

**Submissions to Draft Mid-Loddon Groundwater Management Area Local Management Rules**

COMMENT	AGREE WITH RULE?	RESPONSE	ACTION
<b>Rule 1 - Cap on authorised usage</b>			
Is the cap too large?	Yes	A cap is established by the Minister for Water setting a Permissible Consumptive Volume, which is the current licence entitlement in this case. Licence entitlement will not be reduced as discussed in the draft Northern Sustainable Water Strategy. Extractions will be limited to 70% of entitlement if restrictions are triggered in the Local Management Rules.	None
The cap should be invoked where the greatest amount of water is taken from i.e. the Serpentine area	Yes	A cap on the aquifer system is set at current licence entitlement. Restrictions in the Local Management Rules are set with the understanding that the aquifer responds as one system. This understanding also means that the tools available to manage in times of restrictions - e.g. trade and carryover - are available throughout the Mid Loddon area.	None
In drought conditions	Yes	There is a cap on new licence entitlement with restrictions to allow G-MW to respond when groundwater levels fall below the trigger.	None
New bores are brought on line	Yes	New bores can be installed and licensed, but entitlement must be transferred from an existing user.	None
Retain cap in each zone. Retain zones as they were.	Yes	Based on the hydrogeological understanding of the area only three zones are required for management of the resource. Trading rules cap entitlement in the Laanecoorie-Serpentine Zone. There is also a limit to the volume of water that may be traded out of the Jarklin Zone.	None
There is a need for a cap on domestic and stock use. The rationale for this cap is provided in the document Droplet 17, Water security: should urban water use, like rural water use be capped?	Yes	Domestic and stock use is a statutory right, is not licensed and cannot be capped. The Northern Sustainable Water Strategy is addressing how domestic and stock use should be managed in the future and any policy initiatives on this matter will need to be considered when available.	None
While supporting the rule, the draft rules in section 2.1 are confusing. One paragraph says that the Permissible Consumptive Volume has been revised down to exclude domestic and stock use, but the next paragraph says or implies that the Permissible Consumptive Volume does also include domestic and stock use. Perhaps these sections should be reworded to avoid any confusion	Yes	Accept that domestic and stock usage in paragraph 4 should be removed.	Remove reference to domestic and stock usage in section 2.1 paragraph 4
Support for a cap on licensed use from the Mid-Loddon Groundwater Management Area. The demand for groundwater resource is high and likely to increase under climate change, therefore a cap on extraction is critically important	Yes	Agree	None
<b>Rule 2 - Managing groundwater interference</b>			
Irrigation bores should be cut to 50% allocation to preserve water resource	Yes	Groundwater levels with respect to trigger level suggest that there is no current need for restrictions. Groundwater can be used as a drought reserve and increased recharged is expected for wetter conditions.	None
Needs to be strictly controlled and adhered to	Yes	G-MW has well developed procedures already in place.	None
If the neighbouring bores are affecting pumping, should not be allowed to go over their licence entitlement	Yes	License holders must abide by their licence conditions. In the case of a transfer, a risk assessment is undertaken to assess the level of interference. An application will be rejected if unacceptable interference is likely.	None
How far apart in distance can a new bore be placed to an existing one?	Yes	The distance a new bore may be placed from an existing bore is site dependant. It depends on the available drawdown of existing groundwater user, the aquifer hydraulic characteristics and the pumping demands of the applicant.	None
New irrigation bores must be 1.5 km from existing domestic and stock and irrigation bores. New domestic and stock bores do not have right of way if interfered by existing bores eg irrigation & domestic and stock	Yes	There is no specified minimum distance for new bores in the Local Management Rules. A risk assessment is undertaken for each application to assess impacts on neighbouring groundwater users. The distance a new bore may be placed from an existing bore depends on the available drawdown of existing groundwater user, the aquifer hydraulic characteristics and the pumping demands of the applicant. Existing users are to be protected.	None
The various drawdown measures for the domestic and stock bores need to be based on applied research, and this has not been done in the sensitive areas of the WSPA	Yes	Investigations have been undertaken to determine the impact on domestic and stock bores. The potential drawdown on domestic and stock bores has been clearly presented at public meetings.	None
Appears to be a reasonable approach	Yes	Agree	None
<b>Rule 3 - Managing intensity of groundwater extraction</b>			
