

Upper South East Water Allocation Planning Review 2016
Phase 1: Community Engagement Report



Natural Resources
South East

Contents

1. Introduction	3
2. Methodology	3
2.1. Public Forum Meetings	4
2.2. Stakeholder Group Meetings	5
2.3. Written Submissions	5
3. Results	6
3.1. Public Forum Meetings	6
3.2. Stakeholder Group Meetings	6
3.3. Written Submissions	6
4. Analysis	7
5. Key Findings	7
5.1. Current Plans	7
5.2. Amalgamation	9
5.3. Community Engagement	10
5.4. New Plan/s	10
6. Summary	11

Tables

Table 1 - Public Forum Attendance.....	4
Table 2 - Public Meeting Comments & Feedback	6
Table 3 - Stakeholder Meeting Participation	6
Table 4 - Written Submission Specific Question Comments & Feedback.....	6
Table 5 - Current Plans Key Findings.....	8
Table 6 - Amalgamation Pros Key Findings.....	9
Table 7 - Amalgamation Cons Key Findings.....	9
Table 8 - Community Engagement Key Findings	10
Table 9 - New Plan/s.....	10

Appendix 1 – Public Forum Meetings Summary

Appendix 2 – Stakeholder Meeting Feedback Summary

Appendix 3 – Written Submissions Summary

Appendix 4 - Bordertown Public Forum – Individual Comments & Feedback

Appendix 5 - Tintinara Public Forum – Individual Comments & Feedback

Appendix 6 – Padthaway Public Forum – Individual Comments & Feedback

Appendix 7 - Stakeholder Groups – List & Comments & Feedback

Appendix 8 - Written Submissions – Individual Comments & Feedback

Appendix 9 – Feedback Form

1. Introduction

In 2016/17 the South East NRM Board proposed to engage the community in a review of the Water Allocation Plans for the Tatiara, Padthaway and Tintinara-Coonalpyn Prescribed Wells Areas (PWAs). These Plans were adopted between 2009 and 2012, and under the NRM Act 2004 they are required to be reviewed within 10 years of adoption.

In the initial stages of the review community engagement was undertaken to gather information to assist with developing an appropriate approach to the review of the WAPs. In addition the engagement sought licensee and stakeholder views on the potential for amalgamating the Tatiara, Tintinara Coonalpyn and Padthaway WAPs into one Upper South East (USE) WAP.

This first phase (Phase 1) of the community engagement process, began in October 2016 with the objectives of:

- Seeking water licence holder and key stakeholder views and opinions on:
 - what is working well and what aspects of the WAPs need improvement
 - the pros and cons of a potential amalgamated WAP for the USE
- Presenting and discussing the 5 year groundwater resource condition trends with water licensees and key stakeholders.
- Seeking advice from licence holders and key stakeholders on how best to engage with them during the water allocation planning review process.
- Providing information obtained during this engagement process to the SE NRM Board for their consideration in determining an appropriate approach to undertaking the review.

Phase 1 finished on 16th December 2016.

This report sets out how Phase 1 was undertaken and provides an analysis of the information gathered during the engagement process to assist the SE NRM Board in its decision making concerning the review of the Upper South East WAPs.

2. Methodology

To inform the community and generate discussion in Phase 1, information on the intent of the process, context in relation to the potential amalgamation of the 3 USE WAPs and the groundwater status reports were made available.

This information was provided through:

- Natural Resources South East (NRSE) web site
- From the Ground Up
- AgConnect
- Individual fact sheets
- Newspaper advertisements and articles
- Radio interview
- Direct letter of invitation mailed out to licensees and key stakeholders

The 3 main methods used to engage with the community and to gather information were:

- Public forum meetings
- Stakeholder group meetings
- Written submissions

A focus of the engagement process was to gather information from the community on 3 main points:

- The operation of the current WAPs
- The potential for amalgamating the WAPs
- Community engagement during the review

2.1. Public Forum Meetings

Three public forum meetings were held:

14th November 2016, 7:30 pm Bordertown Civic Centre, Bordertown

15th November 2016, 4:00 pm Tintinara Health & Recreation Centre, Tintinara

15th November 2016, 7:30 pm Padthaway Football Club, Padthaway.

All water license holders and key stakeholders in the Tatiara, Tintinara-Coonalpyn and Padthaway Prescribed Wells Areas were sent a letter with information concerning the review and an invitation to attend one of the 3 public meetings. The letter also provided information on alternative ways in which comment and feedback on the review could be provided.

Information about the meetings was also provided on the NRSE web site, local paper adverts and on local radio.

Table 1 - Public Forum Attendance

Meeting	Attendees signed in
Bordertown	29
Tintinara	10
Padthaway	31*

*actual attendance was 40

Each meeting followed the same format aided by a PowerPoint slide presentation. The agenda consisted of:

1. Introduction – outline of the meeting’s context and content
2. Background on the status of the 3 USE WAPs – outline of the review process
3. Resource condition reports – key 5 year trends and issues
4. Mandatory requirements – unbundling and consumptive pools
5. Group discussions and feedback – on 2 questions
 - What has been working well in the WAP for this area?
 - What aspects of the WAP are not working / do you think require change?
6. Amalgamation of WAPs – advantages and challenges
7. Group discussions and feedback – on 2 questions
 - What do you see could be other pros and cons for taking a one plan approach?
 - What are the most important issues for the Board to consider when making a decision on whether to amalgamate the USE WAPs?
8. Group discussions and feedback – on 1 question
 - What do you think is the best way to involve the community in the WAP review?
9. Summary – where to from here
10. Introduction of conceptual models – invitation to provide input

Information gathered during the group discussions concerning each question and any other points was recorded and transcribed into an electronic format. A copy of these verbatim comments and feedback collected from each of the meetings is contained in Appendices 4 - 6.

