

What is the Georgina Wiso Water Allocation Plan?

The [Georgina Wiso Water Allocation Plan](#) covers a huge area, stretching across 600km, from south of Tennant Creek up to Daly Waters. It includes the Beetaloo basin, where gas companies are trying to set up an industrial scale fracking project. In addition, this plan enables a huge expansion of irrigated horticulture such as cotton across the region.

So what is it and why is it so controversial?

Water allocation plans in theory are intended to assist governments and the community to determine water management and allocation decisions to meet productive, environmental, cultural and social objectives i.e. how much water can be used, by whom and with 'X' determined impacts.

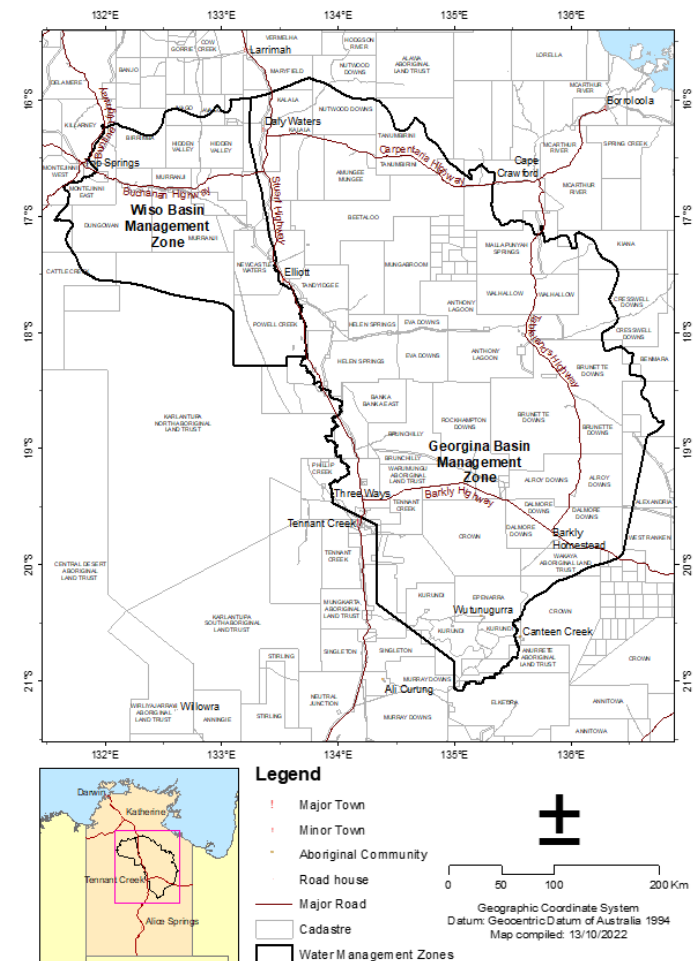
Instead, we are seeing water allocation plans be developed that remove protections for ecological and cultural values. The plans are being developed to meet the timelines of the fracking industry, the desires of big agribusiness and would increase water extraction in the region 13 fold. This is happening in the NT, which already has some of the weakest water laws in the country¹.

What are others saying?

The Georgina Wiso Water Allocation Plan has been condemned widely. Recently 18 water experts from universities across the country condemned the plan as 'particularly poor and regressive'. Land Council and environment groups have also expressed strong opposition. Recent media includes:

- [University academics send joint letter to NT Chief Minister about 'poor' water planning regime](#)
- [Northern Territory government under mounting pressure over water plans for area the size of Cambodia](#)
- [Environmental groups say the NT government's draft water allocation plan prioritises big business at the cost of rivers](#)

Schedule C: Map of water management zones



¹ Environment Defenders Office, 2022. 'October 2022 Update: Deficiencies in the existing water law and governance framework in the Northern Territory'

Writing a submission on the Georgina Wiso Water Allocation Plan

Example introduction

Dear Minister Moss/ Chief Minister Fyles,

I'm writing to ask you to urgently intervene to protect everyone and everything that relies on freshwater, from the largest water allocation in the Territory's history.

The Georgina Wiso Water Allocation Plan gives away 262 billion litres, 13x more than all groundwater currently used in the area, to unregulated industries like fracking, cotton and mining.

I am a *(Insert short description of who you are and your connection to this issue)*

I implore you to delay the declaration of the Georgina Wiso Water Allocation Plan for the following reasons:

Six priority areas that could be included in your submission

1. No water advisory committee

This plan has been developed without a water advisory committee which means community stakeholders have had no input into or oversight of how the plan was developed. This is unconventional and goes against the National Water Initiative which states that water plans are

‘developed in consultation with all relevant stakeholders on the basis of best scientific and socio-economic assessment, to provide secure ecological outcomes and resource security for users’ (see Schedule B(i)).

The draft plan states that a water advisory committee will be established ‘where appropriate’.²

2. Largest water allocation plan volume in Territory history

This is the largest water allocation plan volume in NT history, for 262.5 billion litres. Every two years, this plan will give away water the size of Sydney Harbour.

