

Public submissions and hearing report

**Southern Rural Water,
Alcoa groundwater
licence renewal and
amendment
application**

September 2025

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Executive summary

Alcoa seeks to renew and amend its existing groundwater licence for the Upper Eastern View Formation (UEVF) from 4,000 megalitres per year (ML/y) to 1,500 ML/y for ten years to accelerate filling of the Anglesea mine void as part of rehabilitation and closure. Southern Rural Water (SRW) received the application in July 2024, requested further information in November 2024, and deemed the application complete in May 2025. SRW then conducted a comprehensive public consultation process, including a public exhibition from 2 June to 11–14 July 2025, agency referrals, public information materials, and an online hearing on 28 August 2025. At the hearing, Alcoa, the Independent Technical Peer Review Panel (ITPRP), and community submitters presented their positions. A total of 167 submissions were received.

Community perspectives

Submissions overwhelmingly oppose the renewal and amendment, with approximately 97% against the proposal. Community members and local organisations emphasise environmental risks as their primary concern, particularly potential impacts on aquifers and baseflows to the Anglesea River (Kuarka Dorla). They raise significant concerns about acidification, water quality degradation, and cumulative environmental impacts that could lead to fish kills and broader ecological damage. Many submissions reference the *Water Act 1989* purposes and section 40 matters, arguing that issues of water availability and quality, adverse effects on waterways and aquifers, environmental protection, and equity provide strong grounds for refusal. The economic and social impacts on tourism and recreation feature prominently in submissions, as does scepticism about the public value of what would remain a fenced, acidic pit lake. Several submissions propose alternatives such as recycled water and question whether Alcoa's own public engagement adequately addressed community concerns.

A small proportion of submissions (3%) support Alcoa's application. These supporters view the creation of a lake as a community asset with recreational and commercial potential that would finally end the site's decades-long industrial status. They argue the proposed 1,500 ML/y extraction is modest compared with the historic 4,000 ML/y licence and believe pumping from the deeper aquifer would not harm surface baseflows while potentially accelerating shallow system recovery. Supporters cite additional benefits including wildlife habitat creation, improved community liveability, and crucial fire risk reduction. However, this support remains conditional on independent technical review confirming minimal environmental impact, accompanied by robust monitoring and binding triggers to adjust or halt pumping if adverse trends emerge.

Technical and regulatory considerations

The ITPRP finds the groundwater model fit for examining water levels, system fluxes, discharge patterns, and water balance components and is comfortable with order-of-magnitude comparisons showing natural filling would take approximately 40 years versus approximately 10 years if 1,500 ML/y is extracted. However, the panel highlights three key uncertainties: acid generation risk in the alluvial swamp aquifer, a plausible seepage pathway from the pit along the former Lower Salt Creek channel, and incomplete understanding of future pit lake water quality.

Agencies and submitters drew attention to broader duties and policies under Victorian and Commonwealth legislation. These include EPA's general environmental duty, protections for *Environment Protection and Biodiversity Conservation Act 1999* (Cth)-listed species, the *Marine and Coastal Policy 2020*, and the 2022 *Central and Gippsland Sustainable Water Strategy*. If SRW amends the licence, public submissions and agency comments emphasise the need for a more robust monitoring and management framework, including triggers aligned with Barwon Water's extraction from the Eastern View Formation and improved attribution of impacts.

Purpose and scope of this report

This report provides SRW with a consolidated account of the public submissions and the outcomes of the independent submissions hearing for Alcoa's groundwater licence renewal and amendment application, meeting *Water Act 1989* requirements. It records what was presented by Alcoa, the ITPRP, agencies, and submitters, and synthesises issues raised to assist decision-making by SRW as the Minister's delegate.

The public consultation process

Application and assessment

Southern Rural Water received an application from Alcoa of Australia in July 2024. Following an initial assessment of the technical evidence, Southern Rural Water identified several matters requiring clarification and requested additional information from Alcoa in November 2024.

Alcoa provided its response in March 2025. In May 2025, Southern Rural Water, with support from the Independent Technical Peer Review Panel (ITPRP),¹ determined that sufficient information had been provided to deem the application complete, enabling the commencement of public consultation.

Consultation framework

The consultation process followed requirements set out in the *Water Act 1989* (Vic) and the *Ministerial Policies for Managing Take and Use Licences*. Southern Rural Water also applied its risk-based framework to determine specific consultation requirements.

This resulted in the most comprehensive consultation process ever undertaken by Southern Rural Water.

Public consultation period

Public consultation opened on Monday 2 June 2025 and closed on Friday 11 July 2025. Extensions were granted upon request to several individuals until Monday 14 July 2025.

During this period, Southern Rural Water:

- Advertised the call for submissions in local newspapers on two occasions
- Utilised social media channels
- Hosted an open house event in Anglesea on Thursday 12 June 2025

The complete Groundwater Impact Assessment Report was made publicly available

¹The ITPRP is elsewhere referred to as the Independent Technical Advisory Panel. ITPRP will be used for the remainder of this report for consistency.

through both Alcoa's and Southern Rural Water's websites, along with comprehensive Frequently Asked Questions to ensure community access to information.

Agency Referrals

On 2 June 2025, Southern Rural Water referred the application to relevant agencies including the Department of Energy, Environment and Climate Action (regions), Wadawurrung Traditional Owner Aboriginal Corporation, Barwon Water, the Environment Protection Authority (EPA), Regulatory Operations at Resources Victoria, Surf Coast Shire Council, and the Corangamite Catchment Management Authority. While agencies were encouraged to respond by 11 July 2025, extensions were granted to ensure adequate time for comprehensive responses.

Prior to formal consultation, Southern Rural Water maintained regular engagement with referral agencies and met with key community groups.

Public submissions hearing process

Following the consultation period's close, 167 individual submissions were registered, recorded, and provided to the Independent Panel for consideration.

Southern Rural Water convened an online public submissions hearing on Thursday 28 August 2025, facilitated by Independent Panel members Jennifer Fraser and Rod Marsh. Both are experienced facilitators within the water sector—Ms. Fraser serves as a highly experienced executive and director at North East Water, while Mr. Marsh brings expertise across public, private, and non-profit sectors.

