Questions and answers from the registrations for the June 2026 community consultation forums for the Lower Limestone Coast Water Allocation Plan amendment process

When people registered for the June 2026 community consultation forums for the amendment process for the Lower Limestone Coast Water Allocation Plan, they were able to provide questions. Below are the questions asked and where possible answers have been provided. The content presented in the June 2026 consultations answered some questions, but others were addressed at the end of the forums where time allowed. The questions and answers are provided in this document as others may have similar questions. The Limestone Coast Landscape Board has made assumptions around the context and intent of the questions in providing a response.

Questions from registrations have been inserted into this document without major editing. However, some grammatical editing has been completed where appropriate to improve the reader experience. The overall intent of each question has not been altered.

The presentation from the June 2026 consultation is provided separately as is a summary of discussions at the consultations.

June 2026 consultation presentation [PDF, 968KB]

June 2026 consultation summary [PDF, 293KB]

Questions and answers

What are the extraction figures for the last ten years in all areas? Where can I access them?

Allocation and use data for each management area is now available from 2015 – 2025 on the project page.

Click on a management area and the graph will appear. The graph can be made larger by clicking on it.

Observation wells in the Lower Limestone Coast prescribed wells area | Lower Limestone Coast Water Allocation Plan (WAP) | Engage Limestone Coast Landscape Board

How will the WAP ensure adequate quantity and the appropriate quality of water is delivered to high conservation value aquatic ecosystems including Threatened Ecological Communities, Ramsar sites and significant bird sites?

The revision of sustainable allocation and the setting of resource condition limits are the key mechanisms proposed for a revised Plan to ensure adequate quantity and the appropriate quality of water for the environment.

Protecting groundwater dependent wetlands has been identified as a key indicator in the setting of resource condition limits. Other environmental provisions will also be considered but work has not commenced on this yet in the amendment process.

How is it possible that you used scenarios "Found Implausible" by the IPCC in your ground water models to frighten water users in the SE of SA of the associated doom that would face our communities with that disinformation. Who was the responsible filter for this mistake and where is the apology? In addition how could you not realise that the Benara hydro graph was unrepresentative of at least 50 of the 61 WMAs? An Analysis of the hydro graphs in your previous presentations proves that you knew that Benara is not on the shortlist of "ongoing decline". But you still allowed its use? is this "misinformation" or "disinformation"? I would like you to also present the (at WMA) use data for the last 10 years and other relevant material you have been asked for?

When groundwater models are built, they are tested using two scenarios, a current scenario and then stress tested under a worst-case scenario. The best available climate science at the time of the groundwater models being built was the NARCliM 1.5 scenarios. The RCP8.5 was the worst-case climate projection scenario. This scenario is now considered to be unlikely to eventuate but is still considered useful as a stress test.

Observation well data is always publicly available on WaterConnect and some data is also provide on the project page for the amendment process for the Lower Limestone Coast Water Allocation Plan. Allocation and use data for each management area is also now available from 2015 – 2025.

How will the WAP ensure the impact of water allocation does not adversely impact the quality of the groundwater resource?

Water quality is known to vary at different depths of the aquifer. Similarly, yield will vary depending on where and at what depth groundwater extraction occurs. There is insufficient data to inform exactly at what depths water quality and/or yield will change, and the resource subsequently not be fit for purpose. This can be referred to as a physical limit of the aquifer, where the groundwater resource is no longer fit for purpose. Given the uncertainty about at what depths the groundwater resource would become not fit for purpose, the key mechanism for the revised Plan to protect water quality is to protect groundwater levels. Declining groundwater levels create a risk of changes in groundwater quality and yield.

The key way this is being considered in the amendment of the Lower Limestone Coast Water Allocation Plan is the introduction of resource condition limits. These will be groundwater levels that the water allocation plan will seek to manage the groundwater resource above.

Are the Taking licence's going to be preserved? If not, will there be compensation for the invested Dollars? Are Land holders going to be reimbursed for any or if any water allocation that is taken away? Are we going to lose more irrigation capacity with all the cost of production these days and into the future our ability to make enough income to be viable is being eroded away with no compensation or help, ask any Australian worker to take a cut in there income and there would be more trouble politically, socially than ever seen before but we are a minority here with little power yet we trying to feed the nation.

