



Government of **Western Australia**  
Department of **Water**

# Warren–Donnelly

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surface water allocation plan  
Statement of Response

Department of Water

April 2012



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*Looking after all our water needs*

Department of Water

April 2012

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# Contents

Warren–Donnelly surface water allocation plan – Statement of Response .....	1
The public comment period .....	1
Completing the plan.....	1
Submissions received.....	2
Comments received and the department’s responses.....	3
Where to next? .....	15
Further information .....	16
Shortened forms .....	17
References .....	18

## Figures

Figure 1 Breakdown of the issues and topics raised in submissions .....	3
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## Tables

Table 1 List of respondents, their interest group and number of responses .....	2
Table 2 General comments received on the draft plan .....	3
Table 3 Comments on consultation .....	4
Table 4 Comments on the Warren Donnelly Water Advisory Committee .....	5
Table 5 Comments and questions on yield methodology .....	5
Table 6 Comments on balancing economic, social and environmental objectives ..	7
Table 7 Comments and questions on allocation limit decisions.....	10
Table 8 Comments and questions on managing surface water .....	12
Table 9 Comments on licensing policies.....	12
Table 10 Comments and questions on implementing and evaluating the plan .....	14
Table 11 Comments on water reform and the National Water Initiative.....	15



# Warren–Donnelly surface water allocation plan - Statement of Response

This statement provides the Department of Water's response to the comments, issues and questions raised in submissions responding to the *Warren–Donnelly surface water allocation plan: draft for public comment*.

## The public comment period

The water allocation plan was open for a three month public comment period in 2010 from 4 June to 6 September.

During the public comment period, the Department of Water notified 110 stakeholders that the plan had been released for public comment. The plan's release and the public comment period were advertised each month in the *Manjimup Bridgetown Times*.

During the public comment period the department gave briefings on the plan, in Manjimup, to:

- Fruit West
- Avocado Growers Association of WA
- vegetablesWA
- WA Farmers Federation
- Potato Growers of WA
- Shire of Manjimup
- Warren Catchments Council.

The department also provided a detailed briefing to the Warren Donnelly Water Advisory Committee who are appointed by the Minister for Water and represent water users in the plan area.

## Completing the plan

Following the public comment period we have worked closely with our stakeholders to complete the plan. During 2011, we held regular meetings with the Warren Donnelly Water Advisory Committee and periodically met with representatives from the Department of Agriculture and Food, Fruit West, vegetablesWA and Avocados Australia Limited.

This collaboration has improved the department's knowledge of local water use and helped irrigators understand the department's allocation planning process and water management obligations.

To complete the plan, we have considered all of the comments, issues and questions raised in the public comment submissions and at the subsequent stakeholder meetings.

## Submissions received

During the comment period we received 52 formal submissions. Of these, 41 respondents made their submissions using one of two templates that were developed by local community and industry members. We have treated each submission separately. The respondents and their associated interest group are listed in Table 1.

Figure 1 summarises the comments made in the submissions and indicates how many responses raised the same issue.

*Table 1 List of respondents, their interest group and number of responses from each group*

<b>Respondents</b>	<b>Interest group</b>	<b>Number of responses</b>
A & N Fontanini & Son		
A. Parker and Sons		
Avonova Farms (2 submissions)		
Bazzani Holdings Pty Ltd		
C.T. Blakers Pty Ltd		
Bracken Ridge Estate		
CJ Walker and Co.		
Cosy Creek Farms		
Delroy Orchards		
F Pessotto & Sons	Agriculture and irrigation	20
French's Ironstone Rise		
Jasper Farms		
Manjimup Farmers Market		
Manjimup Pemberton Landowners		
Pemberton Wine Association		
Ryan Pemberton Pty Ltd		
Salitage Wines		
WA Farmers Federation		
Winterbrook Avocados		
Warren Catchments Council	Conservation and environment	1
Water Corporation	Public water supply	1
Individuals	Individual	28
Shire of Manjimup	Local government	1
Department of Agriculture and Food WA	State government	1
<b>Total</b>		<b>52</b>

