

Submission to the Dept of Water and Environmental Regulation

Consultation Draft - Fitzroy-Derby Water Resources Management Plan: Policy and Guidance

Submitted by: Fiona Preston | [REDACTED]

I write as someone who has lived in the Kimberley, supported mineral exploration endeavours in a secondary capacity and who now focuses on river protection. I have maintained an interest in the Kimberley because of its uniqueness and beauty.

While I object to the draft plan as it stands, I commend this plan for taking certain steps in the right direction:

- You have combined groundwater and surface water in this plan, acknowledging that the river is more than simply the water held between its banks.
- You have stated there will be no dams and that the river will remain free-flowing.
- No further surface waters will be allocated.
- You have stated that ‘ecological, cultural, heritage and social values’ will be included in decision-making.
- You have consulted with Traditional Owners and stated that there will be an Aboriginal Water Holding. That appears to be groundbreaking, an acknowledgment of Indigenous water rights, aligning with the National Water Initiative (2004) and WA’s Water for Life Strategy.
- The precautionary principle is mentioned.

However, on a closer reading, you have not made the most of this opportunity. Questions remain unanswered. How will Traditional Owners access or use their 25 GL holding, who will manage it and what happens if this water is not used? No environmental flow is noted let alone made the priority. Is that hidden in this holding? It seems quite possible that this is just a symbolic gesture and given that this is an unceded Aboriginal river, this is a fraction of what was once entirely Aboriginal-cared-for water, and reads as colonialism still playing itself out.

For all the consulting done, there are important issues that have been overlooked, and this is a shame because this is a free-flowing water body with unique characteristics and it comes with its own keepers who have acquired river knowledge and wisdom unbroken over thousands of years. In effect, this is Australia’s greatest opportunity to create a bold, innovative water plan that saves the Martuwarra from the diminishment common to Australian rivers. There is real scope to protect this river, its various waters, the environment it has shaped and the communities, both human and otherwise that it supports, through an unpredictable future, but instead this plan fails as other plans before it have failed. It starts from a position of over-allocation rather than river health.

It is telling that for all the consultation, there is a high level of First Nation anxiety about the integrity of this plan and the incorrect deferment of important decisions leaves all those who love this river anguished about the government’s intentions. An appropriate first principle would be to cause no harm, but Elders appear to have been put in the unfair position of having to agree to decisions on trust. Trust in the past has been repeatedly broken. There is nothing in this plan to demonstrate this won’t happen again. And there is no guarantee that Traditional Owners will be properly included, no mention of how disputes will be resolved if Traditional Owners disagree with licensing decisions, no power of veto, no clear statement of the composition of the Advisory Committee.

This plan must have the courage to name its limitations and to act on them.

Colliding world views

What science knows and what politics demands can be two different things. The result is that water management plans are made from a limited Western/Cartesian perspective designed to accommodate growth over increase, profit over sharing, greed over reciprocity and in so doing plans may mention sustainability while acting to accommodate allowances for extraction way past ecological limits. This worldview treats nature primarily as a resource to be allocated, the scientist standing apart from the river system being considered and the river itself

with no legal standing to speak, unlike the corporations who arrive without an environmental ethic and who do have legal standing. It is a reductive and anthropocentric worldview and this ontological commitment forecloses other ways of knowing, including First National relational frameworks. And so, while there has been some effort to accommodate Aboriginal perspectives and needs, the plan still uses the damaging language of allocation and extraction. It also repeatedly says Traditional Owners will be “considered”, “consulted”, or “engaged” but it does not give them decision-making authority. The lack of lockdown and clear intention through the use of loophole-permitting words like these, is notable throughout the document.

Had the plan truly stepped up to the viewpoint that the river is a self-organising living system shaped across immense timescales and that its health and resilience are paramount to support its communities as well as long enduring economies fit to scale, then it would have been unequivocally prioritised, along with the people whose knowledge of the river system is deepest, who are in a more than political sense the true owners of this river. They should be centred in its water governance and should be the final say in all decisions being made about its future.

