My only question / comment would be that the Murray-Darling Basin Authority have been grappling with this issue for a long time. Has there been a review undertaken of what they've done with a view to identifying what works / doesn't work so that we can learn for past successes / failures.

Rick James

With comment from Alex Gardner

FROM ALEX Here is the January 2019 report of the Productivity Commission on the Five year assessment of the Murray-Darling Basin Plan:

https://www.pc.gov.au/inquiries/completed/basin-plan/report

The comment is that most of the recommendations are for incremental improvements to current arrangements. The key point to note about the MDB Plan is that it sets 'sustainable diversion limits' for all surface water and groundwater management areas, plus gives a total for the whole catchment. It is providing for reductions in consumptive use entitlements to return water to the environment, though the details are still contentious.

The entire Peel-Harvey Estuary system needs sustainable diversion limits for all surface and groundwater provided in legally enforceable statutory plans. Of course, it will take a lot of work and Commonwealth funding will be required to achieve it. The Commonwealth should be involved because of the Ramsar values, and threatened species and communities. The State may need to be convinced that Commonwealth involvement is important and essential. I realise my comment here predicates the answer to Jane's question immediately below. I believe the answer to her question is 'no'. It is clear that the current framework for water allocations in the PH Catchment is mostly non-statutory. There are some groundwater allocation plans for particular groundwater management areas:

https://www.water.wa.gov.au/planning-for-the-future/allocation-plans/kwinanapeel-region . I see also (on that same page) that there are now two 'allocation statements' published since Jeanette and I published our article in June 2017:

1. Managing releases from the North Dandalup Dam, Nov 2017, NB comment at p.6: "Releases from the dam are not expected to reach the Peel-Harvey Estuary, so would not be a means to improve its water quality. Even the maximum release that could be made from the dam infrastructure would only increase the amount of water reaching the estuary by 0.15 per cent - assuming no losses to evaporation, pumping or seepage."

I strongly suggest you compare this allocation statement against the article before speaking with DWER. It looks like the Department has slightly increased the total volume of releases.

2. Managing releases from the Serpentine River, Nov 2017 – I have not studied the Serpentine and not looked at this document.

While the release of these two documents is a great improvement, it does not avoid the need to do a comprehensive water allocation and management plan for the entire PH system.

 Is the Harvey River system, and allocations for the tributaries etc. flowing in the Harvey considered from a whole of catchment perspective? Is groundwater considered in water allocation planning in the Harvey River catchment? The Harvey River catchment is a very heavily utilised system, why isn't there a surface/groundwater allocation plan for the system. I think this question is similar to one posed by Steve, what are the ecological water requirements of the Harvey Estuary and what indicators are used to monitor that? 	Jane Townsend
 Does DWER apply the principles described in the Water and Rivers Statewide Policy No. 5 (2000) regarding Environmental Water Provisions or has this policy been superseded? How did / does DWER establish the ecological water requirements for the Peel-Harvey waterways, including the Peel-Harvey Estuary? How does DWER monitor the impact of reduced flows on the ecological values of these Peel-Harvey waterways in a drying climate? 	Steve Fisher
 What interaction does DWER have with the Commonwealth Department of Agriculture, Water and the Environment about the management of the Peel-Harvey system? How has the Commonwealth contributed to the management of the PH system? Why is there no allocation statement for the Harvey Dam? There should be a proper allocation plan made for the whole of the Harvey catchment. If the State is preparing / were to embark upon preparing such a plan, will they undertake it with proper community consultation? Does the State recognise the need to adjust the Harvey Water licence entitlements set in the mid-1990s to take account of the reduced rainfall and the need to better share existing water in the catchment between consumptive and environmental purposes? Does the State recognise the need to reconsider water licence entitlements in other parts of the PH system for the same reasons? What consideration has the State given to developing waste water recycling and storm water utilisation to the point where it is not necessary for transboundary transfers of scarce surface water from the PH system to metropolitan water supply? When will we know about the proposals for a new Water Resources Management Act? 	Alex Gardner