It is being proposed that a revised Plan will partially unbundle water licences. This would result in a water licence comprising of a water access entitlement and water allocation. The Limestone Coast Landscape Board has been transparent that there are two mechanisms that could be used to address over allocation and/or overuse. They are reductions to water access entitlements and/or restrictions to allocations in alignment with an adaptive management framework. The Limestone Coast Landscape Board has not made any decisions about how these mechanisms will be used, this is still very much under consideration.

To date, the South Australian Government has not provided compensation for reductions. To date, the Padthaway, Tintinara Coonalpyn and the Lower Limestone Coast Prescribed Wells Areas have been subject to reductions without the provision of compensation.

If there are any updates in relation to the SA Water Blue Lake water modelling project?

The Limestone Coast Landscape Board does not have any updates on the groundwater modelling project being undertaken by SA Water.

Have the Zones been finalized, and if so was Comaum moved into which. The information that has been circulated by your team has indicated this rationalisation has been for efficiency and nothing to do with the fact it is a small zone that its different to. Will there be a larger geographical area that licences can trade within?

Early in the amendment process the Limestone Coast Landscape Board tested the idea of changing the management area boundaries. No decisions have been made to make any changes. We raised this early in the process to test appetite for change. So far appetite for change has been low. The Limestone Coast Landscape Board recognises that some management areas are defined for hydrogeological reasons. We will come back to this idea of revising management zone boundaries towards the end of the process to see if there are any logical changes that might assist in keeping the Plan as simple as possible without creating perverse outcomes. The water market will also be a consideration when the management zone boundaries are revisited.

How will fair and equitable reduction in allocation be ensured? How will re-allocation be managed fairly and justly? How is the amount of water allocation allowed by land holders going to be agreed upon? What is the immediate change and future change to accessibility of water?

No decision has been made as to whether reductions will occur. Fair and equitable evaluations will likely be defined very differently by different people. If reductions or an adaptive management framework is introduced that includes restrictions, fair and equitable outcomes will be considered through different ways. The Limestone Coast Landscape Board is providing ways for people to contribute to the process and the amendments. Fair and equitable will be a consideration for any management action that impacts licence holders and be informed by how stakeholders view fair and equitable.

I would like to better understand how wetlands will be protected if they are not allocated a percentage of the water bucket?

Under the *Landscape South Australia Act 2019* a water allocation plan must make an assessment of the quantity and quality of water needed by the ecosystems that depend on the water resource and the times at which, or the periods during which, those ecosystems will need that water.

The Lower Limestone Coast Water Allocation Plan used an approach of estimating an annual average recharge per management area and then allocating 90% to consumptive uses, leaving 10% for the environment. This large fraction of recharge allocated to consumptive uses was an arbitrary estimate based on the approach at the time. The approach of allocating a percentage of recharge for the environment is now widely understood to be insufficient to protect groundwater dependent wetlands.

Under a revised Plan it is proposed to introduce resource condition limits. Groundwater dependent wetlands have been identified as a key indicator to inform the setting of a groundwater level resource condition limits in management zones where these wetlands remain. The overarching intent is to ensure wetlands have access to their water requirements, rather than the allocation of an arbitrary volume.

What does adaptable management look like across the catchment area?

Adaptive management is still to be worked through in the amendment process. A key step in determining an adaptive management framework is setting resource condition limits to guide future management and decision-making. Some initial work has been done looking at the different scenarios that exist in different management zones, such as where forestry and extraction both occur versus where it is only extraction and no forestry occurring. The Limestone Coast Landscape Board recognises that adaptive management may need to look different depending on the management zone, the type of consumptive uses and what we are trying to protect.

How is this going to affect us being flood irrigation?

The Limestone Coast Landscape Board has no intent with the revised Plan to remove flood irrigation. The Limestone Coast Landscape Board recognises that flood irrigation is an appropriate irrigation method in some places and for some purposes.

There are some changes being proposed to be introduced that have relevance to flood irrigators. In particular, the proposed classes of water access entitlements introduce changes to the delivery supplement that flood irrigators have.

Flood irrigators are encouraged to review the proposed classes of water access entitlement.

Reducing the complexity | Lower Limestone Coast Water Allocation Plan (WAP) | Engage Limestone Coast Landscape Board

How are the pine and gum plantations not being affected by the obvious reduction in water allocation?