Trigger level at 11.5 m below the surface is too low. Stock and domestic to be monitored at drawdown level not recovery level as the bores are dry when needed. Most stock and domestic bores will have to be redrilled to go to the trigger depth	No	Significant technical work has been undertaken to establish a trigger level that has considered domestic and stock bores. Drawdown levels can be localised depending on demands in a particular area at any time and are therefore not a reasonable measure. A commitment has been given to undertake additional monitoring of bores on the margin of the management area to identify the relationship between groundwater pumping and the levels in these bores.	Increase groundwater monitoring along Rothackers Road to better understand impacts on domestic and stock bores on the margin of the groundwater management area
Concern that without recharge of water into the system, there shouldn't be any allocation of groundwater extraction greater than the licence entitlement	No	License entitlement is capped. A water shortage will be declared if the 3 year rolling average level falls below the trigger level and 70% allocations will be announced.	None
Agree with intensive management in Serpentine area but can't justify the charge per megalitre in Moolort Zone where there is minimal management. Licence size determines the fee. I can see unfairness in charges	Yes	Charges apply equally as a megalitre rate. The deep lead is the aquifer that has been developed in the Moolort Zone and has therefore been included in the Mid-Loddon Groundwater Management Area. The same charges apply to groundwater users in other defined groundwater management areas.	None
Concern that when an older bore needs replacing will it be possible to increase the rate of extraction but not licence volume	Yes	A licence holder may apply to G-MW to increase their extraction rate. G-MW will undertake a risk assessment when considering the application. If there are no unacceptable impacts then the application will be approved. If a licence holder is not increasing their licence volume then it will not be impacted by the intensity rule.	None
New irrigation bores must be 1.5 km from existing domestic and stock and irrigation bores. New domestic and stock bores do not have right of way if interfered by existing bores eg irrigation and domestic and stock	Yes	There is no specified minimum distance between bores. A risk assessment is undertaken for each application to assess impacts on neighbouring groundwater users. The intensity rule reduces the potential for larger drawdown cones to develop.	None

This rule is directed to key users of groundwater, a similar rule should be applicable to domestic and stock users	Yes	Domestic and stock use is a statutory right for specified purpose - it is not a volume (e.g. volume may change depending on stocking rates in a given season). The Northern Sustainable Water Strategy is addressing domestic and stock use and any policy changes will need to be considered when available.	None
Rule as outlined suggests that allocations will be either 70% or 100% - there appears to be no scope for anything in between. Is this what the intention was? Or should 4 (c) be amended that allocations may increase 'up to 100 %'	Yes	The intention is that allocations will be reduced to 70% to have an impact on groundwater levels. Usage of 70% of licence entitlement represents a dry climate scenario of groundwater use in the Mid Loddon GMA. Smaller percentage changes will not have a significant impact on groundwater levels and if restrictions are required than sufficient recharge is required to raise levels above the trigger.	None
Consideration of the impact of this rule and other rules on groundwater dependant ecosystems will be required, once groundwater dependant ecosystems are more clearly defined. If groundwater dependant ecosystems are identified within the Mid-Loddon Groundwater Management area, it is recommended that the Local Management Rules be reviewed and appropriate amendments be made if required.	Yes	Accept that there is little information on groundwater dependant ecosystems at present. Groundwater dependant ecosystems are considered under Section 40 of the Water Act 1989 when assessing a licence application. The challenge is to locate groundwater dependant ecosystems and determine their dependency on groundwater. Once this has been done then rules can be amended to offer greater protection to groundwater dependant ecosystems if required	Include need to update the rules when better information on groundwater dependant ecosystems is available.
<b>Rule 4 - Managing groundwater levels</b>			
Trigger level set too low. Allocation announcement in September for irrigators is based on high level readings but does not take into account the stock and domestic bore requirements in December, January and February which is during the drawdown period	Yes	The trigger level has been established to minimising throughflow out of the system and maintain a positive groundwater gradient to the north. The impacts on domestic and stock users have been considered by assessing seasonal aquifer response to groundwater pumping, that is the projected drawdown levels if groundwater levels were to fall to the trigger level. This information was presented at the public meeting in May 2008.	None. The Corporation will investigate impacts to domestic and stock user concerns if required.