Critically this plan does not provide any information regarding whether ecological and cultural values will be protected from this level of extraction (see section 3 and section 6). Extraction of this water may put Mataranka's Bitter Springs, the Roper River and the Flora River at risk;

The plan allocates 10 billion litres to fracking activities and 205 to activities such as agriculture, aquaculture and mining - this is likely to include cotton and other broad acre cropping.

3. No guidance for management

The plan is extremely light on detail and provides no guidance for management. The management zones are extraordinarily large. It appears the NTG is indifferent as to where water within the largest WAP volume in Northern Territory history is taken across a 600 km stretch of land. The draft Plan also removes any limits whatsoever as to the circumstances across this 155,000 km² area under which groundwater can be taken.

As the plan gives no guidance on where and how water can be taken, it cannot meaningfully predict the consequences of taking this amount of water on receiving environments.

² Draft Georgina Wiso Water Allocation Plan 2022 - 2030, p.14

4. The plan puts the Government above the law

The plan puts the government above the law, where it attempts to prevent decisions around water from being taken to court. It does this through major structural changes of what constitutes a water allocation plan.

The plan proposes to split the Draft Georgina Wiso Water Allocation Plan (Draft WAP) into three documents:

1. Draft Georgina Wiso Water Allocation Plan 2022-2030 (Statutory WAP);
2. Draft Georgina Wiso 2022-2030 Background Report (Report);
3. Draft Georgina Wiso 2022-2030 Implementation Actions (Actions).

The structural problem is that Water Act 1992 only applies to the Statutory WAP, which will be the only plan which is to be gazetted.

Cynically, the statutory WAP has been gutted of any meaningful content that gives assurance or guidance as to how water is to be taken safely. The Controller of Water Resources in making water licensing decisions does not need to consider the Report or Actions, and these may be varied.

This is done by drastically minimising the content within the Statutory WAP. Key examples of this are the failure to include objectives for protection of cultural and ecological values, or guidance around how water should be taken so as to avoid risks along with performance targets. The Statutory WAP is silent on these, which puts it vastly out of step with Australian practice and the National Water Initiative. (We expand on this in the following section.)

The Department has a number of times referred to the litigious environment verbally as reason for the plan restructure. This has also been captured in the minutes of the Western Davenport Water Advisory Committee Meeting 6 on October 3, where it is stated that 'the current format majority of committee do not endorse and do not want their name against it saying they endorse it as a committee, although noting structure is not for endorsement as it is a result of legislative responsibilities and to prevent future opportunity for litigation' and goes on further stating that due in part to the 'litigation environment' the Department is constrained in changing the structure.³

Muzzling scrutiny is a very serious escalation by the Northern Territory Government. It is ever more astounding in contexts where no consultation has even occurred such as for the Georgina Wiso WAP. It is remarkable that this is being communicated so openly and honestly by the Department. ALEC emphasises that the attempt to silence scrutiny in the Draft Plan is absolutely unacceptable

5. The plan goes against the National Water Initiative

The Draft Plan sets a dire precedent across the Northern Territory where it breaks away from key components of the National Water Initiative (NWI). This includes the decision to:

- Not consult e.g. with a Water Advisory Committee;
- Remove an objective for ecological values out of the statutory WAP;
- Remove an objective for cultural values out of the statutory WAP;
- Remove considerations of risk and uncertainty out of the statutory WAP;
- Remove the implementation and monitoring plans (including performance monitoring) from the statutory WAP;
- Remove the adaptive management framework out of the statutory WAP.

Instead of strengthening our water laws, this plan further weakens the management of water in the Northern Territory.

³ https://depws.nt.gov.au/data/assets/pdf_file/0020/1165124/western-davenport-ti-tree-wac-meeting6-3october2022-.pdf
(bullet point 5, p6)

ALEC submission writing guide

6. Scientific studies incomplete

The background report concedes that scientific baseline studies (recommended by the Scientific Inquiry into Hydraulic Fracturing) are not yet complete:

The SREBA is expected to be completed by the end of 2022. The information will be collated and prepared into a final report and database. Any recommendations from final reports will be used to inform the implementation of this plan.

The background report states that the groundwater model will not be completed until 2024.

The evidence is clear that this Water Allocation Plan is not backed by science and should not be declared.

What is the ask?

This is a dangerous plan! ALEC has written to the NT Minister for Water Security and Chief Minister Fyles, we have written to the Federal Government and we would like your support.

Submissions to the NTG are due on the 16th December. ALEC is calling for:

- The withdrawal of the Draft Georgina Wiso Water Allocation Plan; and
- Water allocation plans in the NT to be prepared in accordance with the expectations set out in the National Water Initiative, including the involvement of a Water Advisory Committee and protections for ecological and cultural values.

Next Steps

- **Submissions are due Friday, 16 December 2022**
- **Email your submission to:**
 - waterresources@nt.gov.au
 - Minister.Moss@nt.gov.au
 - Chief.Minister@nt.gov.au