina Basin and Larrimah zone as development occurs.</p> <p>Additional detail added into the background report to improve the clarity of information includes:</p> <ul style="list-style-type: none"> • references to relative impact of climate and water extraction on Roper River flows published in CSIRO’s Roper River water resource assessment¹⁴.

¹⁴ <https://www.csiro.au/en/research/natural-environment/water/water-resource-assessment/roper-river-water-resource-assessment>

Theme	Subtheme	Summary of the submission	Response	Resolution
			<p>Data also confirms that the variation in water availability in the Roper River is driven by climate, and not water extraction.</p> <p>In the Larrimah water management zone, where the connection with the Roper River occurs over hundreds of years, it is more appropriate to consider groundwater level triggers as development occurs in the Larrimah zone into the future, particularly along the boundary of the Larrimah and South Mataranka water management zone.</p>	
	1b. Climate data	<p>Submissions suggested that the plan does not effectively take into consideration climate change and that above average rainfall events misrepresent the climate of the area.</p>	<p>The plan explains spatial and temporal rainfall trends since data collection began in 1900 and references the Bureau of Meteorology's projected rainfall and evapotranspiration for periods to 2030 and 2050.</p> <p>The plan applies management rules to ensure water extraction does not materially alter flows associated with naturally occurring climatic conditions.</p> <p>Consideration of above average rainfall events is critical because it is these events that generate significant recharge to the aquifer, especially in Larrimah's arid zone.</p> <p>Monitoring data over multiple years in North Mataranka and South Mataranka water management zones indicate that natural seasonal variation drives water levels in the Roper River. Similarly, rainfall and groundwater levels in the Larrimah zone have been increasing over time, see background report figures 5 and 19.</p>	<p>The background report describes the data relied on by the plan, with external data referenced with active links. This acknowledges that under the two most likely climate change projections as identified by the Bureau of Meteorology, rainfall is projected to remain consistent or increase, while temperature and evaporation will increase, which will likely lead to a net reduction in recharge in the plan area.</p> <p>Additional detail added into the background report to improve the clarity of information includes:</p> <ul style="list-style-type: none"> • references to climate projection information published by in CSIRO's Roper River water resource assessment • further explanation of how management actions would be applied in a drying climate.
	1c. Information and data for identifying and assessing values	<p>Submissions stated that water requirements of ecological and cultural values were not determined/are not provided in the plan, and that because of this, there are no measurable targets or thresholds for the protection of these values.</p>	<p>The plan identifies the outstanding environmental values in the plan area through the Roper Discharge Zone.</p> <p>While the specific water requirements of significant species are not defined, the plan uses conservative allocations and caps the amount of water that can be taken from North Mataranka</p>	<p>Ongoing work to inform the setting of limits of acceptable change in the plan is prioritised within the implementation actions. The department has committed to develop an improved understanding of groundwater and surface water resource characteristics and environmental values as per implementation action 3.2.1a.</p>

Theme	Subtheme	Summary of the submission	Response	Resolution
			<p>and South Mataranka and Larrimah water management zones. This ensures that on average 88 per cent of Roper River dry season flows are maintained, which increases to protecting 90 per cent of river flows under dry conditions.</p> <p>Initial investigations of ecological and hydrological datasets to assess the dependency of ecological assets and ecosystems on the water resources of the plan area have started. Focussing on three key species of significant ecological, cultural, recreational and economic value: cabbage palm, freshwater sawfish and barramundi – to describe in broad terms, how dry season groundwater levels and groundwater discharge can influence lifecycle factors, habitat condition and the seasonal threats such as fire and extreme heat, that may affect these species.</p> <p>Since publication of the draft plan, CSIRO has published the paper - Ecological assets of northern Australia, intended to inform water resource assessments which provides useful information regarding ecological assets of the Roper River and their flow requirements. The mapping of groundwater dependent ecosystems (GDEs) in the plan area has been completed through modelling and field validation. Schedules in the background report show that 13-15 per cent of North Mataranka and South Mataranka zone areas are potentially GDEs and that <1 per cent of the Larrimah zone are potentially GDEs.</p>	<p>The department will also accelerate its existing water science program to support good practice water resource management and sustainable development.</p> <p>Additional detail added into the background report to improve the clarity of information includes:</p> <ul style="list-style-type: none"> content from Ecological assets of northern Australia.
	<p>1d. Existing water extraction and impacts</p>	<p>Submissions stated that the volume and impact of existing water extraction was not presented in the plan. Many submissions stated that the community is experiencing the impacts of the existing water extraction on river flows, such as wetlands drying up sooner, changes in fish numbers and algal blooms.</p>	<p>The department delivers a continuous monitoring program including water level monitoring at 31 groundwater sites and water flow monitoring at 22 surface water sites, within and downstream of the plan area. This monitoring clearly indicates that since the 1960's the area is generally wetter with increasing groundwater levels and flows (background report figure 6, 8, 9, 17, 18 and 19) than it has been in the recent past, and that the dominant driver is rainfall.</p>	<p>During consultation on the draft plan, specific concerns were raised within an area of the Roper River. Department staff attended the site to investigate and collect water quality samples. This combination of technical expertise with local observations provides the most effect monitoring program.</p> <p>The department will strengthen monitoring programs by clarifying ways that people can be involved in water resource management, to</p>