2.2. Stakeholder Group Meetings

Key stakeholder groups received a letter, that in addition to inviting attendance of their members to one of the public meetings, an offer was also made to have a staff member from Natural Resources South East attend one of their groups meetings to discuss the review of the Water Allocation Plans. Appendix 7 lists those stakeholder groups.

As a result of this invitation, Natural Resources staff attended 3 stakeholder meetings to provide a briefing on the process and seek feedback. The content of these meetings included an overview of the status of the 3 USE WAPS, an outline of the review process and an overview of the 5 year resource condition reports. The opportunity to provide a written submission was also highlighted.

A summary of comments provided back at the 3 meetings attended are contained in Appendix 2 with the a full list of comments contained in Appendix 7.

2.3. Written Submissions

From mid-November 2016 the community was invited to submit individual written feedback concerning the USE WAP review. This was promoted at public forums, at stakeholder meetings, on the NRSE website and by advertising in local newspapers, From the Ground Up and AgConnect E-News.

Feedback forms and pre-paid envelopes were made available at the public forum meetings and over 50 were distributed. The feedback form asked 5 specific questions relating to; the current WAP, amalgamation, review consultation and any other comments. A copy of the feedback form has been included as Appendix 9.

The closing date for submissions was the 16th December 2016 to allow for the preparation of this report prior to the February 2017 SE NRM Board meeting.

At the time of closing 8 individual submissions were received. Of the 8 received, 5 were on the feedback form, 2 were in letter form and 1 was in email form.

In addition to the 5 questions, respondents were also asked to select their preferred method of receiving information about the review. Only 4 of the 8 provided their preferred methods. All 4 selected email with 1 selecting the web site and 1 selecting radio in addition to email.

A copy of the 5 questions asked and a verbatim record of the feedback and comments received is contained in Appendix 8.

3. Results

3.1. Public Forum Meetings

Table 2 – Public Meeting Comments & Feedback

Question		Number of Comments Recorded		
		Padthaway	Bordertown	Tintinara
What has been working well in the WAP for this area?		26	18	12
What aspects of the WAP are not working / do you think require change?		33	32	6
What do you see could be other pros and cons for taking a one plan approach?	Pros	2	8	9
	Cons	38	24	12
What are the most important issues for the Board to consider when making a decision on whether to amalgamate the USE WAPs?		17	12	4
What do you think is the best way to involve the community in the WAP review?		48	41	11

3.2. Stakeholder Group Meetings

Table 3 – Stakeholder Meeting Participation

Number of stakeholder groups invited to participate in a meeting	17 [#]
Number of stakeholder group that accepted the invitation	3
Names of stakeholder groups that participated in stakeholder meetings	<ul style="list-style-type: none"> • Tatiara District Council • The Upper South East NRM Group • The South East Aboriginal Focus Group

[#] The list of invited stakeholder groups is in Appendix 7.

3.3. Written Submissions

Table 4 – Written Submission Specific Question Comments & Feedback

Question	Number of Comments Received		
	Tatiara	Tintinara Coonalpyn	Padthaway
What has been working well in the current policy and why?	4	2	0
What needs improvement and what change is needed?	4	1	0
What are your views about amalgamation of all or any of the WAPS?	2	2	0
Do you have any other feedback or comments about the current WAP or the process for the review?	5	1	0
How would you like to be involved in the WAP review?	1	1	0

4. Analysis

The purpose of Phase 1 was to gather information concerning the operation of the current WAPs, the proposed WAP amalgamation and the preferred communication and consultation methods for the review process. Most comments and feedback received were directed specifically to these points.

Comments and feedback received during the engagement period were grouped into different themes. Grouping the comments and feedback in this way allowed for the comments context with the review to be determined.

The themes chosen to group the comments were:

- Administration – issues relating to the administration of licencing
- Allocation – issues relating to the allocation of the water resource
- Areas – issues relating to defined geographic areas or defining geographic areas
- Communication – issues relating to the supply of review information
- Consultation – issues relating to the methods used to undertake consultation
- Consumptive Pool – issues relating to the introduction of consumptive pools
- Differences – issues relating to the distinctive differences between the 3 WAP areas
- Metering – issues relating to water meters
- Monitoring – issues relating to monitoring of the water resource
- Transfer – issues relating to the trade, sale and transfer of licences
- Unbundling – issues relating to the introduction of unbundling
- WAP Review – issues requiring consideration as part of the amendment of any WAP

A summary table of issues and themes from each of the 3 public forum meetings is attached as Appendix 1.

A summary table of issues and themes from the 3 stakeholder meetings is attached as Appendix 2.

A summary table of issues and themes from the written submissions received is attached as Appendix 3.

The most significant grouped issues identified during the analysis are presented in the summary section.

5. Key Findings

This section divides the key findings and responses into 4 main topics:

1. Current Plan/s
2. Amalgamation
3. Community Engagement
4. New Plan/s

Under each topic the responses are then grouped into the one of the themes identified in section 4 - Analysis.