This plan fails to acknowledge that all water in the catchment is already allocated to the environment. Instead, too much power is vested in licencees. They have rights built into a flexible framework that works entirely in their favour. Self-monitoring involves a conflict of interest. This plan has accommodated that regardless. Applicants for water rights just need to show they “consulted” in good faith. And that is such a *major weakness* it undermines the whole plan. The definition of consulted is open to wide interpretation and ‘good faith’ is entirely subjective. It leaves Traditional Owners undefended.

The Martuwarra Fitzroy River Council has formalised what First Nations peoples have always known: that the Martuwarra is ancestral, alive, is kin, and possesses rights to flow, nourish, and sustain life. They have stated this repeatedly on social media, in academic papers and in earlier submissions. The Fitzroy River Declaration reflects a relationship so old and so tested that it should require no defence. This is not a minority view. It is common amongst First Nations elsewhere. It is a view shared by Eastern civilizations. It is also a view held by other Australians with non-Indigenous roots.

This Declaration, a clear statement of the river’s rights and the principles that should govern its care, is tragically absent from the operative framework of the plan. The Martuwarra Fitzroy River Council has no guaranteed standing in implementation or governance structures, including within the proposed Water Advisory Committee, whose structure and authority remain undefined, undermining the draft plan’s credibility.

Traditional Owners are owed more respect than this.

This weakness becomes especially concerning given the scale of knowledge involved and yet although the plan references FPIC (free, prior and informed consent), it isn’t mandatory. There is:

- No requirement for consent before approvals
- No veto right
- No legal mechanism preventing approval if Traditional Owners object
- No binding dispute-resolution process

At a time when hydrogeological understanding remains tentative and incomplete, particularly within a highly variable monsoonal system entering an era of accelerating climate instability, Indigenous knowledge should be absolutely at the forefront of governance, not relegated to the margins. When a river’s own flourishing is not the central objective of care it inevitably begins to fail in its role as life-giver, ecological stabiliser and support for future endeavours. The Murray Darling is one such example. It makes everyone within its shrunken sphere of influence so much more vulnerable to climate change.

Unresolved concerns

The plan fails to answer a fundamental question: *how was the enormous groundwater figure available for human consumption and activities actually derived?* It is used as though it requires no justification.

The Martuwarra Fitzroy River is one of Australia’s largest rivers by discharge volume, but that’s deceptive. The plan mentions, but does not adequately address the fact that its flow is *extremely seasonal* and inter-annually

variable. Most of its discharge occurs during the short wet season and in dry years the river can run very low and cease to flow at all in some areas. This is a huge vulnerability and climate change throws in additional risks. *Where are the seasonal constraints? Where is the climate change modelling?*

Some of the risks are a timing mismatch. On this river, mean average flow is a dangerous figure to use. It's based on the past, which isn't the future we're moving towards. What really matters is low-flow availability for the environment first. There's also the saltwater interface problem. If you reduce the freshwater discharge pushing back against saltwater intrusion, particularly given the nature of tidal bores, there will be cascading consequences on riparian vegetation and aquifer recharge which does not appear to be effectively prioritised or precisely stated.

This plan uses cumulative allocation logic, adding allocations incrementally against a "remaining" figure that hasn't been ecologically validated. This is enormously concerning given the importance of dry season water availability. Further, the loss of unallocated surface water into dams etc, has an impact both on groundwater and the river. This has not been sufficiently addressed. While on the one hand it is good news that no surface water within the river will be taken, going after groundwater comes with enormous risks that remain hidden from view until the damage is done, is irreversible, becomes the problem of future generations. Is this the intention?

The submissions process since 2020 has raised the same unresolved concerns:

- the obligations and authority arising under First Law are not recognised *in practice*
- the Aboriginal Water Holding requires a distinct legal pathway rather than a standard licence under the Rights in Water and Irrigation Act 1914
- the proposed Aboriginal Holding (and in fact, the planned water allocation process as a whole) does not reflect that the overwhelming majority of the plan area is subject to native title
- free, prior, and informed consent remains advisory rather than legally determinative

In 2021, the Martuwarra Fitzroy River Council, the Water Justice Hub and the Environmental Defenders Office jointly recommended a moratorium on additional water abstractions in the Derby Plan area until new governance processes were established¹. That recommendation was not adopted. Five years later, those governance processes remain undefined. The Water Advisory Committee proposed in this draft has no confirmed terms of reference, no confirmed membership, and no confirmed authority. This plan should not proceed until this is in place, but these issues are largely deferred to future engagement processes, future governance arrangements, or the future Water Advisory Committee. This repeated pattern of deferral is itself a significant failure.