Theme	Subtheme	Summary of the submission	Response	Resolution
			<p>There is no evidence of current extraction substantially affecting the flows in the Roper or its springs systems, and modelling indicates there should be no further significant impacts from extraction in accordance with the ESY.</p> <p>Additional licence conditions and implementation actions will confirm this as water use in the region increases.</p> <p>The river is a highly dynamic system, consistently in flux, responding to external influences including weather events such as cyclones, as well as land clearing, land use change, and the natural ecological succession or habitat progression that occurs in response to these changes. People who live in the region observe these changes that occur over medium to longer term, including over decades.</p> <p>The data shows that rainfall has reduced since 2011 relative to the two wetter decades before, and consistent with the understanding of the system, that rainfall and climate are driving the changes in river flows rather than extraction. Local observation and understanding are important and specific concerns, including identification of place-based sites of social or cultural value are important for the department to understand so they can be monitored and managed appropriately.</p>	<p>provide input, and by progressing fee for service arrangements, focussed on supporting local Aboriginal economic development.</p> <p>Additional detail added into the background report to improve the clarity of information includes:</p> <ul style="list-style-type: none"> modelled outputs that depict the reduction in Roper River flow as a result of groundwater use hydrogeological setting including clarity on groundwater flow direction impact of extraction – cross-section added into the schedules.
	1e. Limits of change	Submissions stated that the background report did not reference impacts associated with limits of change or present enough scientific research to define limits.	<p>The plan has used alternative management arrangements to limits of change that are appropriate for the resource. This reflects that the resource being managed by the plan is primary driven by a highly variable climate. Historically rainfall in the region can vary more than 1500 mm per year between dry to wet years (background report figure 3, 4 and 5), which correlates to river flows that can vary more than 300 ML per day between dry to wet years (background report figure 8 and 9).</p> <p>The significance of the springs and Roper River in the region means that dry season river flow</p>	<p>The plan sets rules for water allocations and specific arrangements that are precautionary and more conservative than the generalised water policy and legislative settings that apply across the Territory.</p> <p>Adopting three flow thresholds means that reductions through Announced Allocations in licence conditions are more likely to be applied to ensure a greater level of protection.</p> <p>The plan also uses the Roper Discharge Zone to further limit new water licences in the area identified as having outstanding environmental</p>

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			<p>thresholds are most effective in maintaining these flows. This is the first plan to introduce three flow thresholds, reflecting the variable climate, which limits annual extractions depending on the climatic conditions.</p>	<p>value, and which would have the most impact on flows in the river.</p>
	<p>1f. Data used in models</p>	<p>Many submissions criticised the use of climate data from the 1970's onwards as this time period includes the five largest recharge events in an otherwise dry century.</p>	<p>The integrated surface water – groundwater model uses all available climate, groundwater level and surface water flow data. Post 1970's data is important history matching (i.e. calibration) as observed potential evapotranspiration data, which is reliant on evaporation data, is only available from the 1970's onwards. Prior to 1970, potential evapotranspiration could only be estimated based on current day seasonal averages. The model is particularly sensitive to changes in potential evapotranspiration and the impact that has on recharge, therefore extending the dataset beyond this period increases uncertainty of the model.</p>	<p>Additional detail added into the background report to improve the clarity of information includes:</p> <ul style="list-style-type: none"> • climate period used in model • calibration period used in the model.
	<p>1g. General comments</p>	<p>Many submissions commented that there was not enough scientific evidence in the plan documents, not enough science had been conducted, or that scientific evidence had been ignored.</p>	<p>All scientific evidence is referenced in the background report. All technical documents authored by the department are available publicly and independent reviews are conducted periodically and published on Territory Stories.</p> <p>The department's data monitoring data spans groundwater levels measurements in bores, flow measurements at the springs and over 60 years of flow measurements in the Roper River. This data has been combined with an integrated groundwater and surface water model to provide an in depth understanding of the resources that is verified with measured groundwater levels and flows. More broadly this was informed by the recently completed Strategic Regional Environmental and Baseline Assessment (SREBA), which is the most comprehensive ecological assessment ever conducted in the Territory.</p>	<p>Key elements of the plan including the impact of extraction on spring and dry season flows are consistent with independent studies undertaken by CSIRO, see Roper River water resources assessment.</p>

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<p>4.2. Approach in the plan</p>	<p>2a. Estimated sustainable yield (ESY)</p>	<p>Many commenters felt the ESY is too high and is not precautionary. Commenters further identified that the ESY in South Mataranka should be no more, and potentially less, than current use (not entitlements) because it is clear that current use is already causing stress. Additionally, comments were made identifying the ESY for Larrimah specifically as not precautionary, and felt it should be set to start at a smaller volume and progressively increased depending on groundwater response.</p> <p>Commenters also called for much greater information about the methods and modelling used to determine the ESY for the three zones within the planning region is urgently required to understand how the ESY were determined.</p>	<p>The ESY values have been set to deliver the objectives of the plan as established with the water advisory committee.</p> <p>The ESY is allocated to the North Mataranka, South Mataranka and Larrimah water management zones. These zones are managed according to their distinct hydrogeological characteristics, climate conditions and impacts and the relationship between water flows and environmental and ecological values.</p> <p>In developing the ESY, groundwater extraction scenarios were modelled (35,000 ML per year to 97,000 ML per year) to assess the relative impact of extraction on groundwater levels and throughflow across the plan area as well as dry season flows in the Roper River. Modelling scenarios are presented in background report section 6.3.3.</p> <ul style="list-style-type: none"> • Recent studies by CSIRO (Taylor, 2023) verify the department's understanding based on modelling and monitoring that the source of groundwater for Rainbow Springs and Bitter Springs is from localised flow from the north and west. To protect the springs a highly precautionary ESY has been set for the North Mataranka zone equivalent to 3 per cent of average annual recharge and no more water is available for licensing. • CSIRO indicate that discharge to Fig Tree Springs and Salt Creek are reflective of localised groundwater flow and that regional groundwater flow provides discharge to the eastern parts of the upper Roper River. The ESY for South Mataranka sets an ESY equivalent to 13 per cent of annual average recharge with modelling indicating that this will equate to an average reduction in Roper River dry season flows of 12 per cent. Management arrangements in the plan further reduce the impact of extraction in the South Mataranka zone with entitlements 	<p>The ESY reflects extensive consideration and discussion with the committee to balance the protection of the Roper River with providing a defined volume of water for public drinking water, stock and domestic take, and for the economic benefit of the region. The ESY:</p> <ul style="list-style-type: none"> • recognises the outstanding environmental values of the region with the Roper Discharge Zone (section 4.1 of the background report) and restricts development to current licence entitlements closer to the river • preserves 88 per cent of the dry season flows to the Roper River to sustain its discharges to springs and ecosystems. Further, environmental flow thresholds will reduce the amount of water able to be taken by licence holders in a particular year, depending on climate • provides the opportunity for water development where this is less impact. <p>The ESY has been informed by consultation with the committee and based on the following principles:</p> <ul style="list-style-type: none"> • maintaining stored volumes of water in the aquifer and discharge to the Roper River to ensure minimal impact on values • maintaining existing and future rural stock and domestic needs and ensuring availability of public water supplies • maintaining a reliable supply of water to existing licence holders • supporting sustainable development of the region.