The information provided under each theme sets out the key findings for that theme and outlines an abstract of each issue. They are based on the information provided by participants in the engagement process. The WAP area where the comments concerning the issue were recorded are also presented to help qualify the importance of the issue in relation to each of the WAP areas.

5.1. Current Plans

Table 5 - Current Plans Key Findings

Administration	
Comment/Feedback	WAP Area/s
The timing for the reporting of water usage and the confirmation notification of carryover is not aligned with the seasonal usage and irrigation management needs of water users. Confirmation of carryover volumes takes too long and comes too late in the season to allow for effective irrigation planning and management.	Padthaway Tatiara
Water levy and fees associated with water licence administration are considered too high.	Tatiara Padthaway
The process for applying for a transfer takes too much effort and too much time. It should be more streamlined particularly for temporary transfers.	Padthaway
Allocation	
Comment/Feedback	WAP Area/s
The carryover provisions in the plan works well by allowing for seasonal variations and providing the flexibility of water use that is required.	Padthaway Tatiara Tintinara Coonalpyn
Special production requirements and delivery supplements work well and should be considered part of normal business and become part of the whole allocation.	Padthaway Tatiara
Volumetric conversion has been successful and has provided more awareness about water use and efficiency	Tatiara
Allocation	
Comment/Feedback	WAP Area/s
Conversion rates when shifting to more efficient methods of delivery are too severe.	Padthaway
The current volume of water allocated is considered adequate and equitable with irrigators generally working well together.	Tintinara Coonalpyn Padthaway
Areas	
Comment/Feedback	WAP Area/s
Using Hundred boundaries which are an artificial construct may not be the best way to define management areas. Particular reference was made to Wirrega management area.	Tatiara
Metering	
Comment/Feedback	WAP Area/s
Metering of extractions works well as it allows better monitoring.	Tatiara Tintinara Coonalpyn Padthaway
The water meters recommended and being used are failing too often and getting a service agent to repair them is difficult.	Tintinara Coonalpyn Padthaway Tatiara
Monitoring	
Comment/Feedback	WAP Area/s
Monitoring and water use reporting information has improved and is more accessible.	Tatiara Padthaway
The current monitoring and reporting system in place has allowed better management of the resource which has been demonstrated by the condition of the aquifer even after the drier years recently experienced.	Tintinara Coonalpyn Padthaway Tatiara
Transfer	
Comment/Feedback	WAP Area/s
Temporary trading and current exemptions from hydrological assessments working well.	Tatiara Padthaway
The rules around transfers, particularly between zones, are too restrictive and make it too difficult to transfer.	Tatiara Padthaway

5.2. Amalgamation

Table 6 - Amalgamation **Pros** Key Findings

Administration	
Comment/Feedback	WAP Area/s
Amalgamation could lead to simpler administration and better consistency.	Tatiara Tintinara Coonalpyn
Areas	
Comment/Feedback	WAP Area/s
Boundaries could be changed to better reflect the resources and aid better management.	Tintinara Coonalpyn Tatiara

Table 7 – Amalgamation **Cons** Key Findings

Consultation	
Comment/Feedback	WAP Area/s
Amalgamation could lead to a dilution of local knowledge, representation and autonomy in plan development.	Tatiara
Differences	
Comment/Feedback	WAP Area/s
The 3 areas have different water resources and their water quality and hydrology requires separate management.	Tatiara Padthaway
Environmentally and geographically the 3 areas are different and need different rules and management.	Tintinara Padthaway Tintinara Coonalpyn
One size fits all approach would not work as there are too many differences including the different uses of the water.	Padthaway Tatiara Tintinara Coonalpyn
There is a potential to lose local rules suited to local conditions.	Tintinara Coonalpyn Padthaway Tatiara
Differences in the 3 plans are significant and any amalgamated plan would need to recognise this and make allowances for this.	Padthaway Tatiara
WAP Review	
Comment/Feedback	WAP Area/s
Lining the plans up under an amalgamation may lead to more complexity and confusion.	Padthaway Tintinara Coonalpyn Tatiara
The benefits and advantages are not clear and if there is nothing to gain the areas should be left as is.	Padthaway
The plans are not broken and if the amalgamation is not going to make things simpler or more efficient it should not be done.	Tatiara Tintinara Coonalpyn
An amalgamated plan will reduce the ownership felt for the plan by the stakeholders.	Padthaway
WAP Review	
Comment/Feedback	WAP Area/s
The current plans are right and are working well there is no need to amalgamate.	Padthaway Tintinara Coonalpyn Tatiara