Pleased to see this system of monitoring and management applied depending on the results of monitoring	Yes	Level response is seen as being a transparent method of managing the resource.	None
There should be a 70% to 50% allocation now rather than wait until the 11.5 m level is obtained. We need to see what the recovery level is now after the 70% - 50% reduced usage has been enforced for a couple of seasons to see if the Mid-Loddon Groundwater Management Area is actually replenishing! It's too late when its like the Hume Reservoir at 4.2% which 10 years ago would have been unthinkable	Yes	Bores are not going dry and the region is dependant upon groundwater use to support the local economy during periods when surface water supplies are not available. Groundwater monitoring indicates that levels have only fallen by around 4 metres in 40 years. High groundwater levels in the 1970s and 1980s resulted in land salinity issues. A lower groundwater level provides watertable relief and land salinity benefits.	None
As long as it drops uniformly from one end to the other end of the Groundwater Management Area within reason, otherwise the trigger should not be imposed one end if it has not dropped much compared to the other end	Yes	It is expected that groundwater levels will fall most at the northern end of the GMA, and taper up-gradient as the volume in storage is reduced. The entire groundwater management area covers the deep lead sediments that are part of a single system. Extractions from anywhere in the aquifer system will reduce the groundwater storage. There is limited information on groundwater levels and usage in the Moolort Zone and monitoring is in place to confirm the understanding and system response. The trigger location has been chosen based on where falls are to be seen first and greatest impacts are observed.	None
Smaller groundwater licence holders in the Moolort Zone will be discriminated against by larger holders further north drawing huge amounts of water	No	The groundwater management area covers the deep lead sediments that are part of a single system. Storage within the aquifer system reduces regardless of where the groundwater is taken from. Accepting that it is all part of the one system, and that available entitlement is relatively well distributed throughout the system, allows for increased transfer opportunities.	None
Best management practices need to be used	Yes	Agree	None
Levels have been watched for some time and are an accepted tool for ?? understanding of the aquifer. Aquifer status should be established for salinity and other 'chemical measures' that can help monitor the quality the aquifer.	Yes	Agree. Groundwater quality monitoring is described in Rule 8	None
OK with this from our point of view	Yes	None	None
Support for the trigger level and rolling 3 year rolling average approach. Strong support for the ability to put in place restrictions when these triggers rules have been met. Also support for further restrictions if groundwater levels continue to fall. However, the Local Management Rules do not clearly articulate how this will occur.	Yes	If groundwater levels continue to fall after restrictions have been enforced then a review of the water balance and allocations is required. The timing for this review has not been specified. This is considered in Rule 10.	None
<b>Rule 5 - Transfer of groundwater entitlement</b>			
Agree that there be restrictions on the amount of carryover in any one season to limit groundwater extraction	Yes	Carryover to be limited to 30% of licence entitlement	None
Believe that the original zones should still stay	Yes	Based on the hydrogeological understanding of the area only three zones are required for management of the resource. Reducing the number of zones supports National Water Initiative objective to reduce barriers to groundwater trading.	None
Allowance of permanent entitlement transfers need to be confirmed early in spring to enable purchases and usage of water by September/October. Quick processing of transfer forms for same reason	Yes	Permanent transfer will be available as soon as the Minister abolishes the Mid Loddon Water Supply Protection Area (and the Mid Loddon reverts to a Groundwater Management Area) - noting that permanent transfers cannot current occur as per section 54 of the Water Act 1989. An application will be made to the Minister to request abolition of the Water Supply Protection Area in late June and it is anticipated that it will be abolished by early September 2009. This action will then allow permanent transfers to be assessed. Temporary transfers can be processed quickly if the risk is considered low. G-MW will continue to investigate ways that the process can be streamlined. At present, if you transfer more than 2 ML above the licence entitlement a Diversions Inspector will be required to undertake a site visit and a risk assessment is preformed to assess the impact of the transfer on surrounding groundwater users and the environment. This can take up to 6 weeks to complete. Licence holders are encouraged to make application to transfer early in the season.	Corporation to identify ways to streamline groundwater transfer process
As long as the application will not result in unacceptable impacts on surrounding groundwater users in the local area	Yes	G-MW has well developed processes in place to assess the risk to existing groundwater users and the environment. Applications that may result in unacceptable interference will be refused.	None

Let opportunities available to best use water but keep entitlement in (old) zone	Yes	Based on the hydrogeological understanding of the area only three zones are required for management of the resource. Reducing the number of zones supports National Water Initiative objective to reduce barriers to groundwater trading.	None
This will be important for the proposed aquifer recharge program that will be investigated at bore Number 67755 adjacent to waste water treatment plant. It could also be important in the case of the Bulabul aquifer acting as a recharge agent to Loddon River water between Newbridge and Bridgewater.	Yes	The rules have not considered any proposal for managed aquifer recharge. The time to undertake investigations, seek approvals and consider any such proposal are likely to be significant (possibly years).	None
Very good proposal	Yes	Agree	None
Support for the transfer of groundwater entitlement. Although, once groundwater dependant ecosystems are better understood it is recommended that before any transfer of entitlement the impact on the groundwater dependant ecosystem is assessed.	Yes	Accept that there is little information on groundwater dependant ecosystems at present. Groundwater dependant ecosystems are considered under Section 40 of the Water Act 1989 when assessing a licence application. The challenge is to locate groundwater dependant ecosystems and determine their dependency on groundwater. Once this has been done then rules can be amended to offer greater protection to groundwater dependant ecosystems if required.	Include need to update the rules when better information on groundwater dependant ecosystems is available.