In practical terms, Traditional Owners are being asked to accept a framework whose most consequential elements remain undefined. And that is not okay.

There is a category of harm this plan does not account for given its water allocation framing: solastalgia. It is the grief suffered through the loss of the world one was formed by. For Traditional Owners of the Martuwarra catchment, this is an ongoing reality, one harm following closely on another. The disappearing food and medicine plants, the retreating species and the encroaching salinity are so much more than environmental indicators. They are kin, and it is not Traditional Owners alone that feel this. Around the world, this loss is becoming real, wide-spread and detrimental to mental health through large-scale destruction, of which water plans, unattuned to the nuances of rivers, incapable of proper protection, unaware of the fragilities of the web of groundwater aquifers and their inter-relationships to each other, are a part.

The 2021 Murtuwarra Fitzroy River Council submission noted that after 150 years of invasive colonial development, *Traditional Owners cannot have peace whilst being continuously invaded*.

That sentence needs the close attention of water planners. It places a moral weight on the writers of this plan and those that have responsibility for endorsing it. It describes the accumulated cost of decisions made without accountability to the people and the country that bear their consequences.

Better options (river rights)

¹ Poelina, A, et al. (2021) Submission in response to: Derby Groundwater Allocation Plan. DOI: 10.6084/m9.figshare.15131439.

The Whanganui River in Aotearoa New Zealand achieved legal personhood in 2017. It is also progressing for the Yarra River, with state assistance. The fragmentation that allows a fracking approval and a water plan to proceed in parallel, with no full voice for the river in either process, is a problem that legal personhood, when properly funded, seeks to resolve.

Groundwater, fracking and ecological limits: too many unknowns

This is on the WA government more broadly, but it plays into the water allocation plan. The Code of Practice setting minimum standards for hydraulic fracturing in Western Australia doesn't exist although it's been five years since the government committed to implementing all safeguards recommended by the independent Hatton inquiry by December 2020. As of February 2026, eight of the twenty promised safeguards remain incomplete - the same position as three and a half years earlier. That means that a water plan that allocates and promises to protect groundwater in a catchment where fracking is simultaneously being approved, without minimum standards in place, is a plan whose protective commitments are not yet backed by the legal infrastructure necessary to enforce them.

That Project Valhalla, Black Mountain Energy's hydraulic fracturing proposal within the Martuwarra Fitzroy River catchment, is proceeding through a regulatory process largely separate from this water plan, is administratively convenient for government and industry, but it is exceptionally dangerous for the river and the Kimberley. The onus should be on prioritising a "forever economy" over boom and bust activities.

The Martuwarra Fitzroy River Council cannot effectively intervene as of right in the fracking assessment currently underway, a mining approval or a planning decision. Until it is given legal recognition and operative legal standing, the river's protection depends on the goodwill of decision-makers rather than on the rule of law and these decision-makers are too often pressured by large business interests that do not care about communities or environments although their reports will purport to.

I acknowledge that this plan can't grant legal personhood, resolve the Hatton gap, or restructure the relationship between WA's planning, mining and water regimes, but it can recommend river rights to the WA Government that will make a substantial difference between a plan that manages water allocation and a plan that prioritises care above managing-for-extraction. I note in Table 3 Outcome 6, the wide-open "other commercial activities", both arriving with well-known negative climate, geological and water consequences that impact most heavily on local communities.

The water implications of Project Valhalla are substantial and, by the proponent's own admission, poorly understood. Black Mountain Energy's own hydrogeological assessment acknowledged that *there is insufficient data to determine whether there are vertical interactions between target formations and overlying aquifers, and that aquifer connectivity and groundwater parameters remain largely unknown*. The Independent Expert Scientific Committee, assessing the proposal on behalf of the Federal Government, found *the water risk assessment to be limited and disjointed, with largely unsupported conclusions about impacts on the Fitzroy River system*. Despite this, the WA EPA recommended approval for an initial 20 wells. Nearly 10,000 appeals were lodged. Each of the 20 proposed wells could require between 40 and 100 million litres of groundwater, with total water use for this initial phase alone potentially approaching two billion litres extracted by drilling through multiple aquifers - *in a system whose connectivity to the Grant-Poole resources this plan relies upon remaining uncharacterised!*

There are too many known unknowns, and too many unknown unknowns, which is precisely why the precautionary principle should be properly applied and not fudged for convenience's sake. Water should not be required to support something that damages its own integrity and that of the environment.