Plantation forestry has been subject to reductions under the Lower Limestone Coast Water Allocation Plan. The Limestone Coast Landscape Board recognises that the licensing and rules that apply to plantation forestry may be less understood. Forest water licences can be, and have been, subject to reductions in allocations. If an adaptive management framework is introduced, forest water licences can be subject to restrictions on allocations. Both water licences and forest water licences are within scope in the consideration of reductions and restrictions.

The Limestone Coast Landscape Board acknowledges there are differences between water licences and forest water licences in the *Landscape South Australia Act 2019*. More information on these differences can be found in the document relating to water licence instruments and consumptive pools.

Legislation and policy alignment | Lower Limestone Coast Water Allocation Plan (WAP) | Engage Limestone Coast Landscape Board

Accounting for water use by native forest (parks and reserves) and inclusion in water allocation policy.

Land use is a consideration in the water allocation plan and is a data input into the groundwater models. Native forests are accounted for at 100% of recharge interception.

How will this affect Council's irrigating their ovals and open space green areas.

Many councils currently hold water licences with a recreational purpose of use. Changes are being proposed that impact purposes of use. The introduction of classes of water access entitlements will replace the current purposes of use. Most licences with a recreational purpose of use will transition to Class 2. Class 2 would be exempt from reductions to entitlement but could be subject to restrictions to allocation in an adaptive management framework.

More information on this proposed change can be found on the project page.

Reducing the complexity | Lower Limestone Coast Water Allocation Plan (WAP) | Engage Limestone Coast Landscape Board

The use of industry science (evidence) in decision making.

The Limestone Coast Landscape Board recognises that it is important to some industries to gain their own understanding of the groundwater resource. This action can be very positive for industries, improving their overall understanding of the challenges and opportunities of allocating water in this region. Where there is an expectation that science contributes directly to the policy settings of the water allocation plan, appropriate peer review processes are required, consistent with requirements for science undertaken by the Department for Environment and Water.

Will small beef farmers have their water allocations reduced? How will you determine water allocation for beef farmers? Anticipated cuts to allocations?

It is assumed that the reference to reductions to allocations is in reference to beef farmers who hold water licences. No decisions have been made in relation to reductions. Livestock producers also access groundwater for stock water. Stock water is not licensed or metered but is accounted for in the water budget. Work is being undertaken to revise stock use volumes to appropriately account for it in the water budget.

What are the likely changes to be made to the water allocation plan? What are the changes to be made? What will the plan address?

The amendment process is focusing on six key areas:

- Aligning the Plan to legislation and policy.
- Reducing the complexity of the Plan.
- Incorporating new knowledge.
- Revision of sustainable allocation.
- Improving environmental provisions.
- Understanding water trade and the water market.

Together these will result in substantial change to the water allocation plan. Visit the project page to understand more detail about these focus areas.

Lower Limestone Coast Water Allocation Plan amendment

Given the decline in drain infrastructure, and the lack of water in ponds, swamps, bogs, and wetlands, are there any plans to block drains or otherwise reduce the amount of water that gets removed from the ecosystem?

The Limestone Coast Landscape Board has partnered on a range of projects to modify the drainage network to hold water in the landscape for environmental benefit. Projects have occurred at Lake Hawdon North, Mount Burr and Hutt Bay. More projects are also getting underway at Eight Mile Creek and Lake George. The Limestone Coast Landscape Board will continue to pursue opportunities as resourcing allows.

Farm forestry.

An initial proposal for revision of the farm forestry principles has been developed and is available on the project page. This is very much an initial proposal with changes expected based on early feedback.

New Knowledge | Lower Limestone Coast Water Allocation Plan (WAP) | Engage Limestone Coast Landscape Board

What sources of water are available to the rare earth mining project?

Under the current water allocation plan there are no new allocations available. Any new industry, or new user, that does not own a water licence, needs to seek water on the market to meet their needs. It is proposed that under a revised Plan this would be the same. No new allocations would be available, new users would need to source water on the market.

Do we know how the actual annual recharge of the aquifer or is it a modelled (i.e. theoretical) number?