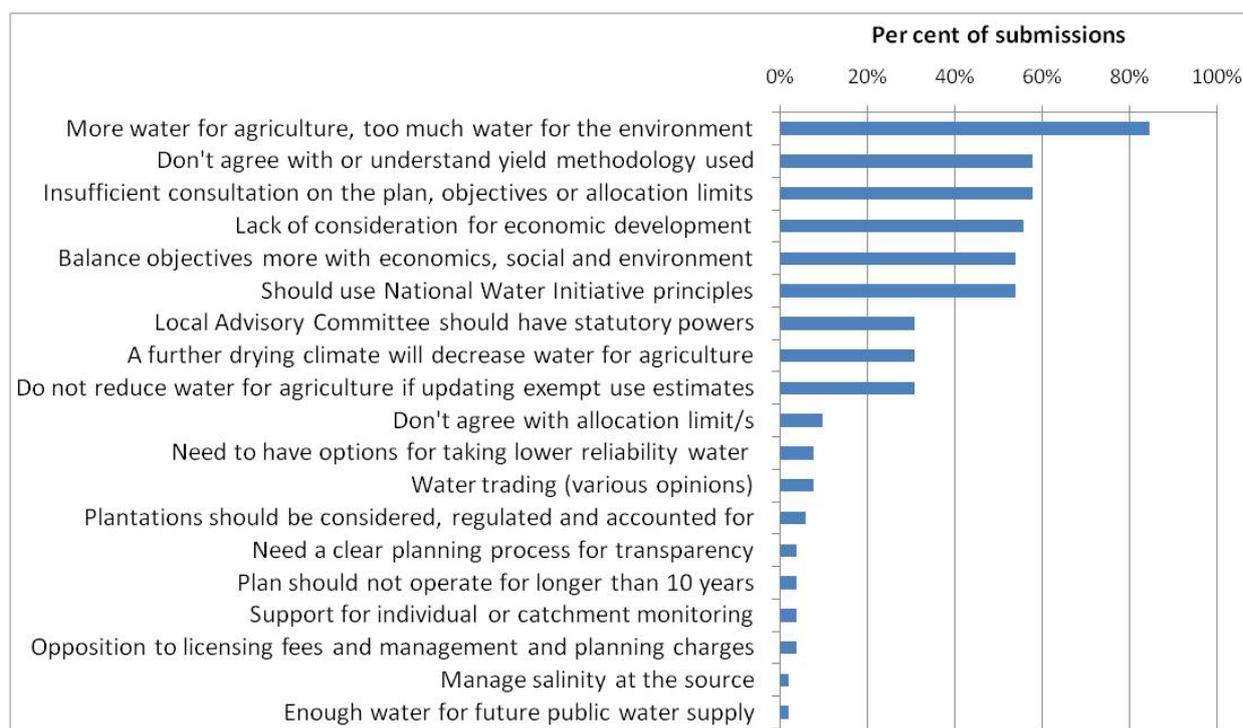


Figure 1 Breakdown of the issues and topics raised in submissions

## Comments received and the department's responses

The following tables summarise the main issues and questions raised in the public submissions and the department's responses. The comments are grouped according to the water allocation issue they relate to.

Table 2 General comments received on the draft plan

Comment	Department of Water response
<p><b>Support for the plan</b></p> <p>Three respondents indicated they supported the plan and 45 indicated they did not.</p>	<p>We value the interest shown by stakeholders and their advice on managing surface water in the Warren–Donnelly area.</p>
<p><b>Developing the plan</b></p> <p>Two respondents said that the process used by the department to develop the plan was not clear.</p>	<p>The plan now includes more information on how we developed it. The supporting methods report also includes more detail and clearer explanations of how the allocation limits were developed. Further information about our allocation planning process is available in <i>Water allocation planning in WA: a guide to our process</i> and this is available on our website &lt;<a href="http://www.water.wa.gov.au">www.water.wa.gov.au</a>&gt;.</p> <p>We have demonstrated how we developed the plan and the basis of our allocation limit decisions to the Warren Donnelly Water Advisory Committee, peak bodies and sector groups to help them understand the process we've used.</p>

