

As you would be aware, Nicola Hoey of the City of Wanneroo attended the hearings session held on 8 December 2010 at Perth. During the discussion with Nicola, Dr Mundy asked Nicola about this City's concerns about the impacts associated with the taking of extra water from the Gngangara Mound, and that if the City wished to submit further comment on this matter, then it could do so via email to the Commission. I wish to submit the following further comments in response to that invitation.

Firstly, while Dr Mundy's comments on this matter refer to the City having concerns about the impacts of extra abstraction on the community, our submission actually relates more to impacts of the extra abstraction on the environment, and while such environmental impacts do also include community impacts (eg through impacts on areas of high social and amenity value such as lakes), the City's main concern is with impacts on the natural environment.

In this regard, I would refer to clause 7 of schedule 1 of the Rights in Water and Irrigation Act 1914 (the current application for extra abstraction from the Gngangara Mound is happening under section 5C of this Act). Clause 7(2) sets out the matters which the Minister for Water is to have regard to in deciding whether to grant a licence or not, and these include "... whether the proposed taking and use of water-

(b) are ecologically sustainable;

(c) are environmentally acceptable"

These are the matters (or impacts) which this City is most concerned about.

In respect to just what those impacts will be, given that additional abstraction will mean further decline in the storage of the superficial aquifer and further decline in water table levels, there must be impacts on groundwater dependent ecosystems. The thrust of our submission to the Department of Water (DOW) was that we wanted the Minister for Water to be fully informed of the nature of those impacts. We do not see how the Minister can have proper regard for the matters referred to in 7(2)(b) and (c) of the Act (see above) if he is not so fully informed. It was also noted in our submission that the Gngangara Groundwater Areas Allocation Plan (GGAAP) also requires that the Minister be advised of these impacts, as well as the public (the advertisement for public comment on this does not provide this information).

Please find attached for your Commission's information a copy of a response to the City's submission recently received from DOW. Of particular note is DOW's advice that it has ensured that the Water Corporation has adequately addressed each key action stated in the GGAAP. Some comments on this:

1. Regarding the key action "That efforts to secure alternative sources had been investigated and evaluated", it is important to note that there are two aspects to this City's concern that further water sources need to be developed as soon as possible to relieve the Gngangara Mound: firstly, so that even during normal seasons, less 'take' is required from the Mound, giving it greater opportunity for recovery; secondly, during dry years, it is not used as the contingency water supply. The discussions at the hearings of 8 December, in relation to augmentation of current supplies, appeared to focus mainly on the first aspect. The main thrust of the City's submission was in relation to the second 'contingency' aspect, and I do not see how DOW can say that it has ensured that efforts have been made to investigate and evaluate the securing of alternative contingency sources (note that the DOW letter omits 'contingency', but the relevant condition is clear that it relates to contingency supply) when there is no evidence that it has, and on the contrary, the evidence is that Water Corp and DOW see that the Mound will continue to be the contingency supply.

2. Regarding the third key action which refers to "... a considered response that balances the needs of the environment while meeting realistic economic and social expectations", this reference to the needs of the environment again highlights this City's view that the Minister will only be able to properly consider the needs of the environment if he is fully informed about the environmental impacts which will be associated with the additional abstraction.

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