

Tintinara Coonalpyn Water Allocation Plan Review Stakeholder Advisory Group Minutes

Meeting No. 4, 9 December 2025, 2:00 – 4:30 pm
Coorong District Council Board Room, Tintinara

Objectives

- Continue to consider key concepts and principles from the Water Allocation Plan.
- Review and evaluate transfer principles within the Plan.
- Start to consider trade principles within the Plan (deferred due to time).

Attendees:

Group Attendees – Dr Jonathon Sobels (Chair), Tracey Strugnell, Adam Zacker, Campbell Foote, Graham Gates, James De Barro, Jim Rowntree, John Young, Rodney Lush

LC Landscape Board Staff Attendees – Sue Botting, Chelsea Burns

Apologies – Ryan Judd

Welcome and agenda

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

Agenda check and minutes

Discussion:

- No changes requested at meeting.
- Minutes now include a table of *Items identified to be revisited and/or for recommendation*.

Meeting 3 minutes confirmed as true and correct Moved by: Jim Rowntree. Seconded by: James De Barro. All were in favour.

Feedback on community sessions

A summary of community sessions was provided to the Group following Meeting 3.

Discussion:

- The LC Landscape Board Governing Body representatives provided an update on discussion of the Board from the presentation given at the meeting held on 4 December 2025. The presentation focused on the progress of the Group in the review so far, key areas of interest raised by the Group and in the community sessions as well as resource condition. The Board recognised the Group and community concerns about the change in salinity monitoring over time.

- It was raised that organisations such as CTLAP weren't hearing much about salinity issues more recently in comparison to the past and suspect there are a few different reasons for this.
- The Group discussed their ongoing concerns in salinity monitoring and how this impacts decision making. It was raised that monitoring and resource condition underpins the rules in the Plan and whether it is doing what it said it would do. It was further discussed that yes the monitoring is important and the review recommendations can reflect the concerns accordingly. A summary collation of the salinity monitoring data and context is being prepared to transparently communicate these concerns. But ultimately it is only one part of the Plan which needs to be evaluated under the review and those things need to be progressed to be able to meet the evaluation timeframe.

Water Allocation Plan Principles – Transfers

Chelsea Burns provided a recap of Meeting 3 and presented key transfer principles within the Plan for the Group to consider.

Discussion:

- Group members spoke to their experience with trade and transfer in the PWA. These included:
 - Unreasonably long waiting periods for trades to be approved, 8-10 months in one example which was a temporary transfer between internal company holdings. This is partly to alleviate an administrative issue experienced where ideally the two licences would be extracted from same bore but can't be reported on in this way so the temporary transfer is used as the mechanism.
 - Application for new bores used to be approved really quickly but now is several weeks or more.
 - Concerns around mywater and how this has changed the application processes. Transfers are being processed as unbundled requiring multiple applications for entitlement/allocation/licences when Plan is bundled. Noted that some fees were waived but concerns that the system is driving processes that don't really match up with the Plan or realistic needs of licensees.
 - Water transacted with land purchases appeared to be more straightforward but examples were all prior to mywater implementation.
 - Permanent trade/purchase had been undertaken, change of certificates of title and planning for purchase into the future. Some issues also experienced.
 - It was raised that at some point during the term of the Plan, a licence originally had two management areas listed where a property was both sides of the boundary had transitioned to having just one management area. Wasn't communicated when it did occur and would now need to be a transfer or trade to do so. The Plan did include some principles around allotments that cross management area boundaries.
- The Group discussed the Transfer Objectives for the unconfined and confined aquifers from the Plan in the context of what the Plan was trying to achieve with transfer principles and to refer back to these as part of the review evaluation.
 - There was some discussion around the 'flexibility and equitability' in access objective and subjectiveness. The objectives were seen by some Group members as more 'aspirational' and some crossovers between them. Such as 'flexibility'

aligns to the objective to minimise constraints to allow producers to manage their business.