Comment	Department of Water response
<p><b>Suggested edits</b></p> <p>One respondent suggested the following changes to the plan:</p> <ul style="list-style-type: none"> <li>i. The headings in Table 1 of the plan should use positive instead of negative language.</li> <li>ii. The plan should include a summary of how the limits were calculated and refer directly to the documents supporting the plan.</li> <li>iii. Provide information on how licensees can object to new licence conditions introduced at licence renewal.</li> </ul>	<p>We have:</p> <ul style="list-style-type: none"> <li>i. amended the wording in Table 1 (now Table 2 in the plan)</li> <li>ii. included a summary of how we developed the allocation limits (Section 3 of the plan)</li> <li>iii. updated Section 4 to provide information on the rights of licensees under Clause 25 of Schedule 1 of the <i>Rights in Water and Irrigation Act 1914</i>.</li> </ul>

*Table 3 Comments on consultation*

Comment	Department of Water response
<p>Thirty-two respondents commented on consultation during the plan development. Many of the responses said the local community and industry had not been adequately consulted during the planning process, contrary to the department's <i>Statewide Policy no. 5 – Environmental water provisions policy for Western Australia</i>.</p>	<p>Noted. The department consulted with the Warren Donnelly Water Advisory Committee throughout the planning process. The committee is established under the <i>Water Agencies (Powers) Act 1984</i> and members are appointed by the Minister for Water.</p> <p>In addition to the consultation prior to the plan's release for public comment, we reviewed the whole planning process with the Warren Donnelly Water Advisory Committee over nine meetings in 2011. In partnership with the committee, we held a series of information sessions in November 2011 for members of sector groups.</p>

Table 4 Comments on the Warren Donnelly Water Advisory Committee

Comment	Department of Water response
<p>Sixteen respondents commented on the Warren Donnelly Water Advisory Committee (WDWAC). Comments included:</p> <ul style="list-style-type: none"> <li>• support for granting the committee full powers as a Water Resource Management Committee under section 26GK of the <i>Rights in Water and Irrigation Act 1914</i></li> <li>• that the committee members were erroneously advised in 2007 that the committee was a Water Resource Management Committee as outlined in section 26GK of the <i>Rights in Water and Irrigation Act 1914</i></li> <li>• that the committee was not given adequate opportunity to participate in the plan development.</li> </ul>	<p>The WDWAC is an advisory committee appointed under s109 of the <i>Water Agencies (Powers) Act 1984</i>. In 2007 the committee was incorrectly advised that it was a statutory committee appointed under s26GK of the <i>Rights in Water and Irrigation Act 1914</i>. This error was corrected at the time. The current members would like the committee to remain non-statutory.</p> <p>There are currently no statutory committees under s26GK of the Act. However the department maintains a number of advisory committees (including the WDWAC) to provide advice to the Minister for Water and the department. The status of advisory committees will be reconsidered under any new legislative regimes.</p> <p>Since the plan was released for public comment in 2010, the department has worked closely with the WDWAC to complete the plan. The role of the WDWAC is outlined in the plan (see Section 1.6 of the plan).</p>

Table 5 Comments and questions on yield methodology

Comment	Department of Water response
<p>Thirty-one respondents commented on yield information and methodology. The main comments are below.</p>	
<p>i. The science underpinning the ecologically sustainable yield (ESY) methodology is unproven and should be reviewed by an independent party. A peer review would provide confidence that the science and methodology is robust.</p>	<p>We agree that a peer review is a valuable way of confirming that the ESY methodology is scientifically robust. Since the plan was released for comment, the University of Melbourne has completed an independent peer review of the ESY methodology. The review found that the method is sound, applicable to the rivers of the south-west of Western Australia and consistent with current best practice. The report of the findings of the review is available on our website &lt;<a href="http://www.water.wa.gov.au">www.water.wa.gov.au</a>&gt;.</p>