The hearing provided a forum for:

- Alcoa to present the key elements of its application to amend its existing groundwater licence
- An ITPRP member to present ITPRP findings to a public audience
- Community members and groups who lodged written submissions to speak to their concerns.

All submitters were invited to present their perspectives at the hearing. The hearing was open to all members of the public, with registration required by 22 August 2025.

The submissions hearing was held on Thursday 28 August 2025, running from 10:00am to 3:55pm. The hearing was conducted via Zoom to maximise attendance and enable public viewing.

The hearing opened with the independent panel outlining procedures, followed by Alcoa presenting a 40-minute application overview and an ITPRP member outlining the panel's role, scope, review process and interim findings.

Twenty community members and organizations then presented their submissions across three scheduled sessions. Presenters included individual community members, Surf Coast Shire Council representatives and various community groups who had lodged written submissions during the consultation period. The panel concluded with overviews from the Independent Panel members.

Issues raised

Issues raised in public submissions

Southern Rural Water received 167 public submissions, with an overwhelming majority (approximately 97%) opposing Alcoa's application to amend its groundwater licence. Three-quarters of opposing submissions followed a template provided by Friends of the Anglesea River, grounding their arguments in personal connections to the river through family routines, seasonal visits, and recreational activities. As one resident writes, "We spent endless days at the beach and of course, swimming in the Anglesea river." Another pleads: "When the grandkids are down to stay, they use the river for swimming, kayaking, canoeing and fishing... We all love the river, we need a healthy river, so please do not let Alcoa start pumping again and destroying this wonderful river."

KEY CONCERNS OF THOSE OPPOSING THE RENEWAL AND AMENDMENT

Environmental risk forms the central argument against Alcoa's application. Submitters document historical ecological damage from mining operations between 1976 and 2015, including substantial lowering of the water table, major reduction in Salt Creek flows, multiple fish kills, sustained estuary acidity, and the loss of springs, pools and groundwater-dependent ecosystems. Many cite Professor Haese's analysis linking ecological decline to pumping rather than rainfall patterns, and some reference Freedom of Information documents revealing the pit will lose ≈ 1000 ML/y to evaporation and seepage. They stress that the river's value depends on the quality of the water itself and the experience it affords. One submission sets the benchmark plainly: "We need a healthy river with good water quality as it is an asset the whole community should be able to share and enjoy."

Legal and policy conflicts feature prominently in submissions. Opponents argue the proposal contradicts *Water Act 1989* purposes and Section 40 considerations, conflicts with environmental protection obligations for the EPBC-listed salt-wedge estuary, and lacks the beneficial public purpose required under the Act. Multiple submissions argue that using Upper East View Formation (UEVF) groundwater to accelerate filling the pit-lake is an inappropriate use of water. They emphasise that the proposed pit lake would remain permanently acidic, fenced and inaccessible, unable to support recreation, swimming or aquatic life, ultimately becoming a hazardous liability requiring ongoing management.

Economic concerns centre on risks to the region's \$10+ million annual tourism and education economy, which supports over 160 direct jobs and 40,000 camp bed nights. They emphasise that these economic benefits are likely to be compromised by river water quality deterioration if Alcoa's application is approved. Submitters argue viable alternatives to using UEVF water exist, particularly recycled water from Barwon Water, and suggest Alcoa's true motivation is cost minimisation, noting the original 2011–2014 rehabilitation plan used earthworks without water extraction.

Process and governance concerns also emerge strongly. A petition against the proposal has received over 1,635 signatures, and many submissions criticise Alcoa's consultation as consisting of one-way information sessions where representatives were unable to answer basic questions about the need to fill the pit. If SRW grants the application, submissions call for stringent limits, real-time monitoring, and non-negotiable triggers if impacts emerge, emphasising that "responsible water stewardship must prioritise future needs, sustainable use, and ecosystem and social resilience."

ARGUMENTS SUPPORTING THE RENEWAL AND AMENDMENT

Five submissions (approximately 3%) explicitly support Alcoa's application, though this support remains conditional. Supporters view accelerated filling as transforming an industrial site into a potential community asset with recreational and commercial value, ending decades of "work site" status. They argue the proposed 1,500 ML/y extraction is modest compared to Alcoa's historic 4,000 ML/y licence, with some suggesting a higher rate could be justified to further shorten the void-filling timeline.

Hydrological arguments from supporters rely on recent monitoring and test-pumping data suggesting the shallow perched systems and deeper UEVF are largely separate. On this basis, they frame deeper pumping as unlikely to harm surface baseflows, while potentially accelerating shallow system recovery by reducing leakage into the void. Natural filling, they argue, would prolong ecological stress and delay public access for 40–100 years.

Fire risk reduction emerges as a significant consideration for supporters, who describe a permanent waterbody as providing both a strategic firebreak and reliable water source for aerial firefighting operations in Anglesea's bushfire-prone landscape. Additional community benefits cited include wildlife habitat creation, improved liveability, and recognition of Alcoa's long-standing support for local groups and facilities.

Critically, all supporting submissions condition their approval on independent technical review confirming minimal environmental impacts, accompanied by robust monitoring, transparent reporting, and binding triggers to reduce or stop pumping if adverse effects emerge. Several suggest that after filling to a regulator-set level, additional options such as treating and releasing water could be explored to improve river water quality, with all management costs borne by Alcoa.

Issues raised in the public hearing

Community and local organisation speakers at the public submissions hearing showed familiarity with the *Water Act 1989*'s core principles and structured many of their submissions around: integrated management of the water cycle; orderly, equitable and efficient use; the duty to conserve and properly manage water resources for present and future Victorians; and the importance of maximising community involvement and

considering Traditional Owner values alongside social and recreational waterway uses. All community and local organisation speakers were opposed to Alcoa's application.

TECHNICAL CONSIDERATIONS

Evidence presented by Alcoa and the ITPRP described a highly modified, climate-sensitive system where historic discharges from the power station have historically masked natural flows and river acidity. Since power station discharges ceased, rainfall and evapotranspiration drive much of the short-term variation and river system impacts, making past extraction impacts difficult to detect within the envelope of altered and natural variability. Alcoa advocated for steady progress in managing this legacy system while applying contemporary values and avoiding over-interpretation of limited data.