5.3. Community Engagement

Table 8 – Community Engagement Key Findings

Communication	
Comment/Feedback	WAP Area/s
Information needs to be relevant, informative, delivered in a timely fashion and understandable without jargon.	Tatiara Tintinara Coonalpyn
There was a mixed response on the preference and use of emails to send out information with references to not sending out too many and making them concise.	Padthaway Tintinara Coonalpyn
The use of posted mail is considered effective if it is sent out early enough.	Tatiara Padthaway
The use of local papers to supply information is considered effective.	Padthaway Tatiara
The use of local radio to supply information is considered effective.	Padthaway Tatiara Tintinara Coonalpyn
There was an evenly mixed response on the use and appropriateness of social media as a means of communication.	Padthaway Tatiara
A timeline/schedule of the review needs to be readily available and notification of events and consultation periods needs to be provided as early as possible.	Padthaway Tatiara
Consultation	
Comment/Feedback	WAP Area/s
The community needs to be involved from the beginning in the decision making process.	Padthaway Tatiara
Public meetings with two way discussion/consultation with feedback on the outcomes of the meeting provided back to participants work well.	Padthaway Tatiara
There is a strong indication that working with existing industry and community groups is a preferred means of undertaking consultation and engagement as part of the review.	Padthaway Tintinara Coonalpyn Tatiara
There is a strong indication that local reference or steering groups need to be formed and that their membership allows for adequate representation of all stakeholders and the different stakeholder groups.	Tatiara Padthaway Tintinara Coonalpyn

5.4. New Plan/s

Table 9 – New Plan/s

WAP Review	
Comment/Feedback	WAP Area/s
The new plan should not favour specific users and be equitable for all users.	Tatiara Padthaway
The new plan should encourage and facilitate efficient water use and recognise efficiency gains and associated investment.	Padthaway Tatiara Tintinara Coonalpyn
WAP Review	
Comment/Feedback	WAP Area/s
Plans should have a long term focus of at least 5 years.	Tatiara Tintinara Coonalpyn
Where monitoring and assessment identifies positive trends in the water resource then consideration should be given to returning to users a percentage of any previously reduced allocation.	Tatiara

6. Summary

There is some dissatisfaction with current water licencing administration as outlined in the key findings. (This information will be forwarded to DEWNR Water Licencing to address.)

The current carryover provisions appear to be well accepted and provide the flexibility needed for seasonal variations.

Special production requirements and delivery supplements appear to be well liked and some consider that they should become part of the main water allocation.

There is some positive feeling towards the current monitoring and reporting system in that it has allowed for better management of the groundwater resources demonstrated by the current resource condition even after the recent dry years.

There appears to be some satisfaction with the current rules concerning temporary trading but the rules concerning transfers between zones are felt to be too restrictive.

The majority of feedback concerning the amalgamation of the WAPs has been against the amalgamation with the main arguments being the differences between the areas and what is required to manage them in their own unique way. A lot of comment concerned that the current plans were working well and that unless there are clear benefits why change. The fear that local representation would diminish and that the plan would be too complex were also a concern.

Positive feedback concerning amalgamation centred on the potential for consistency, the potential for simpler administration and the potential to realign boundaries to better reflect the resources.

Concerning the provision of information the main points raised were that the information needs to be relevant, timely and understandable. There also needs to be a schedule of the review available and updated and any notifications concerning events or closing periods need to be provided as early as possible.

In terms of methods of getting information out there was no clear indication that any one method was preferred over another but there was conflicting indications over the use of social media and emails.

There was an indication that public forums that allow for two way discussion are well liked and a preferred way to consult widely. There are also indications that consultation should include existing community and industry groups.

There is a strong indication that stakeholders want a local reference or steering group established to represent the stakeholders and that the membership of the group must allow for equitable representation.

Some concerns were also raised that any new plan should be more equitable for all water users and that it should encourage water efficiency.

Appendix 1.

Public Forum Meetings Summary

Padthaway Meeting - Summary

Main Point Questions	Themes (Number)	Issues Summary
What is working well in the WAP?	Allocation (14) WAP Review (6) Metering (1) Monitoring (3) Transfer (2)	Irrigators work well together. The plan is equitable and is working well. Carryover allocations and 3 in 5 rule work well. Special production requirement allocation and delivery supplement worked well. Irrigators have adapted well and plan is working well. Resource is in good condition and usage information has improved. Temporary trading and 16km rule work well.
What is not working well/requires change?	Administration (14) Allocation (8) WAP Review (2) Metering (4) Monitoring (1) Transfer (4)	Administration processes take too long and improvements in transfers and carryover notifications needed. Reporting out of sync with the pattern of water usage. Issues with ability to complete online reporting if unusual circumstances occur. Delivery supplement should be part of whole allocation. Better access to frost allocations is needed. Conversion rates too severe and concerns over loss of water when shifting to more efficient delivery systems. Issues around estimated meter readings and carryover. Recommended meters faulty. Difficult to transfer water between zones and due to 2km radius rule.
Pros of amalgamation	Differences (1) Transfer (1)	Potential for consistent policy provided it recognised differences across the region. Potential to free up transfer rules.
Cons of amalgamation	Areas (1) WAP Review (16) Differences (21)	Does not appear to be any advantages or benefits for irrigators. Potential for more administrative complexity. Locals more take ownership of local plans. Current plan works well and does not need change. Area is unique with different water uses than other areas. The same policy cannot apply to all areas due to the differences and could cause admin confusion. Different water resources, water quality and soil types have site specific issues that require specific management. Best studied and researched aquifer and as a result have a very successful plan.
Most important issue	Allocation (4) Communication (1) WAP Review (4) Differences (2) Unbundling (6)	Efficiency gains should be returned to users and there is room to return water. More use of carryovers. Any changes need to consider equity. Alignment of WAP review dates. Compensation for loss of water rights. Need to be able to recognise different areas.
Preferred community engagement	Communication (22) Consultation (25) WAP Review (1)	Timeline of the review process needs to be publicly available and kept up to date. Keep information current. Emails and letters considered mostly effective. Social media not considered appropriate.