If Valhalla proceeds and the Canning Basin is progressively opened to development, as the WA Government's 2023 lifting of the gas export ban anticipates, cumulative groundwater demand will dwarf what this plan's already generous allocation limits were designed to manage. Contamination of aquifers, not ruled out by the proponent's own consultants - is not a recoverable event that monitoring and operating strategies can address after the fact. Add to that sea level rise along a coastline subject to tidal bores and groundwater contamination has the potential to create desertification on a vast and rapid scale. In short, the government is sequencing approvals ahead of safeguards and that is not precautionary at all. (See Boyle, 2026).

Government treats water, mining, planning, heritage, groundwater, biodiversity, and climate impacts as separate domains managed through separate approval pathways, as though they are not actually inseparably connected. This leaves the Martuwarra vulnerable to cumulative negative decisions made against its well-being, often under 'adaptive management' schemes with their built-in capacity for providing handy loopholes.

This plan cannot resolve all of these failures. But it can and must name them, and it can recommend a fundamentally different approach: one that moves beyond managing water allocations towards prioritising river health and water quality *within the government's brief to protect its citizens, lands and waters from climate change*.

Over-allocation

The plan sets a total groundwater allocation limit of 75.7 GL per year across the plan area, with approximately 50 GL available for licensing - 25 GL for general purposes and 25 GL reserved for the Aboriginal Water Holding although there is a disconcerting lack of clarity about how these figures were arrived at and how they will be interpreted. The rule applied to available aquifers is 40% (!) of *estimated* annual rainfall recharge, a figure that warrants *serious scrutiny* because commonsense suggests this is far too much and the scientific foundation on which it rests is less stable than the plan's confidence in it suggests.

The CSIRO 2018² Northern Australia Water Resource Assessment estimated that up to 120 GL per year could be extracted from the Grant Group and Poole Sandstone aquifers alone at less than **5%** of mean annual recharge, which CSIRO estimated at 3,500 GL. The plan's 40% figure produces a Grant-Poole limit of 33.2 GL, a figure that *appears* conservative relative to the CSIRO ceiling, but which rests on a recharge estimate derived from *historical rainfall data* in a climate that is shifting. The plan's own text acknowledges the *highly variable monsoonal climate and incomplete baseline hydrogeological data*. Yet the allocation arithmetic proceeds as though the recharge estimates are reliable and stable.

They are not.

A [2022³ CSIRO groundwater baseline study of the Canning Basin](#), the first comprehensive review ever undertaken of the entire basin, found that hydrogeological characterisation remains poor across much of the region, that many parts remain underexplored or unexplored, and that information is sparse regarding the vertical separation between formations targeted for unconventional gas development and the overlying aquifers supplying fresh groundwater.

Previous studies had been geographically dispersed and their findings fragmented across different databases. This means the 2018 NAWRA recharge estimates were produced *without* the benefit of a basin-wide integrated hydrogeological picture - a picture that was only assembled for the first time in 2022, and which even then identified major remaining gaps. CSIRO noted explicitly that *increasing competition for water from agricultural and energy sectors requires careful management to protect key assets before further development proceeds*. This is the hydrogeological foundation on which this plan's allocation limits rest. The uncertainty is structural and was identified by CSIRO's own researchers. It predates the additional uncertainty introduced by climate change.

As climate change compresses wet seasons, intensifies individual rainfall events and alters infiltration patterns, mean annual recharge will change. An allocation limit expressed as a fixed percentage of an estimate that will itself change is *not* a precautionary limit. It is a limit whose real conservatism or recklessness will only become apparent retrospectively.

