



# Upper Collie

water allocation plan

Statement of response

*Looking after all our water needs*





# Contents

Contents .....	i
Tables .....	i
Statement of Response – Upper Collie water allocation plan .....	1
Summary .....	1
Comments we received and the department’s responses .....	2
List of respondents.....	19
Where to next?.....	21
References .....	22

## Tables

Table 1	General comments received on the draft plan .....	3
Table 2	Comments on water demand.....	4
Table 3	Comments on managing Wellington Reservoir.....	7
Table 4	Comments on managing Harris Reservoir .....	8
Table 5	Comments on managing groundwater of the Collie Coal Basin.....	9
Table 6	Comments on coal mining and dewatering.....	10
Table 7	Comments on proposed Collie water utility.....	11
Table 8	Comments on managing water quality.....	12
Table 9	Comments on managing the environment .....	13
Table 10	Comments on climate change .....	15
Table 11	Comments on water licensing and compliance.....	17
Table 12	Comments on water use efficiency .....	18
Table 13	Comments on water trading.....	18
Table 14	Comments on water reform .....	18
Table 15	Comments on water pricing .....	19
Table 16	List of respondents .....	



## Statement of Response – Upper Collie water allocation plan

This statement is the Department of Water's response to the comments received on the *Upper Collie water management plan: draft for public comment*.

### **Summary**

The draft plan was open for a three month public comment period. During the comment period (December 2007–March 2008) the Department of Water sent out over 60 copies of the plan to stakeholders, as well as emails to over 115 people. An invitation to comment was also advertised weekly in the Collie Mail, South West Times and West Australian newspapers during this period.

We held ten workshop sessions with various stakeholder groups, including the local community, Collie shire, mining and industry groups, and the Ngalang Boodja council.

We received 21 submissions during the comment period. We considered all of the comments from the submissions in finalising the *Upper Collie water allocation plan*. This statement summarises our responses to those submissions.

### **Interest groupings of respondents to the draft plan**

## ***Comments we received and the department's responses***

The following tables summarise the main issues raised in the comments and questions submitted and how we have responded to them. The comments have been grouped by the type of water related issue raised by the submissions.

<b>Table</b>	<b>Comment group</b>	<b>Page</b>
1	General comments	3
2	Water demand	4
3	Managing Wellington Reservoir	7

4

**Table 1 General comments received on the draft plan**

Comment	Department of Water response
<p><b>Support for the plan</b> Four respondents expressed their support for the plan. Generally the plan was recognised as a positive step for the Upper Collie, with respondents highlighting that water planning in the Collie Coal Basin is a complex task and that the plan will set a consistent framework for water use while protecting the natural environment.</p>	<p>We value the support that stakeholders have expressed for the plan.</p>
<p><b>Implications from the plan</b> Two mining and industry respondents stated that the plan will have an impact on industry in the area, in particular the mining and power generation industries.</p>	<p>We recognise that the Upper Collie water allocation plan may affect certain companies' practices. However, we see water allocation planning as an essential means of increased accountability for water users, as well as transparent and equitable decision-making. Planning ensures that:</p> <ul style="list-style-type: none"> <li>• water resources are not over-abstracted,</li> <li>• users have access to supply in the long term</li> <li>• the environment is not unduly harmed.</li> </ul>
<p><b>Plan structure</b> Four respondents commented on the structure of the plan, including its consistency with other plans and the link between objectives and assessment tools.</p>	<p>We have modified our plan structure to ensure a consistent approach with recently released allocation plans. Section 2.8 – Evaluating the plan has been changed to refine the objectives and performance indicators by which the plan will be evaluated over time.</p>
<p><b>Non-allocation related issues</b> One respondent raised the concern that the plan did not cover issues including:</p> <ul style="list-style-type: none"> <li>• logging of forests</li> <li>• fire</li> <li>• phytophthora management.</li> </ul>	<p>We acknowledge that these are issues within the Upper Collie area; however we are unable to address or manage these issues in an allocation plan. We have forwarded these concerns to the Department of Environment and Conservation.</p>

Comment	Department of Water response
<p><b>Further information</b> Five respondents made requests for further information on:</p> <ul style="list-style-type: none"><li>i) the proposed water utility</li><li>ii) recreation on Wellington Reservoir</li><li>iii) an additional draft comment period</li><li>iv) Wilga Basin.</li></ul>	<p>We recognise that more information is needed on these topics. However, to maintain the focus of allocation planning information may be released separately to the allocation plan. The following addresses the issues raised by each submission:</p> <ul style="list-style-type: none"><li>i) Further information has been provided on the proposed water utility in Section 1.12 – A Collie water utility.</li><li>ii) Our response to comments on managing the Wellington Reservoir is detailed in Table 3 below.</li><li>iii) We provided a public comment period (3 months) longer than our legislative requirements under the <i>Rights in Water</i></li></ul>



