

I've had a detailed read of the draft SEPP (Waters) and it looks quite good, however I think consideration should be given to separately dealing with perched groundwater, as currently it is treated the same as groundwater within regional aquifers. Perhaps a definition could be included for *Shallow Perched Groundwater* and provisions be made for the protection of relevant beneficial uses only, such as:

- Water dependent ecosystems and species
- Water based recreation (primary contact recreation)
- Traditional Owners' and Aboriginal Victorians' cultural values
- Cultural and spiritual values
- Buildings and structures

A new segment for *Shallow Perched Groundwater* (or similar) could be added to Table 2, or a Table of exclusions for groundwater (like Table 5 for surface water) be added referencing perched groundwater.

Alternatively, reference to the authority determining some beneficial uses do not apply for perched water could be added to Clause 15(2).

Happy to talk through my suggestion if you like.

Regards

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