Lower Limestone Coast Water Allocation Plan amendment process

June 2026 consultation report

In June 2026 the Limestone Coast (LC) Landscape Board held a third round of broader community consultations. Sessions were open to anyone interested in the process and were held in Kingston, Naracoorte, Mount Gambier, Millicent and online. Naracoorte, Mount Gambier, Millicent and online presented the same information. At the Kingston session there was an additional presentation on setting resource condition limits in the confined aquifer. The Kingston area has the highest number of confined aquifer users to support starting a discussion around the confined aquifer.

This report brings together what was heard at all sessions under key themes. The report isn't designed to detail every comment or question asked but presents the key themes raised by attendees.

What was presented in the sessions

The presentation is publicly available with some notes provided.

June 2026 presentation [PDF, 968 KB]

Setting resource condition limits

General discussion

The indicators to inform resource condition limits are at different levels of development. No categorisations were shown for the groundwater dependent wetland indicator. It was requested that this information be made available. The Limestone Coast Landscape Board's intent is to provide this when it is available.

One of the use scenarios being used in initial categorisation is use at full allocation. It was queried if this includes holding licences. It does include holding licences.

It was discussed that the Plan amendment is focusing on water quantity, and it was asked how the revised Plan will address water quality, considering new developments for the region were under discussion, such as fracking and strip mining. The main mechanism for the revised Plan to protect water quality, is to protect water quantity and groundwater levels. Protecting the volume of water will ensure flushing of the system, and therefore the quality of the resource will remain fit for purpose. This can also protect wetlands by ensuring the necessary levels of turnover of water in wetlands.

It should be noted that other agencies have responsibilities for water quality such as the EPA. There are also existing processes that ensure developments, such as mining developments, are referred to the LC Landscape Board under its Water Affecting Activities Control Policy. There are also multiple pieces of legislation and regulatory frameworks that control whether fracking or mining is approved and the conditions under which these activities occur. Not all of this is within scope of a water allocation plan.

It was queried what powers exist in the legislation that allow developments to operate outside of the water allocation plan. There are powers under the legislation that allow the Minister for Climate, Environment and Water to make decisions contrary to the water allocation plan. The LC Landscape Board cannot change the decision of a minister but would always seek that decisions align with the water allocation plan and that allocations are maintained within the sustainable limits of the resource.

Compensation and buybacks were raised around any reduction to entitlement. To date, the South Australian Government has not provided compensation for reductions. In the Limestone Coast, Padthaway, Tintinara Coonalpyn and the Lower Limestone Coast Prescribed Wells Areas have been subject to reductions without the provision of compensation.

In the initial proposal for setting resource condition limits the climate change projections have not been applied. Once resource condition limits have been proposed they will be stress tested using climate change projections.

The Padthaway Prescribed Wells Area and revisions of the Padthaway Water Allocation Plan were discussed as an example of what has occurred in other places. The Padthaway Prescribed Wells Area is very different to the Lower Limestone Coast Prescribed Wells Area. Whilst there are elements of the Padthaway Water Allocation Plan that can be useful in the Lower Limestone Coast Water Allocation Plan, the Padthaway Water Allocation Plan cannot simply be replicated for the Lower Limestone Coast Prescribed Wells Area. Under prior iterations of the Padthaway Water Allocation Plan there has been a reduction to allocation and then in later revisions the introduction of an adaptive management framework. The latest process that the LC Landscape Board completed to revise the Padthaway Water Allocation Plan has been similar to the process for the Lower Limestone Coast Water Allocation Plan, but the Lower Limestone Coast Prescribed Wells Area is significantly larger and more complex. It was queried whether the LC Landscape Board prefers reductions or restrictions. The LC Landscape Board does not have a preference. Both mechanisms are within scope, with the main outcome being to sustainably manage the resource while also managing the economic impact of doing so.

It is the view of some that the LC Landscape Board would set random triggers to subject licence holders to management actions. This is not the case. Any actions would have to be

clearly outlined, transparent and easy to follow within the revised Plan. The Department for Environment and Water are responsible for administering the water allocation plans and couldn't implement actions not included within the revised Plan.

It was queried whether Primary Producers SA and Livestock SA have been consulted. The stock and domestic access is being proposed as an indicator to protect the productive potential of the resource. Consultation is ongoing with industry bodies and their input will be important.

