

Document details	
Document name	Online submissions received from organisations on the <i>Consultation draft - Fitzroy-Derby water resources management plan: policy and guidance</i>
Author	Respondents and the Department of Water and Environmental Regulation (Government of Western Australia)
Consultation summary	The Department of Water and Environmental Regulation sought feedback and submissions on the Consultation draft – Fitzroy-Derby water resources management plan: policy and guidance from 1 April to 30 June 2026.
	Input was sought with particular regard to how we should support sustainable groundwater use for economic development in the Fitzroy–Derby plan area, while protecting the Fitzroy River and water-dependent ecological, cultural, heritage and social values of the plan area. See online information to learn more about the public consultation and see other published submissions that we received.
Published responses	This document provides a record of online responses the Department received from organisations (the respondent identified the views were for an organisation). Responses from individuals has been published separately.
	Other responses not included here those where the respondent requested their submission be kept confidential (not published) and other submissions received via email (published separately). Responses have otherwise been published here in full, except for removal of contact and locality details. Any files uploaded with online responses or via emails have also been published online and redacted as requested or appropriate.
Related publications and web pages	<i>Consultation draft - Fitzroy-Derby water resources management plan: policy and guidance</i> <i>Consultation draft - Fitzroy-Derby water resources management plan: methods</i> https://consult.dwer.wa.gov.au/water-policy/consultation-draft-fitzroy-derby-water-resources/ https://www.wa.gov.au/service/natural-resources/water-resources/fitzroy-derby-water-planning
Editing of all responses	Where necessary, responses may include text <i>[in italics and square brackets]</i> to show where we have edited or redacted content for publishing purposes. Edits included removing location or identifying information about individuals, signatures, and crude or abusive language.
Published	9 July 2026

Organisation's name	Which of the following best describes you?	Which of the following best describes you? - Other	The draft plan proposes the department’s approach to regulating, allocating and managing water resources in the Fitzroy-Derby Plan Area. Tell us what you think about the approaches outlined in the draft plan.	Are there are any other comments you would like to make?
Agknowledge	Hydrogeological Consultants	Pastoral and Agricultural	See submission attached.	
Association of Mining and Exploration Companies	Mining Industry		see attached submission	see attached submission
Australian Energy Producers	Not Answered	Industry Association		
Beyond Gas Network	Conservation and Environment			
Bibbul Ngarma Aboriginal Association Incorporated	Conservation and Environment		Please strengthen the plan to protect the Martuwarra. We agree with the commitment for no surface water extractions and dams - this should be withheld in the final plan. We are deeply concerned about groundwater. Groundwater and surface water interactions are very complex and the two cannot easily be separated. We urge you to protect all water in the Martuwarra through protection of groundwater by imposing strict limits on abstraction. Finally, we urge you to give Traditional Owners a genuine say in water management decisions on their Country. Not performative consultation - true, free, prior informed consent and the power to say no to decisions that will damage Country. Thank you.	
Black Mountain Energy	Mining Industry			
Chamber of Minerals and Energy of WA (CME)	Mining Industry	Peak representative body	See submission document attached.	
Conservation Council of WA	Conservation and Environment		see attached submission	see attached submission
Cotton Australia	Pastoral and Agricultural		See submission document attached.	
Environment Institute of Australia and New Zealand	Conservation and Environment		Please see enclosed submission letter.	Please see enclosed submission letter.
Environs Kimberley	Conservation and Environment			See attached submission
Esperance Local Environmental Action Forum (LEAF)	Conservation and Environment		We have concerns.	They are documented in our submission.
Gogo Station Pty Ltd	Pastoral and Agricultural		See attached	See attached
Gooniyandi Aboriginal Corporation	Organisations representing Aboriginal People		Please refer to attachment	Please refer to attachment
Groundwater Consulting Services	Hydrogeological Consultants		refer submission	
Joombarn-buru Aboriginal Corporation	Organisations representing Aboriginal People			
Kimberley Land Council	Organisations representing Aboriginal People		See attached submission.	See attached submission.