The ITPRP provided an additional perspective, expressing confidence in volume comparisons (natural fill approximately 40 years versus augmented fill approximately 10 years at 1,500 ML/y) and confirming the groundwater modeling as generally fit for purpose. However, they identified areas of uncertainty, notably acid generation and seepage, which remain low-probability but potentially significant risks, particularly under drier climate scenarios with increased zero-flow days.

COMMUNITY PERSPECTIVES

Community members and community organisation representatives emphasised the Anglesea river's cultural, ecological, and social importance, particularly as a site for recreation, the liveability of the Anglesea region, and an educational resource for young people. Many speakers also highlighted the river's importance to the Wadawurring. Intergenerational equity emerged as a central concern, with speakers stressing that current decisions must honour obligations to both present and future Victorians—a principle central to the *Water Act*.

Many speakers expressed concerns about the consultation process, questioning whether the *Water Act*'s requirement to maximise community involvement had been met. Many characterised Alcoa's consultation as inadequate and noted that the licence renewal and amendment decision presents either an opportunity to rebuild or further erode community trust.

Several speakers questioned the merits of accelerating void filling when natural processes would achieve the same outcome over time, or alternative water sources could be used. They raised concerns about the final water body's acidity, cumulative environmental impacts and limited ecological or recreational value. Other speakers emphasised the water security benefits of maintaining groundwater reserves in situ. These considerations directly relate to the *Water Act*'s requirements regarding appropriate purposes for water use.

Submission and hearing statement links to legislation or policy

Around one-quarter of public submissions directly reference the *Water Act* and other legislation or policy. Most other submissions also refer to matters relevant to these sections. The majority of statements made during the public hearing also directly referred to the *Water Act* and relevant sections. Tables 1, 2, 3 and 4 outline the sections of the *Water Act* and other legislation and policies most frequently referenced by submissions

and speakers. They also include an estimate based on a thorough review of issues raised in those submissions that did not directly reference legislation or policy.

Table 1: Section 1 issues raised in submissions or by speakers

Section	Text
s1(ea)	to ensure that Victoria's water resources and waterways are managed in a way that considers—(i) Aboriginal cultural values and uses of waterways; and (ii) the social and recreational uses and values of waterways
s1(d)	to make sure that water resources are conserved and properly managed for sustainable use for the benefit of present and future Victorians
s1(k)	to provide for the protection of catchment conditions
s1(j)	to provide formal means for the protection and enhancement of the environmental qualities of waterways and their in-stream uses
s1(e)	to maximise community involvement in the making and implementation of arrangements relating to the use, conservation or management of water resources
s1(c)	to promote the orderly, equitable and efficient use of water resources

Note: Sections are ordered from most to least frequently mentioned.

Table 2: Section 40 issues raised in submissions or by speakers

Section	Text
s40(1)(l)	the purposes for which the water is to be used
s40(1)(d)(ii)	any adverse effect that the allocation or use of water under the entitlement is likely to have on—a waterway or an aquifer
s40(1)(g)	the need to protect the environment, including the riverine and riparian environment
s40(1)(c)	the existing and projected quality of water in the area
s40(1)(b)	Existing and projected availability of water in the area
s40(1)(i)	the conservation policy of the government
s40(1)(k)	if appropriate, the proper management of the waterway and its surrounds or of the aquifer
s40(1)(ab)	all submissions received by the Minister that were made in accordance with a notice under section 38(2)(a) in the manner and within the period specified in the notice
s40(1)(d)(i)	any adverse effect that the allocation or use of water under the entitlement is likely to have on—existing authorised uses of water

Note: Sections are ordered from most to least frequently mentioned.

Table 3: Section 93 issues raised in submissions or by speakers

Section	Text
s93	Sustainable management principles for water corporations Each water corporation, in performing its functions, exercising its powers and carrying out its duties must have regard to the following principles—
s93(a)	the need to ensure that water resources are conserved and properly managed for sustainable use and for the benefit of present and future generations
s93(b)	the need to encourage and facilitate community involvement in the making and implementation of arrangements relating to the use, conservation and management of water resources
s93(c)	the need to integrate both long term and short term—(i) economic, environmental and equitable considerations; and (ii) Aboriginal cultural considerations; and (iii) social and recreational considerations
s93(d)	the need for the conservation of biological diversity and ecological integrity to be a fundamental consideration
s93(e)	if there are threats of serious or irreversible environmental damage, lack of full scientific certainty as to measures to address the threat should not be used as a reason for postponing such measures.

Note: This table summarises the sustainable management principles for water corporations raised by submissions or speakers at the public hearing.

Table 4: Other legislation or policies raised in submissions or by speakers

Jurisdiction	Legislation or policy
Victoria	<i>Environment Protection Act 2017</i>
Commonwealth	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
Victoria	<i>Marine and Coastal Policy 2020</i>
Victoria	<i>Central and Gippsland Sustainable Water Strategy 2022</i>
Victoria	<i>Mines (Aluminium Agreement) Act 1961</i>
Victoria	<i>Minerals Resources (Sustainable Development) Act 1990</i>
Victoria	<i>Water is Life (2022)</i>

Note: Legislation and policies are ordered from most to least frequently mentioned..

Issues for consideration by SRW

Legislative and policy context

The licence decision will be made under the *Water Act 1989* (Vic). However, both submitters and the *Water Act* itself require consideration of the broader legislative and policy context. Key legislation and policy documents raised by relevant agencies and community submissions include the *Environment Protection Act 2017* (Vic), the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act), Victoria's *Marine and Coastal Policy 2020* and the *Central and Gippsland Sustainable Water Strategy 2022*.

MARINE AND COASTAL POLICY 2020

Multiple submitters identified the *Marine and Coastal Policy 2020* as a relevant conservation policy under section 40(i) of the *Water Act*. The policy applies to land and waters within five kilometres inland of the high water mark, including subsurface areas to 200 metres depth. The Alcoa site clearly falls within this definition.

The policy emphasises minimising impacts and promoting resilience in marine and coastal ecosystems. Of particular relevance are:

- Policy 2.5: Maintaining and enhancing native habitat extent and condition
- Policy 2.9: Accounting for and minimising cumulative and synergistic effects
- Policy 2.10: Avoiding, remedying, and mitigating impacts from acid sulphate soil disturbance

These policies should inform assessment of potential ecological impacts from acid generation, persistent pool depletion, and seepage pathways.