Comment	Department of Water response
<p>future</p> <p>iii) highlighted the need to ensure water users are using their allocation for the purposes it was allocated.</p>	<p>available for use. There is no evidence at this point that there will be an abundance of surplus dewater in the future. We have updated the plan to include further information on mine dewater and its use in Section 1.11 – Mine dewater use and availability.</p> <p>iii) We agree that monitoring water users is an important part of good water management (see policies in Section 2.5 of the plan). We will ensure water use is in line with licence arrangements and will carry out on site inspections of large water users.</p>
<p><b>Future industrial use</b></p> <p>Nine respondents discussed future industrial use. Respondents raised:</p> <p>i) issues on future demand including:</p> <ul style="list-style-type: none"> <li>• expansion of power generation, or other industries</li> <li>• the requirement for more water than what is available in the plan</li> <li>• the requirement for that water by industries to replace coal mining once it ceases</li> </ul> <p>ii) the need for the department to consider future use scenarios in water resource planning</p> <p>iii) the potential for additional use of currently marginal resources.</p>	<p>i) Under this plan most of the water resources are fully allocated. All fresh surface water and groundwater resources are fully allocated. In the future additional water demand may be met through opportunistic and agreed use of surplus mine dewater and through the use of Wellington Reservoir. As water resources are a finite resource and becoming scarcer and less reliable the department encourages use of available technologies to reduce or remove the need for water, particularly high quality water, in industrial processing or cooling operations.</p> <p>ii) This plan provides for the use of current water resources and their current quality. It is the base case scenario. We will continue to investigate other allocation scenarios and ways of optimising the use of water resources in the future through salinity recovery.</p> <p>iii) There is scope for water users in the Upper Colliery area to use water of marginal quality.</p>
<p><b>Security of supply</b></p> <p>i) Three respondents raised the issue that industry requires high security of supply. There was support for the way that the plan recognises this issue.</p> <p>ii) One respondent raised the issue that different levels of security apply to different users and that the plan requires more detail in this area.</p>	<p>i) The department recognises that security of supply for industrial uses is of paramount importance. Hence, the setting of robust allocation limits and the plan position that surplus mine dewater should not be relied upon and that contingency sources will be required. Security of supply must be achieved through a diversity of sources.</p> <p>ii) The plan has been updated to include our position on the priority of surplus</p>

Comment	Department of Water response
	mine dewater under each of the mining companies' state agreements. Please refer to Section 1.11 – Mine dewater use and availability. The reliability of the surface water resources is provided in Table 4 – Summary of surface water allocation limit assessment.
<p><b>Fit-for-purpose use</b></p> <p>Three respondents raised the issue of how the department considers fit-for-purpose use. One was in support of the department's position that public water supply is highest value use, while others raised the concerns that industrial use of water may be seen as second order to public water supply.</p>	<p>Our position on fit-for-purpose use is the same as the position stated in the <i>State Water Plan</i> (Department of Premier and Cabinet 2007). This position is that water use is matched with an appropriate water quality.</p>
<p><b>Inter-regional transfer</b></p> <p>Respondents from public water supply, local government and mining and industry groups raised the issue of the potential for an inter-regional transfer of water from the Upper Collie. Comments focused on:</p> <ul style="list-style-type: none"> <li>• economic inefficiency of exporting water out of the region then needing to import it back in</li> <li>• support for the position that regional demand must be met before water is exported</li> <li>• needing to assess options for water supply and select the most sustainable option.</li> </ul>	<p>In the Upper Collie area inter-regional transfers of water already exist, including water going from Harris Reservoir into the Great Southern Towns Water Supply Scheme. Our position on inter-regional transfers of water in the Upper Collie area is outlined in Section 2.5 – Allocation policies.</p>
<p><b>Tree plantations</b></p> <p>Four respondents discussed the issue of tree plantations. Issues raised included:</p> <ol style="list-style-type: none"> <li>i) benefits to reducing saline inflows</li> <li>ii) impacts of tree plantations on water production.</li> </ol>	<ol style="list-style-type: none"> <li>i) We recognise that since the Upper Collie catchment has become affected by salinity there is a benefit in planting trees in certain areas of the catchment to reduce saline inflows to the river.</li> <li>ii) We acknowledge that tree plantations can intercept and reduce the amount of surface and groundwater available in the area. We have factored land-use change within the catchment into our surface water modelling which supports the decisions made on limits for allocating water.</li> </ol>

# Upper Goulburn water allocation plan

Water Allocation Plan 2017-2020  
Upper Goulburn Water Allocation Plan

Comment	Department of Water response
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**Drinking water source protection and recreation**

Five respondents raised the issue of water source protection in and around the Wellington Reservoir.