It is not possible to determine actual annual recharge. Recharge is contingent on many different factors including the timing and intensity of rainfall, soil moisture, geology of the aquifer, depth to the water table, land use and many other factors. As a result, annual recharge is estimated and modelled using different methodologies. Recharge for the current water allocation plan was calculated using four different methodologies:

- Recharge area-weighted from existing soil/land use rates (Bradley et al., 1995).
- Recharge by water table fluctuation method.
- Recharge determined by area weighting results of Allison and Huges 1978.
- Recharge estimates as per previous water allocation plans.

A summary of this information can be found in a 2006 summary paper.

Review of groundwater resource condition and management principles for the Tertiary Limestone Aquifer in the South East of South Australia

Future grant opportunities for council and community.

The Limestone Coast Landscape Board has grants available and projects in relation to water may be eligible. This includes Grassroots, Habitat Conversation and Climate-smart Landscapes Grants.

More information on funding opportunities is available on the Limestone Coast Landscape Board website.

Funding opportunities | Limestone Coast Landscape Board

Is any work being undertaken to 'develop a water trading market within the Limestone Coast'? I gave evidence to a university survey conducted locally (some 18mths ago) on this topic.

Some initial work has been undertaken to understand the current water market and some of the factors that drive the current development of the water market. This report will be released in 2026. The Limestone Coast Landscape Boards thanks those that participated in the study.

What effect will changes have on water licenses held but not used?

It is assumed this question relates to what is currently known as a holding licence. Holding licences are not a category of licence under the *Landscape South Australia Act 2019*. Historically, they are water licence without a point of take. Holding licences will be subject to the same treatment as water licences.

If the question relates to portion of allocation on a water licence that has not been used: the Limestone Coast Landscape Board is aware some people believe that a "use it lose it" scenario may be implemented. This is not the case. Unused allocation is not being targeted above used allocation in the amendment process. Allocation as a whole is being considered.

What are the new irrigation laws going to be what does the future hold?

It is assumed this question relates to the National Water Initiative which has been revised to a new National Water Agreement. The new National Water Agreement is in draft and is publicly available.

The new National Water Agreement - DCCEEW

The Limestone Coast Landscape Board considers all relevant policy in the revision. The new National Water Agreement is being considered in the proposed revisions.

Condition and trends of GDEs, examples of impacts already seen (e.g. Pic Ponds, Bool Lagoon, Deadmans swamp…), importance to tourism. Assist in showing people why there is a problem.

The Limestone Coast Landscape Board acknowledges there is broad interest in understanding groundwater dependent ecosystems (GDEs). The Limestone Coast Landscape Board will seek to make more information available as the process continues.

What further industries would be allowed to use aquifer water now that allocations have reached maximum or are over allocated.

Under the Plan there are no new allocations available. Any new industry, or new user, that does not own a water licence, needs to seek water on the market to meet their needs. It is proposed that under a revised Plan this would be the same. No new allocations would be available, new users would need to source water on the market.

Will increased evaporation have a serious impact as climate gets warmer?

Evaporation is a significant loss from the system. Increases in temperature and other climate variability will impact the amount of evaporation. In a revised Plan the introduction of resource condition limits allows the revised Plan to be adaptable to changes in climate and water use.

Can the Board explain what weighting it intends to apply to speculative or model derived estimates—particularly those based on assumptions, projections, or inferred recharge—relative to empirical datasets such as observation well records, verified extraction data, and Bureau of Meteorology rainfall data when determining amendments to the Lower Limestone Coast Water Allocation Plan? Further, will the Board publish the weighting methodology so stakeholders can clearly understand how uncertainty in modelling is being treated in the decision making process?

The Limestone Coast Landscape Board has no defined weighting. The Limestone Coast Landscape Board considers extensive data sets, science, information and context to inform decision making. The Limestone Coast Landscape Board will be transparent about what data sets, science, information and context is used to inform decisions.

Groundwater models are recognised as best practice in hydrogeology because they bring together the key processes that influence groundwater systems, rather than relying on a single piece of information, such as recharge estimates.

While recharge is an important input, groundwater levels are affected by factors such as rainfall, pumping, aquifer properties, groundwater flow, discharge to springs and wetlands, and interactions with watercourses and drains.