- Active and efficient use of water as an objective was also discussed. The Active and Expeditious use principles and innovative purposes allocation for Boothby in the Plan could have fed into this but also references 'industry best practice'. It as raised as to if there is anything in the Plan or legislation that penalises inefficient use. There are conditions around wild flooding on licences.
- Maintain water to groundwater dependent ecosystems (GDE) objective raised as to if any work had been done more recently in the area.

Carry over

- Group members discussed how carry over is generally seen and used by licensees. Key discussion points included:
 - Recent years delay in notification of carry over. Used to receive notification of volume in November but has been as late as March in recent years which was not ideal in drought conditions.
 - Most licensees are more familiar and comfortable with carry over and the automatic process. Provides a level of security and comfort to licensees.
 - Seen to encourage not using full allocation in some instances as they can still access some of the unused portion in the following year if they need to.
 - Some licensees may use or factor in for business planning. Example where a business manages lucerne for water in a full rotation/production year or where may need extra water when have a seedling crop.
- The Group considered that allocation, use and carryover figures could be changing due to better understanding of crop needs, efficiencies or business management. Keen to see the 2024 year figures given the season as the last couple of years will be critical in thinking about what dry years mean for use and the resource. Last 2 years of data will be provided once has been verified and any adjustments made as a result of change to annual water use reporting returns.
- Generally 'carry over' seen as just the term for the principles as it is a 'use'/allocation and impact to the aquifer doesn't distinguish those different allocation/uses.
- Broadly the Group viewed that current Plan principles regarding carry over were highly valued by licensees and support the principle as is currently unless there is a significant resource condition issue that warrants a more in depth consideration.

Seasonal variability transfers

- The Group discussed general views of seasonal variability transfers. Key discussion points included:
 - Similarities to carryover and temporary transfers other than being exempt from hydro test. Would also be useful to have confirmed by DEW licensing as to how much it is used.
 - If there was ever a need to tighten up allocations then people might need to use seasonal transfers more. Have the benefit of hindsight now as when allocations were initially issued they were really an estimate and anticipated full use which hasn't occurred.
 - If this principle wasn't available and it was a temporary transfer, could the hydro test and approval be able to be expedited? Ideally a response would need to be received within 3-4 weeks/1 month maximum if being used in the intent of the principle as an 'emergency/buffer' principle.

- It was raised that most growers and licence holders would know their crop rotation and water needs well in advance. They shouldn't need an emergency principle in 3 years out of five. It was raised that in community sessions it was heard that some licence holders use this principle where they have been unable to buy or transfer water in more permanently. There was some general commentary on water markets which will be considered more in the trade evaluation of the review.
- There was some support for review of the principle to reduce down to 2 years out of 5 which would more align to the original intent of the principle.
- Broadly the Group viewed the need to revisit this principle for a formal recommendation. There was an indication that the principle could still have a place in flexibility for licence holders but could be reduced to 2 years out of 5.

Rotational crops

- The Group hadn't had any direct engagement with use of the rotational crop principles and suspect that licence holders may have fairly low awareness or understanding of these specific principles.
- Some licence holders using water for intensive horticulture aren't using rotational principles as they have enough pivots and water to manage within their own business structure/property. Rotational crop principles used more where people are moving from property to property or move pivots or lease arrangement scenarios.
- It was raised that expansion is limited by water quality mainly so opportunities within the TC PWA wouldn't be huge so unlikely to activate these principles in a significant way.
- It was raised whether this principle could also apply to other industries such as lucerne seed crop production, if it was the intent of the principle and how that would look practically. It was noted that rotational crop principles are fairly standard across the Plans in the Limestone Coast PWAs.
- Opportunity to engage directly with industries where rotational crop principles are likely to be used by to understand whether it remains appropriate. Would also be useful to have confirmed by DEW licensing as to how much it is used. Likely it is very low use or volumes.
- Broadly the Group viewed that industry should be engaged with prior to making a formal recommendation. There was an indication that current Plan principles regarding rotational crops should remain within the Plan as an option into the future even if there is low uptake of the use of the principle and managed in other ways.

Next meeting date

- Next meeting date: Meeting 4 scheduled for Thursday 19th February 2025 2.00-4.30pm.

