**Consultation on the Draft Gnangara Groundwater Allocation Plan**

**Points to make in your submissions**

The proposal that the abstraction of water from the Gnangara Mound be reduced by at least 54 Gigalitres (GL) is strongly supported, but it needs to be implemented **much earlier** than the proposed 2028.

**However the proposed reductions need to be much greater.** The draft plan acknowledges that even at a reduction of 54 GL, that this **will not restore** all the 30 representative wetland and bushland sites in the Gnangara plan area (and explicitly covered in Ministerial Statement no. 819) back to minimum water levels. Page 23 of the Plan indicates that 16 of the 30 sites will continue to be compliant with environmental criteria. But this means that 14 sites cannot be restored at the proposed reduced rate of abstraction. This is not acceptable.

DWER advice to seek to lower the critical groundwater level conditions set by the EPA (Ministerial Statement no. 819) is not supported. Rather it is strongly recommended to provide a scenario in which **all 30 representative sites are returned to minimum water levels.** Our endangered Banksia Woodlands and wetlands are already suffering from groundwater drawdown and this must be corrected by much more reduction in abstraction by groundwater by bores.

Additional changes needed are:

1. Immediately decreasing abstraction of groundwater for **all users by 30%** not just Water Corporation and domestic bore users.
2. Phase out bore water use in domestic home gardens. Reduce watering days immediately to 1 per day in autumn and spring and 2 per day in summer. Then by 2025, ban all bore water use for this sector. Scheme water is already provided for home garden watering.
3. Monitoring with meters and charging a volumetric charge for all bore water use.
4. Refusing to allow any new bores in all sectors as the aquifers are linked and are suffering drawdown.
5. Increasing to at least 20% the reduction for the agriculture and horticulture sectors. And starting these changes sooner than 2028.
6. Prohibit all (new and existing) near coastal bore abstractions as they cause saltwater intrusion into groundwater which can result in death of coastal vegetation from saline groundwater or from irrigated groundwater.
7. Rather than discharging wastewater to sea, increase the standard of wastewater treatment to reuse standard (with at least quarternary treatment) so that it can be directly reused for irrigation or potable supply.
8. Treated wastewater could then be used to increase ‘urban greening’ by planting local native trees and shrubs with irrigation assistance on public lands.
9. Increasing the cost of scheme and bore water. Although an allocation of water is already made available to users at a very modest rate, the next charge rate should be much increased so that there is an incentive to change to waterwise practices and for example growing local native plants which are already adapted to our low rainfall and low nutrient soils.
10. Immediately stop clearing and harvesting of the **Gnangara pine plantation** in order to retain this essential foraging habitat for our **endangered Carnaby’s Cockatoo**. If this clearing is not stopped, ~40% of the Carnaby’s population will be starved to death and this is totally unacceptable.
11. Finding other ways to reduce the human impact on wetlands and groundwater levels is essential rather than clearing pine trees for possible recharge gains

**Key links for further information**

Overview: <https://gnangara.dwer.wa.gov.au/plan/>

The plan: <https://www.wa.gov.au/government/publications/gnangara-groundwater-allocation-plan-draft-public-comment>

Online survey: <https://consult.dwer.wa.gov.au/water-policy/gnangara-groundwater-allocation-plan-draft/>

UBC blog: <https://www.bushlandperth.org.au/blog/>