Lower Limestone Coast Water Allocation Plan
Stakeholder Advisory Group
Minutes

Meeting No. 6, 17 October 2024, 10:30 – 3:30 pm

Chardonnay Lodge, Coonawarra

Objectives

- Check in on progress of the amendment process and next steps.
- Revisit guiding principles for the revised Plan to further refine.
- Provide an update on progress of the water market study (deferred from Meeting 5).
- Revisit the process to work through acceptable impact and adaptive management.

Attendees:

Group Attendees – Penny Schulz (Chair), Pete Bissell (Chair), Alan Rossouw, Belinda Williamson, Claire Harding, Claire Davies, Graeme Hamilton, Kerry DeGaris, Kylie Boston, Peter Balnaves, Terry Buckley, Melissa Herpich (Teams, until 2 pm), Darren Shelden, Simon Sherriff (Teams, until 3 pm).

Staff Attendees – Liz Perkins, Sue Botting, Chelsea Burns

Apologies – James Prescott, Wayne Hancock, Ryan Judd

Welcome and agenda

The Chairs welcomed everyone and thanked Group members and staff for their attendance and gave an acknowledgement of country.

Agenda Check Discussion

Nil

Minutes

Discussion:

- At meeting 5 there was some discussion on industrial purpose of use and confirming that the relevant class would apply to both the confined and unconfined aquifer. Also confirmed that the current proposal is no additional class 2 water would be made available. Confirmation that any new purposes such as mining would need to source water on the market.
- Iron bacteria was discussed. Suggestion that some technical input may be needed as it is a complicated issue. There are two different things when we talk of iron bacteria, what some people think is iron bacteria isn't. Limestone Coast Grape and Wine Council did some research on this and could speak to it. Deepening of bores is increasing the instance of iron bacteria.
- Guiding principle discussion was listed in agenda check and actions but did not fully capture discussion. It was requested that minutes be amended to include more wording on what was discussed.
- Requested a change to the minutes, discussion wasn't around decommissioning of drains, but around the management of them.

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- The point around people not being interested in the changes proposed was specific to changes to management zones. Requested an amendment to the minutes.
- The request for a session on drains should be added as an action. Request to amend action list.
- Request typo of salutation/solution be fixed.
- Simon Sherriff, missing from attendees, minutes to be amended.
- A point missing from adaptive management discussion. Whether adaptive management impacts allocation or use. Requested a carefully worded sentence be added.

Minutes from Meeting 5 were confirmed as true and correct with amendments.
Moved by: Terry Buckley. Seconded by: Alan Rossouw. All were in favour.

Unpacking the amendment process

Liz Perkins and Sue Botting provided a check in of the amendment process so far and next steps.

Discussion:

- The Province 2 subregional groundwater model report is now publicly available. It has been placed on the Group's page. Regional confined and unconfined groundwater model is completed. It is expected to be made public in 2025.
- South Coast, Mid-South East and Province 2 groundwater models have been developed and published. These will be used to apply the additional scenarios which are currently being run, as opposed to waiting for the regional models to be finished.
- A consideration in the Province 2 groundwater model is the presence of runaway holes. These can be naturally occurring or installed/constructed. Poocher Swamp in Tatiara Prescribed Wells Area is a good example of a naturally occurring runaway hole. Province 2 groundwater model includes a portion across the border into Victoria which will be beneficial for the Border Groundwater Agreement and could be requested to be used by Victoria.
- There are several projects occurring around groundwater dependent ecosystems. Work on stygofauna is identified as a project to be progressed. Stygofauna are micro crustaceans within the aquifer that need to live in water, they are groundwater dependent. Previous survey of stygofauna in region occurred over 15 or 20 years ago. We don't have a good understanding of their function in groundwater. As a groundwater dependent ecosystem we know very little about them, even less so about near shore environments.
- Members raised how far are we going with wetlands? We need to specify at some stage about which wetlands we accept are lost or different, or to be kept.
- Understanding the impact of water decline on water quality is going to be really important in determining acceptable impact. Where we don't have enough information available to make decisions, we need to identify those knowledge gaps and determine how we will manage that.
- Resource condition triggers and ecological thresholds based on acceptable impact/adaptive management would be very complex if at management zone level. The aim for the revised Plan would be to have those triggers and thresholds determined as to when adaptive management actions are relevant. Can be at small- or large-scale, dependant on the acceptable impact.
- The baseline for groundwater dependent ecosystems has changed significantly over time, both before and after the Millennium drought. We need to acknowledge that we will not get back what we have had historically, pre-Millenium drought. With a new baseline we are

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accepting that we are moving forward with a significantly reduced ecological resource. This could be captured in a guiding principle around that we have already accepted a huge ecological loss in the region over the past 20 or so years.