Close of meeting

Meeting closed at 4.33pm

The Chair thanked the stakeholders and staff for attending.

Tintinara Coonalpyn Water Allocation Plan review
Stakeholder Advisory Group
Action Table

Action	TC WAP Stakeholder Advisory Group Actions	Status	Meeting 4 Update
1.1	To be provided to Group Members: • Presentations from Meeting 1 • Endorsed ToR and ground rules	Complete	
1.2	Provide further break down of TML allocation and use to show delivery supplement	Complete	
1.3	Delivery supplement explanation and licence example	Complete	
1.4	Licence authorisations (bundling/unbundling) explanation	Complete	
2.1	To be provided to Group members: • Presentations from Meeting 2 • Acronyms list	Complete	
2.2	Map of obswell locations for context of data and trends	Complete	
2.3	Confirm obswell bore purpose within the monitoring network ie specific obswell bores vs irrigation bores	Complete	
2.4	Allocation and use data breakdown/analysis including % use of licences. Heat maps of extraction (if able to be provided from DEW).	Complete	
2.5	To be followed up with DEW: • Current monitoring program in TCPWA, and what are they actually committed to doing as part of the regional program. • Further explanation/reason for decrease in number of wells for 10 year and static salinity trends. • Seek advice on potential influence and/or risk of hydrogeology to west of PWA and whether that could be contributing to rising water levels in Coonalpyn/Tauragat. • Confirm locations of observation wells in Ngarkat Conservation Park or explanation if none present in this area as part of network	Ongoing	

Action	TC WAP Stakeholder Advisory Group Actions	Status	Meeting 4 Update
3.1	Salinity monitoring: - To be raised at LC Landscape Board level and/or DEW water steering committee. - Continue ongoing liaison with DEW Science and Monitoring on salinity data availability and application, potential gaps and opportunities. - Request monitoring team to confirm purpose of use of obswell bores during next round of monitoring. - Seek DEW feedback on coverage and representativeness of current obswell network in TC PWA as part of evaluation/review.	Ongoing	Discussion at the Board meeting / presentation on 4 December 2025. Salinity monitoring summary being prepared.
3.2	LC Landscape Board to request DEW hydrogeologist to present to Group to report on the TC PWA resource and condition	In progress	Request has been raised with DEW for early 2026.
3.3	Summary of key concepts to revisit recommendations for: - Holding licences - Active & expeditious use - Delivery supplement - flood		
4.1	Engage with industry groups for feedback on the Plan.		
4.2	Summary of key concepts to revisit/recommendations for principles of: - Carry over - Seasonal variability - Rotational crop		

**Tintinara Coonalpyn Water Allocation Plan review
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Items identified to be revisited and/or for recommendation

Item number	TC WAP Stakeholder Advisory Group	Status	Meeting raised
1.	Salinity monitoring 10 year trends to 2025 from DEW only showed 2-3 obswells. This is insufficient for educated decisions to be made.	Revisit for formal recommendation	2
2.	Consider need for mandatory salinity readings/returns from licence holders.	Revisit	2 3
3.	Consider whether Delivery Supplement (DS) is still needed as a component or whether it could be simplified. DS-Flood still considered a relevant need and component for TC PWA. View to retain existing DS-flood allocations with no new.	Revisit Revisit for formal recommendation	2 3
4.	Holding licences no longer relevant and not current in PWA. View to manage intent through other mechanisms more aligned with legislation.	Revisit for formal recommendation	3
5.	Active and expeditious use no longer relevant for the PWA and was time specific. View to remove these principles.	Revisit for formal recommendation	3
6.	Carry over is highly valued. View that it remains appropriate as per current principles unless resource condition warrants more in depth review.	Revisit for formal recommendation	4
7.	Seasonal variability principle is likely to remain appropriate in intent. Consideration of being available 2 years out of 5.	Revisit for formal recommendation	4
8.	Rotational crop principle is likely to remain appropriate noting it is expected to have low use or expansion. Engage with industry groups prior to formal recommendation	Revisit for formal recommendation	4