Comment	Department of Water response
<p>ii. The department should use existing yield methods and allocation limit setting decision processes from the eastern states in the plan because the situation of farm dams in the Warren–Donnelly region is similar and the science of existing yield methods is scientifically accepted.</p>	<p>We disagree. The methods developed in the eastern states are not directly applicable to the unregulated self-supply systems in the south-west of Western Australia, though the principles of environmental water requirements are similar.</p> <p>The ESY method has been designed to apply to the characteristics of the unregulated river systems in the south-west of Western Australia. The method is the most current and appropriate science available for our south-west river systems. The peer review by the University of Melbourne confirmed that it is consistent with current best practice.</p>
<p>iii. The department has converted the principles embodied in the 'Sustainable diversion limits' of 2008 into 'Ecologically sustainable yields' to arrive at new allocation limits.</p>	<p>The ESY method is distinctly different from the SDL yield method. Unlike the SDL approach, the ESY method is based on environmental flow studies and uses methods more suited to calculating yields for developed areas. More detail on SDL and ESY is provided in the plan's methods report (Section 6).</p>
<p>iv. Suggest using mean annual flow as an alternative method to ESY to determine allocation limits.</p>	<p>We disagree. The average annual runoff has declined significantly in the past ten years and mean annual flow doesn't account for variation in flows between years or for trends in flow (see Section 6.2 of the plan's methods report). Mean annual flow is not an appropriate method for calculating yields or allocation limits in the Warren–Donnelly area because the system would be over allocated in drier years and reliability of supply would be unpredictable, jeopardising investment.</p>
<p>v. The ratio between water for agriculture and for the environment is much higher in the Harvey, Collie and Ord irrigation systems and public water supply catchments in the Darling Range, where virtually no water is provided for the environment, with water for use between 50% and 98% of average flows.</p>	<p>We note these comments. In these areas, flow is captured in very large dams associated with scheme irrigation or public water supply. Water is still released from these large storages for environmental water purposes.</p> <p>The large storage capacity of these systems allows for water to be allocated to consumptive uses while keeping some water in storage to buffer the effects of flow variability from year to year.</p> <p>Small farm dams, such as those in the Warren–Donnelly area, do not have the carry-over storage capacity to cope with the variability of annual flows. There is currently no plan to implement a large scale scheme in the Warren–Donnelly area.</p>

Comment	Department of Water response
<p><b>Questions</b></p> <p>1. How is the one site (located in the Warren–Donnelly area), used to develop the ecologically sustainable yields model, representative and therefore appropriate for determining allocation limits throughout the area?</p>	<p>The environmental flow study site in the plan area (Lefroy Brook) is one of 14 sites in the south-west of Western Australia that we used to determine ecological water requirements and potential yields. In combination, these sites are representative of the types of rivers and water yields of river systems across the south west, including those in the Warren–Donnelly area.</p>
<p>2. How was groundwater flow accounted for in sites used to develop the ecologically sustainable yields model, when there is no groundwater interaction in the Warren–Donnelly site? Was this impact considered?</p>	<p>Groundwater is not considered as a separate resource in the plan, but may contribute a base flow to streams and be measured as part of the river flow at gauging stations. To calculate Warren–Donnelly yields using the ecologically sustainable yield method, we used the river flow data for each catchment. This means the effects of groundwater interaction are included.</p>

*Table 6 Comments on balancing economic, social and environmental objectives*

Comment	Department of Water response
<p>Thirty respondents commented on the objectives of the plan and the balancing of the economic, environmental and social values of water in the Warren–Donnelly area.</p>	
<p>i. The objectives of the plan fail to get the right balance between economic, environmental and social values of water. The plan does not explain how the economic and social values of water were determined.</p>	<p>With the assistance of the Warren Donnelly Water Advisory Committee, we have amended the plan objectives so that they more clearly align with the economic, social and environmental values associated with water in the 25 subareas of the Warren–Donnelly area.</p> <p>The plan and the supporting methods report now include more information and discussion of water related values and the development of the plan objectives.</p> <p>The total allocations for the Warren–Donnelly area exceeds the highest CSIRO water demand projections to 2030.</p>