Even measured against actual recharge rates rather than total groundwater stock, a 40% extraction limit assumes a precision about recharge dynamics that the plan's own acknowledged data gaps do not support. Recharge estimates derived from historical rainfall patterns are *not* reliable planning foundations in a monsoonal system entering a period of accelerating climate instability. Longer dry seasons, intensified but less frequent wet-season

² (CSIRO NAWRA, 2018)

³ (CSIRO, 2022)

events, and altered infiltration dynamics will all affect recharge in ways that current modelling cannot adequately capture.

In short, the plan's allocation arithmetic inherits all this uncertainty without adequately accounting for it. In low-recharge periods or fossil aquifer conditions, extraction within estimated recharge limits is more akin to mining than it is to sustainable management. And even where extraction remains technically within recharge estimates, it may still be ecologically destructive if environmental baseflow requirements are excluded from accounting, as they routinely are within Australian water planning frameworks. Sustainable yield calculations in this country have repeatedly treated groundwater-dependent ecosystems as secondary considerations rather than the primary claimants and have too often failed to apply the precautionary principle to contamination. The Macleay River in NSW is one such example.

The Devonian reef and alluvial aquifers are hydraulically connected to the Martuwarra River's baseflows and floodplain processes. Groundwater extraction does not simply remove isolated underground reserves. It intercepts the flows that sustain the river between wet seasons and maintain ecological continuity through dry periods and extend the influence of the river in directions too complex for current science to accurately predict.

The WA Government's own decision to restrict access to alluvial and Devonian reef aquifers implicitly acknowledges this connectivity risk. Yet restriction is not exclusion, and the draft plan does not adequately resolve the underlying vulnerability. This matters most acutely for species survival. The Martuwarra remains one of the last global strongholds for the critically endangered freshwater sawfish, whose lifecycle depends upon intact dry-season refuge pools and connected flows, precisely the hydrological conditions most vulnerable to groundwater depletion.

More than 43,000 submissions opposing large-scale extraction were received in 2021. The scale of that response is itself evidentially significant, democratically representing something the plan has not adequately absorbed: a clear public judgment that the precautionary principle *must* govern here.

Hydrological modelling alone cannot settle what is fundamentally a rights question. The proposed Aboriginal Water Holding acknowledges a prior claim, but still structures that claim as a defined volume carved from within an extractive allocation framework. That is not the same as recognising authority over the framework itself.

This is why the legitimacy of any proposed extraction limit cannot be determined by hydrology alone. The underlying rights question needs resolution. Those two things - the scientific question and the rights question - must be addressed together, and neither can substitute for the other.

The scale of extraction now contemplated is substantial, and its cumulative implications are not adequately addressed.

While the current plan confirms no additional surface water licensing, groundwater allocation limits remain incompletely defined, and the irrigation appetite that drove earlier proposals has not disappeared. Hancock Agriculture and the Harris family of Gogo Station retain interests in the catchment. Those pressures will return and this policy seems to fall into the category of 'weaker policy and higher demand/investment in industries that modify natural landscapes.' (Alvarez-Romero, et al, 2021).

At a recent webinar I attended, there was discussion about the salinity intrusion already being observed by Indigenous communities, aquifer decline, altered floodplain vegetation dynamics, and loss of dry-season connectivity - and these may not become fully visible until, ecologically, it is too late. Essentially, the best management and monitoring system the river and the State has are the Traditional Owners who are deeply embedded in Country. I suggest that valuing and expanding their expertise on Country would resolve social problems too, instead of exacerbating the harms that flow from dispossession.

The limits of adaptive management

The plan relies heavily on adaptive management. In theory this appears cautious and scientifically responsible, but adaptive management assumes that impacts can be detected early, attributed clearly, acted upon quickly, and reversed once identified. In practice, adaptive management too often becomes a mechanism for approving

extraction before adequate understanding exists, with the assurance that impacts will be monitored and adjustments made if problems emerge. But rivers are not laboratories and many times the damage done can't be undone, so in complex groundwater systems, those assumptions are dangerously optimistic.

The Murray-Darling Basin offers a stark warning. That system was managed adaptively for decades while ecological collapse unfolded steadily across rivers, floodplains, wetlands, and dependent species. Monitoring increased, giving the appearance of action, when in effect, without triggers for action, it is nothing more than government induced paralysis. Modelling became more sophisticated, reviews multiplied while the river system deteriorated because political and economic pressure to maintain extraction consistently outweighed the willingness to impose restraint. Uncertainty was repeatedly treated as justification for continued extraction.

