



RESPONSES TO THE CONSULTATION DRAFT – FITZROY–DERBY WATER RESOURCES MANAGEMENT PLAN: POLICY AND GUIDANCE

Please accept our comments and inputs in relation to the ‘Consultation draft Fitzroy-Derby water resources management plan April 2026’. Our comments, in italics, are provided in reference to the key policy positions outlined in the Consultation Draft.

1. Protecting the Fitzroy River and dependent environments (policy positions 01, 02, 04 and 07)

The Consultation Draft states that the Fitzroy River and its tributaries are not to have dams and there is to be no additional surface water entitlements issued unless for the essential public purposes proposed in this plan. Further, the surface water and groundwater regimes must remain within their natural range to protect water for dependent ecological, cultural, heritage and social values.

We strongly endorse the decision: a) not to dam Martuwarra and its tributaries and b) not to allow additional surface water allocation (currently 6.083 GL/year). We recommend that the water management plan explicitly state that there will be NO floodplain capture (e.g. levees) for consumptive use (and which may not necessarily be defined as dams).

2. Groundwater allocation limits and availability (policy positions 02, 03 and 07)

We strongly endorse the Precautionary Principle, as stated in the Consultation Draft. We go further in how the principle is implemented in practice within the water management plan. That is, effective water management requires an iterative or stepped change in extractions using a risk-based approach. For us, this means that the proposed groundwater allocation limit should be NO more than the current use listed as Exempt Use and which is estimated at 9.345 GL/year. That is, a more than doubling of extractive water use is, in our view, high risk given the lack of adequate measurement of groundwater extractions and groundwater tables in a highly-fracture hydrogeology. Thus, we strongly recommend that the 37 GL/year allocated for a general component in the

Consultation Draft be limited to a maximum of 9.3GL/year for the duration of the plan.

Further, any increase in the groundwater use requires the proper (telemetry) and comprehensive monitoring of all licensed pumping along with adequate and transparent measures of what is happening with groundwater tables and the quality of the water (e.g. salinity).

3. Fitzroy–Derby Aboriginal Water Holding (policy position 05)

We strongly endorse the principle of the Fitzroy-Derby Aboriginal Water Holding. We go further and recommend that this allocation be managed by First Peoples of Martuwarra, and which is consistent with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). That is, there must be a fair and equal partnership between the WA Government and First Peoples in how decisions about how water is used, when and by whom. The First Peoples of Martuwarra must be responsible for the management of the Aboriginal Water Holding and we recommend that it act as regional water management body.

4. Careful and staged groundwater development (policy positions 02, 06, 07, 08 and 09)

We strongly endorse the policy to build on the precautionary principle that groundwater use should increase gradually so that monitoring can detect any unacceptable impacts early. We recommend that, in addition to water allocations for groundwater, that there be licensing for point of use and purpose of use. This is because some water uses (e.g. hydraulic fracturing versus irrigation) have different impacts on the volume of water consumed and water quality.

Damaging impacts on water dependent ecosystems, sites of ecological, cultural and social significance must be avoided. Most of these impacts are largely irreversible. Thus, we strongly support the commitment to track water resources, water use, water-dependent ecosystems and significant sites, and adjust the licence conditions, and policies, as needed, to avoid damage.

In the alluvial aquifers which interact with the estuary, the large tidal changes in marine water levels are prone to the hazards of saltwater intrusion. This needs to be very careful monitoring and measurement of the groundwater levels but also the rates of groundwater recharge which are key to avoiding saltwater intrusion. The interface of groundwater with estuary tidal fluctuations and the alarming projections of future sea-level rise under climate change (Kompas et al., 2024) require constant monitoring and an effective and rapid response when required. As sea levels rise, the likelihood of seawater inundation onto low-lying coastal

landscapes and aquifers increases. In many cases, seawater ingress can cause significant and irreversible damage. ([Seawater intrusion | Geoscience Australia](#)). Experience in the Burdekin Delta in North Queensland (Narayan et al., 2003) demonstrates the seriousness of the problem once saltwater intrusion takes place as a consequence of over extraction of the groundwater. For this, and for other good reasons, we strongly endorse policy positions that adopt the precautionary principles of water extraction.

We are encouraged by and strongly support the commitment to follow the wisdom of Traditional Owners in line with contemporary science in recognising their cultural authority and responsibilities, and deep connections to water and Country. We strongly endorse partnerships with Traditional Owners early in project design and to use specific local licensing policies in sensitive areas (water management zones) of cultural significance.

5. Advisory group (policy position 10)

We endorse, as first steps towards regional governance, the establishment of the proposed Water Advisory Committee (WAC) under the Water Agencies (Powers) Act 1984 (WA) while acknowledging that the committee's terms of reference and membership have not yet been decided and that these will be co-developed using feedback from the public consultation. Further, we support the intention that Membership of the WAC to comprise Traditional Owners, government, industry and the communities. We recommend that the WAC have clear decision-making authority and base its decision-making informed by bottom-up and deliberative processes as practised by the Martuwarra-Fitzroy River Council.

There is a long-standing experience in NSW and Victoria where regional water governance, such as through catchment management authorities, build local and regional ownership of the water sharing plan and encourages ground level actions for responsible implementation and delivery. Based on our first-hand knowledge and experience of catchment management authorities in NSW (Natural Resources Commission, 2010 ; Williams, 2012) and Victoria, we recommend that WAC be designated a regional natural resource management (NRM) body responsible for the Fitzroy–Derby Water Resources Management Plan within the policy framework set down by the Department of Water and Environmental Regulation. This would give regional responsibility for delivery of the water resource outcomes in the places where its members live and would shift from a top-down governance approach that can lack legitimacy, and too often ignores valuable experiential and traditional ecological knowledge needed to generate good policy outcomes.

References

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