Lower Limestone Coast Water Allocation Plan
Stakeholder Advisory Group
Minutes

Meeting No. 10, 17 July 2025, 10:45 – 3:30 pm

Chardonnay Lodge, Coonawarra

Objectives

- Continue to work through acceptable impact.
- Revisit acceptable impact approach for stock and domestic (deferred, time didn't allow).
- Revisit guiding principles for the revised Plan to finalise draft and introduce objectives (deferred, time didn't allow).
- Check in on the amendment process timeline and status of progress on key concepts (update to be provided out of session).

Attendees:

Group Attendees – Pete Bissell (Chair), Alan Rossouw, Belinda Williamson, Claire Harding, Claire Davies (MS Teams), Darren Shelden, Kerry DeGaris, Kylie Boston, Melissa Herpich, Peter Balnaves, Simon Sherriff (MS Teams), Terry Buckley, Wayne Hancock.

LC Landscape Board Staff Attendees – Liz Perkins, Sue Botting, Chelsea Burns, Ryan Judd.

Apologies – Dr Penny Schulz, Graeme Hamilton.

Welcome and agenda

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

Agenda check and minutes

No amendments, minutes from Meeting 9 were confirmed as true and correct.

Moved by: Darren Seconded by: Alan. All were in favour.

Action update:
A document addressing Action 8.1 was provided (also available on members page).
Group discussed where new language comes from. Consumptive pools is terminology under the legislation. Adaptive management is generic language used to describe a framework of resource condition limits and trigger, not specifically in the legislation.

There was a request for some members on whether they able to see, at management area level, current purpose of use into classes as will be very different across the prescribed wells area. There were queries around access to detailed allocation and use data Request for detailed data components at management area level as classes, but also over time. Data to include holding licences.

Discussion around how holding licences were allocated to the management areas and whether they underwent hydrogeological assessment. Risk of holding licences being stranded as will fail hydro and

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won't be able to be activated. Could forestry buy holding licences as a buffer to reductions and what would that assessment be. This would depend on how the holding licence was treated. If it remained as a separate licence it would also be subject to a reduction. Can you get delivery supplement on holding licence when activated. There is no delivery supplement available.

There was discussion on whether fees would be less if reductions/restrictions in place. Currently the levy applies to the entitlement, you pay for your full allocation whether you use it or not. Restrictions would not impact levy payment. Reduction to entitlement would impact levy payment.

Some discussion around the intensity of pivots in the south coast area given the hydrogeological assessment principles in the current water allocation plan. Due to the historical allocation of the water there may have been not requirement for the hydrogeological assessment.

Members thanked Terry for the potato delivery.

Acceptable impact

Liz Perkins revisited acceptable impact and provided further details on how this will be worked through.

Discussion:

- The Group discussed how the proposed adaptive management is different to how reductions are applied under the current Plan. Adaptive management would introduce resource condition triggers aimed at preventing the resource hitting resource condition limits developed through acceptable impact.
- The examples provided to Group members around adaptive management are hypothetical, the Group would be interested in some examples with real allocation and use data and rainfall data from management areas. The approach for the revised Padthaway Water Allocation Plan was briefly discussed.
- The Group queried how holding licences that remain unconverted to taking work, have they been allocated to a land parcel or passed a hydrogeological assessment. Holding licences are not allocated to a land parcel and have not passed a hydrogeological assessment. The water is accounted for in the water balance for the management area. It would need to pass a hydrogeological assessment to be activated and used.
- How holding licences work in relation to reductions was also discussed. Could holding licence be purchased to buffer a reduction, e.g. if you have a holding licence and are subject to a reduction, could you take reduction from your holding licence rather than the activated licence? You don't get to decide which licences take a reduction; all licences would be reduced. But a holding licence may then be able to be added on to another licence.
- It was queried with a licence holder can have a delivery supplement on a holding licence. This is not possible.
- If a water licence is reduced is your licence fee then reduced. Licence holders pay a licence fee and then per kilolitre of water. If a licence is reduced there would be less to pay.
- It was briefly discussed that in some places there is significant irrigation development close together (pivots close together), such as places between Mount Gambier and Port MacDonnell. It was queried how the Plan has allowed this with principles such as the hydrogeological assessments in place. The LC Landscape Board has recently discussed the need to do a comprehensive review of the hydrogeological assessments.