A groundwater model combines these factors into a single framework that is tested against real-world monitoring data, such as groundwater levels, to ensure it provides a realistic representation of how the aquifer behaves. This allows scientists and water managers to better understand the current condition of the resource and assess how it is likely to respond under different management or climate scenarios. For this reason, groundwater models are

internationally accepted as best practice for assessing groundwater systems and supporting water management decisions. They provide a more comprehensive and scientifically robust assessment than considering recharge estimates or other individual datasets in isolation.

It is important to note that the groundwater models do not use an inferred recharge rate as an input. Groundwater models use actual data which then estimates recharge. The current Plan uses inferred recharge or annual average recharge estimates. It is not possible to know the actual recharge rate and models have always been used to estimate recharge.

It is also important to note that the groundwater models are underpinned by 50+ years of research, investigation and monitoring. Each model is made up of tens of thousands of data points, research, information and monitoring:

- Previous reports (all parts of water balance).
- Drillhole data.
- Monitoring data.
- Pumping data.
- Geophysical data.
- Previous models.
- Land use data.
- Inflows, regional flows from Victoria, aquifers extend into Victoria groundwater flows in from Victoria.
- Discharge to coastal springs.
- Beach springs and seeps.
- Submarine groundwater discharge.
- Evapotranspiration.
- Groundwater extraction.
- Drains.
- Wetlands and groundwater dependent ecosystems.
- Rainfall and climate data.

The groundwater model reports are publicly available and can be accessed from the project page or WaterConnect. These reports include how uncertainty is addressed.

New Knowledge | Lower Limestone Coast Water Allocation Plan (WAP) | Engage Limestone Coast Landscape Board

Does the current LLCWAP amendment process recognise that the present landscape condition and groundwater–surface water interactions are the direct and previously accepted outcomes of earlier Water Allocation Plans, which allocated water for development more than 25 years ago?

The Limestone Coast Landscape Board recognises that groundwater resources have been developed in the Lower Limestone Coast Prescribed Wells Area. Moving to an approach of acceptable impact is in alignment with this. It is recognised that we need to continue to use groundwater resources to support economic and social values in the region, but acceptable impact allows a determination of what impact we accept from further development.

It is important to understand that even early water allocation plans were developed under legislation that sought to establish a system for the use and management of water resources that sustained the physical, economic and social well-being of people and facilitated economic development while:

- ensuring that those resources are able to meet the reasonably foreseeable needs of future generations
- protecting the ecosystems (including their biological diversity) that depend on those resources.

Early water allocation plans have sought to do this incorporating the best available science at the time.

Given that these past plans explicitly enabled economic development, job creation, and landscape change—and that the resulting drainage and surface water systems now provide critical autumn wildlife refuge—how is the Board accounting for these established, relied upon benefits when assessing what constitutes an 'acceptable impact' under the amended plan?

Further clarification is being sought on this question. This document will be updated once the Limestone Coast Landscape Board has this clarity.

Will residents on small acreage using bore water that don't have access to town water be required to install water meters under the new plan? Will domestic sheep water bores be charged a levy or rate?

Metering, licensing and the introduction of a levy for stock and domestic bores is not in scope for the current amendment of the Lower Limestone Coast Water Allocation Plan.

Will a licensed water holder be penalised if they have not been able to implement their future water plans?

It is assumed this question relates to water licence holders who have unused water in their allocation but do intend in the future to activate this water. The Limestone Coast Landscape Board is not targeting unused water in the amendment process. The Limestone Coast Landscape Board also has no intent to introduce "use it or lose it" principles as part of the amendment of the Lower Limestone Coast Water Allocation Plan.

How are you going to differentiate between environmental and Indigenous water?

The Limestone Coast Landscape Board does not make the assumption that water for First Nations is equivalent to water for the environment. In many cases protection of the environment may meet First Nations objectives, but this is never assumed. The Limestone Coast Landscape Board works with the South East Aboriginal Focus Group and Nori Native Title Aboriginal Corporation to understand First Nations objectives in the Lower Limestone Coast Prescribed Wells Area.

When will at least the ten years of water use and total Licence Entitlement data be available for each WMA with forestry extraction and interception detail visible? Please put it in a table rather than graph form.

Allocation and use data for each management area is now available from 2015 – 2025. Allocation and use will continue to be provided in graph format, but the numbers are displayed allowing individuals to create alternate formats if it suits their need.