- General discussion on challenges around access to mywater. Some have been contacted due to prioritisation of getting SPR frost into mywater system. There is still much to happen in terms of onboarding licence holders.
- In terms of assessing the capacity of the resource to provide hydrological needs, is this referring to the hydrologic needs of groundwater dependent ecosystems and then how this could be addressed moving forward. It could also mean acknowledging past management decisions that may have been detrimental or need to be amended. Example provided was around setbacks to wetlands in the current Plan. Some of these perhaps needed to be more but we didn't have that knowledge at the time. Due to new knowledge we can now reflect that the previous setback was insufficient and then that would inform policy moving forward.
- Forestry water entitlement legislative inconsistency is continuing to be pursued by the LC Landscape Board through DEW. Currently listed as one of the priorities through the review of the *Landscape South Australia Act 2019* led by John Hill. The list of priorities in this review is publicly available. The LC Landscape Board is ensuring that the forestry water entitlement recommendation is pursued in a timely manner so as to not disrupt or delay the current LLC Water Allocation Plan amendment process.
- It was raised that alignment to legislation and policy needs to also reflect State Government Critical Human Water Needs Policy (Water Security Statement), EPBC requirements for Ramsar, migratory species and threatened species, including international treaty obligations for the states and territories and EPA.
- Economic impact is considered separate/different to industry impact and this should be added to key concept slide. Industry impact is more specific to individual industries whereas economic impact is more a broader regional impact.
- Rural living expansion terminology used in presentation may need to be updated or removed, rural living is a very specific term in planning. Likely land use change covers the intent. Minister has a current position that there is to be no development code amendments for rural living expansion. Some existing areas which are already established may experience population growth but could be public water supply or stock and domestic. SA Water response to public water supply needs both now and for the life of the plan may partially address some of these considerations.
- Member queried whether dates for the next 6 months could be locked in.
- Raised that it would be beneficial to share the process and timelines slides through the Limestone Coast Water Steering Committee for DEW and PIRSA to have forward planning knowledge of process with the aim of a timely response at the relevant parts of the process.
- The process may have felt a little convoluted to date but there needed to be a base level of knowledge of lots of different focus areas in order to be able to move forward to some of the more critical discussions. We will keep coming back to these timelines and tweak as we need to as we go along.
- Political influence and industry advocacy will continue to be an external influence on the process. Advocacy is challenging as it is often imbalanced or can be factually incorrect and requires significant response. Acknowledge that industry advocacy is important and expected, the challenge can often be in misinformation or direction of the advocacy (i.e. to media or Ministers without contact with the LC Landscape Board first).

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Guiding Principles

Liz Perkins facilitated a discussion on draft guiding principles for the Group to consider.

Discussion:

- Forestry industry has been working through a process to develop its own guiding principles which are being considered at a forestry board level. They are currently confidential so can't be provided but there are a number of consistencies across forestry principles and the draft guiding principles.
- Guiding principles are what we are working towards in our approach, our intent, can be aspirational, not necessarily a commitment or goal of what we can achieve right now.
- It was noted the Group were not making a recommendation about the guiding principles and it should not be assumed that the Group has agreed to these guiding principles.
- Use of terminology for best available science vs knowledge. Knowledge is more all-encompassing as there is additional considerations. There is no specific principle which refers to new knowledge. This is more the mechanics of how we will get to the principles we are aiming for.
- In a region that supports significant ecological and natural assets, the use of 'environment' may not be strong enough in the principles to cover this off. Some members would like to see an additional principle around groundwater dependent ecosystems starting with 'protects'.
- Change cultural to First Nations cultural needs. Does this sufficiently cover off on economic opportunities and engagement with First Nations. It needs to come from First Nations engagement but could need to add a piece around the contemporary needs (i.e. economic needs) of First Nations as well as traditional.
- In regard to the first draft guiding principle, what is the definition of sustainable and is it more about availability. At some point a need to define sustainable.
- Discussion of the number of guiding principle and opportunities to simplify or reduce number of guiding principles.
- Discussion around the inclusion of innovation and efficiencies. Some viewed it could be removed, others saw it important to keep in. The Act does refer to 'efficiencies' which is why it was initially drafted. It was noted that it could include things that may be developed later in the Plan's lifetime, such as desalination or MAR, this needs to be covered in principles now. Discussion around the current Plan with different perspectives on whether it supported efficiencies or not.
- Current plan talks about the 'precautionary approach' to the confined aquifer due to the non-renewable nature of the confined. More clarity needed in guiding principle on what precautionary means.
- Important to get the 'equitable' principle right. Is it uses, or users? Licence holders? Other wording suggestions included: *No individual consumptive or water uses are disproportionately impacted in the allocation of water resources*. The words transparency and fairness were also suggested. Likely to be differing views on this particular principle. Inherent difficulties in having equitable water treatment on metered vs non-metered consumptive uses. Very hard to achieve equitable treatment when you have such differences in delivery, particularly when reductions are involved. Adaptive management will also be challenging to apply equitably based on variations between industries.
- Guiding principles are very much a starting point for LC Landscape Board Governing Body to consider and will still be able to be adjusted.