Main Point Questions	Themes (Number)	Issues Summary
		<p>Local papers and radio considered effective.</p> <p>Get messages out through local suppliers, consultants and agronomists.</p> <p>Community needs to be involved in the decision making process from the start.</p> <p>Local face to face community meetings and workshops needed.</p> <p>Use local representative groups and stakeholder groups.</p> <p>Form a groundwater committee.</p> <p>Allow adequate time for responses.</p> <p>Meetings not too frequent and do not over consult.</p>

Bordertown Meeting - Summary

Main Point Questions	Themes (Number)	Issues Summary
What is working well in the WAP?	Administration (1) Allocation (5) WAP Review (1) Metering (1) Monitoring (6) Transfer (4)	<p>Volumetric conversion has led to more awareness of water use and efficiency and the delivery supplement and carryover provisions work well.</p> <p>The monitoring data and its availability has improved water usage.</p> <p>The 75% rule, temporary trading and the sale, leasing and purchase of water rights work well.</p>
What is not working well/requires change?	Administration (5) Allocation (15) Areas (4) Metering (1) Monitoring (1) Transfer (6)	<p>Licence and administration costs are too high and administration processes and online water returns need attention.</p> <p>Entitlements not being used prevent further industry development.</p> <p>No more cutbacks in water should occur and uniform reductions across all usage types unfair.</p> <p>Specialised production requirements should be treated as part of the whole allocation.</p> <p>The 2km area and 16km radius rules need modification.</p> <p>The management year should start in April/May and carryovers should be set by August.</p> <p>The Hundred boundaries are not the best way to set management areas they should be based on hydrological boundaries.</p> <p>Rules on transfers across districts and hydrological survey requirements should be relaxed.</p> <p>Cost and fees of transfers should be reduced.</p>
Pros of amalgamation	Administration (2) Allocation (1) Areas (1) Consultation (1) WAP Review (2) Transfer (1)	<p>Potential for simpler consistent administration.</p> <p>Management areas could reflect resources more accurately.</p> <p>Stakeholders could have more lobbying power.</p> <p>Potential savings for government.</p> <p>Potential to trade over larger area.</p>
Cons of amalgamation	Administration (2) Consultation (4) Consumptive Pool (2) WAP Review (6) Differences (9) Transfer (1)	<p>Loss of local autonomy and knowledge. Dilution of local issues and attention.</p> <p>Ability of NRM and resources required to undertake large plan.</p> <p>Current plan working well.</p> <p>There are a large number of differences in landscapes, resource boundaries, water quality, water values, water uses and local management issues.</p>
Most important issue	Areas (1) WAP Review (5) Differences (3)	<p>Should leave the area as is as current plan works ok. Lot of work involved to amalgamate.</p> <p>Amalgamation if done must make things simpler.</p>

Main Point Questions	Themes (Number)	Issues Summary
	Monitoring (1) Transfer (1) Unbundling (1)	Local rules required some differences are too great.
Preferred community engagement	Communication (18) Consultation (21) WAP Review (1) Unbundling (1)	Regular updates are required. Written information without jargon easily available in both hard and electronic versions. Mixed feedback on the use of social media. Use radio and print media. Easily explained technical information. Direct mail outs of information. Adequate timeframes for stakeholders to respond. Opportunities to be proactively engaged through face to face contact across the whole area important. Adequate representation of all stakeholders and stakeholder groups is important. Use of small local reference groups and a steering committee important.

Tintinara Meeting - Summary

Main Point Questions	Themes (Number)	Issues Summary
What is working well in the WAP?	Allocation (8) Metering (1) Monitoring (2) Transfer (1)	Irrigation enterprises are stable and the amount of water allocated is sufficient and working well. Carryover is working well. Aquifer is stable. Stable irrigation enterprises so trading not really required.
Main Point Questions	Themes (Number)	Issues Summary
What is not working well/requires change?	Allocation (1) Metering (3) Monitoring (2)	Concerned what will happen if non-users start using their allocation. Meter breakdowns and maintenance and service an issue. More monitoring with up to date on line data would assist management.
Pros of amalgamation	Administration (2) Areas (2) WAP Review (3) Differences (2)	Hope that fees would reduce. Different boundaries set on hydrological areas. Less work and costs in plan development and administration. As long as users are not disadvantaged and local issues can still be addressed.
Cons of amalgamation	Allocation (1) Areas (1) WAP Review (3) Differences (7)	Different delivery supplements need to be maintained. There is a risk of losing what is working well and being able to line up all 3 areas. The area is unique and is ok as is and needs to remain being treated individually.
Most important issue	Communication (1) WAP Review (3)	Raise any bad news as early as possible. The current plan is not broke. No politics.
Preferred community engagement	Communication (7) Consultation (4)	Signal intentions early, supply detail, keep it interesting and use plain language. Use local people. Use email and radio. Use industry and local groups for consultation.

Appendix 2.

Stakeholder Meeting Feedback Summary

Main Point Questions	Theme/s	Issues Summary
Resource condition reporting	Monitoring	There is a need for 10 year timeframe
Operation of the WAP	WAP Review	Need to ensure the WAP ensures the sustainable ongoing water dependent industries and public water supply of the region.
Recognition of cultural water need for traditional owners	WAP Review	Ensuring cultural water needs of Aboriginal Traditional Owners is recognised as part of the groundwater allocation planning process.