ENVIRONMENT PROTECTION REQUIREMENTS

The Environment Protection Authority (EPA) highlighted the general environmental duty under section 25 of the *Environment Protection Act 2017* (Vic). This creates an ongoing obligation for businesses to understand and minimise environmental risks as far as reasonably practicable. This duty evolves with scientific understanding and requires continuous improvement in risk management approaches.

The Anglesea River estuary holds federal protection as part of the endangered "Assemblage of Species associated with open coast salt-wedge estuaries of western and

central Victoria” under the *EPBC Act*. Actions likely to have significant impacts on this assemblage require federal approval. Southern Rural Water should consider whether the proposed extraction volumes constitute a significant impact.

The *Central and Gippsland Sustainable Water Strategy 2022* aims to reduce reliance on stressed natural systems for water and argues the case for increased use of alternative sources of water. The Corangamite CMA argues that additional groundwater extraction contradicts this objective, potentially further depleting river flows.

Community concerns

The purposes of the *Water Act* include ensuring that:

- social and recreational uses and values of waterways are considered (s1(ea))
- community involvement in the making and implementation of arrangements relating to the use, conservation or management of water resources is maximised (s1(e))
- orderly, equitable and efficient use of water resources are promoted s1(c)
- water corporations encourage and facilitate community involvement in the making and implementation of arrangements relating to the use, conservation and management of water resources s93(e).

SRW as the Minister’s delegate will assess Alcoa’s application for renewal and amendment of its water licence in the context of considerable, widely expressed community concern. Public submissions and speakers at the public hearing held by SRW overwhelmingly opposed granting the renewal and amendment. Community submissions and speakers raised concerns pertinent to multiple matters the Minister must have regard to under section 40 as well as concerns relating to section 1 and the sustainable management principles SRW operates under listed in section 93. These are summarised above for SRW’s consideration in Issues raised and Tables 1, 2 and 3.

Traditional Owner Perspectives

Water is Life (2022) acknowledges the cultural authority of Traditional Owners to speak for water, rivers and river Country within their region. One of the purposes of the *Water Act* is to ensure the consideration of Aboriginal cultural values and uses of waterways (s1(ea)) This is also one of the sustainable management principles for all water corporations (s93(c)).

The Wadawurrung Traditional Owners Aboriginal Corporation (WTOAC) submission emphasised protecting Wadawurrung Country in accordance with Paleert Tjaara Dja, its Country Plan. Waterways were specified as key Country values and water extraction as a key threat, noting the potential from this decision for impacts on plants, animals, breeding cycles, and cultural values. The WTOAC urged consideration of the potential for cumulative impacts of aquifer extraction by both Barwon Water and Alcoa and expressed concern about past exclusion of Traditional Owners from water allocation decisions. The WTOAC also requested that any decision on amending Alcoa’s water licence should eliminate risks to Country.

Multiple submitters (both individual and institutional) supported acting on Wadawurrung advice, using the traditional name Kuarka Dorla for the Anglesea River.

Technical issues

The complex hydrogeology of the Anglesea area has been extensively studied and modelled. Alcoa, the ITPRP, and referral agencies referenced results of these studies in submissions both written and oral. The ITPRP found the groundwater model “*fit for purpose*” as the quantitative basis for the groundwater-related impact assessment.”¹ It was comfortable with order of magnitude comparisons showing natural filling would take approximately 40 years versus approximately 10 years if 1,500 ML/y is extracted.

However, the groundwater model was not designed to directly simulate the processes of acid generation and mobilisation or ecological impacts and these areas of uncertainty were highlighted in the public hearing. The Hearing Panel has been advised that further work is continuing on acid generation risk in parts of the Alluvial Swamp Aquifer (ASA) and a plausible seepage pathway from the top of the pit along the former Lower Salt Creek. Related to the plausible seepage pathway there is also a current lack of understanding of future pit lake water quality. This will be relevant for EPA licensing should the water licence be granted to Alcoa.

Professor Haese, engaged by Friends of the Anglesea River, presented alternative hydrogeological analysis focusing on regional coal seam functioning (see further detail at pages 17 and 19 below). SRW is reviewing this material.

ACID GENERATION RISK

The Anglesea area naturally experiences acid generation when groundwater levels drop during dry periods, causing oxidation of sulfidic sediments. When rain returns, this acidity and associated metals are washed downstream into Salt Creek and the Anglesea River. The ITPRP noted in its draft report that such “climatic drivers dominate the ASA system.”² The key question is whether Alcoa’s proposed groundwater pumping risks augmenting this natural process.

While no drawdown has been observed during deeper aquifer pumping tests (including a 2021 six-month test), the ITPRP review found through fundamental analysis that “there could be a *risk of moderate groundwater drawdown despite the relatively small volume* of the proponent’s proposed groundwater take, which *may be a material acid generation risk*.”³ Modelling suggested that a limited number of areas in the ASA could experience up to 2m of additional drawdown, potentially triggering increased acid generation beyond what occurs naturally. This led the ITPRP to conclude in its draft report that it “*is not confident that the modelled impact of proposed pumping on drawdown in the ASA would not contribute to acid generation* (when compared to natural water table fluctuation).”⁴ This risk was raised by Corangamite CMA in its submission.

The ITPRP considered “that such small to moderate drawdown is not a major concern in terms of the ecological basis for the guidelines for groundwater dependent ecosystems (DELWP 2015a), but is a material concern in terms of potential acid generation”.⁵ Despite Alcoa’s improvements to its modelling and risk assessment following ITPRP

¹Independent Technical Advisory Panel, *Review of Anglesea Groundwater Impact Assessment: Upper Eastern View Formation*, Draft July 2025, p.10, original emphasis. The draft report is yet to be finalised and quotations from it should be understood as provisional.

²*Ibid.*, p.7.

³*Ibid.*, p.11, original emphasis.

⁴*Ibid.*, p.12 and Figure 6, original emphasis.