Kimberley Like Nowhere Else Alliance	Conservation and Environment			
Kimberley Pilbara Cattlemen's Association	Pastoral and Agricultural		While KPCA has provided a comprehensive submission on the proposed Fitzroy–Derby Water Plan (attached), the Association wishes to highlight the following key issues on behalf of Kimberley pastoralists. Surface Water Capture The proposed cessation of surface water capture will significantly constrain pastoralists' ability to meet their lease obligations, which require the responsible management and improvement of pastoral lands. This includes activities such as landscape remediation and rehydration to improve land condition, biodiversity and long-term environmental sustainability. The proposal also creates uncertainty regarding the ability of pastoralists to undertake erosion control works on mapped waterways. There is concern that necessary land management activities may be interpreted as altering natural surface water flows, potentially discouraging or preventing essential erosion mitigation measures that improve landscape resilience and environmental outcomes. Three (3) GL Water License Limit The proposed 3GL license limit appears arbitrary and risks significantly restricting future pastoral development across the Kimberley and Pilbara. The reopening of Pindan Beef Company (formerly Kimberley Meat Company) presents a significant opportunity to increase regional employment, strengthen local communities and improve the viability of the pastoral supply chain. To support the planned 48-week-per-year operation of the processing facility and maintain the region's contribution to established domestic, international beef and live export markets, producers must have the capacity to increase both cattle numbers and turn-off weights to meet market specifications. Achieving these outcomes will require investment in irrigation infrastructure and feedlot development. Such investments demand long-term certainty regarding water availability and access to licenses exceeding the proposed 3GL limit. Without this certainty, the commercial viability of these developments will be severely compromised. The proposed limit also has the potential to restrict the growth of Aboriginal-owned pastoral enterprises and other economic opportunities intended to be supported through the Indigenous Water Reserve. KPCA has outlined alternative licensing models within the attached submission that better balance environmental protection with sustainable economic development. Proposed Oversight Committee KPCA is concerned by the proposal to establish an Oversight Committee without clearly defined terms of reference, governance arrangements, responsibilities or required competencies. KPCA understands the proposed committee would comprise 50 per cent Traditional Owner representatives, with the remaining 50 per cent representing all other stakeholder interests, including the pastoral industry. KPCA has also been advised that Traditional Owners themselves have expressed reservations regarding the proposed structure. The pastoral industry remains the region's primary economic contributor and will continue to be a key driver of future regional development. It is therefore essential that any committee responsible for overseeing implementation of the Water Plan and providing advice to the Minister includes strong and meaningful pastoral representation. KPCA believes the committee should be skills-based, with appointments reflecting the expertise required to make informed decisions across water management, environmental stewardship, pastoral operations, regional development and governance. Appropriate support should also be provided to enable representatives to develop the knowledge and skills necessary to contribute effectively. KPCA has proposed an alternative governance model within its detailed submission that provides a more balanced, transparent and effective framework for oversight of the Water Plan.	KPCA acknowledges and appreciates the activities undertaken by DWER representatives 'on the ground' during the consultation process, particularly <i>[DWER staff]</i> for their willingness to undertake difficult and potentially confrontational discussions and to provide considered feedback and follow-up. However, we also have concerns regarding some of the documented 'consultation' for specific areas of the plan that was undertaken (prior to this last round of meetings and individual consultations), which notes 'industry' consultation for which no pastoralist nor the KPCA was included. KPCA looks forward to the opportunity for further involvement in the plan's development towards a fair and equitable outcome that has long-term sustainable outcomes for the environment, traditional owners, the pastoral industry and the towns and communities that rely on them.
Malarngowem Aboriginal Corporation RNTBC	Organisations representing Aboriginal People		Refer to attached.	

Martuwarra Fitzroy River Council	Not Answered	Research consultant	Submissions attached	Submissions attached
Mayala Inninalang Aboriginal Corporation RNTBC	Organisations representing Aboriginal People		See attached	See attached
National Native Title Council	Organisations representing Aboriginal People			
Nerrima Pastoral Company	Pastoral and Agricultural		The 3 Gig underground allocation is an offence to the future of agriculture in WA and australia alike. There needs to be a complete overhaul on the amount allocated and a scientific and environmentally backed allocation system for overland flow only accessing water when the system reaches maximum capacity and above excess. The sun and soil up here with the addition of the watershed and reliable wet seasons allows the kimberley to become an agricultural force without the environmental impacts we've seen in other areas.	Our message to the Minister and elected cabinet both leading and opposition should be this. 'There is a real opportunity right now to engage and partner with some of Australia's leading pastoralists in the northwest region of WA who are willing to put up the capital out of their own pockets to grow food for the nation and beyond. The economic and social benefits received from this kind of capital injection into the community and region will far outweigh those of any other taxpayer funded outcome. We are not out to destroy an ecosystem or impact this pristine environment in any way rather to use some of its natural resources only when appropriate accountable measures are actionable.