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- It was raised whether in the documentation provided to the group around the acceptable impact methodology for stock and domestic whether further clarity is needed around the fact that stock and domestic use has an impact, but the methodology is assessing resource condition limits to prevent unacceptable impacts to this use. LC Landscape Board to review document and consider update to clarify.
- It was queried how data is reported from bores that support both irrigation and stock and domestic use. If the take point for stock and domestic is after the meter the use is being recorded against the irrigation licence. If use exceeded the irrigation licence it is likely there would be a process to work through with water licensing around what use was actually stock and domestic and therefore not required to be metered.
- The Group discussed there are a lot of housing developments occurring around Mount Gambier with all these blocks requiring stock and domestic bores as it is not connected to mains water supply.
- Currently under legislation stock and domestic is not required to be metered and a levy can't be applied. Under this amendment of the water allocation plan, in alignment with the legislation no changes are being considered to stock and domestic other than ensuring they are appropriately accounted for in the water balance. In future amendment processes legislation may have changed and the need to consider stock and domestic further, particularly around rural living areas may exist. Some members commented that we need to be careful not to complicate the process by adding in more items like stock and domestic for potentially very little benefit. A simpler option would be to buy a large water licence close to Mount Gambier to cover this potential development of stock and domestic bores for rural living for a long period of time.
- The Group considered the different methodologies being proposed to inform resource condition limits. It was discussed whether for Karst systems there is enough data to inform a methodology. There is enough data and information on some of the coastal springs that can inform an adaptive management approach for protecting these springs e.g. Pic Ponds, Ewens.
- The Group discussed that while salinity is monitored across the region what is unknown is at what groundwater levels salinity levels will change. There is also insufficient data on other water quality aspects to inform adaptive management.
- The Group queried why bushfire refuges are sitting as not having an acceptable impact methodology. Bushfire safer refuges need to be considered as many are groundwater dependent to keep areas green. But ultimately there isn't sufficient data to inform a resource condition limit that supports bushfire safer refuges. It was commented that some policies may be changing around bushfire safer refuges and this should be considered. Bushfire safer refuges are usually recreational purpose of use licences.
- It was raised that cross border creeks should be considered for a methodology that informs a resource condition limit. There is a lot of data and knowledge that they are groundwater dependent and could have something done to manage these.
- The Group discussed a suggestion from last meeting about better informing licence holders on resource condition. Data should be provided to all water licence holders for groundwater levels for all the monitoring bores in their management area.

Acceptable impact: groundwater level ongoing decline

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Sue Botting presented on the approach for determining acceptable impact for groundwater level and ongoing decline.

Discussion:

- Some group members disagreed that community were in strong alignment with sustainably managing the resource. Group members indicated they have communicated with many people who don't want to sustainably manage the resource. The Groups discussed what might be driving these views. Is this due to people not understanding the implications. This point was presented at community consultation and feedback suggested there was support for sustainably managing the resource. Some Group members disagreed and discussed that we need stakeholders to have trust and support of the data.
- It was queried whether using the winter recovered level (spring reading) was actually the recovered level under forestry or whether recovery comes later. In most management areas monitoring only occurs twice a year and the spring reading will be the most recovered of the readings. But it was acknowledged that the spring or autumn readings might not always capture the high and the low, depending on the season. Can we check how groundwater levels respond under plantation areas and where the peak will be.
- Group members discussed a preference to have a longer dataset for the ongoing decline statistical analysis, suggest going back to 1985.

Acceptable impact

Liz Perkins ran through data provided around acceptable impact for setting resource condition limits for primary production and industry.