⁵*Ibid.*, p.11, DEWLP (2015a) is the *Ministerial Guidelines for groundwater licensing and the protection of high value groundwater dependent ecosystems*.

recommendations, the ITPRP considered that “the outcomes reported warrant further clarification to more clearly present and evaluate the risk of additional acid generation associated with drawdown in some areas of the ASA.”⁶ Consequently, the ITPRP recommended “*further clarification of the impact assessment of risks to the environment from acid generation* that is associated with drawdown in the ASA.”⁷

SEEPAGE PATHWAY RISK

The ITPRP identified a plausible seepage path from the filled mine void along the former Lower Salt Creek channel to the Lower Anglesea River. While overflow risk during wet periods is negligible, the ecological consequences remain uncertain due to unknown future pit water quality. While this potential pathway has been modelled, this issue is being further considered.

ECOLOGICAL VALUES

The region supports high ecological values underpinning economic, social, cultural, and recreational activities. The Great Ocean Road Coast and Parks Authority emphasised viewing the mine site as part of an interconnected ecological system including the river, aquifers, and Great Otway National Park.

Over 25 years, the river and estuary have experienced declining flows, fish kills, and acidification. While acid sulphate soils and climate change are recognised drivers, potential additional impacts from pumping concern many submitters.

The ITPRP expressed particular concern about two permanent pools in the ASA with high ecological value. Evidence supporting claims these pools are disconnected from the aquifer (such as water isotope analysis) was not identified, raising questions about their vulnerability as refugia.⁸

Interim water quality targets for the mine water body may not be achievable within the 10-year timeframe due to incomplete water quality data and inadequate geochemical modeling. The EPA confirmed it cannot assess potential impacts without additional geochemical studies of pit walls, the pit lake, and surrounding waters.

MONITORING AND MANAGEMENT FRAMEWORK

Should Alcoa’s licence be amended, comprehensive monitoring and management plans are essential. While a monitoring plan is under development, the ITPRP notes that it requires additional focus on the ASA and development of pumping cessation triggers.

The Corangamite CMA noted that pumping impacts may not manifest for extended periods and may persist after pumping ceases. They advocate for a jointly developed, peer-reviewed framework to address Alcoa and Barwon Water extraction risks.

Barwon Water emphasised that monitoring arrangements should provide equivalent protections to those in their Bulk Entitlement and enable attribution of any impacts to specific extraction sources. Engagement of both agencies in reviewing monitoring plans would be beneficial.

The EPA recommended expanding monitoring sites to better capture background conditions for developing appropriate water quality targets.

⁶*Ibid.*, p.11.

⁷*Ibid.*, p.9, original emphasis.

⁸*Ibid.*, p.15.

Appendix A – Detailed submissions

An overview of the content of detailed submissions

Just under one quarter of the submissions provide a detailed perspective that does not follow the campaign submission format. Submissions that stand out for their specific perspectives and detail provided include:

- *Friends of Anglesea River*: several submissions including:
 - A detailed submission from the Friends of Anglesea River arguing that Southern Rural Water should refuse Alcoa’s application because the proposal conflicts with the *Water Act 1989*’s purposes and section 40 matters: it would reduce the availability of water for environmental flows, further degrade water quality (including by activating acid-sulfate soils), pose adverse effects on aquifers and the Anglesea River and its EPBC-listed salt-wedge estuary, and lacks a beneficial public purpose; the submission cites strong community opposition (1,635 petition signatories), impacts on recreation and tourism, Traditional Owner cultural values, cumulative and long-term risks under a drying climate, acknowledged knowledge gaps in Alcoa’s assessments, and the relevance of Southern Rural Water’s 2022 refusal to extend Alcoa’s licence to test pump the UEVF as precedent, concluding that sustainable recovery of the aquifer and river should be prioritised over private pit-filling.
 - A discussion paper authored by Prof. Ralf Haese, Richard O’Hanlon and Keith Ship-ton arguing that the Anglesea River’s decline—now marked by sustained acidity in the estuary and a near-tenfold reduction in Salt Creek flows since the 1960s–70s—is not explained by rainfall trends but by mine-era groundwater abstraction from the UEVF that created a cone of depression, dewatered and increased the permeability of a regional coal seam that once acted as an aquitard, shifted swamps from a stable unconfined system to perched, loss-prone aquifers, reduced baseflows, and left acidic pulses from acid-sulfate soils less diluted; it presents monitoring evidence (pH records since 2010 showing persistent low values; flow records contrasting pre-1982 and post-2010) and rainfall analyses showing no comparable long-term drying (see figures on pp. 2–5), proposes a hydrogeologic mechanism (figures on pp. 11–12), and recommends halting further extraction while undertaking targeted well tests and an integrated groundwater model, with independent expert oversight, to diagnose causes and evaluate remediation options. (Several other submissions also attached this discussion paper and at least 16 submissions referenced it directly.)