Organisation representing Aboriginal people.	Organisations representing Aboriginal People		It disrupts the living river as it is.	
Pastoralists & Graziers Association of WA	Pastoral and Agricultural		See attached file.	
Recfishwest	Recreational		please see attached submisison	please see attached submisison
Ridgeline Advisory	Not Answered	Strategic Advisor	<i>[Cell 1/5 for publishing purposes]</i> SUBMISSION TO THE CONSULTATION DRAFT — FITZROY–DERBY WATER RESOURCES MANAGEMENT PLAN The Aboriginal Water Holding: turning a reserve into self-determination Matthew Cronin — Managing Director, Ridgeline Advisory, Perth, Western Australia. June 2026. Submitted to the Department of Water and Environmental Regulation via consult.dwer.wa.gov.au. Offered as questions and considerations in support of a Traditional Owner-led co-design — not a model to adopt. ACKNOWLEDGEMENT OF COUNTRY Ridgeline Advisory acknowledges the Traditional Owners and custodians of the Fitzroy River catchment and the Derby Peninsula — a river known by many names across the nations of the catchment, including Martuwarra — and their continuing connection to land and water. We pay our respects to Elders past and present, and we recognise Traditional Owners as the first scientists and water managers of this Country. HOW THIS SUBMISSION IS OFFERED The Fitzroy–Derby Aboriginal Water Holding is the water of native title holders, and how it is governed and used is theirs to decide. The plan rightly commits to co-designing that governance with native title parties and the Kimberley Land Council. I do not propose a model, and I do not speak for Traditional Owners. What follows is a set of questions and considerations, drawn from practical experience elsewhere, offered as a resource to that process — to be taken up, changed, or set aside as Traditional Owners see fit. THE TRADITIONAL OWNERS' OWN RECORD This catchment holds a long and continuing history that is the Traditional Owners' to tell — and they have already told much of it in their own words. On 3 November 2016 the nations of the Martuwarra concluded the Fitzroy River Declaration, the first instrument in Australia to recognise both First Law and the rights of nature. In it they affirm the river as "a living ancestral being from source to sea" with a right to life — to be protected for current and future generations, and managed jointly by its Traditional Owners. In 2018 they established the Martuwarra Fitzroy River Council, an alliance of Senior Elders who speak for the river with one voice. The authority — and the history — behind the Aboriginal Water Holding are theirs. This submission works within them, and defers to the Declaration, the Council, and the Kimberley Land Council as the standing record of how this river is to be cared for. (Sources: Fitzroy River Declaration, 3 November 2016; Martuwarra Fitzroy River Council, established 2018, via the Kimberley Land Council. The quoted words are the Traditional Owners' own.) IN SHORT Protecting the Fitzroy River and its water-dependent values comes first. Within those protections, the plan's proposed Aboriginal Water Holding — about 25 gigalitres a year — is its strongest lever for self-determination. A reserve of water only becomes opportunity when Traditional Owners have a way to use it that they control — and only if and when they choose to. What decides the outcome, on the evidence elsewhere, is less the size of any deal than who decides and who keeps the value. The points below are offered to the co-design, in support of Traditional Owner authority and the Kimberley Land Council — not as answers. 1. Governance for the Holding that is genuinely Traditional Owner-led, and resourced to actually work. 2. Principles that protect decision rights and retained value in any commercial partnership. 3. Capability and brokerage support, so Prescribed Bodies Corporate can negotiate from strength. 4. A public timetable, so the interim case-by-case approach does not quietly harden into the permanent one. 5. A clear link between the Holding's governance and the proposed Water Advisory Committee.	