It was discussed how the indicators are applied to the management area. Some indicators won't apply to some management areas. Where multiple indicators are applied, they will result in different depths, it is the shallowest depth to water that would initially be considered for the setting of the resource condition limit. The groundwater models allow the testing of different water use scenarios to understand how groundwater levels change in relation to the resource condition limits. The resource condition limits aren't so much built into the models, the groundwater models provide an understanding of under what scenarios the resource condition limits are reached or not.

There was discussion around the impact the drainage network has had on groundwater dependent wetlands. Looking at maps of wetland extent change through time shows that drainage had a significant impact on the wetland extent. But drainage has not disconnected all wetlands and some can still be protected even though drainage exists. Discussion around modifying the network by implementing more weirs was raised. Projects that modify the drainage network for environmental benefit have occurred and are continuing to occur but can require significant investment and require land to be flooded. Drainage continues to be important to primary production by removing salt from the landscape and allowing year-round production in some places.

There was discussion around how impacts from Victoria are considered in the process. The Border Zone or Designated Area falls under the *Border Groundwaters Agreement 1985*. The agreement seeks to manage equitable sharing of the resource along the border. In addition to this, the LC Landscape Board is looking at how the groundwater models can be used to assess impacts from South Australia on Victoria and impacts from Victoria on South Australia. It is recognised that we can't manage to resource condition limits if the impact is outside of the Lower Limestone Coast Prescribed Wells Area.

It was queried if a restriction to allocation comes in under an adaptive management framework and after recovery how long does the restriction remain in place. This is all still to be worked out in the development of an adaptive management framework. It could be removed straight away but could also remain for an additional year/s to ensure recovery remains and the resource does not immediately decline again.

It was raised that management areas like Coles and Short have already been subject to reductions and had some increase in groundwater levels as a result. This should be considered if further management actions are going to be proposed.

The seawater intrusion monitoring observation wells were raised as to when this data would be publicly available and provide results. The monitoring data from the seawater intrusion monitoring bores is already publicly available as they are part of the monitoring network. Seawater intrusion monitoring bores are drilled to certain depths along the south coast to understand where the seawater/freshwater interface is. They are essentially already providing results as they are being monitored and if salinity changes occur this will be detected.

It was discussed at what depths forestry trees access groundwater. It is assumed for the purpose of the policy that trees don't direct extract when groundwater levels fall below 6 metres. But there is research that indicates trees can direct extract below the 6 metres level. 6 metres is the agreed level for the policy.

It was raised whether encouraging the installation of rainwater tanks is within scope for the water allocation plan. It isn't within scope for the water allocation plan, but alternate water sources and water efficiency are things the LC Landscape Board is interested in encouraging through other work.

Indicators to inform resource condition limits: stock and domestic access

There was a view from some that stock and domestic users should just have to deepen their bores, that vulnerability of stock and domestic bores should not be a consideration. Climate is having an impact on stock and domestic wells. The stock and domestic data in WaterConnect was also discussed. No dataset is perfect, but it has been cleaned as much as possible to improve it.

It was queried whether the stock and domestic access approach should use autumn levels instead of spring given how significant the fluctuations can be. This was considered but spring was chosen in alignment with the recovered water level. But it is recognised that stock and domestic access will be less on the autumn low. Spring levels are typically used in the indicator approaches as representative of resource condition being the recovered level. It was requested that aquifer thickness needs to be a consideration as part of the stock and domestic access indicator. The stock and domestic indicator isn't just about protecting their access but an overall indicator to protect the productive potential of the groundwater resource.

Indicators to inform resource condition limits: public water supply

The indicator of public water supply was discussed and whether the approach had been requested by SA Water. The approach is about the purpose of use and has no relation to the licence holder. The LC Landscape Board is proposing this approach in alignment with state

and federal policies and legislation. It was discussed whether public water supply could just move into the confined aquifer. Public water supply is subject to extensive regulatory process. Providers of public water supply cannot simply change or move. Approvals processes are extensive, and investment needs can be significant.

Indicators to inform resource condition limits: groundwater dependent wetland

It was queried what is the methodology, what is the timeline and which department is conducting the groundwater dependent wetland work. The LC Landscape Board is working with the Department for Environment and Water on all the methodologies. No timeline was provided.

There was some indication that many wetlands are manmade. It was clarified that wetlands considered by the water allocation plan are not manmade. There are wetland restoration projects that occur, but these restore wetlands that were in the landscape, they don't create new wetlands. It was also raised that other ways to address issues should be considered not just extractive use.

Regarding the approach to using groundwater dependent wetlands as an indicator it was suggested that any wetlands that are going to be protected should have to be ground truthed. The LC Landscape Board could not commit to this and would need to understand better what is meant by ground truthing given you can't necessarily determine groundwater dependence from visiting wetlands and the number of wetlands would be prohibitive. It was queried when a result would be available from the approach. The approach is still very much in development and information will be made available when possible.