- *A letter from Environmental Justice Australia* (for Friends of Anglesea River) urges Southern Rural Water to refuse Alcoa’s proposed renewal and amendment to “take and use” groundwater to fill the Anglesea mine void, contending that a large extraction (1,500 ML/y) would be inconsistent with the *Water Act 1989*’s purposes (s 1), the mandatory considerations (s 40(1)—availability and quality, adverse effects on aquifers and waterways, environmental water reserve, and equity among applicants), and the sustainable management principles (s 93); the paper relies on VCAT/Supreme Court decisions (Alanvale 2010; Castle 2008; Cox 2009; Niebieski Zamek 2001; Peninsula Hot Springs 2017) to prioritise conservation and long-term sustainability, highlights likely environmental harms (river diversions, reduced tributary flows, activation of acid-sulfate soils), and invokes the precautionary principle to prefer refusal where impacts cannot be confidently ruled out.
- *An audiovisual presentation* prepared by Christina DeWater and Tanya Wilson highlighting the ecological values of the Anglesea River and catchment and their importance to the Anglesea community.
- *A petition of 1,635 signatures* collected by the Friends in opposition to Alcoa’s proposed licence renewal and amendment.
- *Jessica Stewart* provided a submission and article from *Landscape Australia*, both opposing Alcoa’s bid to amend its groundwater-pumping licence because, in her view, decades of pumping from the UEVF have dropped groundwater from near the surface to $\approx 70\text{m}$ below sea level, driving acid-sulfate soil activation and degrading groundwater-dependent ecosystems and community use of the river. Ms Stewart refers to an interview with long-term Anglesea resident, Bill Bubb, who recalls that before the mine, “there were many springs and pools right throughout [the Anglesea River catchment] and even some within the town area.” She notes that shifting baselines have normalised the damage done to the river and catchment since the start of mine operations. Ms Stewart also argues that the proposed pit lake would be inaccessible, acidic and fenced-off rather than a community asset and urges Southern Rural Water to “Dump the Pump” so the aquifer and river can recover.
- *Richard O’Hanlon’s* submissions and the accompanying oral history argue that renewing Alcoa’s UEV take would impede catchment recovery and run against the *Water Act*’s decision-making duties: it would defer the return of baseflows and swamp levels, prolong activation of acid-sulfate processes and estuary acidity, and introduce avoidable risks (mobilised contaminants, seawater ingress). His second submission frames these harms squarely against s40 factors—availability and quality of water, effects on waterways and aquifers, and equity for other users—contending the balance should fall against further extraction and for rehabilitation that restores higher flows and more frequent bar openings. The first submission marshals observed change: a step-change decline in Salt Creek discharge (average $\approx 3,175\text{ ML/y}$ in 1968–82 to $\approx 466\text{ ML/y}$ in 2009–17, with far more no-flow days) and a >3 -year low-pH episode from 2019–2022 with no fish observed and public health warnings, which he links to the cone of depression and hydraulic connectivity between perched systems and the UEV (likely exacerbated by legacy bores), rather than rainfall trends. The oral history provides grounded corroboration: a once deep, fish-rich estuary with abundant springs and pools across the lower Salt and Marshy catchments; “blue” acid events noticed only from the 1990s; and engineering works (Coogoorah channels, the since-removed mouth weir) that altered—but never replaced—the estuary’s need for strong freshwater flushing.
- *Keith Shipton* made two submissions. In the first, he argues that resuming UEV-aquifer pumping would further depress catchment flows and prolong acid mobilisation, compounding harm to the EPBC-listed “assemblages of species associated with

open-coast salt-wedge estuaries” at Anglesea; he says Alcoa’s GIA offers no flora–fauna baseline or impact modelling, points to Barwon Water monitoring showing declines (including five consecutive years without Southern Pygmy Perch at a Breakfast Creek site), and contends SRW risks enabling a breach of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) if it licenses pumping while the cone of depression persists and the pit continues to remove habitat within a hydraulically connected system. In his second submission, he challenges Alcoa’s claim of strong community support, documenting feedback that calls for a “no risk” (not “low risk”) threshold, prefers natural filling over pumping, questions the previously proposed Eden Project’s benefits and impacts, and criticises technical communication and the lapse of the Community Consultation Network since February 2020; he cites 1,253 online and 385 hard-copy signatures on the local “Dump the Pump” petition as evidence of opposition.

- *Prof. Ralf Haese*’s submission includes his discussion paper and argues that Alcoa’s proposal to extract 1,500 ML/y from the UEVF to accelerate pit lake filling cuts across the Water Act’s decision factors: it would reduce the existing and projected availability of water, degrade water quality, and have adverse effects on waterways, aquifers and the drainage regime (s40(1)(b)–(d)). His case ties decades of abstraction to a region-wide depression of groundwater heads and a 90% fall in Salt Creek flows, which, together with the loss of dilution and frequent bar openings, shifts the estuary from short-lived to multi-year acid conditions—outcomes pumping would prolong rather than remedy. He further invokes s40(1)(g) (protection of the riverine and riparian environment) and s40(1)(l) (purpose of use) to contend that using a stressed aquifer to create a fenced, acidic pit lake offers no credible public purpose when compared with allowing recovery of artesian conditions, swamps and surface flows. The remedy he advances is straightforward: cease groundwater production so the system can recover as quickly as possible.
- *Eco-Logic Education & Environment Services* submitting on behalf of a group of Local Camp Managers, Licensed Activity Providers, and Aquatic Equipment Operators submitted that Local tourism operators, camp managers, and outdoor educators formally oppose Alcoa’s application to resume groundwater extraction from the UEVF, citing significant risks to the Anglesea River’s \$10+ million annual recreation and education economy (supporting 160+ direct jobs and 40,000+ camp bed nights), documented environmental damage from previous extraction (1976–2015) including 70-metre water table drops, toxic algal blooms and fish kills, the river’s recent ecological recovery since pumping ceased, and concerns that using precious groundwater to fill the mine void represents a misuse of public water resources that could result in an acidic, unusable lake rather than serving community and environmental needs.
- *Friends of Anglesea Acidic Lake (FoAAL)*, a collective of 61 community members led by local artist Pattie Beerens, opposes Alcoa’s groundwater extraction application, arguing that corporate expedience is not sufficient justification for further environmental extraction, Alcoa has no positive vision for the acidic lake (proposing it remain fenced, uninhabited, and inaccessible), groundwater is precious and should be preserved for community and environmental needs, and the site—formerly a rainforest on Wadawurrung Country with unique Eocene fossil deposits—deserves care rather than manipulation; the submission is richly illustrated with photos documenting community art projects since 2022 (including a fabric mural painted with earth pigments depicting the mine site), circumnavigation walks, site tours, and exhibitions aimed at reconnecting the community with this significant but fenced-off landscape that they believe should be allowed to heal naturally rather than being filled rapidly with extracted groundwater.