The precautionary principle exists because uncertainty isn't neutral. Where uncertainty surrounds a living system of this ecological and cultural significance, *the burden of proof should fall on those proposing extraction and in the case of Valhalla it is a fail*. Likewise with water licencees expected to self-monitor. This plan has the appearance of regulatory rigour without the substance. These licences will carry a legitimacy they haven't earned and they are being locked in before ecological baselines can be properly established. This reads poorly, because in effect, the order of operations has been deliberately inverted with commercial interests having full scope for development through spacious syntax.

The Martuwarra represents one of the last opportunities in Australia to care for a major river system *before* ecological decline becomes normalised rather than after it. That is such a precious opportunity. The decisions made now - on this plan, on Project Valhalla, on whether the Hatton safeguards are completed before fracking proceeds (with hope that this damaging industry does not), on whether the Fitzroy River Declaration is given legal force - will determine whether future generations inherit a living river or a managed remnant they recognise as yet another environmental crime. We are in a new world now. This plan needs to put the river first. It needs to do much more than merely paying lip service to [Indigenous knowledge systems](#).

Amendments

These requested amendment are made in full knowledge that several exceed this plan's statutory mandate. They are placed on the record regardless, with the hope that this submission is read by people who genuinely care about the Martuwarra, that fully grasp that without rivers there is no life, and that the conceptual concerns it raises enter departmental and governmental discussions beyond the formal allocation process.

The repeated pattern of deferring structural questions to future processes - future governance arrangements, future Water Advisory Committee terms of reference, future engagement - this plan needs to be more transparent. It needs to remove all the loopholes. The committee (2.6) is an afternote and this is wrong.

The most significant change this submission calls for is not to any single provision but to the framework within which this plan operates: a framework that moves beyond the narrow Western allocation paradigm and genuinely centres the knowledge, authority and wisdom of the people who have cared for this country for sixty thousand years, building the kind of adaptive capacity that no hydrological model alone can provide. The specific requests below are made within that larger call.

- With regard to consultation, Traditional Owners are *central* to decision-making, are represented on all bodies that have anything to do with the river and hold veto powers on licences and allocations. Guarantee the Martuwarra Fitzroy River Council standing on the Water Advisory Committee with meaningful authority, not advisory capacity, as stated above.
- That FPIC language is amended from "encouraged" to mandatory, with consent being legally determinative.
- Require the Fitzroy River Declaration to be incorporated into the operative framework, not just acknowledged.
- Clear governance for the Aboriginal Water Holding, giving Traditional Owner groups legal authority to manage the holding, and an acknowledgement that as it stands it is hardly generous or well structured.

- Require that the Aboriginal Water Holding be administered through a legal pathway distinct from the Rights in Water and Irrigation Act 1914, reflecting its nature as a rights-based rather than licensing instrument.
- Require the plan to formally recommend legal personhood for the Martuwarra to the Minister.
- Require completion of the Hatton safeguards before any fracking approvals and water licences in the catchment proceed and explicitly address the regulatory gap between this plan and Project Valhalla, noting the overwhelming opposition to any fracking in the first place. It is dangerous. It comes with risks that cannot be managed. As this department represents water, it ought to be vehemently opposing fracking in the first place.
- Require that any licence relying on adaptive management include mandatory cessation triggers that operate automatically on breach of threshold criteria, not at Departmental or Ministerial discretion.
- Require applicants, not the Department or the river, to bear the burden of demonstrating no unacceptable impact before a licence issues, particularly where aquifer connectivity remains hydrogeologically unresolved.
- Require groundwater allocation limits to be expressed as a function of rolling recharge monitoring rather than a fixed percentage of a static historical estimate, with mandatory recalculation as new basin-wide data, including the 2022 Canning Basin baseline study, becomes available.

CITATIONS

Alvarez-Romero et al. 2021. *Future scenarios for the Fitzroy Catchment: summary of key findings relevant to the WA Government discussion paper*. James Cook University, Queensland.

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