It was asked whether the LC Landscape Board looks at how other states manage wetlands, particularly Ramsar wetlands. Ramsar wetlands in the region have a range of unique characteristics, what works elsewhere may not work for them. We aim to keep up to date with the latest water resource and wetland management practices by continually integrating the latest Australian and international research, policy and industry best practice into our work.

There was a view from some attendees that if the government wants to protect wetlands it should offer buy backs because it is government that wants the wetlands, it shouldn't be the responsibility of water licence holders. Providing water for the environment is a requirement of the legislation and there are many landholders in the region that would like to maintain the wetlands on their land.

Indicators to inform resource condition limits: ongoing decline

Conmurra was discussed as an example of where groundwater levels are acceptable now but if all allocation was activated it will be in an ongoing decline. It is challenging to consider this might be the case when you can see what the groundwater levels are now. This is an

example of the difference between what we are using now versus what is allocated. Other users could come into the area and activate water which would lead to a decline, resulting in existing users being subject to a management action such as reductions or restrictions.

Structure of the revised Plan

Water licence instruments

There are differences between forest water licences and water licences under the legislation, it was asked whether the LC Landscape Boad is still committed to treating forestry and irrigators the same/equally. While differences in the legislation create structural differences in the proposed changes the LC Landscape Board is still committed to the equitable treatment of the different industries.

It was discussed whether the legislation could be changed and whether the LC Landscape Board is advocating for legislation change. Legislation change might be possible in time but there are some elements where change is unlikely. Landscape Boards across South Australia contributed areas for change to the review of the *Landscape South Australia Act 2019*, many areas were raised in relation to the water parts of the legislation.

It was raised that fully unbundling should be avoided as it allows water speculation.

It was raised whether forest water licences can be subject to restrictions or reductions like water licences are. Forest water licences can be subject to restrictions and reductions even though the structures are different. The legislation outlines the conditions around how forest water licences can be varied.

Consumptive pools

It was asked whether there would be management areas within the consumptive pools proposal. Management areas will become management zones in alignment with the legislation but will still exist. They will remain as a spatial scale at which different rules can be applied. Consumptive pools are proposed to primarily be applied at the aquifer level.

It was asked whether the LC Landscape Board saw benefit to partial unbundling and forestry therefore sitting outside of the consumptive pool. The LC Landscape Board sees benefits for water licence holders from partial unbundling and sees that the differences around licences and consumptive pools can be managed.

The Lower Limestone Coast Managed Aquifer Recharge Consumptive Pool was discussed and what would be required. Managed aquifer recharge schemes would need to meet a range of requirements including metering and water quality. There isn't necessarily someone particularly requesting this policy option but managed aquifer recharge could be a future opportunity.

Trade within and between consumptive pools was discussed. Trade could occur within consumptive pools and between the Lower Limestone Coast Unconfined Aquifer Consumptive Pool and forest water licences.

Classes of water access entitlements.

Data centres were raised as a potential new water user that could be seeking water. Under the current Plan and proposed under a revised Plan there would be no new allocations available. New users, such as data centres, would need to find water on the market.

It was raised that the purposes of use in Class 3 should not be treated any different or have any more protections than general irrigation (Class 4).

The definition for intensive animal keeping was discussed and whether it should be included as stock and domestic or intensive animal keeping. A water licence is required for intensive animal keeping in acknowledgement that the water use for livestock is well above the average stock use. It was raised that some dairy is moving to housing dairy cows in a barn rather than grazing in paddock and what definition this would fall under. It was also discussed whether containment feeding under a drought scenario would be intensive animal keeping. This isn't the intent of the intensive farming definition.

It was raised that water licences with a purpose of use of health should be included in Class 1.

The proportional transfer of Class 5 to Class 4 was discussed. Class 5 was assumed to return to the aquifer, allowing any to transfer to Class 4 would contradict this.

Transfer between classes was discussed. It was asked whether inter management area trade would still be possible. Trade may still be possible between the management zones, this will be looked at further as more is understood about resource condition limits. It was queried whether trade would be possible between a forest water licence and a water licence. This trade will be possible. It was queried whether forest water licences could transfer to a Class 6. Intent is they would be able to, the exact pathway is still to be worked through, whether it needs to transfer to a Class 4 first.