<b>Rule 6 - Carryover</b>			
Too difficult to manage - if all irrigators didn't use full entitlement in one season and is carried over into the next season and all decided to drawdown at one time plus usual allocation, how far will drawdown go?? How many seasons can carryover be carried?	No	A maximum of 30% of licence entitlement can be carryover in any season - it is not cumulative. There is sufficient storage in the aquifer to cope with large scale use of carryover and triggers in place if groundwater levels fall to restrict future extractions. It is unlikely that all irrigators will manage their entitlement the same.	None
Good rule to manage groundwater extraction, providing security of supply in times of low allocations and greater flexibility for management of entitlements	Yes	Carryover provides licence holders with greater ability to manage their entitlement.	None
Support the rule but still think there is too much water already being extracted under the current climatic conditions	Yes	A trigger level has been established to reduce extractions if groundwater levels fall.	None
If consideration is given to rule 2	Yes	Licence holders must apply to G-MW to use carryover. A risk assessment will be undertaken to assess impacts on existing groundwater users and the environment to determine if carryover can be used.	None
Believe this is one of the most important things in this submission to have a carryover	Yes	Agree	None
Allows flexibility for licence holders in different seasons	Yes	Agree	None
Carryover provides flexibility to the entitlement holder and encourages more efficient use of water. Any impacts of carryover will be identified through the monitoring process and acted on by Rule 4 above.	Yes	Agree	None
<b>Rule 7 - Monitoring groundwater levels</b>			
Monitoring of groundwater level for key bores is desirable but this information should be disseminated and available to the community in these areas	Yes	Monitoring data is public information that can be retrieved from the Department of Sustainability and Environment website. G-MW puts groundwater levels from key bores on this website.	None
I am pleased to see the monitoring of bores but I am concerned about added costs to groundwater licence holders to cover this	Yes	There should be no net increase in groundwater level monitoring costs.	None
This is extremely important and the key to the whole plan rules. Several bores around us have fallen again in recent months	Yes	Monitoring groundwater levels is vital to rules.	None
Don't over do it	Yes	The Department of Sustainability and Environment monitors State observation bores quarterly. G-MW will monitor key State observation bores that support the rules monthly.	None
It creates a history trail. Should use bores that are inactive to gain more information and planning knowledge	Yes	State observation bores provide a greater level of confidence in monitoring data. The Corporation encourages groundwater users to monitor levels in their own bores.	None
Some attempt should be made to better explain the location of the key monitoring bores, particularly those that relate to the contribution of systems that feed into the main trunk system	Yes	Bores are identified on the map in the rules. It is acknowledged that some bores are poorly labelled and this will be rectified.	Ensure all monitoring bores are clearly identified on the map in the rules
Groundwater information will be critical to understand the long-term effects of Local Management Rules and monitoring is strongly supported	Yes	Agree	None
<b>Rule 8 - Monitoring groundwater salinity</b>			
Community should be kept informed of results	Yes	Data will be made available in the annual report. Data from State observation bores will be entered into State Groundwater Management System.	None
Groundwater sampling and monitoring of changes to salinity levels will be positive but again costs for this testing need to be minimised	Yes	Cost to be minimised, but it is extremely important that there be adequate salinity monitoring for the rules.	None
Very important	Yes	The trigger levels are based on potential impact on groundwater salinity, so monitoring groundwater quality is extremely important.	None
Don't over do it	Yes	The trigger level has been established based on groundwater quality, so it is very important that sufficient data is obtained to identify any trends.	
Monitor trends in water quality during different seasons	Yes	Groundwater quality monitoring can be expensive. A commitment has been given to sample at least 2 bores annually for lab analysis. The rules are structured to enable more sampling.	Further consideration to be given to number of bores to be sampled, sampling frequency and funds available for obtaining results
The selection of sample points needs revision - There is no indication that in some parts of the WSPA there is high quality water i.e. below 500 TDS. This water ?????? critical for the small town survival in this area. The location and protection of these high quality water areas will need to be mapped and supported by located monitoring bores.	Yes	Groundwater quality monitoring for lab samples to be concentrated at the northern end of the groundwater management area around the trigger bore as the trigger level has been based on maintaining groundwater quality. Groundwater users are encouraged to provide samples to the Corporation for salinity analysis. This will provide information that will enable broader trends to be identified.	None
Groundwater information will be critical to understand the long-term effects of Local Management Rules and this rule is strongly supported.	Yes	Agree	None
<b>Rule 9 - Record meter readings</b>			

Suggest that twice a year reading would be adequate because meter readings also come at a cost	Yes	Meter readings are undertaken for a number of reasons including to record usage, to remind licence holders when usage is approaching their licence entitlement and to ensure compliance. It is also important to gain an understanding of usage patterns in response to seasonal conditions. All Groundwater Management Areas are managed in the same way.	None
Annually for the majority of irrigators apart from the trigger area	Yes	All licence holders to be treated equally - extraction is from the same aquifer system	None
Show previous readings on accounts	Yes	This proposal will be investigated.	Consider showing readings on accounts.
