



31 October 2025

Mr Andrew Johnson PSM  
Controller of Water Resources  
Department of Environment, Parks and Water Security

By email: [water.licensing@nt.gov.au](mailto:water.licensing@nt.gov.au)

Dear Mr Johnson,

**RE: Water extraction licence application by Consolidated Pastoral Company Pty Ltd to extract 4737.5 ML per year for 10 years.**

We refer to the above groundwater extraction licence application, lodged by Consolidated Pastoral Company Pty Ltd.

Consolidated Pastoral Company has applied to take 4737.5 megalites (ML) per year for 10 years for irrigated agriculture at Dungowan Station, NT Portion 850. This water is allocated from the Georgina Wiso Water Allocation Plan, part of the Montejinni Limestone Aquifer.

We submit that this licence should not be granted, as there is insufficient scientific understanding of the water balance, groundwater recharge rates and hydrogeology to reliably assess the impacts of such extraction. In addition, there is no evidence of informed consent from affected Traditional Owners.

The proposed extraction of 4737.5 ML per year accounts for 36% of the total Estimated Sustainable Yield (ESY) for *Other Consumptive Uses* (e.g. agriculture) within the Wiso Basin, per the Georgina Wiso Water Allocation Plan 2023-2031. Under the NT Government's *Processing Water Extraction Licence Applications* policy<sup>1</sup>, any proposal exceeding 10% of the general consumptive pool constitutes a *significant proposal*. This makes the Dungowan application a matter of considerable public interest and warrants a precautionary approach.

The enormous increase of water extraction in the Wiso Basin is concerning, given the scientific uncertainties associated with groundwater in the Wiso basin region and the important natural and cultural values in the area, cited in the application.

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<sup>1</sup> Department of Environment and Natural Resources 2020, *Processing Water Extraction Licence Applications* policy, NT Government.



## **The Georgina Wiso Water Allocation Plan is an unsuitable basis for water licensing decisions**

The Georgina Wiso Water Allocation Plan 2023-2031 is highly controversial and has been widely criticised by water scientists and Traditional Owners. Experts argued that the plan was declared in breach of the National Water Initiative standards, without a water advisory committee.

The Plan permits an ESY equivalent to 40% of estimated recharge, which is double the contingent allocation (20%) recommended under the NT Water Allocation Planning Framework. Scientists warn that if allocations approach this limit, extraction will exceed recharge in most years, leading to progressive depletion of aquifer storage between major recharge events - a risk that climate change is likely to exacerbate <sup>2</sup>.

### **Natural values and Groundwater Dependent Ecosystems**

The Flora and Daly Rivers are among the Northern Territory's most significant river systems, supporting outstanding biodiversity, tourism, and cultural values.

The Flora River is sustained by groundwater from the Cambrian Limestone Aquifer (CLA) and supports diverse species including the pig-nosed turtle, freshwater sawfish, Mertens' water monitor, 30 fish species and over 90 bird species.

While the application concludes there is minimal risk to GDEs, scientific evidence indicates that long-term increases in groundwater extraction are likely to reduce aquifer discharge to key sites such as Chidbung Spring and potentially the Flora River, threatening these ecosystems and the communities that depend on them<sup>2</sup>.

### **Uncertainty around groundwater flow**

The Strategic Regional Environmental and Baseline Assessment for the Beetaloo Sub-basin<sup>3</sup> states that the groundwater flow path in the Wiso Basin, the Flora River Flowpath, originates in the central Wiso Basin and flows in a northerly direction into the south-western Daly Basin and discharges along the Flora River, and potentially at Top Springs.

There is still great uncertainty regarding elements of the groundwater system, and the potential environmental impacts of extraction. A 2022 NT Government Technical

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<sup>2</sup> Currell, M. and Ndehedehe, C. 2022. The Cambrian Limestone Aquifer, Northern Territory: Review of the Hydrogeology and Management Rules to Ensure Protection of Groundwater Dependent Values.

<sup>3</sup> Department of Environment, Parks and Water Security (2022). Regional Report: Strategic Regional Environmental and Baseline Assessment for the Beetaloo Sub-basin. DEPWS Technical Report 41/2022. Department of Environment, Parks and Water Security, Northern Territory Government. Berrimah, Northern Territory.



Report<sup>4</sup> found that water level data in the southern Wiso Basin is very limited, leading to a level of uncertainty regarding the detailed groundwater flow paths in those areas.

Given these uncertainties, the precautionary principle must apply. It is irresponsible to approve large-scale extraction without adequate understanding of groundwater flow and connectivity,

### **No evidence of informed consent from Traditional Owners**

Groundwater drawdown from the proposed extraction is predicted to occur up from 0.1-1m over 4,741,810 hectares of Aboriginal Land, including land within the Yingawunarri Mudbura Aboriginal Land Trust, Murrarji Aboriginal Land Trust, and Karlantijpa North Aboriginal Land Trust.

Despite these impacts, the application confirms that no response was received from the relevant Land Trusts or the Central Land Council, indicating that informed consent has not been obtained. Proceeding in these circumstances would contravene the principles of free, prior and informed consent and risk significant consequences.

### **Proposed purpose of the application poses environmental risks.**

The proposed extraction is for the purpose of irrigating *Leucaena*, a species recognised as an environmental weed in northern Australia. *Leucaena* has already [wreaked havoc](#) in parts of Queensland<sup>5</sup>. While not a declared weed, this plant may pose a threat of spreading via waterways and impacting on downstream habitat and can contribute to increasing fire risk.

Yours Sincerely,

Correa Driscoll

Water and Nature Campaigner

Environment Centre NT

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<sup>4</sup> Amery, T. and Tickell, S. (2022). Beetaloo Sub-basin SREBA Water Studies: Water level monitoring review for overlying primary aquifers. Technical Report 20/2022. Northern Territory Department of Environment, Parks and Water Security. Palmerston, Northern Territory

<sup>5</sup> Heagney, P. (2022) *A weed or feed? the cattle wonder crop creeping into City Creeks*, ABC News. Available at: <https://www.abc.net.au/news/rural/2022-05-28/weed-or-cattle-feed-leucaena-creeps-into-urban-areas/101100588> (Accessed: 31 October 2025).