Comment	Department of Water response
<p><b>The Collie Water Advisory Group (CWAG) management initiative</b></p> <p>Two respondents (one mining and industry, one individual) made reference to the previous CWAG initiative. Respondents raised the issues of:</p> <ul style="list-style-type: none"> <li>i) how CWAG relates to the department plan</li> <li>ii) the effort in community consultation through the CWAG process.</li> </ul>	<ul style="list-style-type: none"> <li>i) This plan supersedes previous water allocation principles established in the by the Collie Water Advisory Group 1996 and 1999 (Department of Resource Development 1996 and 1999). The plan builds on and supports the CWAG principles with a new emphasise on accountability for water use and recognition that surplus mine dewater is not a secure source.</li> <li>ii) We recognise that the CWAG initiative (from the Department of Resources Development 1996) included a comprehensive consultation process.</li> </ul>

**Questions**

Comment	Department of Water response
<ul style="list-style-type: none"> <li>ii) need to consider the scenario that all coal will be mined</li> <li>iii) contribution of coal mining to greenhouse gas emissions.</li> </ul>	<p>coal will be mined. if coal mining activity reduces or the required water levels for safe mining practices are achieved (through dewatering) then dewatering activities will reduce or cease. Because of this, we do not see dewatering discharge as a reliable, secure supply for industries.</p> <ul style="list-style-type: none"> <li>iii) Addressing the contribution of coal mining to greenhouse gas emissions is not within the scope of this water allocation plan.</li> </ul>

**End use of dewatering discharge**

Twelve respondents, including six from the mining and industry interest group, commented on the end use of dewater, including:

- i) the need for dewatering discharge to meet power and industrial supply
- ii) not supporting the Upper Collie plan policy that companies may not sell or trade dewatering discharge.

- i) We recognise that while dewatering takes place for safe mining practices





Comment	Department of Water response
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Comment	Department of Water response
<p>sites, particularly relating to the Bingham River.</p> <p>ii) Another respondent stated that the plan does not integrate with the principles of ecologically sustainable development and it is not clear how ecological water requirements were considered in setting allocation limits.</p>	<p>considered the principles of sustainable development in setting the water resource allocation limits as well as developing the policies for water use and management. Detail on how allocation limits were set is provided in <i>Upper Collie surface and groundwater allocation limits: methods and calculations</i> (Department of Water 2008), which is available on our website.</p>



Comment	Department of Water response
allocation limits and worst case scenario analysis ii) that a 10% recharge reduction is insufficient iii) that the plan must include how climate risk will be assigned.	activity. ii) We selected a 10% reduction in rainfall recharge to reflect the reduced rainfall between 1999 (when the model rainfall data ends) to 2007. See <i>Upper Collier</i>

Comment	Department of Water response
<p>change, including the effect of climate change on forests and tree growth.</p> <p>ii) Another raised the issue of ecological water releases from reservoirs in the context of the plan. The plan has a static volume whereas naturally it would reduce over time with drying climate conditions.</p>	<p>outside the scope of this plan.</p> <p>ii) As we have described in Table 9 above we will be reviewing the current environmental release regimes from the major reservoirs. This includes considering how they may change in a drying climate.</p>

**Table 11 Comments on water licensing and compliance**

Comment	Department of Water response
<p><b>Licensing</b></p> <p>Six respondents raised the plan's licensing strategy, including:</p> <p>i) requests for clarity on which water users certain policy would apply to</p> <p>ii) challenging the department's standard for a 10-year licence tenure</p> <p>iii) the need to ensure that all licences in the Upper Collyer over 0.05 GL/yr meet the national standard for metering.</p>	<p>i) We have changed the wording in the plan to improve clarity.</p> <p>ii) The 10-year licence tenure is a departmental standard which will not be changed at this stage, except if there are risks associated with the licence that must be managed under shorter licence tenure.</p> <p>iii) We have updated our policy requirement for metering in the plan for all licenses 0.05 GL/yr and above.</p>
<p><b>Farm dams</b></p> <p>Three respondents queried the department's approach to managing and licensing farm dams. Queries raised include:</p> <p>i) the policy to ban on-stream dams</p> <p>ii) period of take rule.</p>	<p>i) We have updated our policy position on on-stream farm dams. We prefer off-stream storages to on-stream storages, but we recognise that this may not always be possible. New dam proposals will be assessed on a case-by-case basis.</p> <p>ii) Applying a period of take ensures that water is abstracted from the system when it is available, in line with a system that has winter rainfall.</p>

**Source development planning**

Two respondents (public water supply and mining) raised the source development plan policy.

Both respondents requested clarity on this

# Upper Goulburn water allocation plan

[Comment](#)







## References

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