



**Central Australian
Aboriginal Congress**
ABORIGINAL CORPORATION | ICN 7823

24 November 2022

Northern Territory Department of Environment, Parks and Water Security
Goyder Centre
25 Chung Wah Terrace
PALMERSTON NT 0830

By email: WaterSecurity.ntg@nt.gov.au

RE: RESPONSE TO THE DRAFT TERRITORY WATER PLAN

Dear Sir / Madam,

On behalf of Central Australian Aboriginal Congress (Congress), thank you for the opportunity to comment on the draft Territory Water Plan. Please accept this letter as a submission to your consultation process on the draft Plan.

As you may know, Congress is a large Aboriginal Community Controlled Health Service (ACCHS) based in Alice Springs. We deliver services to more than 17,000 Aboriginal people living in Alice Springs and remote communities across Central Australia including Ltyentye Apurte (Santa Teresa), Ntaria (Hermannsburg), Wallace Rockhole, Utju (Areyonga), Mutitjulu and Amoonguna.

Since the 1970s, Congress has developed a comprehensive model of primary health care that includes multidisciplinary clinical care; health promotion and disease prevention programs; and action on the social, cultural, economic and political determinants of health and wellbeing. This has included advocacy on the provision of clean and safe drinking water to all Territorians as a foundation of good health.

We have supported a four-point plan for delivering on this fundamental right for all people in the Northern Territory, especially those in remote Aboriginal communities:

1. The development of a NT Safe Drinking Water Act to provide clear lines of accountability for the supply of safe and adequate drinking water.
2. The creation of a Territory Water Commission to act as an independent authority addressing water security, allocation and planning.
3. The development of a comprehensive, enforceable, overarching policy that clearly delineates departmental responsibilities in water and ensures greater collaboration between those departments.
4. The integration of climate change variability and uncertainty into water planning processes and drinking water supply.

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**Aboriginal health
in Aboriginal hands.**

We are pleased to see that the draft Plan addresses these points. We particularly welcome the specific commitments and timeframes for:

- establishing a Strategic Water Advisory Council on water security to ensure Territorians have a voice on strategic water issues (by 2023)
- improving water security for remote communities, by delivering water information forums in priority communities (from 2023) and developing and publishing a regional and remote community water infrastructure priority list (from 2024)
- introducing safe drinking water legislation (by 2024)
- delivering a Territory-wide climate risk assessment and adaptation plan for water security (by 2024)
- developing new legislation to replace the Water Act 1992 (NT), providing a contemporary regulatory regime for water resource management (by 2026)

We will be following the implementation of these important reforms closely. In the meantime, we have three issues which we would like to see addressed more explicitly in the draft Territory Water Plan to include a greater emphasis on drinking water quality and security as a health issue.

1. Enforcing drinking water standards. We appreciate the draft Plan's commitment to ensuring that all Territorians have safe drinking water with secure supply. However, we would like a specific commitment to the effect that the NT government will ensure the provision of safe and potable drinking water for all Territorians, including those living in remote communities on Aboriginal land. This could be done by ensuring that the new safe drinking water legislation prescribes:

- consistent and enforceable minimum safe drinking water standards;
- clear lines of responsibility to guarantee the supply of drinking water that meets these standards in all Aboriginal communities, whatever their land tenure arrangements; and
- reporting requirements, including annual reports to the Northern Territory Aboriginal Health Forum detailing water quality testing regime and outcomes at all significant Aboriginal communities, and identification of key risks and priorities.

2. A greater focus on the health risks posed by climate change as it affects drinking water supply and quality. We attach our submission to the Northern Territory Government on the development of a *Northern Territory Climate Change Strategy* (2018) which contains a more detailed analysis of this issue. In particular, we believe that the draft Territory Water Plan needs to explicitly acknowledge the significant risks to both water quality and to increased greenhouse gas emissions posed by Hydraulic Fracturing ('fracking') in the Northern Territory.

3. Water quality and kidney disease. There is accumulating evidence from around the world of an association between poor quality drinking water and the development of renal disease especially where there is a high concentration of heavy metals in the

water especially, in the NT context, uranium made soluble by nitrates¹. We understand that there is research being carried out by the Menzies School of Health Research into this issue. Given high levels of concern in the Aboriginal community and the high and rising rates of renal disease, we suggest that the issue be specifically identified as a matter for research investment in the draft Plan.

Thank you for your consideration of these important issues. I would be very happy to discuss them should you wish. In the meantime, please contact Congress' Public Health Medical Officer, Dr John Boffa on 0418 812 141 or john.boffa@caac.org.au if you would like more detail on the matters raised here.

Yours sincerely



Donna Ah Chee
Chief Executive Officer

cc: John Paterson, CEO, Aboriginal Medical Services Alliance Northern Territory
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¹ Wasana HM, Aluthpatabendi D, et al *Drinking water quality and chronic kidney disease of unknown etiology (CKDu): synergic effects of fluoride, cadmium and hardness of water*. Environ Geochem Health. 2016 Feb;38(1):157-68.; Chang KY, Wu IW, et al. *Associations between Water Quality Measures and Chronic Kidney Disease Prevalence in Taiwan*. Int J Environ Res Public Health. 2018 Dec 3;15(12):2726.