- *Australian Institute of Landscape Architects (Victoria)*’s submission urges SRW to reject Alcoa’s application, arguing the proposal conflicts with the *Water Act*’s purposes and s40 matters, risks further harm to a degraded estuary and groundwater-dependent ecosystems, and undermines community, cultural and recreational values; instead, AILA backs “fit-for-purpose” recycled water (pointing to Barwon Water’s Alternative Water Grid and the Anglesea ocean outfall, which together far exceed the volume sought) and a landscape-led rehabilitation that restores hydrology, habitats and access, with Traditional Owner decision-making central; the paper cites threatened species and the catchment’s high habitat value, notes recent fish kills and acid-sulfate risks, and contends there is both policy inconsistency (*Environment Protection Act 2017* (Vic), *Flora and Fauna Guarantee Act 1988* (Vic), *Catchment and Land Protection Act 1994* (Vic), *Environment Protection and Biodiversity Conservation Act 1999* (Cth)) and a viable, precedent-backed design pathway for post-extraction sites (e.g., Brickpit Ring Walk) that avoids further groundwater drawdown. AILA’s final position is succinct: oppose groundwater pumping, use recycled water, and deliver integrated, regenerative outcomes for the river, aquifer and community.
- *Dr. David Foster* objects to Alcoa’s application, arguing it’s misleadingly framed as a “reduction” when it’s actually a new application (from zero) solely to minimise rehabilitation costs by creating a water body instead of the originally planned earthworks; he cites a 2019 FOI document showing the pit will lose ≈ 1000 ML/y to evaporation/seepage making it impossible to fill with the requested amount, leading to inevitable future requests for more extraction or costly recycled water (\$43.5m); notes the Eden Project doesn’t require a water body and could be located anywhere, no long-term management plan exists for the permanent lake, the original 2011–2014 rehabilitation plan proposed using earthworks without water, the area contains critically endangered species (New Holland Mouse) and rare fish (Spotted Galaxias, Southern Pygmy Perch) in nationally significant ecosystems that would be put at risk, and Alcoa’s “consultation” consisted of one-way information sessions rather than genuine community engagement, making their claims of community support baseless.
- *Tanya Wilson* objects to Alcoa’s application, arguing that Alcoa has failed to demonstrate any compelling reason to fill the mine pit beyond aesthetics, noting Alcoa’s own assessment admits the water body will not provide environmental values or recreational use (only “visual appearance and bird watching from afar”); she emphasises that Anglesea already has rich biodiversity with 100+ bird species recorded in 2025 alone per eBird data, highlights the critical importance of groundwater-dependent ecosystems that invisibly support all life along the river, questions Alcoa’s unsubstantiated economic claims about the Eden Project as justification, and argues the economic value of leaving groundwater in place to perform its natural ecosystem functions far exceeds any benefit from extraction; she attended Alcoa’s consultation sessions where representatives could not answer her basic question about why the pit needs filling, concluding that the onus should be on Alcoa to demonstrate overwhelming benefit rather than on the community to prove potential harm, and urges authorities to take a “wide boundary and long view” favoring restraint over action given the irreversible risks to interconnected water systems.
- *David Birrell* opposes Alcoa’s bid to amend its groundwater licence, arguing it conflicts with the *Water Act*’s purposes (conservation, orderly and efficient use, and recognition of Aboriginal cultural, social and recreational values) and with SRW’s remit, noting the licence would now serve a different, post-mining purpose and is being driven by commercial opportunism rather than rehabilitation (including pressure from the Eden Project and a preference to use the aquifer rather than fund recycled-water

infrastructure); he contrasts this with Alcoa’s earlier plans that favoured natural replenishment via Salt Creek rather than groundwater intrusion, cites independent analysis linking decades of pumping to ecological decline and rejects climate-only explanations, points to strong community opposition (including an 80% “not support” survey result), and warns that granting the licence would jeopardise an environmentally based local tourism economy—hence his request that SRW refuse the application.

- The *Surfrider Foundation* argued that the *Mines (Aluminium Agreement) Act 1961* may not cover mine rehabilitation through groundwater extraction, and that leaving an acidic lake fails to meet the *Minerals Resources (Sustainable Development) Act 1990* requirements for safe, stable, and sustainable rehabilitation. The submission emphasised sections 40(1)(b), (c), (g), (k), and (l) of the *Water Act* and cited multiple policies including the *Marine and Coastal Policy* and the *Corangamite CMA Estuary Management Plan 2012–2020*. It detailed ecological impacts including altered catchment runoff, reduced flows, disrupted frog breeding, waterbird habitat changes, decreased sea-grass, and increased algal blooms. These were linked to economic consequences from poor water quality deterring school visits, recreational fishing, boat hire, and market attendance. The submission argued that Alcoa benefits from using groundwater for its Mine Closure Plan while the community bears ongoing impacts, proposing recycled water from Black Rock Treatment Plant as an alternative.
- *Angair (Anglesea, Aireys Inlet Society for the Protection of Flora and Fauna)* supports amending the licence to allow Alcoa to pump from the UEVF aquifer to fill the mine void to a nominated safe level over 10 years. Angair note their position is grounded in an assessment of available evidence with an acknowledgement that views in the community diverge. The submission sets the hydrological and ecological context: historically the lower Anglesea River functioned more like a wetland with periodic flows; during mining (1960s–2015) ≈ 4.5 ML/day of treated water artificially smoothed variability; legacy interventions (e.g., Coogoorah Park) and exposure of acid-sulphate soils have contributed to acidity problems; drying of the perched aquifer during the Millennium Drought and recent dry periods further stressed wetlands. Angair notes that fish kills and algal blooms correlate with higher catchment flows that mobilise acidity and metals, while periodic seawater inflow can be beneficial; climate change is expected to intensify dry spells, heavy rainfall and bushfire risk, reinforcing these dynamics. Angair argues that there is substantial evidence for limited connection between the shallow perched system and the deeper, largely confined UEV aquifer; visible leakage from the perched system into the pit would cease once the void is full. On risk, Angair cites an updated model (with Barwon Water) assessing low risk from extraction and compares the benefits of accelerated filling—earlier public use, potential treated releases to support river management, firefighting resource—against a “do-nothing” path that prolongs acid-sulphate risks and depresses river flows over 40–100 years. Angair recommends any approval proceed with rigorous, independent monitoring and binding triggers to halt if adverse impacts emerge, within an active, day-to-day management plan funded by Alcoa as the proponent.