Comment	Department of Water response
<p>ii. The plan does not provide enough water for agricultural use and fails to recognise the importance of irrigated agriculture industry to current and future economic development, and the Warren–Donnelly area as an important production area for healthy, fresh foods for Western Australia.</p>	<p>The total water available for allocation across the Warren and Donnelly basins is 72.8 GL/year (or 72 867 ML/year). Of this, 67 GL/year is available for general licensing, such as for irrigated agriculture. This is enough water to meet current use and the highest estimated demand projected by CSIRO for the whole plan area to 2030 (39.8 GL/year).</p> <p>From the dam survey following the 2010–11 irrigation season and further reliability work we completed in 2011, we eliminated the need for a risk factor in the allocation limit. This allowed us to make some increases to allocation limits from the plan for public comment in some subareas.</p> <p>We accept that at a localised scale, demand will exceed the allocation limit before 2030. While implementing the plan, we will investigate how licence holders may be able to take additional water in wetter years.</p> <p>We will also continue to work with water users and other departments to promote innovative and efficient ways to use water in the agricultural industry and new developments.</p>
<p>iii. Agriculture should be given priority over other industries including mining in terms of water and land use. The plan should support the principle of cleared land in the Warren–Donnelly area being protected as a priority agricultural management area under <i>Statement of planning 2.5</i> (SPP 2.5).</p>	<p>Reserving water for specific uses (other than public water supply) is not part of the plan.</p> <p>The plan maximises the allocation of water in priority agricultural management areas as part of the allocation limit setting process (see sections 5 and 8 of the methods report).</p>

Comment	Department of Water response
<p>iv. The plan allocates an excess of water to the environment which is not needed, particularly in highly developed catchments. For example, even though 2010 was one of the driest years, there was still plenty of water for the environment flowing from Upper Lefroy after dams had filled and were still filling, with the majority of licensed in-stream dams filled by the end of August.</p>	<p>We disagree. Water left in the rivers is essential for providing water entitlements in drier years and to maintain the current environment. The allocation limits represent the annual amount of water that can be reliably taken.</p> <p>Rainfall and flows in 2010 were the lowest on record in the Warren–Donnelly area. Although most people had sufficient water for irrigation there were a number of dams that did not fill and a number of formal and informal temporary water trades were in place to meet water shortfalls.</p> <p>In April 2011, at the end of the 2010–11 irrigation season, the department conducted a dam survey in the Upper Lefroy and East Brook. A number of dam owners said that their dams had residual water in storage at the start of the 2010 winter. This means that not all of the water from dams was used in the previous irrigation season (2009–10) and less inflow was required to reach maximum storage capacity for the coming irrigation season of 2010–11. The full allocation was therefore not removed from the 2010 streamflow and this water flowed out of the Upper Lefroy and East Brook.</p> <p>Also, in the 92 km<sup>2</sup> of the Upper Lefroy catchment the farm dams are located in the upper portion, covering an area of 79 km<sup>2</sup>. This means that runoff from the 13 km<sup>2</sup> of forested area is able to flow from the catchment through the gauging station without being intercepted by farm dams. Therefore some flow would be expected from Upper Lefroy each year.</p>
<p>v. Suggest that a B class licence system or tiers of water allocation are created to capture opportune water or access extra allocations in years of extra flow.</p>	<p>We recognise that in wetter years, after abstraction, streamflow will exceed minimum flow requirements. Together with the advisory committee, we are trialling an approach for people to access lower reliability (or B class) water in some years, without affecting reliability of supply to existing water users.</p>