Appendix 3.

Written Submissions Summary

Tatiara

Main Point Questions	Theme/s	Issues Summary
What has been working well in the current policy and why?	Allocation	Volumetric records present real data.
	Allocation	Amended 75% rule works well.
	Monitoring	Actual measurement provides a greater awareness of individual use which encourages increased efficiencies.
	Transfer	Annual temporary transfers.
	WAP Review	Promoted greater water use efficiency and is reasonably flexible.
	WAP Review	Believe the current allocation plan with some adjustments will serve well.
	WAP Review	Terminology in plan is easy to follow.
What needs improvement and what change is needed?	Administration	Carryover needs to be sorted out earlier.
	Allocation	Potential overriding of hydrological survey to allow temporary allocation.
	Allocation	Inequitable cutbacks.
	Areas	Separate Wirrega management zone to better address western side issues.
	Areas	Zoning for the Wirrega management area.
	Monitoring	Very few monitoring wells.
	Transfers	Greater flexibility for temporary transfers.
	WAP Review	Consideration of efficient water users and their investment.
	WAP Review	Hydrological test considered too conservative for deeper groundwater.
What are your views about amalgamation of all or any of the WAPS?	WAP Review	Limited flexibility
	Consultation	Could work but requires more community consultation.
	Consultation	May allow for greater lobbying power.
	Differences	Not in favour due to large areas with diversity of uses and variable recharge and use.
	Differences	The areas have different issues and challenges.
	Differences	Changes made to suit one area may be detrimental to other areas.
Do you have any other feedback or comments about the current WAP or the process for the review?	WAP Review	Could complicate the plan.
	Administration	Licence fees for unused licences not justified.
	Administration	Unjustifiable licence fees rise.
	Allocation	Allow sufficient buffer to maintain business in variable years.
	Allocation	There is built in flexibility for rotational crops but not vineyards.
	Allocation	Cannot afford further cutbacks.
	Allocation	50% of past cutbacks should be returned to efficient users.
	Allocation	Equalize delivery supplement.
	Allocation	Increase carryover to 30% and 3 years.
	Consultation	Need a steering committee so that irrigators are involved in decision making.
	Consumptive Pool	Better understanding required with consultation as we must clearly understand the changes.
	Monitoring	Consideration of study on recharge and models that may impact restrictions.

Main Point Questions	Theme/s	Issues Summary
	Unbundling	Requires community consultation and steering committees if it is to be introduced.
	Unbundling	Department does not have a good understanding so how are irrigators supposed to understand it.
	WAP Review	Drop the 2.25km radius and just measure actual impacts.
	WAP Review	Efficient use of water by particular industries should be recognised and rewarded.
	WAP Review	Degradation of resource attributable to flood irrigation in western side of Tatiara.
	WAP Review	Ideas and issues from public meeting all need to be discussed in greater depth and addressed.
	WAP Review	Removal of principle 118 has provided better flexibility and has demonstrated that irrigators can get things changed.
How would you like to be involved in the WAP review?	Consultation	Mundulla Vignerons Assoc. requests being kept informed and involved in consultation process to ensure equability in allocations.

Tintinara

Main Point Questions	Theme/s	Issues Summary
What has been working well in the current policy and why?	Allocations	Carryover allows establishment of seedling crops even in dry years.
	Areas	Plans has been adapted to suit individual area.
	Differences	Area is unique and no need to complicate it.
	WAP Review	Plan has been around the longest and is now working well.
	WAP Review	Plan is working well.
What needs improvement and what change is needed?	WAP Review	Let irrigators make decisions not government bureaucrats.
What are your views about amalgamation of all or any of the WAPS?	Differences	Areas are very different and need individual attention.
	Differences	Amalgamation would take the focus off issues specific to WAP.
	Differences	Crops are different in each WAP.
	WAP Review	Not broke so leave as is.
	WAP Review	Uncomplicated leave it that way.

Main Point Questions	Theme/s	Issues Summary
Do you have any other feedback or comments about the current WAP or the process for the review?	WAP Review	If meeting the hydrological assessment requirements leave it alone.
	WAP Review	Change will create tension between different groups.
How would you like to be involved in the WAP review?	Consultation	Need plenty of time for consultation.
	Communication	Keep stakeholders informed through LA, agronomists, seed agents etc.

Appendix 4.