Class 6 and its purpose was discussed. It was discussed whether the purpose of Class 6 was government looking to undertake claw back for the environment. The purpose of Class 6 is the strategic holding of water licences for environmental projects, such as providing water to a wetland to allow a threatened species to complete a breeding season. It is not part of a broader claw back scheme. It was raised that Class 6 should have a cap on how much water could be Class 6. It was discussed that some water licence holders want to use their licence to provide water for wetlands on their property. Currently a condition on their licence known as wild flooding prevents this. This is not what is proposed for Class 6, but the LC Landscape Board is proposing that this could be a water affecting activity permit that places a condition on a licence that allows a volume of a licence to be used for environmental water (considered wild flooding). It was raised that the term wild flooding shouldn't be used and that a permit is not necessary.

It was raised where mining would sit in the classes proposal. There are currently no licences with a purpose of use of mining; however, it is proposed mining would be classified as Class 4.

It was asked what happens with holding licences. Holding licence is not a category of licence under the legislation, they are water licences and would sit in Class 4.

Some components such as specialised production requirements under the proposal would become tradeable when under the current Plan they are not. Some raised concerns about this and that they should remain as not tradeable. The way specialised production requirements were issued they did not have a value attached to them and could not be traded and this should remain the same.

It was raised whether other classes should be able to convert to Class 1 if purchased for the purpose of the public water supply. Under the current proposal it isn't suggested that other classes could become Class 1, and it is acknowledged that this doesn't fully protect public water supply. It has been proposed this way as concerns were raised about public water supply growing and not being subject to any management actions.

It was noted that the initial proposal included a First Nations Consumptive Pool. Stakeholders observed that this is no longer present in the current proposal and has not been incorporated into any water access entitlement class. The LC Landscape Board is still committed to pursuing opportunities for First Nations but is working through some legislative complexities.

Farm forestry

It was asked whether shelter belts and native trees are included in the farm forestry principles. Shelter belts and native trees are excluded from the farm forestry principles.

It was raised that the forestry industry has done some work on a land use tool for farm forestry in Victoria that may have applicability for the Limestone Coast.

Setting resource condition limits for the confined aquifer

At the Kingston forum an additional section was presented regarding the setting of resource condition limits for the confined aquifer. The Kingston area has a higher concentration of confined aquifer users due to salinity in the unconfined aquifer in this area. The Limestone Coast Landscape Board discussed with the Lower Limestone Coast Water Allocation Plan amendment process Stakeholder Advisory Group working on some initial resource condition limits for the confined aquifer with users in this area.

Confined aquifer presentation [PDF, 4 MB]

Discussion, comments and queries

It was queried how well do the confined management area boundaries align to the hydrogeology. Confined management areas are much larger than for the unconfined aquifer and do have some alignment with hydrogeological zones.

In the Plan the Kingston management area is over allocated and it was asked whether allocations could be reduced to current use. The management of the over allocation does need to be worked through. It could be a combination of reductions to entitlement or restrictions to allocation in alignment with an adaptive management framework. How realistic the risk of reaching maximum extraction was also discussed.

Some attendees spoke to changes in resource condition that they had noticed. This included artesian stock and domestic bores that over the recent dry times had reduced pressure and required the addition of a pressure pump.

The timeframes to responding to a change in resource condition were discussed. If adaptive management is introduced how quickly can a response occur. The Padthaway Water Allocation Plan adaptive management framework was provided as an example of how the timelines can work. It was discussed that unlike Padthaway, in the Kingston area, there hasn't been an identifiable date where resource condition has declined to a physical limit of becoming not fit for purpose. It was raised whether use could be used as a trigger rather than resource condition.

Integrity of the current confined aquifer wells was discussed and whether they remain suitable for the adaptive management framework. Observation well networks will need to be re-assessed in relation to any proposed adaptive management framework. The prior capping project (2001 to 2010) was also discussed and the positive impact it had on resource condition.

Of key interest in the confined aquifer is the seasonal variation and how much variation occurs in response to pumping. The impact of the seasonal groundwater low on artesian

pressure is of consideration. Changes in the unconfined aquifer could also impact the confined aquifer.

Artesian pressure has been used to inform resource condition for the Kingston management area under the Lower Limestone Coast Water Allocation Plan. Artesian pressure was discussed, including its importance in supporting groundwater access. It was noted that where artesian pressure is insufficient, water users would need to rely on pumping. Under the increased use scenario some marginal bores will be impacted regardless.

It was asked whether the legislation could enforce the permissible annual volumes (PAVs) set for the confined aquifer management areas, the legislation can't enforce the PAVs.