Table 7 Comments and questions on allocation limit decisions

Comment	Department of Water response
<p><b>Allocation categories</b></p> <p>i. One respondent commented that the Beedelup Brook and Fly Brook subareas are high value areas for future horticulture expansion. However, the plan capped water use in these subareas. It was noted that a similar approach was also used in the Tone River subarea.</p>	<p>Noted. After consultation with the Department of Agriculture and Food and the Warren Donnelly Water Advisory Committee, we have now reclassified the Beedelup Brook and Fly Brook subareas as ‘important for irrigated agriculture’ in the plan. More water has been allocated in these subareas.</p> <p>The department has not provided an additional allocation in Tone River as there is no irrigation activity in this area (due to the high river salinity), and to account for potential water interception by plantations as part of salinity management in the Warren River. If there is a demand we would consider licensing fit-for-purpose use of water from Tone River.</p>
<p>ii. One respondent commented that while no water is available in the Lower Donnelly subarea in the plan, the flow data suggests there should be a substantial amount of water available.</p>	<p>We note these comments. The Barlee, Lower Donnelly, Carey Brook, Upper Warren, Treen Brook, Lower Warren and Unicup Lakes subareas are mostly forested. Taking water for irrigation in these subareas is limited by legal access to the land. We have reviewed the allocation limit decision for these subareas and set an allocation limit based on the yield scaled to the area of freehold land (see Section 8 of the methods report). As there is no freehold land in the Carey Brook and Unicup Lakes subareas the allocation limit remains at zero.</p> <p>The department will consider providing more water in addition to the current allocation limits, if proponents can show they have legal access to the land in the forested areas.</p>
<p><b>Drying climate</b></p> <p>Twenty respondents raised the impact of a drying climate on streamflow and rainfall as an issue. Many respondents were concerned that this may lead to less water being available for agricultural use and the imposition of consumptive pools.</p>	<p>We note these comments. We have considered future climate projections by making allocation limit decisions using data for the driest year in the period 1975 to 2007. This approach is suitable for the life of the plan.</p> <p>Allocation limits are fixed annual volumes. Consumptive pools are not suitable in the plan area because of the current infrastructure of fixed, distributed on-stream dams. This makes it difficult to release and manage the sharing of water in drier years. While implementing the plan, we will investigate how licence holders may be able to take additional water in wetter years.</p>

Comment	Department of Water response
<p><b>Water uses currently exempt from licensing</b></p> <p>Eighteen respondents commented on water uses currently exempt from licensing. Some respondents said they believed water use from plantations, dams in stream headwaters, runoff dams and spring fed dams currently exempt from licensing is up to four times the department's estimations. They also commented that some of this water was used for commercial purposes, not just for stock and domestic use.</p> <p>A number of respondents were concerned that the proposed changes to water legislation could require currently exempt water use to be licensed under existing allocation limits, thereby reducing water available in agricultural catchments.</p>	<p>We note these comments. The plan uses the best available data from farm dam mapping from satellite imagery to estimate the existing volume of stock and domestic water use that is exempt from licensing (Section 4.5 of the methods report).</p> <p>We will refine these estimates as part of the annual evaluation of the plan. This would not affect the licensed entitlements current at the time.</p> <p>We have an online guideline on our website, which clarifies current policy and arrangements for managing water use by plantations. Go to &lt;<a href="http://www.water.wa.gov.au">www.water.wa.gov.au</a>&gt; Managing water &gt; Plantations&gt;.</p>
<p><b>Public water supply</b></p> <p>One respondent agreed that the plan reserves sufficient water for future town water supply to Pemberton, Manjimup and Quinninup.</p>	<p>The plan preserves existing water supply reserves for water for future public water supply needs.</p>
<p><b>Questions</b></p> <p>1. How was river condition considered in the allocation limit setting process?</p>	<p>The department considers existing, post-development conditions and not pre-development or pre-settlement conditions in its management. To decide on allocation limits for each catchment, we considered current land use, current and future demand for water and the high social and ecological values in forested areas (see plan objectives and the plan's methods report).</p>
<p>2. Why is the full volume from post-clearing not available to growers?</p>	<p>In most years, dams intercept over half the runoff produced from clearing. In very dry years, farm dams intercept more than the flow produced by clearing (see Table 4 of the plan's methods report). The allocation limits are based on a benchmark dry year.</p>