Appendix B – Public Hearing

Table 5: Hearing Schedule

Time	Speaker	Representing	Duration
Hearing opens			
10:00am	Jennifer Fraser & Rod Marsh	Panel – Hearing purpose and rules	10 min
	Warren Sharp & Chris Smitt	Alcoa – application overview	40 min
	Hugh Middlemis	Independent Technical Peer Review Panel	20 min
11:10am	<i>Break</i>		
Group 1 Speakers			
11:15am	Richard O'Hanlon	Friends of the Anglesea River	10 min
	No speaker		5 min
	Julie Dingle	Friends of the Anglesea River	5 min
	Chris Pike	Surf Coast Shire Council	10 min
	Christina DeWaters	Friends of the Anglesea River	5 min
	Ralf Haese	Friends of the Anglesea River	15 min
	Nathan Shammer	SeaEarth Adventures	5 min
12:35pm	<i>Break – lunch</i>		
Group 2 Speakers			
1:05pm	Jennifer Fraser & Rod Marsh		5 min
	Pattie Bereens	Friends of the Anglesea Acid Lake	10 min
	Ben Schokman	Friends of the Anglesea River	10 min
	Darren Noyes–Brown	Surfriders Foundation Anglesea Branch	5 min
	Daniel Cato	Friends of the Anglesea River	5 min
	Tania Wilson	Friends of the Anglesea River	5 min
	Keith Shipton	Friends of the Anglesea River	10 min
2:25pm	<i>Break</i>		10 min
Group 3 Speakers			
2:30pm	Jennifer Fraser & Rod Marsh		5 min
	David Foster	Individual	10 min
	Regina Gleeson	Ecologic Education & Environment Services	10 min
	Ross Wissing	Australian Institute of Landscape Architects	5 min
	Jessica Stewart	Individual	5 min
	Harry Menzies	Friends of the Anglesea River	10 min
	Jennifer Fraser & Rod Marsh		10 min
3:45pm	Hearing closes		

Appendix C – List of submitters

Table 6: Number of submissions (Sub) by name

Name	Sub	Name	Sub	Name	Sub
Aaron Tyack	1	Friends of Anglesea River ^b	5	Michael Collins	1
Adam Gangoiti	1	Friends of the Barwon	1	Mitch Pope	1
Alanna Ricardo	1	Gabrielle Fanning	1	Monica Esmond	1
Aleisja Henry	1	Geelong Environment Council ^b	1	Nan McNab	1
Alex Baird	1	Georgia Lennon	1	Naomi Lambie	1
Alexander Shaw	1	Georgia Radley	2	Nick Day	1
Alison McRoberts	1	Gill Hutchison	1	Nick Helliwell	1
Amy Scott	1	Glenn Bouckley	1	Nina Atkinson	1
Angair Inc	1	Great Ocean Road Coast and Parks Authority	1	Patricia Dressel	1
Angela Gibson	1	Harry Menzies	1	Patrick Bongiorno	1
Anna Landale	1	Hayley Does	1	Pattie Beerens	1
Annie Davis	1	Helen Booth	1	Peter Forster	1
Ashlee Cunningham	1	Ian Laging and Helen Berthelsen	1	Peter Harrington	1
Ashleigh Falconer	1	Ian Ricardo	1	Peter Mackintosh and Paul Beattie	1
Australian Institute of Landscape Architects (Vic)	1	Isabelle Gardy	1	Philip Warne	1
Bart and Margaret De Vries	1	Issy Mildenhall	1	Phoebe Crockett	1
Barwon Water	1	Ivy Craw	1	Pru Gell	1
Ben Schokman	1	James Bailey	1	Ralf Haese	1
Bernadette Lipson	1	Jan Calaby	1	Resources Victoria	1
Bridie Cotter	1	Jane Rafe	1	Richard O’Hanlon	4
Bronte Norris	1	Jasmine Cooper Sutton	1	Ron Hurst	1
Bruce Phillips	1	Jeff Harding	1	Ross Harrison	1
Bryony Callander	1	Jenny Bradshaw	1	Ruby Dingle	1
Cameron Mcrae	1	Jessica Stewart	1	Sally Groom	1

Continued on next page

Table 6: Number of submissions by name (continued)

Name	Sub	Name	Sub	Name	Sub
Carlo Maye	1	Jo Hernon	1	Sarah Treacy	1
Catherine Mackintosh	1	Jodie Oliver	1	Scarlet Sykes	1
Catherine Merry	1	John McIntyre	1	Hesterman	
Cathy Mulligan	1	Jonathan Chapman	1	Sean Andrews	1
Charlotte Allen	1	Julie Butler	1	Simon Dunn	1
Christina de Water	1	Julie Spowart	1	Simone Shaw	1
Christine Ferguson	1	Justin Marriott	1	Skye Hueneke	1
Corangamite CMA	1	Katelyn Dooley	1	Sonya Zwolinski	1
Damian West	1	Kathleen Scholtes	1	Sophie Stewart	1
Daniel Cato	1	Keith Shipton	3	Southern Rural Water	1
Daniel Hercott	1	Ken Shannon	1	Stephanie Main	1
Dave Kelman	1	Kerri Stuart	1	Stuart Spark	1
David Birrell	1	Kim Andrewartha	1	Surf Coast Shire Council	1
David Foster	1	Kylee Hattwell	1	Surfrider Foundation Australia ^b	2
Denis Johnston	1	Lachy Gibson	1	Susan Sullivan	1
Di and David Foster	1	Laurie Caulfield	1	Suzanne and William Jennings	1
Duncan Strachan	1	Leah Ashe	1	Suzanne Cavanagh	1
Dylan Westaway	1	Leanne den Ouden	1	Tanya Wilson	2
Eco-Logic Education ^a	1	Leon Fitzgerald	1	Tarryn O’Leary	2
Elissa Keogh	1	Lily Tait	1	Terri and Michael Troup	1
Elizabeth Wood	1	Lorraine and Phil Warne	1	Tess Oliver	1
Ella Dean	1	Louise McRoberts	1	The River Basin Management Society	1
Ella Sweeney	1	Lukian Adams	1	Trevor Mildenhall	1
Ella Wilkinson	1	Lynne Hume	2	Trevor Morris	1
Emma Fenty	1	Margaret Knight	2	Trish Morgan	1
Environmental Justice Australia	1	Margot Smith	1	Victor Komarovsky	1
Environment Protection Authority	1	Mark Foster	1	Victoriana Gaye	1
Finn Day	1	Mark Pelar	1	Viv Gugger	1
Fiona Armstrong	1	Megan Jacobs	1	Wadawurrung Traditional Owners Aboriginal Corporation	1
Frances Overmars	1	Melissa Mohr	1	Wendy Stainton and Garry Cartony	1
				Willow Townsend	1
				Zoe Foster	1
				Zoe Nash	1

^a On behalf of Local Camp Managers, Licensed Activity Providers, and Aquatic Equipment Operators^b Individuals who made submissions on behalf of these organisations have also been listed here. This will cause duplication if submission numbers are added to make a total.