Ridgeline Advisory	Not Answered	Strategic Advisor	<i>[Cell 2/5 for publishing purposes]</i> 1. WHY I AM WRITING I write as a water-sector practitioner, not on behalf of any client, and not as a Traditional Owner. Over thirty years across government and regulated industry — including as an executive at Water Corporation — I led the expansion of Aboriginal community water services to more than 140 remote communities, and worked on regularising water services in Fitzroy Crossing and the communities around it. My advisory work has included governance design for Traditional Owner water and joint-venture structures. A consistent lesson from that work is less about the equity split than about the provisions beneath it — the quiet ones that do the real work: which decisions cannot be made without Traditional Owner consent, and how value is structured so that it stays with the community rather than leaking away over time. I also have a long personal connection to the Fitzroy Valley. I offer what follows as a resource, and with respect for the people whose Country and water this is. 2. WHAT THE PLAN GETS RIGHT This is a careful draft, and much of it deserves support. The commitment that the Fitzroy and its tributaries will not be dammed, and that no further surface water will be licensed, protects one of Australia's last great free-flowing river systems. The precautionary groundwater limits — about 40 per cent of estimated rainfall recharge, for a total of 75.7 GL a year — reflect real humility about a data-poor, highly variable climate. The Aboriginal Water Holding, the planned Water Advisory Committee, and the early engagement of Traditional Owners in licensing are the right instincts. Nothing here seeks to weaken these settings. I should be plain about one thing. When the draft was released, some Traditional Owners said publicly that it left them underwhelmed — that it did not go far enough on the questions that matter most to them. I am not in a position to speak to that, and I will not try to. Their reading of this plan carries far more weight than mine, and nothing in this submission should be taken as a non-Aboriginal voice pronouncing it good enough. My support is for the plan's protective settings, and for the Holding as an idea worth getting right. Whether the plan as a whole serves the people of this catchment is for them to judge. 3. PROTECTING THE RIVER AND ITS VALUES COMES FIRST Any conversation about using water in this catchment has to begin, and end, with the values the plan exists to protect. The Fitzroy is a living system: groundwater discharge sustains the river pools, wetlands and springs that hold water through the dry season; aquifers connect to one another and to the surface; and a naturally occurring saltwater interface has to be kept in its place along the King Sound coast. The plan recognises that all watercourses, wetlands and springs are likely Aboriginal heritage, that the catchment holds sites of deep cultural and social significance, and that the West Kimberley is a place of national heritage value. These values are not a backdrop to development. They are the point. [Note: A schematic locator map of the plan area — the Fitzroy River catchment and Derby Peninsula, King Sound, and the townships of Derby and Fitzroy Crossing — is included in the accompanying PDF. It is schematic only: the authoritative plan-area and water-resource boundaries are DWER's, and Native Title determination boundaries are held by the National Native Title Tribunal.] That is why the precautionary limits, the staged "initial development phase" approach (single licences unlikely above 3 GL a year), and the requirements for hydrogeological assessment, baseline monitoring and operating strategies matter so much, and why this submission treats them as fixed. It is also why the case made here is, at bottom, a case for stewardship. The Traditional Owners who would draw on the Holding are the same people who have cared for these waters for countless generations. Putting them genuinely in charge of how the water is used lines up the incentive to develop with the responsibility to protect — which is exactly the alignment good water management needs.	

Ridgeline Advisory	Not Answered	Strategic Advisor	<i>[Cell 3/5 for publishing purposes]</i> 4. THE OPPORTUNITY: THE HOLDING AS A SELF-DETERMINATION LEVER Of the water the plan makes available, about half of what can still be licensed sits in the Aboriginal Water Holding — roughly 25 GL a year, set aside for native title holders' economic development, "either independently or in partnership with others." It is a significant commitment. It is also, today, an entitlement on paper. The plan is candid that the Holding "does not guarantee access or a right to any person," that its governance is not yet settled, and that until a framework exists, access will be handled case by case. Holding that water unused is itself a legitimate choice. No one is obliged to develop it, and the plan's caution rightly leaves that decision where it belongs. The point here is narrower: if and when Traditional Owners do decide to put some of the Holding to use, it is the absence of an agreed governance framework that will stand in the way. The plan has already done the harder technical work — the hydrogeology, the staged limits, the monitoring. What it leaves deliberately open is the governance of the Holding itself. That gap, not the science, is what this submission speaks to. Groundwater in the plan (annual allocation), GL per year — source: DWER, Consultation draft (2026), Table 5 (rounded): - Total allocation limit: 75.7 (precautionary; about 40% of estimated rainfall recharge). - General licensing: 36.9 (of which about 25 GL is still available). - Aboriginal Water Holding: 25.1 (reserved for native title holders' economic development). - Exempt use (stock, domestic, firefighting): 9.3 (no licence required). - Public water supply and reserves: 4.4 (includes future Derby town supply). - Available now for new licences: about 50 (about 25 GL general plus about 25 GL from the Holding). In the plan's own words, the Holding "does not guarantee access or a right