Discussion:

- Does it matter if we don't have a groundwater level that would be sustainable for primary production due to the industries being so variable? GDE's will impact groundwater levels before primary production as these are more sensitive. It was pointed out that GDEs don't occur everywhere. At this stage there is substantial data on salinity in relation to primary production and industry but not groundwater level data. The discussion couldn't identify a groundwater level beyond which the impacts would be unacceptable to primary production and industry. It was considered that it wasn't a one size fits all situation. There was some acknowledgement that loss of shallow groundwater under primary production would have an impact.
- Human consumption and guidelines for TDS mg/L are driven by taste and health concerns. But often taste is a bigger driver as this becomes an issue before health impacts.
- The Group discussed salinity levels for different industries. Potatoes water quality estimate is close, potatoes in the region can handle 1200-1400 mg/L but beyond that is trouble.
- For Zone 3A, the time period of around 2006 groundwater levels were at a critical level that we would not want to reach again. It was a bad frost year, salinity increased and bores were deepened across the region from around 10m deep to 40m deep with it being pumped from around 20m and it would want it to remain around this level.
- Recent seasonal conditions were discussed by the Group. South of Mount Gambier has been experiencing harder times in the past two years than was felt in the millennium drought.
- The Group then discussed different ways to determine resource condition limits. It was discussed whether it would be easier to look at recovery rather than a groundwater level,

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using the models can we start using reduction scenarios to test what will be needed to have stabilisation at current levels or recovery and support GDEs etc.

- It was discussed with the Group that the LC Landscape Board is seeking to make informed decisions about resource condition limits rather than just picking or guessing a number. It was also discussed that the LC Landscape Boards starting position is not currently no further declines, which was another suggestion from the Group. Some members of the Group pushed needing reduction and restriction numbers sooner rather than later to have decision making for industry and future planning. The environment could be used as the reason for picking the number.
- The Group discussed how reductions and restrictions could be used and how they interact.
- Group members raised support for industries to adjust and transition around any changes that might occur under a revised Plan. Was anyone looking at this. The LC Landscape Board is discussing this internally.
- If industry is provided with allocation, use and hydrographs then they can try to decide themselves what reductions may be required for their management areas and can get context for how big the issue of over allocation is and can start planning for the future.
- The Group requested a practical example for a management area to better understand how the resource condition limits will work.

Guiding principles and objectives

Time did not allow to go through updated principles and objectives. Deferred to future meeting.

Timeline

Time did not allow to go through updated timeline. To be provided to members out of session.

Next meeting date

- Next meeting date: Meeting 11 is scheduled for Thursday 18 September 2025.

Close of meeting

Meeting closed at 3.45pm
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 10 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	
6.2	LC Landscape Board to added glossary of terms on project page.	Ongoing	
9.3	LC Landscape Board to consider implementing resource condition updates during the amendment process.	Ongoing	
10.1	Request for allocation and use data per management area.	Meeting 11	
10.2	LC Landscape Board to review stock and domestic document and consider update to clarify impact to and impact from stock and domestic use.	Meeting 11	
10.3	LC Landscape Board to provide a practical example for a management area to better understand how the resource condition limits will work.	Meeting 11	

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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
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
2.2	Provide the Group terms of reference for Limestone Coast Water Steering Committee	Complete
2.1	Request from Group for extraction and allocation for each management area + holding licences info.	Complete
5.3	Have a session on the drains to provide members more information.	Complete
6.0	Pull out key concepts slide and provide on members project page.	Complete
6.1	LC Landscape Board to send out dates for meetings for the first 6 months of 2025.	Complete
6.3	LC Landscape Board to query DEW about providing IMAT table to the Group.	Complete
8.1	LC Landscape Board staff to provide some examples of reductions vs restrictions using same example – do a one pager example.	Complete. Document provided at Meeting 10.
9.1	LC Landscape Board staff to reword an equity principle and bring back the group.	Complete. Updated principles provided at Meeting 10. Document not discussed.
9.2	LC Landscape Board to consider a principle around economic use.	Complete. Updated principles provided at Meeting 10. Document not discussed.
9.4	LC Landscape Board to update the amendment process timeline.	Complete. Timeline prepared for meeting, time didn't allow. To be provided out of session.

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