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			<p>reduced such that 90 per cent of dry season flows are retained in the river during dry periods and no more water is available for licensing.</p> <ul style="list-style-type: none"> Larrimah zone is much further from the Roper River and therefore connectivity to the river is small. Groundwater is deeper in this zone so impacts from extraction on GDEs is negligible and therefore has the highest volume of water made available under the ESY. <p>The ESY, in conjunction with management arrangements, protect the high ecological values within and surrounding the Roper Discharge Zone and provides water security for public water supply licences, while making water available for regional and Aboriginal economic development.</p>	<p>Additional detail has been included in the background report to improve information in the following sections:</p> <ul style="list-style-type: none"> 3.5.1 Hydrogeological setting 3.6.2 Natural water balance 6.2 Future water use.
	2b. Water zones	<p>Submissions called for the plan to consider the three zones as connected, given the through flow of water between the regions. Some submissions claimed that extraction in the Larrimah zone could cause the reverse of groundwater flow towards the springs and Roper River.</p>	<p>The plan does not consider the aquifer system as disconnected as suggested by some of the comments, rather the background report throughout section 3.5.1 describes the interconnected neighbouring aquifers/basins as quantified in the natural water balance in figure 22.</p> <p>Water monitoring provides multiple indicators that demonstrate that the Larrimah zone operates as a regional to intermediate flow system, with storage volume as the dominant hydraulic driver. North Mataranka and South Mataranka zones operate as a local flow system where both horizontal and shallow vertical flow components dominate in stream flows, and are managed appropriately. This approach is consistent with the Classification of the Top End and Arid Zone for Northern Territory water resources. Water Resources Division Technical Report 55/2020¹⁵.</p> <p>This claim that the groundwater extraction will reverse the flow is inconceivable in the context of the climatic conditions in the region and the nature</p>	<p>The plan recognises Tindall Limestone Aquifer as a continuous system as based on the modelled conceptualisation of the resource, verified through multiple water monitoring indicators.</p> <p>Separation of a plan into different management zones is a logical and nationally accepted approach to managing a resource where hydrological, hydrogeological, climatic, and ecological characteristics and behaviour vary across the resource or where there is highly variable usage. Applying management zones allows location specific management arrangements to be applied to meet the objectives of the plan.</p> <p>The plan makes less than five per cent of the ESY available from the North Mataranka zone to ensure the protection of the springs and on average preserves 88 per cent of the dry season flows to the Roper River. These settings are more conservative than generalised water policy and legislative setting that apply for the Territory.</p>

¹⁵ <https://territorystories.nt.gov.au/10070/843257/0/0>

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			<p>of the water resources. The claim is not plausible given the groundwater gradients, elevations of groundwater and riverbed elevations. Nor is this claim supported by modelling which uses measured data to calibrate the model.</p> <p>The claim is based on applying theoretical principles out of context, with no attempt to calculate the volume of water that would be required to physically create this impact or compare this volume with the ESY of the plan.</p> <p>Groundwater flows for the springs are driven from groundwater flow paths from the north and west and are predominantly locally driven, not from the south or the larger plan regional, which was confirmed by the CSIRO Roper River water resources assessment (Taylor 2023).</p>	<p>Additional detail added into the background report to improve the clarity of information includes:</p> <ul style="list-style-type: none"> • a revision of mapping and text to highlight and contextualise interconnectivity of the resource.
	<p>2c. Water resource models</p>	<p>Submissions suggested that a numerical model may not represent the complexities of the complex karst aquifer accurately.</p>	<p>Computer models of natural systems are used to help humans better understand their environments, and can be used to find sustainable ways of living in them. Analytical methods are one dimensional and are a basic first pass in assessing a systems response to a proposed stressor. Numerical models are far more appropriate when considering complex systems and environments.</p> <p>A water model uses physics and maths to represent the flow of water and its underground storage. They use the facts about the geology, groundwater levels and hydrogeological processes and climate data, including actual data obtained from investigation bores and bore reports, which has been calibrated using groundwater monitoring information collected by the department. Periodically, independent reviews are conducted as part of ongoing scientific advancement within the department.</p> <p>The integrated groundwater and surface water model for Mataranka was refined in 2009 for the Roper River and upgraded in 2020. This included multiple independent peer reviews, which assessed as Class 2-3 based on Australian Groundwater</p>	<p>The model is continuously improving representation of the water resource behaviour. The model is used and refined consistently by the department through:</p> <ul style="list-style-type: none"> • its application, at the end of wet season to predict Roper River flow conditions assuming everyone is using their full water entitlements • its verification, at end of the dry season, the model is updated with actual water usage data and measured flows in the Roper River. <p>The annual prediction and verification process provides evidence of high confidence in the model predictions, which are on average, within 6 per cent of the predicted and observed river flows, and are generally more conservative than the actual levels measured each year.</p> <p>To further support the continuous improvement process, the next iteration of the model has been funded through the National Water Grid Authority with the recalibration scheduled for completion in 2025, as outlined in the implementation actions.</p>