Table 8 Comments and questions on managing surface water

Comment	Department of Water response
<p><b>Monitoring and measurement</b></p> <p>Two respondents suggested that more gauging stations and metering of all water users was required to gather more data and understand water use.</p>	<p>The department’s current monitoring projects in the Warren–Donnelly area provide us with a good range of data to carry out modelling and planning work. As part of the annual evaluation process we will prioritise areas for additional monitoring.</p> <p>Section 4 of the plan sets out when monitoring and metering may be required as a licence condition.</p>
<p><b>Impacts of dams and water use</b></p> <p>One respondent commented that the plan didn’t recognise the environmental contribution that farm dams make by providing a refuge habitat for birds, fish and marron.</p>	<p>We agree that farm dams provide benefits to the environment and ecology. Reconciling the environmental benefits against any disadvantages of farm dams is not an objective of the plan. The plan needs to provide for adequate flows between dams.</p>
<p><b>Managing water quality</b></p> <p>One respondent suggested that the department should subsidise farmers to plant trees in the Upper Warren and Tone River catchments to manage salinity.</p>	<p>Land rehabilitation and the provision of trees for mitigation of salinity is not within the scope of this plan. However, the department is involved in projects such as developing a Warren recovery plan that will recommend tools for salinity recovery. A partnership with the Warren Catchments Council undertakes strategic tree planting, fodder shrub and saline rehabilitation work in the Tone and Perup subareas. For more information contact Greg O’Reilly, our salinity recovery officer for the Warren area, on 08 9771 1878.</p>
<p><b>Question</b></p> <p>One respondent asked how the freshwater tributaries affect the salinity in the Warren River and whether this was accounted for in the plan?</p>	<p>Taking water from the fresh tributaries in the Warren River basin has the potential to increase the salinity concentration downstream. We have accounted for this in the forested areas by basing allocation limits on a proportion of the yield according to the percentage of freehold land.</p>

Table 9 Comments on licensing policies

Comment	Department of Water response
<p><b>Licensing and regulation</b></p> <p>Two respondents suggested that government regulation should only apply to large water users or where downstream users are disadvantaged.</p>	<p>The Warren and Donnelly basins were proclaimed under the <i>Rights in Water and Irrigation Act 1914</i> in 1959 and 1968 respectively. This means that all water use, with some exemptions, are subject to legislative requirements under the Act. The licensing process allows us to assess the potential impact of new dams on reliability of supply, downstream users and the environment.</p>

Comment	Department of Water response
<p><b>Term of water licences</b></p> <p>Some respondents commented that water licences should be perpetual to provide long-term security to water users.</p>	<p>Our current legislation does not permit the issuing of perpetual licences. Licences are usually issued for 10 years and are usually renewed if all licence conditions and renewal requirements are met, and the system is not over allocated.</p>
<p><b>Release of new water</b></p> <p>One respondent asked how the department allocates new water that becomes available in a fully-allocated resource.</p>	<p>Water is allocated on a first-in first-served basis up to the allocation limit.</p> <p>The department is currently reviewing state-wide policy and alternative allocation mechanisms. We released <i>Discussion paper: Review of first-in first-served policy</i> in September 2011 for public comment. The public comment period closed on 28 October 2011 and the submissions are being reviewed.</p> <p>As a local policy, first-in first-served will remain the most suitable approach for licensing water in the Warren–Donnelly area (see Section 4.3 of the plan).</p>
<p><b>Water trading</b></p> <p>Five respondents provided comments on water trading showing both support and non-support for trading.</p> <p>A number of respondents indicated that trading already occurs informally in the Warren–Donnelly area. Some respondents said that trading water may be difficult in practice because of the infrastructure associated with capturing and storing surface water.</p> <p>One respondent suggested that the ‘price’ of water should be valued by the cost of the infrastructure built to capture the water (e.g. dam), and not by the water itself.</p>	<p>The ‘water market’ is in its infancy in Western Australia but in the long term the department expects this will become a more popular way of obtaining water where demand is close to limits of water availability.</p> <p>To assist trades, details of water availability and current licences are available from the department’s on-line water register at &lt;<a href="http://www.water.wa.gov.au">www.water.wa.gov.au</a>&gt;.</p> <p>All water trades are subject to assessment by the department. Further information about water trading is available in <i>Operational policy no. 5.13 – Water entitlement transactions for Western Australia</i>.</p>
<p><b>Water use efficiency</b></p> <p>One respondent said under the department’s <i>Statewide policy no. 11 Management of unused licensed water entitlements</i> to recoup unused water from licensees gives the wrong messages to growers and leads to wasting of water.</p>	<p>We note this comment. This policy is intended to maximise the effective and sustainable use of water. To achieve this, the department may recoup and reallocate portions of licensed entitlements that are consistently unused. If water taken to be stored in a dam is a specified use on a licence, then it is not classified as ‘unused’.</p>