to any person." The question this submission explores is how, in time, that reserve becomes something Traditional Owners can actually use. 5. QUESTIONS TO ASK OF ANY PARTNERSHIP Water on its own does not build an economy. Turning an entitlement into jobs and income usually takes three more things: capital, operating capability, and enough certainty that others will commit alongside the community. Commercial partnerships can supply all three — but only the right kind, and only on terms Traditional Owners enter freely. There is good reason to be wary here. The history of resource deals on Aboriginal land includes too many where the value flowed out and the say stayed somewhere else. That history is not an argument against partnership; it is the argument for being clear-eyed about what separates a good one from a bad one. In my experience the difference shows up less in the headline deal than in the answers to a handful of plain questions. For each, a stronger arrangement and a weaker one look like this: - Who decides? Stronger: Traditional Owners approve what happens on Country, and can say no. Weaker: consultation only; the real decisions are made elsewhere. - Who keeps the value? Stronger: retained equity and ownership — revenue and assets stay with the community. Weaker: one-off payments or fees; value flows out. - Is it investable? Stronger: clear governance gives partners certainty without ceding control. Weaker: uncertainty that deters good partners or invites poor ones. - Does it build capability? Stronger: deliberate jobs, training and enterprise capability transfer. Weaker: lasting dependence on outside operators. - Is culture in charge? Stronger: cultural authority is built into the decisions. Weaker: culture treated as a constraint to be managed around.
Ridgeline Advisory	Not Answered	Strategic Advisor	<i>[Cell 4/5 for publishing purposes]</i> - Can you walk away? Stronger: free to act alone, or to partner deal by deal. Weaker: locked into a single counterparty. The aim is Traditional Owner authority and investable certainty at once — not a trade-off between them. Put simply: a water entitlement ("paper water") becomes self-determination when it is paired with governance, partnership, capability and capital — turning it into a community-controlled enterprise with jobs, revenue and assets, always within the plan's precautionary limits and staged (3 GL or less) development pathway. 6. WHAT GOOD CAN LOOK LIKE None of these is a template, and each carries its own hard lessons. I point to them only to show the pattern is real, and that the questions above are the ones that decide whether a partnership empowers. The Kimberley has its own deep base of Aboriginal-owned enterprises and community-controlled organisations, and their leaders are far better placed than I am to name the examples that matter most locally. - Arnhem Land Progress Aboriginal Corporation (ALPA). Established in 1972, ALPA grew from a single community store into one of Australia's largest Aboriginal-owned enterprise groups — Aboriginal-governed, spread across retail, construction, services and training, and putting its profits back into member communities. It reports returning more than \$40 million to those communities last year, with over 80 per cent First Nations employment. What it shows: patient, Aboriginal-governed enterprise compounds over decades. (Figures self-reported by ALPA; illustrative.) - Equity joint ventures on Country — an emerging model. A clear pattern has begun to take shape across northern and western Australia, most visibly in renewable energy. A Traditional Owner group enters a joint venture with a commercial developer and takes a real equity stake in the assets built on its Country — together with the right to approve what proceeds, not just a fee for access. In several instances the same groups had earlier experienced development imposed on their Country without their consent, and the equity model is, in part, a deliberate response to that history. Where these ventures are well built — long-term offtake secured, governance clear — the result is ownership and decision rights rather than a one-off benefit. What it shows: partnerships work when Traditional Owners hold both equity and a genuine say — not just a benefit stream. - Murray–Darling Basin Aboriginal Water Entitlements Program. First Nations peoples hold rights to roughly 40 per cent of Australia's land through Native Title, yet own less than 0.2 per cent of surface-water entitlements. The Commonwealth's Aboriginal Water Entitlements Program — which began at \$40 million and has since grown to \$100 million — was set up to start closing that gap by buying water for First Nations cultural and economic use. Years on, the slow journey from money committed to water actually in hand is well documented. The caution: a reserve announced is not a reserve activated. Governance, resourcing and clear access pathways are what close the gap. None of these is a water story of exactly this kind. Two are enterprise and energy; the one that is about water is still working its way from announcement to activation. What they share is the part that travels: equity, decision rights, and patience. The Holding is a chance to build those in from the start, rather than retrofit them later. 7. CONSIDERATIONS FOR THE CO-DESIGN The first of these is a question for the Traditional Owner-led process the plan envisages. On the points the Department itself can act on now, I have put them as suggestions it might consider — offered in that spirit, not as instructions. - Governance and resourcing. How can the Holding's governance be built with native title parties and the Kimberley Land Council so that it is genuinely Traditional Owner-led — and resourced well enough to function, rather than existing only on paper? - Recognise partnership pathways. The Department might consider stating plainly, in the plan's guidance, that partnership and equity models are a legitimate route to activation — paired with a short set of principles (decision rights, retained value, cultural authority) that protect Traditional Owners in any commercial arrangement.