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- Need to understand the difference between the precautionary approach vs precautionary principle as stated in the Act. It was viewed that sometimes it can be used in a way that wasn't the intent.
- The "affords equity..." principle inevitably leads some to confuse with equality. This guiding principle may be inconsistent with current proposed classes of licence. If public water supply is a "consumptive use", then we are proposing a higher security class there. While that approach is entirely appropriate, we would not want a guiding principle that confuses the matter.
- Discussion around whether innovation and efficiencies needs to be a guiding principle or if it is inherently the outcome of the Plan itself. Mixed views on both the proposed guiding principle and how the current plan supported efficiencies, such as supporting funding opportunities that presented themselves at the time a Plan adoption.
- Fairness, equity and transparency is important to include in guiding principles. e.g. in licencing components, forestry entitlements, how reductions are applied or taken, how the science is used. Transparency is a guiding principle of the amendment process.
- Summary of discussion:
    - 1 and 2 largely ok.
    - Combine 3 and 4.
    - Further work on what precautionary means. Conservative?
    - Add First Nations before cultural.
    - Number 5 ok.
    - Merge quality into another guiding principle.
    - Include contemporary not just traditional First Nations needs.
    - Revisit equitable.
    - Remove last 2.
    - Add a groundwater dependent ecosystem specific guiding principle.
    - Revisit efficiencies.
- Guiding principles and suggestions from the Stakeholder Advisory Group will now be tested with the LC Landscape Board Governing Body.

Water Market Study

Liz Perkins provided an update on progress of the water market study.

Discussion:

- The Group contributed to the scope of the progress earlier in the amendment process. LC Landscape Board went through a procurement process and engaged Flinders University (NCGRT) led by Professor Sarah Wheeler who is an internationally renowned leader in the water market and water economics space.
- Study will consider risks and benefits under different scenarios as well as learnings from other water markets and licencing systems.
- Industry and peak bodies need to be included in the consultation process for the water market study. Farmers will be hesitant to complete another survey so industry will provide representation of across the industry.
- Challenges with trade and transfer data. Data challenge of what is a genuine trade vs administrative processes. Data integrity and management will be important moving forward in the revised Plan, as it is needed to monitor and manage accurately.

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- Temporary trades are often longer term than the 5-year timeframe allowed under the plan but would be showing as a trade more often than the water is actually moving. There are some very long term leases.
- The current Plan allowed for water to be moved from high risk to low risk areas under the reduction schedule. DEW aren't able to identify where this principle was used by licence holders. Are the Group able to be provided the IMAT table that is maintained by DEW licensing for it to show where water can or can't be moved? Will need to check in with DEW to confirm. Land availability is a limitation to where water can be moved.
- Water study survey will be provided to Group members to complete.

Revisit acceptable impact and adaptive management

Sue Botting facilitated a session to revisit acceptable impact and discuss adaptive management frameworks for water resource management.

Acceptable impact discussion:

- Discussion around the homework task and challenges in acceptable impact. Key take away is that it is complex as there are so many different considerations in each management area. What is the definition of 'decline'. Challenging for a consensus on what is acceptable. Need to have thresholds from industry. Good data exists around salinity levels for industry and productivity but not as specific around water levels. Economically some industries would continue to deepen bores, it would be resource condition impacts or loss of the resource that would occur before some industries reached a point where they couldn't deepen.
- Stock and domestic sentiments around impacts of deepening of bores are based on anecdotal feedback through consultation. Includes industry, hobby farms, rural living, domestic etc. Varying levels of knowledge and understanding of impacts at stock and domestic level. Yield can also be impacted upon deepening of bores.
- Tolerance of Public Water Supply has for lower water levels or higher salinity will be different for every town and will often be zero tolerance. Groundwater level and quality is intrinsically linked to the infrastructure required to deliver safe and reliable drinking water. For example the harder the water is to get at or treat, the more expensive the infrastructure, and the higher water bills might be.
- Groundwater dependent ecosystems have lesser tolerance and adaptability, industry can adapt through funding and change to infrastructure but can't do that for groundwater dependent ecosystems. Ecological thresholds will be important to determining acceptable impact for GDEs.
- Discussion around impacts of groundwater decline on yield. Once resource reaches a point where yield is impacted further funding or infrastructure can't adapt for that. The existing data from bore drillers or permits is likely insufficient to inform yield issues.
- Group members are to consider acceptable impacts ranges for their industry specifically around salinity and groundwater levels. Will provide specific subregions for response to provide a preliminary indication without qualifications as to how that might be achieved. Ideally will be representative of industry more broadly, members can discuss with others as to where their impacts may be.
- It was raised what about industries not represented on Group. Group is to focus on their industries, LC Landscape Board staff will work through process for others.