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	2d. National Water Initiative (NWI)	Submissions suggested the plan does not achieve the requirements of the NWI because it allocates water to the SAWR after it is declared, impacts to GDEs are not adequately described, the plan does not have binding legal effect, does not achieve sustainable water use or holistic management.	<p>Modelling Guidelines and described as leading example of best practice.</p> <p>The content and process for water allocation planning are consistent with the NWI guidelines. The department engaged a consultant to review the Territory's implementation of the NWI¹⁶ in relation to water planning. In summary, the NT is consistent with the NWI. While there are areas for improvement, the challenges faced by the NT are unique. However, the NT's commitment to NWI will ensure the importance placed on water continues to reflect its social, cultural, economic and environmental significance to Territorians.</p>	<p>Water planning is a cyclical process. It is subject to continual evaluation and refinement that ensures existing needs are being met through contemporary best practice, and emerging needs are proactively identified. The review identified seven focus areas for future improvement. The department has identified actions to guide ongoing improvements to water planning processes over the coming years.</p> <p>More information on this can be found here Water planning process NT.GOV.AU¹⁷</p> <p>Ongoing water reform and policy development and review that supports sustainable development through contemporary water resource management into the future.</p>
	2e. Determining values	It was not clear to many that the plan considered and aims to protect social, cultural, economic and environmental values. This included the identification of values, assessment of thresholds required to protect values and development of management actions/plan objectives to protect values.	<p>The plan's overarching goal of water sharing is to optimise the benefits to the community created by the sustainable use of a water resource, within climate variability. This section outlines the six objectives and sets the high level strategic direction for water decisions and management of a water resource. Each objective is supported by several outcomes, to which the implementation actions align.</p> <p>The plan identifies the outstanding environmental values in the plan area through the Roper Discharge Zone (section 4.1 of the background report).</p> <p>Although specific water requirements of the identified regionally important species are not defined, the plan uses the conservative allocations and caps the amount of water that can be taken from the North Mataranka and South Mataranka</p>	<p>The plan presents a significant amount of previous research in identifying and understanding these values, conducted by both the department and other research programs and organisations. The plan also acknowledges that more should be done to establish the specific water requirements for these values and commits to undertake this within the implementation actions.</p> <p>Similarly, while Aboriginal water values and biocultural knowledge have been reasonably well documented for the broader Roper region, much less is known about the specific water requirements (quality and quantity) of cultural values and assets. While the process of developing the plan has had some input from local Aboriginal people via the Mataranka committee and other consultation forums, ongoing participation of</p>

¹⁶ https://nt.gov.au/_data/assets/pdf_file/0006/1277259/badu-advisory-review-nwi-nt.pdf

¹⁷ <https://nt.gov.au/environment/water/management-security/water-management/national-water-initiative/water-planning-process>

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			<p>water management zones that to ensure that on average 88 per cent of Roper River dry season flows are maintained.</p>	<p>Aboriginal people will be a key focus for implementation of the plan.</p> <p>Additional detail added into the background report to improve the clarity of information includes:</p> <ul style="list-style-type: none"> • details of monitoring that aligns with locations of cultural interest.
<p>4.3. How water is shared</p>	<p>3a. Beneficial uses</p>	<p>Many submissions commented that allocation of water to beneficial uses of agriculture, mining and other industry are too high, while some submissions suggested the plan didn't allocate enough water to tourism and farming operations and future development.</p> <p>Stakeholders perceived little benefit for local communities as a result of the plan and thought the high allocations would risk social, cultural and environmental values.</p>	<p>The plan priorities public water supply by ensuring that allocations consider growth requirements over time. First and foremost, the majority of water is retained to meet the environmental and cultural needs. After this the amount of water that will be taken is allocated in priority:</p> <ol style="list-style-type: none"> 1. Stock and domestic needs 2. Public water supply 3. Aboriginal economic development 4. Other economic development. 	<p>The volume of water allocated to beneficial uses under the plan is more conservative than what would be available under the generalised policy in the absence of a plan. The plan protects the Roper River and springs by providing a defined and balanced volume of water for public drinking water, for stock and domestic take and for licenced use for the economic benefit of the region.</p> <p>The plan restricts development to current levels of entitlement closer to the river, and provides the opportunity for water use and development in the Larrimah water management zone where there is a lower environmental impact from water extraction.</p>
	<p>3b. Allocated volumes</p>	<p>Many submissions called for no increase to extraction beyond current volumes of extraction. This included groundwater and surface water extraction.</p> <p>One submission acknowledged that the proposed extraction limits are more conservative than the default rules contained in the Water Allocation Planning Framework.</p>	<p>Across the Territory annual reported water use is around 50 per cent of maximum water extraction licence entitlements. While this is a similar trend in the Mataranka plan area, the reported water use varies significantly between the three water management zones and the process for reducing these is through the application of the Recovery of Unused Licensed Water Entitlements Policy.</p> <p>Restricting current water licence entitlements to current actual use would be inconsistent with this policy and would not recognise the planned developments and water use schedules of currently licensed users. Further, the assessment of licence decisions for North Mataranka and South Mataranka regions has identified minimal impacts on groundwater levels in the area, even after modelling 50 years into the future assuming the extraction of full entitlement. This modelling aligns with a separate investigation on water</p>	<p>Consistent with policy, recalibration of water entitlements is being achieved through the application of the Recovery of Unused Licensed Water Entitlements Policy.</p> <p>The policy is being actively implemented in priority areas across the Territory and enables the Controller of Water Resources to consider specific nuances for each water user, including development plans, seasonal variation, crops water requirements, business response to market requirements etc. to ensure the policy's implementation is tailored appropriately to each licence holder.</p>