Again meter readings for all domestic and stock bores should be undertaken where those bores are located on high quality water areas	Yes	Domestic and stock use is not licensed use and is not metered. Groundwater salinity in the Shepparton Formation is also highly variable. The groundwater samples provided by groundwater users will enable the Corporation to map groundwater quality and encourages all groundwater users to return their sample bottles.	None
Metering all of the groundwater bores will be very important to understand the level of extractions	Yes	Agree	None
<b>Rule 10 - Annual reporting</b>			
Good process	Yes	Annual reporting is essential to measure the success of rules and identify any issues.	None
Results of the report could be put in a newsletter as information important to users in the Mid-Loddon Groundwater Management Area	Yes	A report summary is to be sent to all licence holders and full report made available on the G-MW website.	None
Rule should ??? some indication as to when the annual report will be available to the community. Even though Section 4.2 says that the report will be posted on the website, there should be a set date so that customers know when to look.	Yes	Rule 10 states that the annual report will be prepared by 1 October.	None
Supports for the annual reporting process and recommends that the report is sent to agencies.	Yes	Rules will be made publically available on the G-MW website. A newsletter will be sent to all licence holders and relevant agencies summarising the outcomes of the annual report.	Amend Rule 11 (b) to include relevant agencies
<b>Rule 11 - Provide effective communication</b>			
Effective communication of action is vital	Yes	Key to successful implementation.	None
Don't over do it, spend like it's yours not ours	Yes	Reporting to be kept to a minimum with little duplication, but it is important to report all facts and identify any need for change. Newsletters to be sent to licence holders rather than the complete annual report.	None
As required when required	Yes	Important to have clear requirements to meet expectations	None
The newsletters should be made available to key representatives from each of the small settlements located within the Groundwater Management Area	Yes	Newsletters will be sent to licensed groundwater users, registered domestic and stock users and relevant agencies. The newsletter and annual report will be available on the G-MW website	None
There is no reference made to the means of communicating allocation announcements. All groundwater licence holders should receive in the mail written notification of allocations. As there are only 100 plus licence holders this should not be an onerous task for G-MW	Yes	Agree. It is proposed that if a water shortage is declared by 30 September a letter will be sent to licensed groundwater users; that a public notice be placed in the Northern Times, Bendigo Advertiser and Maryborough Advertiser and a notice placed on the G-MW website advising of restrictions.	Amend Rule 11 to include notification if a Water Shortage is declared
Supports continuing involvement of the North Central Catchment Management Authority on the Groundwater Reference Committee and on any technical committees that are established or are in operation.	Yes	Supportive of having greater Catchment Management Authority representation on committee	Invite North Central Catchment Management Authority technical representation onto Groundwater Reference Committee
<b>Rule 12 - Review of local management rules</b>			
Good process	Yes	Review is important to make sure that the rules do not become stagnant.	None
Only if a change salinity, or levels declining	Yes	Rules need to be reviewed in light of any new information or policy that might impact on the rules, not just in response to monitoring.	None
If and when needed	Yes	Need to be reviewed in light of any new information or policy that might impact on the rules. An annual review is appropriate with a comprehensive review after implementation period of 5 years.	None
The licence megalitre charge has gone up unrealistically. Concerning the intensive management fee it has gone up sky high as well. All users should shoulder some of the cost, including stock and domestic users	Yes	Domestic and stock is not a licensable purpose. The intensive management fee covers costs associated with implementing the Local Management Rules.	None
As required	Yes	Need to be reviewed in light of any new information or policy that might impact on the rules. Annual is appropriate with comprehensive review after implementation period of 5 years.	None
The information and review process should be measured in times of drought. As in the situation at present it is critical that all information about health of aquifer is made available to all interested stakeholders	Yes	The annual review will include analysis of drought years	None
Support comprehensive review of groundwater management rules, although if monitoring indicates significant reductions in groundwater levels, the rules should be reviewed earlier	Yes	Agree. This is considered in Rule 10.	None