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- Seawater intrusion should be kept in mind for south coast area as will be critical thresholds of groundwater levels. DC Grant has included sea level rise in their coastal adaptation strategy work.

Adaptive management discussion:

- Some confusion from previous meeting discussion around allocation, entitlement and use terminology in the context of adaptive management. Entitlement is the right to a unit share of a consumptive pool. Allocation is the volume of water that can be accessed for use. Adaptive management will impact the proportion that is applied to the entitlement and allocation volume that is able to be accessed. Terminology acknowledged as critically important, Group requested a glossary of terms on project page.
- Discussion around clarifying that reductions impact entitlement in the current Plan and restriction will be applied to allocation in a partially unbundled system. Current plan principles around reductions worked in a different way. Some viewed that restrictions should only be applied if there is an opportunity for the water to return to what it was prior to restrictions.
- An overview of the proposed adaptive management framework for the Padthaway Water Allocation Plan was provided as an example which included some self-management assumptions. Discussion around the complexities and scenarios of the framework and whether adaptive management can be responsive enough. As an example, 20% would take 6 years of clear fell to reach that. Adaptive management application for forestry still needs to be worked through and that will need industry input as to how that could look. Larger areas for the management actions could be an option. Forestry is also challenging under adaptive management as is already based on an average.
- Technology improvement such as telemetry for water meters could create opportunities that change the timeline from a resource condition trigger to a management action.
- Group worked through some fictional examples of what management might look like for different water licence holders and different management areas. Some discussion of the examples presented included:
    - If actual water use is not impacted by restrictions then the resource is unlikely to recover.
    - Forestry already based on average use so could be disproportionately impacted in drier years where their use is assumed to more than it actually is. Forestry and stock and domestic would likely be the first/most impacted consumptive uses.
    - Potato and dairy example – would appear on paper that use wasn't being impacted, but business would need to adapt and margins would be impacted. Timing, finishing crops etc. Becomes a business risk and creating a buffer within an allocation is important. Businesses would reduce use below reduction to maintain a margin.
    - Education becomes important once the plan comes in around producing the same with less water i.e. innovation and efficiencies in infrastructure or practices etc.
    - Management actions need to be effective. Management actions may need to look different for different management zones to effectively impact resource condition.

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Next meeting date

- Next meeting date: December date and location TBC but will deliver the action to provide a session on the drainage network.

Close of meeting

Meeting closed at 3.43 pm.
The Chair thanked the stakeholders and staff for attending.

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Lower Limestone Coast WAP Stakeholder Advisory Group
Action Table

Action	LLC WAP Stakeholder Advisory Group Actions	Status	Meeting 6 Update
1.1	LC Landscape Board to provide the Group updates on outcomes from the Limestone Coast Water Steering Committee.	Ongoing	
3.1	LC Landscape Board to analyse potential amalgamations and provide back to the Group.	Ongoing	
3.3	Revisit management zones as adaptive management and sustainable allocation are considered.	Ongoing	
3.4	Understand the impact of SPR and DS if class 3 and 4 were merged to look at moving forward with 3 classes as a starting point.	Ongoing	
3.5	Allocation and use data to be presented spatially in addition to the table.	Ongoing	
4.1	Run two scenarios: full allocation extracted with RCP4.5 climate change scenario and current average extraction with RCP4.5 climate change scenario.	Ongoing	
5.2	Organise for the Group to meet with the South East Aboriginal Focus Group.	Ongoing	
5.3	Have a session on the drains to provide members more information.	Ongoing	
6.0	Pull out key concepts slide and provide on members project page.		
6.1	LC Landscape Board to send out dates for meetings for the first 6 months of 2025.		
6.2	LC Landscape Board to added glossary of terms on project page.		
6.3	LC Landscape Board to query DEW about providing IMAT table to the Group.		

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Action Table – Closed Items

Action	LLC WAP Stakeholder Advisory Group Actions	Status
1.2	LC Landscape Board staff to take the option of proxies in the terms of reference to the LC Landscape Board Governing Body.	Complete
1.3	LC Landscape Board staff to provide an overview of the monitoring network at Meeting 2.	Complete
2.1	Request from Group for extraction and allocation for each management area + holding licences info.	Complete
2.2	Provide the Group terms of reference for Limestone Coast Water Steering Committee	Complete
3.2	Move forward with same management zones as current for now.	Complete
5.1	Revisit guiding principles for the Plan in Meeting 6.	Complete

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