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			<p>extraction in the area by CSIRO. The existing licences in the area are not a threat to the social or cultural values of the water resource. Licence decisions can be read on the NT Water Licensing Portal.</p>	
	<p>3c. Aboriginal Water Reserve</p>	<p>There was support in the submissions for allocation of water to the Aboriginal water reserve (reserve), previously the Strategic Aboriginal water reserve. Some submissions called for the reserve to be provisioned through the recovery of existing licence allocations.</p> <p>Others criticised the plan for not fully provisioning the reserve prior to or at declaration of the plan. While some submissions suggested that the provisioning of water to the reserve withholds water from existing businesses.</p>	<p>The introduction of the Aboriginal water reserve into the Act in 2019 followed several years of development of the principles between Government and Land Councils. This process set the allocations between 10-30 per cent of the ESY depending on the amount of eligible land in the plan area.</p> <p>Importantly, the plan is what brings the Aboriginal water reserve into existence; without a plan, the reserve is not in effect and water cannot be set aside or accessed for Aboriginal economic development.</p> <p>As demonstrated by the submissions there are differing perspectives and outcomes of water allocations in specific plan areas.</p>	<p>The plan supports Aboriginal economic development in the plan area with 4,574 ML per year allocated to the Aboriginal water reserve. The reserve is fully provisioned in Larrimah and partially provisioned in the North Mataranka and South Mataranka. This was a deliberate decision in consultation with the committee to set ESY in these zones to current entitlements to ensure that the take of water in the region is sustainable as this water hasn't been used yet.</p> <p>The implementation actions describe how further volumes of water will be allocated to the reserve over time through the application of the Recovery of Unused Licensed Water Entitlements Policy.</p>
	<p>3d. Existing licence allocation</p>	<p>Submissions called for more information about existing licenced volumes and actual water extraction to be included in the plan.</p>	<p>Existing licensed volumes and actual water extraction continuously change and as a result are not appropriate to be included in the statutory plan document, instead this information is included in section 6.1.of the background report.</p> <p>Across the Territory annual reported water use is around 50 per cent of maximum water extraction licence entitlements. While this is a similar trend in the Mataranka plan area, the reported water use varies significantly between the three water management zones. Application of the Recovery of Unused Licensed Water Entitlements Policy and provisions for trade provide the mechanisms for supporting economic development by reallocating water to those that need it, including for Aboriginal economic development through the Aboriginal water reserve.</p>	<p>Information about specific licences and licence conditions are publicly available via the department's Water Licensing Portal.</p> <p>Information on existing licence entitlements and actual water use is included in the background report section 6.1.</p> <p>Additional detail has been included in the background report to improve the clarity of information, including:</p> <ul style="list-style-type: none"> • updating the existing water licence entitlements data, when the plan is declared.

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	3e. Other policies in the plan area	Many submissions expressed concern that the plan was not developed in consideration of surrounding plans (Georgina Wiso Water Allocation Plan) and the Surface Water Take – Wet Season Flow policy, which could ultimately result in unsustainable extraction of the same system. There was also concern that there is not enough information supplied in the plan for the Controller to make informed decisions.	<p>The Mataranka plan joins the Georgina Wiso plan area to the South and the Katherine plan area to the North. Each plan quantifies the level of connection.</p> <p>This plan is about protecting the springs and Roper River flows during the dry season, which is the where the risk to the resource and its associated values exists.</p>	A Water Allocation Plan is one of eleven factors the Controller must consider when making a water extraction licence decision. The Controller must consider any relevant factor under section 90 of the Act and considers each licence application individually, and on its own merit. The basis of the decisions against these factors is published and available from information about specific licences and licence conditions are publicly available via the department's Water Licensing Portal .
4.4. How peopled were engaged	4a. Water advisory committee	Several submissions commented that the right people were not included as committee members on the committee or departed the committee and therefore were not present for important decisions-making processes.	<p>The role of the committee is to advise on the effectiveness of a water allocation plan in maximising economic and social benefits within ecological restraints.</p> <p>The committee have provided advice throughout the development of the plan, and consistently since 2017. As a result of this, the department made a number of changes to the plan that was released for broader consultation.</p>	The department commits to progressively establishing and maintaining committees ongoing where plans are being developed or implemented. The composition of a future committee will prioritise local Aboriginal membership.
	4b. Engagement activities	Many comments raised the fact that community members inside the plan area and downstream of the Roper River were not consulted. Some stakeholders believed that Traditional Owners should have been afforded a decision-making role and also play a role in the implementation of the plan.	<p>Engagement activities can be found in the Overview of Mataranka water allocation plan¹⁸.</p> <p>Important consultations have occurred with Traditional Owners over many years:</p> <ul style="list-style-type: none"> in 2017 dry season water quality at Elsey Station was conducted with Mangarrayi rangers to assess temporal changes in water quality at Elsey Station over the season field inspections and water quality monitoring with Mangarrayi Rangers and Jilkminggan community members to various culturally significant sites in the Elsey and Roper area in May 2019 in 2020 monitoring field work was undertaken with Mangarrayi Indigenous Rangers to map 	<p>The department recognises the need to improve consultation to enable greater engagement in water resource management, including ensuring Aboriginal people are included in water planning into the future.</p> <p>Some of the engagement activities and efforts in this plan included:</p> <ul style="list-style-type: none"> draft plan was released for extended period of more than 11 weeks and included holding 20 face to face information sessions throughout the region holding community forums to increase understanding of the regulatory framework in the Territory and engage on improvements through the legislation reform

¹⁸ <https://nt.gov.au/environment/water/management-security/water-control-districts/daly-roper-beetaloo/mataranka-water-allocation-plan>