Table 10 Comments and questions on implementing and evaluating the plan

Comment	Department of Water response
Four respondents commented on implementing and evaluating the plan.	
i. Two respondents commented that the plan should have a specific term and a designated date for review. One respondent suggested a ten-year term.	We will consider the need to replace the plan in seven years (2019) unless it is required earlier (see Section 1.4 of the plan).
ii. Two respondents asked what monitoring the department plans to undertake to confirm that the allocation limits are right, especially given the reduction in the department's budget.	Actions 5, 6 and 7 in the plan (Section 6) commit us to developing and implementing a monitoring program. Measurement data will enable us to compare the flows leaving the catchment and reliability of existing licensed users with yield modelling and allocation limits. Part of the annual evaluation process is to analyse this information to determine whether the department is meeting the plan objectives.
iii. Two respondents asked how stakeholders were involved in the annual evaluation review process.	<p>The evaluation is an internal review of the department's progress in implementing the plan. This includes measuring the progress against the plan objectives and actions. The results of the evaluation are published on our website in an evaluation statement.</p> <p>Formal public consultation is not part of the evaluation process because it is not a review of the allocation limits or licensing policies in the plan. However, the department will seek input from stakeholders. If an annual evaluation or other information indicates the plan or parts of the plan may need amending, replacing or revoking, the department would discuss this with the Warren Donnelly Water Advisory Committee and wider stakeholder groups.</p>
<p><b>Question</b></p> <p>What is the trigger for the review of allocation limits and who can initiate this process?</p>	The Department of Water will advise the Minister for Water if allocation limits need to be reviewed based on, for example, the results of a plan evaluation or other information that suggests that the existing limits may no longer be appropriate.

**Table 11 Comments on water reform and implementation of the National Water Initiative**

Comment	Department of Water response
Thirty-three submissions commented on water reform and the implementation of the National Water Initiative (NWI). The main points are below.	
i. The plan did not adequately address principles from the National Water Initiative. There is concern that the failure to address NWI principles would make it difficult to make the transition when new water resources legislation was introduced.	We note these comments. Changes to the current legislation are necessary to fully adopt and implement the NWI principles and water reform. However, the plan embodies the intent of the NWI principles of maintaining ecosystem viability, managing sustainably, increasing innovation and efficiency and increasing security for water users as far as possible with our current legislation.
ii. Support for the new water resources legislation as a means of delivering on NWI principles. However, strongly oppose the imposition of fees or charges and the introduction of consumptive pools. There is differing opinions as to whether water licences should be held in perpetuity and separated from land title and traded.	The plan does not provide for consumptive pools or impose fees. The matter of fees and charges for water consumption is beyond the scope of the plan.  Consumptive pools are not suitable in the plan area because the current infrastructure of fixed, distributed on-stream dam storages would make it difficult to release or share water in drier years.

## Where to next?

As indicated above, the department has incorporated responses into the completed *Warren–Donnelly surface water allocation plan*. The plan is available from the department’s website <[www.water.wa.gov.au/allocationplanning](http://www.water.wa.gov.au/allocationplanning)> Warren–Donnelly surface water>. It outlines how the department manages surface water resources in the Warren–Donnelly area through licensing, assessment, policy and reporting.

The plan establishes a baseline for management and is the first step in dealing with complex issues such as variable take. The next phase of management will be focused on trialling options for taking lower reliability water in wetter years. This trialling process is already underway and, while implementing this plan, the department will continue to work with users in the Warren–Donnelly area on it.

This lower reliability water would be available less often than the entitlements licensed under the allocation limits in the plan. Access to lower reliability water will not be allowed where it could affect the ability of existing users to take their full licensed entitlement within the allocation limit.

## Further information

For licensing information, please contact:

South West Region office, Bunbury  
35–39 McCombe Road  
Bunbury Western Australia 6230

For planning information, please contact:

Department of Water  
Water Allocation Planning Branch  
Telephone: 08 6364 7600  
Email: [allocationplanning@water.wa.gov.au](mailto:allocationplanning@water.wa.gov.au)

## Shortened forms

CSIRO	Commonwealth Scientific and Industrial Research Organisation
ESY	Ecologically sustainable yield
NWI	National Water Initiative
SDL	Sustainable diversion limits
SPP	Statement of Planning Policy
WDWAC	Warren Donnelly Water Advisory Committee

## References

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RECYCLED CONTENT

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