Bordertown Public Forum – Individual Verbatim Comments & Feedback

Bordertown Public Forum – Individual Verbatim Comments & Feedback
What is working well in the WAP?
Volumetric Conversion (V HA IE) - more awareness of water use
Volumetric Conversion (V HA IE) - efficiency
Volumetric conversion process has bedded down
Retain delivery supplement
Carryover
Carryover provision
5 year plan period OK - 10 year plan period too long
Metering of extractions
Monitoring - statistics
Monitoring - efficiency in water use
Monitoring - monitor use
Monitoring on web
Annual water use report
Benefit of hydrological model of water resource to use past data to predict future use
Trade in 75% without hydro
sale/leasing/purchase OK
75% rule
Temp trade
What is not working well/requires change?
Levies/licence fees increase
Annual water use return technical issues - phone call may be easier
Costs relating to accumulating holding licences etc. to secure sufficient water for annual crop
Fees and administrative requirements associated
Volumetric conversion process - administrative issues still need improvement
Big entitlements not used - prevents others entering the water irrigation industry - moved resource away - prevents development
Reduced allocation at start of plan - will plan increase allocations
Redistribution/allocation of the water reduction of 42-48% in 2012??
Clarify the 2km area - total allocation to some not others - reallocation causes an over allocation in a small area
Shadowing property where all not used
No more acquisitions of our entitlements
Amalgamation of licence within 16km radius - increase area
More transparency of amalgamation of licence within 16km radius
carryover not cumulative (3yrs) make a higher % say 30%
Management year not financial start April/May - carryovers set by August
Specialised production requirements are they fair? - is this volume just part of normal business?
Cutbacks without \$ compensation
16km radius 125% above target management level - need to review - more based on average use of 5 years
75% reductions brought back in - not accessible - how do we access water not being used?
Reductions taken across all types of water use - vineyards vs flood irrigation (lucerne) - all treated the same - unfair
Highland not well incorporated into plan
Limitations of the 20km border sharing agreement - does it need review - does the line north and south stay the same
Are the hundred boundaries the best way to determine zones?
Using hundreds - not hydrological boundaries - not accurate reflection/segregating areas
Meters are failing too often

Bordertown Public Forum – Individual Verbatim Comments & Feedback
Have the water management zones within prescribed water area recovered - now using metering - need a review of resource by water management area
Temporary/permanent trade across districts?
Transfer water allocations from one zone to another for a specific purpose/crop rotation more easily or even make it possible
Better understanding of the sale/movement of water allocation to another landholder
Fees associated with transfers - hydrological survey and requirements
If the answer is no still charge the fee
Criteria and requirements in WAP for the allocation/movement of water
Pros of amalgamation
Consistency of advice on structure mechanisms and terminology
Simple administration
75% rule would/should not have occurred
water management areas could reflect resource conditions more accurately
Licensees more lobby power
Out of date plans not acceptable
Saving for Government
Trade more widely??
Cons of amalgamation
Separate WAP will allow more detailed assistance/analysis etc. of a concern by an individual land holder - amalgamated WAP will this still be the outcome?
Will licence fees \$ reduce
Lose local knowledge - e.g. Tatiara Local Action Plan
Need to retain autonomy - local character
Consultation could be diluted by other stakeholder issues - other plans
How do you ensure all who wish have a voice?
Define consumptive pool? - averaging over such a large are will have a detrimental effect
What boundaries will be used to allocate water and determine consumptive pool?
Resourcing from NRM
Mistrust of government policy positions
Don't get reactionary - go long term
10 year is too long
Triggers go off in an area - may have detrimental affects elsewhere
Currently working well
Different geographical areas
Role of the border zone in this amalgamated WAP (particularly unique)
Bordertown water supply
Segregate Lower Limestone Coast/Upper South east
Need to retain current areas/plans identified as differences are profound - also for lobbying and remedies
Too many differences across 3 WAP areas - range and flats
Hydrological boundaries/water quality differs too much
Water quality/depth/values
More local management not broader areas
\$ of water - trade and/or transfer
Most important issue
Tatiara manage alone or 1 plan whole of south east
Whether licensees want to do it are we targeting the right 3 - e.g. lower limestone coast/Tatiara/Padthaway/parts of
Lot of work to get amalgamation
Has to make things simpler otherwise don't
Is it broken? (3 plans)
Long term
Local relevant rules for management
Why amalgamate only the upper south east - separated from the lower south east
Differences too great

Bordertown Public Forum – Individual Verbatim Comments & Feedback
More science given to irrigators about origin of waters
Trading water - rules and requirements in the larger geographical zone??
Unbundling will/may complicate things anyway
Community involvement
Information - way it is delivered for example session 1 - not relevant/informative
Could be better provided in printed or USB form as against being given a web address
Confidence in the process when deliverer of information is not informed
hard copy sent in mail - email survey
media - social media
New terminology (unbundling and consumptive pool etc.) needs education of all stakeholders
Not social media - use industry bodies - use radio
Write to irrigators/stakeholders
Radio interview
adverts in paper
Hall display
How do you explain the jargon?
Letter box drop
Regular updates - twitter - Facebook
Tatiara buy swap sell
Community access to expert information
Well-advertised - more timeframe to notify everyone
Invite written submissions
Clearly define who is the most important to be contacted
Sessions like tonight very important
The opportunity to be proactive in consultation rather than being told what is happening
Those who have purchased licence capital investment in utilising water have the greatest opportunity to contribute to the amount of allocation
Local reference groups
Application process to board worked well
Town irrigators dryland stock all represented
Diversity of irrigators (systems and enterprises) small and large
Larger consultation as tonight
Not a preconceived result
Where's the town water come from?
Go through Local Action Plan Groups
District representatives on steering committee
Specialist groups or district groups or interest groups (nominations - appointments)
Small groups reporting back to a large steering group
Open forums vs invite only
Local Council bore field protection zone
Independent facilitator not department
Broad opportunities across whole region - not centralised
On-line feedback - 2 way
Industry reference groups - advisory groups - dryland irrigators councils
Challenges for the plan
Unbundling - better preparation of facts

Appendix 5.