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			<p>cultural values mapping and spring. Consultation facilitated by Northern Land Council meeting throughout the region during October and a number of locations</p> <ul style="list-style-type: none"> in 2022, three days on country consultations were held with Mangarrayi traditional owners and the Northern Land Council in May 2022 to inform development of the plan. Meeting and information session held at Jilkminngan with Traditional Owners and the Northern Land Council to discuss the scenario modelling outputs in July. 	<ul style="list-style-type: none"> continuing to clarify and improve engagement processes, including working with WaterTrust¹⁹ to ensure this reflect good practise and is appropriate for the Territory context.
	4c. Information transparency	Submissions stated that information regarding the sustainability of the Plan had not been disclosed in order for it to be clearly understood. It was noted that presentations made by the department at local authority meetings did not supply balanced or complete information.	The department endeavoured to communicate all necessary information as requested by stakeholders throughout the consultation process, including making it available in language and if varying mediums, such as digital and print. The department made efforts to meet with stakeholders face to face wherever possible.	<p>The department makes its data collected at monitoring sites publicly available through the Water Data Portal. Water assessment and investigation technical reports are published on Territory Stories.</p> <p>The department continues to ensure that publicly available information is accessible, including resources being translated to language and other methods to improve understanding.</p>
	4d. Incorporating stakeholder feedback	Many submissions commented that the plan does not represent views of the community and there is lack of social licence and clear opposition from community.	This consultation summary demonstrates that the views of stakeholders were not disregarded. Over 1,000 records of stakeholder feedback have been considered in the process of preparing this summary document and throughout the development of the plan.	<p>This consultation summary demonstrates that the views of stakeholders were not disregarded.</p> <p>This summary also demonstrates that engagement activities were balanced across water users in the plan area and hence did not favour the views of any one group.</p>
	4e. General comments	Many submissions stated that the plan does not have social licence but that the plan is an opportunity for the Government to form a new model for water governance by supporting community-led decision making.	The department has appointed new staff to a dedicated role with specific engagement skills to improve direct stakeholder engagement processes.	The department recognises the need to improve consultation to enable greater engagement in water resource management.

¹⁹ <https://watertrustaustralia.org.au/>

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4.5. Protection of ecological values	5a. Significant species	Most submissions stated that the plan threatened ecological values. Some detailed submissions identified modelling presented in committee meetings or the plan which suggested that significant species such as barramundi, sawfish, the gulf snapping turtle and cabbage palms would be threatened by the proposed water extraction.	<p>The comprehensive understanding of the ecological environment was informed by the recently completed SREBA²⁰. The plan identifies the outstanding environmental values in the plan area through the Roper Discharge Zone (section 4.1 of the background report).</p> <p>While the specific water requirements of significant species are not defined, the plan uses conservative allocations and caps the amount of water that can be taken from the North and South Mataranka water management zones to ensure that on average 88 per cent of Roper River dry season flows are maintained.</p> <p>Since publication of the draft plan, CSIRO has published a paper - Ecological assets of northern Australia to inform water resource assessments which provides useful information regarding ecological assets of the Roper River and their flow requirements.</p>	<p>Ongoing work to build the science is outlined in implementation action 4.1.4, which commits to determining the specific groundwater requirements of key terrestrial, aquatic and subterranean species associated with the Tindall Limestone Aquifer and the Roper River.</p> <p>Additional detail to background report to improve information:</p> <ul style="list-style-type: none"> content from Ecological assets of northern Australia.
	5b. Groundwater Dependent Ecosystems (GDEs)	Stakeholders were unhappy about the perceived impact to GDEs based on modelled drawdown. Many noted the high level of uncertainty of impacts and/or protections as a deficiency of the plan.	The potential distribution of terrestrial GDEs across the plan area has been modelled and field validated using the methodology developed by Brim Box et al. (2022). The background report shows that 13-15 per cent North Mataranka and South Mataranka are GDEs and that <1 per cent of the Larrimah water management zone are GDEs.	<p>Ongoing work to build the science is outlined in implementation action 4.1.4, which commits to determining the specific groundwater requirements of key terrestrial, aquatic and subterranean species.</p> <p>Additional detail to background report to improve the clarity of information includes:</p> <ul style="list-style-type: none"> the addition of the modelled drawdown mapping.
	5c. Downstream or surrounding ecosystems	Many submissions commented on the potential impacts to ecological values downstream of the plan area.	Studies taken between wet and dry season that show water quality downstream is extremely variable and understood based on the primary source of flow. The Roper River has significant lengths of braided channel segments, which are characterised by multiple shallow flow paths which are highly dynamic, changing regularly after	Ongoing work to build the science is outlined in implementation action 4.1.4, which commits to determining the specific groundwater requirements of key terrestrial, aquatic and subterranean species.

²⁰ <https://depws.nt.gov.au/onshore-gas/sreba>

Theme	Subtheme	Summary of the submission	Response	Resolution
			<p>flooding events, and support a large expanse of riparian vegetation and ecological communities.</p> <p>In 2022, the department undertook analysis of ecological and hydrological datasets to assess the dependency of ecological assets and ecosystems on the water resources of the plan area. It described how dry season groundwater levels and discharge can influence season threats like fires.</p> <p>Waugh, P (2023) highlights that on average, over 97 per cent of total annual flow volume entering the Roper River estuary below Roper Bar occurs during the wet season.</p>	<p>Additional detail added into the background report to improve the clarity of information includes:</p> <ul style="list-style-type: none"> content from Ecological assets of northern Australia.
	<p>5d. Other comments relating to ecological values</p>	<p>Many community members in the plan area described the changes in the environment that they have observed in recent years. This included flood plains and billabongs drying up earlier and creeks and streams flooding less and less.</p>	<p>Perennial streamflow of the Roper River support diverse aquatic ecosystems within and downstream of the plan area. Throughout the dry season, the flows continue to support ecosystems within the main channel and any surrounding billabongs, wetlands and floodplains that maintain connectivity. Further study completed by the department in 2022 recognised that the region is subject to natural seasonal and decadal climate variations that can result in poor recruitment or habitat loss. However, this natural periodic variation still enables ecosystems to thrive, and this variation is recognised by maintaining high flows in high rainfall years, and preserving low flows in dry years.</p> <p>Landscape condition is impacted by a wide variety of factors only some of which are influenced by water availability. The department acknowledges that community observations may not always align with measured data and where this occurs the department is committed to work with community to undertake additional monitoring and analyses.</p>	<p>The department will strengthen the regional monitoring program by clarifying ways that people can be involved in water resources management to provide this input and progressing fee for service arrangements, focussed on supporting local Aboriginal economic development.</p> <p>Additional detail included in the background report to improve the clarity of information includes:</p> <ul style="list-style-type: none"> provision of additional analyses of long term flow trends throughout the Roper River addition of content from Ecological assets of northern Australia.