Ridgeline Advisory	Not Answered	Strategic Advisor	<i>[Cell 5/5 for publishing purposes]</i> - Capability and brokerage. The Department might consider funding independent technical, commercial and negotiation support for Prescribed Bodies Corporate, so that good water is never committed to a weak deal for want of advice. - A public timeframe. The Department might consider committing to a public timetable for standing up the Holding's governance framework, so the interim case-by-case approach is clearly a bridge to something firmer, not a substitute for it. - Benefit beyond native title holders. Ownership of the Holding, and the decisions over it, rest with native title holders — and that should not change. But the wider Aboriginal community of the region, including families who have lived here for generations without holding native title to this Country, has a real stake in what activated water makes possible. Whether and how the jobs, enterprise and services it generates reach that wider community is for Traditional Owners to decide; I raise it only so the question is not lost from view. - Connection to the Advisory Committee. The Department might consider how the Holding's governance will connect to the proposed Water Advisory Committee, with genuine Traditional Owner representation and a real voice in future iterations of the plan. The Committee may also be the right place — distinct from the Holding's own governance — for the region's broader Aboriginal community to be heard, so that wider voice never blurs into authority over the Holding itself. One possible sequence (illustrative only — the sequence, the pace, and whether to follow it at all are for Traditional Owners and the Department to decide together): - Early: co-design governance with native title parties and the KLC; agree principles and interim access arrangements. - Establishing: stand up the governance body; resource PBC capability; set transparent, fair access criteria. - First use: support the first partnership(s); embed monitoring, cultural indicators and review. - Ongoing: adaptive review through the Water Advisory Committee; report progress publicly. 8. IN CLOSING The Fitzroy–Derby plan has done the hard work of protecting a remarkable river while leaving the door open to opportunity. The Aboriginal Water Holding is the clearest expression of that opportunity, and the place where good intent most needs a practical path to follow. That path is for Traditional Owners to design and for the Kimberley Land Council to lead. If these questions help that work, they will have done their job; if they do not, set them aside. Either way I offer them in good faith, and I defer, on every point, to the Traditional Owners of the catchment. DISCLOSURE. The author is Managing Director of Ridgeline Advisory and advises clients in the water sector, none of whom hold any interest in the Fitzroy–Derby plan area. The author is not a Traditional Owner and does not speak for Traditional Owners, any native title body, or the Kimberley Land Council. This submission is personal thought leadership, offered in good faith as a resource, and is not made for or on behalf of any client. Ridgeline Advisory · Matthew Cronin, Managing Director · <i>[redacted]</i> · Perth, Western Australia

Save Our Macleay River	Conservation and Environment		Save Our Macleay River Inc. (SOMR) is a community organisation working on the water quality and governance of the Macleay River catchment, NSW Mid North Coast. We submit on the Fitzroy-Derby Water Resources Management Plan as an organisation with direct experience of the structural governance failures that allow rivers to be degraded incrementally. This submission identifies three compounding technical vulnerabilities in the draft plan: a historically calibrated allocation framework inadequate to a shifting climate baseline, a reactive saltwater monitoring framework insufficient for King Sound's tidal hydraulics under sea level rise and the complete absence of any response to Project Valhalla's threat to the aquifer systems this plan simultaneously allocates and promises to protect. We endorse the more detailed technical submissions of the Martuwarra Fitzroy River Council, the Water Justice Hub and the Environmental Defenders Office and urge DWER to incorporate the changes requested in this submission before the plan is finalised.	Please see attached submission for further comments.