Theme	Subtheme	Summary of the submission	Response	Resolution
4.6. Reflection of Aboriginal cultural values	6a. Cultural values	<p>Most submissions stated that water allocations and use under the plan threatened to destroy significant Aboriginal cultural values. Stakeholders noted that the absence of information to understand cultural values and significant sites compromises the plans' ability to protect these values through water management decisions.</p>	<p>The plan recognises the importance of identifying cultural heritage values and measures to safeguard these in a culturally appropriate way, details are addressed through licence requirements. The work to define cultural sites that need to be protected has not yet been completed, however once these sites are defined there remain mechanisms for their protection through policy and guidance considered in licence decision making processes and through the review of the plan.</p> <p>The larger the area, the less likely that cultural impacts will be properly identified in the absence of information about predicted impacts. Improved understanding of cultural values and monitoring of cultural sites throughout the life of the plan will ensure safeguards that are appropriate to the Traditional Owners, and Custodians and the ecological values of the district are implemented.</p>	<p>It is acknowledged that cultural values are not currently reflected adequately in the plan. The plan recognises the importance of identifying cultural heritage values and measures to safeguard these in a culturally appropriate way. The Wubalawun, Yangman, Mangarrayi and Jawoyn people have deep spiritual connection with the regions many springs, soaks, billabongs, creeks, rivers and landscapes. This extends to Aboriginal people and groundwater dependent cultural values downstream of the plan area along the Roper River.</p> <p>While the process of developing the plan has had some input from local Aboriginal people, ongoing participation of Aboriginal people is a key focus. This work has been identified in the implementation actions.</p>
	6b. Sacred sites	<p>Many submissions detailed the existing impacts on Aboriginal cultural values and significant sites as a result of existing water extraction, pest animals and development and stressed that the plan would only further these impacts. Submission argued that the destruction of cultural values could adversely affect the health and wellbeing of the Traditional Owners and custodians of the land and that this had already occurred as a result of the development of agricultural enterprises in the region.</p>	<p>There is no evidence of current extraction affecting the flows of the Roper or of the springs system and modelling anticipate there to be no impacts from granted water licence entitlements on the flows of the Roper River or springs.</p> <p>The river is a highly dynamic system, consistently in flux, responding to external influences including weather events such as cyclones, as well as land clearing, land use change, and the natural ecological succession or habitat progression that occurs in response to these changes. People who live in the region observe these changes that occur over medium to longer term, including over decades.</p> <p>The data shows that rainfall has reduced since 2011 and, consistent with the understanding of the system, rainfall and climate are driving the changes in river flows rather than extraction.</p> <p>Local observation and understanding are important and specific concerns, including identification of place based sites of social or cultural value are important for the department to understand so they can be monitored and managed appropriately.</p>	<p>The department will strengthen its monitoring programs by clarifying ways that people can be involved in water resources management and provide input on sites of local importance. This combination of technical expertise with local observations will provide the most effective monitoring program, and ensure that it meets the information needs of both the department and community.</p> <p>The department has committed to progressively establishing and maintaining committees ongoing where plans are being developed or implemented. The composition of the committee will prioritise local Aboriginal membership as one of the ways to facilitate the integration of cultural values into the planning processes.</p>

Theme	Subtheme	Summary of the submission	Response	Resolution
	6c. Protection mechanisms	Submissions called for better assessment of cultural values, engagement with Traditional Owners and Aboriginal People to understand values and determine protection measures, an understanding of the thresholds for water extraction which enable protection of values and ongoing co-management of the resource with Aboriginal People.	The plan recognises the importance of identifying cultural heritage values and adopting measures to safeguard these in a culturally appropriate way. Improved understanding of cultural values and monitoring of cultural sites throughout the life of the plan will ensure safeguards that are appropriate to the Traditional Owners, and Custodians and the ecological values of the district, are implemented.	The work to define cultural sites that need to be protected has not yet been completed, however once these sites are defined there remains mechanisms for their protection through policy and guidance considered in licence decision making processes, and through the review of the plan.
4.7 Understanding of social and economic values	7a. Drinking water	Most comments demonstrated concern that the drinking water supply in Ngukurr would be impacted, in particular through increased salinity. Stakeholders feared that negative impacts to drinking water that have occurred elsewhere in the NT could occur in the plan area and surrounds.	Section 6.1.3 of the background information document discusses public water supply. In the plan area public water supply is provided to the communities of Mataranka, Jilkminggan and Larrimah. A water licence is issued to Power and Water Corporation for each of these communities based on existing average demand and forecasted 30 year bulk demand estimates. The existing water licence entitlements for each community includes a significant buffer for expansion of the community or emergency provision. Included in these licence entitlements within this plan is an allocation for downstream public water supply.	Additional detail added into the background report to improve the clarity of information includes: <ul style="list-style-type: none"> • providing additional analyses of long term flow trends throughout the Roper River • providing further information regarding Ngukurr community public water supply.
	7b. Industry and development	Submissions demonstrated concern for impacts to the existing agricultural and tourism enterprises which may struggle to maintain existing operations and/or expand their operation under the plan's allocations and environmental protections.	Across the Territory annual reported water use is around 50 per cent of maximum water extraction licence entitlements. While this is a similar trend in the Mataranka plan area, the reported water use varies significantly between the three water management zones. Application of the Recovery of Unused Licensed Water Entitlements Policy and provisions for trade provide the mechanisms for supporting economic development by reallocating water to those that need it, including for Aboriginal economic development through the Aboriginal water reserve.	The department will strengthen monitoring programs by clarifying ways that people can be involved in water resources management to provide this input on local impacts. This combination of technical expertise with local observations provides the most effect monitoring program.

Theme	Subtheme	Summary of the submission	Response	Resolution
			Tourism interests were considered in the development of the plan and are protected by the management arrangements that have been specifically designed to ensure Roper River and spring flows are maintained to reflect the variable climate.	
	7c. Irreversible harm	The plan in its current form will cause substantial harm to communities.	There is no evidence of current extraction affecting the flows of the Roper or of the springs system, and modelling indicates there are no anticipated impacts of granted water licence entitlements that could significantly affecting flows of the Roper River or the springs.	<p>The plan sets rules for water allocations and specific arrangements that are more conservative than generalised water policy and legislative setting that apply for the Territory.</p> <p>It is based on protecting discharge from groundwater to the river to ensure on average 88 per cent of flows to the Roper River and its springs systems are maintained during the dry season.</p> <p>As the plan is more precautionary than the general NT water management policy, there is a greater risk of harm occurring to the water resource without a plan in place.</p>
4.8. Management of the resource	8a. Announced Allocation	Stakeholders felt that the plan was overly dependent on Announced Allocations rather than embedding thresholds into the plan. Many felt that the Announced Allocations mechanism was not transparent enough and that education for licence holders is needed.	<p>The significance of the springs and Roper River in the region means that dry season river flow thresholds are most effective in maintaining these flows. This is the first plan to introduce three flow thresholds, reflecting the variable climate and that limits in annual extractions depending on the climatic conditions.</p> <p>Announced Allocations enables licence entitlements to be adjusted on a year by year basis, if modelled predictions undertaken at the end of the wet season are below the thresholds specified in the plan to maintain end of dry flows.</p> <p>An annual review of the effectiveness of Announced Allocation process will be reported in the annual Status of the water resource report.</p>	<p>Additional detail added into the background report to improve the clarity of information includes:</p> <ul style="list-style-type: none"> • impact of AAs and other water management activities.

Theme	Subtheme	Summary of the submission	Response	Resolution
	8b. Protection mechanisms	Submissions commented that although the Protected Environmental Area (PEA) was a good idea, the plan did not provide enough clarity on the actual protection measures for this area. Stakeholders wanted to see how extraction outside of the PEA would be managed if it impacts inside the PEA and asked for more details of this in the implementation actions.	<p>The plan identifies the outstanding environmental values in the plan area through the Roper Discharge Zone (section 4.1 of the background report). Alongside the statutory effect of the plan, it is also proposed that the Roper Discharge Zone be declared as a PEA under the Environment Protection Act.</p> <p>The PEA will reinforce the rules of the water allocation plan to reduce development in the Roper Discharge Zone providing reinforced protection to the outstanding ecological and environmental assets of the area defined as part of the SREBA.</p>	<p>Declaration of a PEA has been included in the implementation actions.</p> <p>Additional detail to background report to improve the clarity of information includes:</p> <ul style="list-style-type: none"> revision of the protection measures.
	8c. Water legislation	Some submissions called for reform of NT water legislation to ensure that water allocation plans are legally binding. Other comments suggested the plan does not meet the requirements of the Act.	The plan aligns to the current requirements of the Act as it defines the ESY, allocates to the Aboriginal water reserve and allows for trade.	Ongoing water reform and policy development and review provide a regulatory regime that supports sustainable development through contemporary water resource management for the future.
	8d. Implementation actions	Submission called for the implementation actions to be developed in consultation with Traditional Owners and monitoring to be undertaken by Aboriginal Rangers. Further, that the implementation actions be time-bound and contain more detail. Submissions also called for more monitoring to occur on the boundary between Larrimah and South Mataranka zone and monitoring data made publicly available.	<p>The implementation actions reflect the combination of consultation and specific application of water resource management principles.</p> <p>In the Larrimah zone where the connection with the Roper River occurs over hundreds of years it is more appropriate to consider ground water level triggers in future, as development occurs in the region, particularly along the boundary of the Larrimah to South Mataranka water management zone.</p>	Ongoing work is outlined in the implementation actions section 4.2. Implementation action 4.1.6 commits the department to installing and monitoring bores to further monitor throughflow contributions between the Georgina Basin and Larrimah zone as development occurs.
	8e. Plan reviews	Submissions asked that the plan be reviewed if development in the Larrimah zone occurs rapidly, if water monitoring reveals decreases in water levels beyond modelled expectations and at 5 years to gauge the impact of climate change.	The Minister must ensure that a review of a water allocation plan is conducted at intervals not longer than 5 years.	The plan has provision for review in less than 5 years if water use exceeds 70 per cent of the sustainable yield and, in the Larrimah zone if use exceeds 70 per cent of water allocated to a beneficial use.

4. Next steps

Feedback on the plan have been invaluable in informing the finalisation of the plan for declaration by the Minister and informing broader water planning.

The department will continue to work closely with stakeholders in refining, implementing and managing the resources in the plan area. This includes:

- ongoing facilitation of the Mataranka committee, which will be refreshed with new terms of reference for the implementation of the plan
- continuing and enhancing stakeholder meetings to engage with peak bodies and interest groups
- starting information forums to build community understanding of the water regulatory framework
- producing annual reports on the status of the Tindall Limestone Aquifer
- keeping the community and stakeholders informed about the progress and outcomes of the plan. the department [webpage](#).

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For translating and interpreting services, contact [Interpreting and Translating Service NT](#).