Save Our Marine Life alliance	Conservation and Environment		Please see attached file which contains Save Our Marine Life's submission for the Fitzroy–Derby Water Resources Management Plan.	Please see attached file which contains Save Our Marine Life's submission for the Fitzroy–Derby Water Resources Management Plan.
Shire of Derby/West Kimberley	Government (State, Federal, Local)		Please refer to the attached letter "Fitzroy - Derby Water Planning Draft 2026", endorse by the Shire of Derby/West Kimberley Council (Resolution 63/26) at the 25 June 2026 Ordinary Council Meeting	Nil
The Herald Publishing Company Pty Ltd	Not Answered	Local media	I submit the following article by the ABC in 2020 as the key and central reason the Federal Government of Australia, State Governments and vested private interests can never, ever be trusted to safeguard the public good. https://www.abc.net.au/news/2020-09-03/the-mystery-of-the-murray-darlings-vanishing-flows/12612166 The Private Interests must be forced to build their own infrastructure to capture the rainfall as it falls from the sky. No More Public Subsidies for Private Money Making Interests! And furthermore, all governments in Australia to start the process to remove public subsidies from all major private interests in Australia. The only subsidies by taxpayers for commercial interests must be for government enterprises for the benefit of all Australians (and not for shareholders, especially overseas shareholders). It is time for Australian governments to roll back the pernicious and socially destructive influence of the ‘Chicago School’ of Economics failed experiment of the last 75 years that the privatisation model is the only way. It has failed the world miserably. It is solely responsible for the mess the world is in today where only the wealthy class benefits and all else is trashed in that process. Let the preservation of the natural development of the great Fitzroy River of WA be the signal step. And let the Indigenous name of the Fitzroy River, the Martuwarra, be re-instated: https://en.wikipedia.org/wiki/Fitzroy_River_(Western_Australia) Andrew Smith Publisher Fremantle Herald and Perth Voice Tuesday June 30, 2024	
The Pew Charitable Trusts	Conservation and Environment			
Theia Energy	Mining Industry	Resource Industry	Refer to the attached letter about the approaches outlined in the draft plan.	Refer to the attached letter
Walalakoo Aboriginal Corporation	Organisations representing Aboriginal People		see attached letter	see attached letter
Ward Conservation Lab, Griffith University	Academia		The Ward Conservation Lab's position is that the approach is not adequately precautionary. The proposed allocation limits (up to 40% of average annual recharge for Grant Poole and Wallal) represent a dramatic step-change from current use, are five to twelve times higher than what the department's own 2011 risk-based allocation framework would prescribe under correctly-applied high-ecosystem-risk settings, and rely on a "safe yield" methodology that ignores interannual rainfall variability, cumulative drawdown, and ecological water requirements. The regulatory approach is also weakened by a monitoring and compliance framework that is bore-focused rather than ecosystem-focused, relies on discretionary rather than enforceable triggers, and doesn't require baseline ecological data before new licences are issued. Given the connectivity between Grant Poole, the Devonian Reef aquifer, the Fitzroy and Margaret rivers, and surrounding aquifers, drawdown effects are unlikely to stay contained, meaning the department's site-by-site regulatory model is poorly matched to how the system actually behaves hydrologically.	The Fitzroy supports an exceptional concentration of threatened and priority species and ecological communities (58 bird species, 137 flora species, 110 vertebrate species of note, multiple threatened ecological communities), that the lower Martuwarra and floodplain carry National Heritage listing, and that this is one of Australia's last largely unregulated river systems and the most significant Largetooth Sawfish nursery in the country. Our recommendations in section 4 (reduced allocation limits, enforceable thresholds, baseline data requirements, public monitoring data, and genuine Traditional Owner decision-making authority) should be treated as a package rather than addressed piecemeal.
Water Corporation	Water Service Provider		Refer to attachment.	Refer to attachment
Water Justice Hub	Academia		Please see our attached submission	Please see our attached submission
[Wentworth Group of concerned scientists]	Not Answered	Independent expert NGO		
Western Australian Water Users Coalition (WAWUC)	Not Answered	Organization representing water-dependent primary producers across WA		