Tintinara Public Forum – Individual Verbatim Comments & Feedback

Tintinara Public Forum – Individual Verbatim Comments & Feedback
What is working well in the WAP?
We strive to be efficient and sustainable
Nothing wrong with current allocation
As for usage to go up would require investment and infrastructure so there would be a lag time
System of irrigation regimes (types of cropping) is stable
Carryover is a good thing working well having 25% management tool
Plan in Tintinara Coonalpyn for lucerne is going well amount of water is right on the money
Lifting of cap and reduction to usage was handled well
Plan used - level of water is working
Metering
Strength of aquifer has stood up over last poor years
Aquifer stable and sustainable
No trades really needed most have enough and manage well
What is not working well/requires change?
Can't put plans in place in case non users start using to penalise current users
Maintenance of meters is an issue
Major problem back up service on meters (serviceability)
Victoria and Riverland have trusts with central service and support for meters - works well
Compliance and monitoring required
Current data on line would be good for management
Pros of amalgamation
Hope lower levy would be result
Hope state charging lower fee
Could have different boundaries
Use hydrological boundaries better than current boundaries
Benefit seems to be for administration/development of plan
5 - 10 year thing good
Cost of each review huge
No problem amalgamating only if uniqueness of our area is treated as is required locally
As long as users are not disadvantaged
Cons of amalgamation
Delivery supplement different and needs to be maintained
Shift boundaries there will be wars
Rather pay levy to get job done by right people - local knowledge
Risk of losing what is working well
Could we line them up?
Need to have local triggers
Should not lose uniqueness of the area needs to be treated individually
Area needs to be looked after the same as it currently is
Don't want local conditions in plan averaged/lost
Will be penalised in 5-10 years if amalgamated - local works well
Crap idea - we are unique ok as we are
Not keen on share system
Most important issue
Any bad news needs to be flagged early to groups etc.
Continuity of staff involved in process needed
Not bundled into political thing keep it simple
Tintinara Coonalpyn plan isn't broke
Community involvement
Use service providers/agronomists give them information

Tintinara Public Forum – Individual Verbatim Comments & Feedback

Email good but not too many

Make it interesting

Signal intentions early - supply detail as soon as known
--

Local person involved in WAP to get message out - someone good at getting information out

Undress ideas - get legal jargon out - plain language

Local ABC radio - final position

Use existing people/groups already out there
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Lucerne Australia - group

Do alpha groups - on ground people

Use industry groups

Appendix 6.

Padthaway Public Forum – Individual Verbatim Comments & Feedback

Padthaway Public Forum – Individual Verbatim Comments & Feedback
What is working well in the WAP?
Equitable plan - irrigators worked well together
Carryover working well
More accountable better water efficiency
Frost allocation is working well
Good to have some water in excess of direct needs - need this extra for dry times/expansion
Seasonal carryover works well
Frost water allocation works well
3 in 5 plan is helpful
Padthaway WAP working - give dry years/higher use - resource is stable (depth and salinity)
Padthaway irrigators worked together to meet cuts without impact on anyone's business
Flexible - good seasons allow increase - carryover good could be more
Reductions worked - could have been too much
Renew delivery supplement in new plan - extended to 2018 - expired in 2014
Special production requirements expired in 2014 - increase to 25%
Less fear
Adapted
Have changed approach to management (production and efficiency) in response to the plan and market pressures
Licence is an asset
Working ok - it's not broken don't fix it
Don't need a review for a few more years
Metering good - allows better monitoring - efficiencies
Accurate information on usage - improved information
Resource is in good condition after low rainfall
Given the dry period in the last 5 years it is positive to see the impacts to groundwater levels have been minimal
Temporary trading - seasonal variation
Trade and transfer - 16km rule stops bringing in water from low density areas to higher use areas
What is not working well/requires change?
Carryovers - administration issues re accounting for carryover - wrote to Minister and have had no response
Transfer administration has held up mid-season transfers
Takes too long to get data - frost reading in November - only know volume until January
Annual carryover takes too long to get allocation confirmed - June report
Paper work to make a transfer happen takes too much effort - streamline process - temporary trades as well
Unsatisfactory response from water department
Paper work timing and administration with regard to transfers very poor - facilitation
Need better information transfer from department
Online water returns no flexibility in reporting unusual circumstances
Big time lag in sending out carryover volumes - allocations
Reporting of allocation out of sync with irrigation cycle
Some people getting incorrect carryovers
Shifting to more efficient delivery flood to centre pivot is hampered by native vegetation rules - water management and native vegetation need to work together
User pays - licence fee adjusted to water used
Can't get frost protection as an addition to allocation - not every that needs one has one - issue re administration of frost protection
Morambro Creek water not in addition to groundwater allocation - need to account for this water in addition to allocation
Could raise the percentage of carryover

Padthaway Public Forum – Individual Verbatim Comments & Feedback
Delivery supplement needs to be made more secure - ensure these volumes are permanent - delivery supplement should be considered as an individual's permanent allocation
Conversion rate going from flood to pivot/drip are too severe and need to be adjusted
Volumetric conversion lucerne to vines - reduced volumes - rubble soils promise - obligation given
Conversion rates too severe - flood/pivot
Concern about loss of water when shifting to more efficient delivery mechanisms - flood = delivery component
Storage of surface water
No incentives - social or economic considerations are lacking - economic development - rigid inflexible - what happens to sleeper licences
Administrative - opening reading is different to the closed reading - mistakes occurring in the transfer of meter reading
Estimated figures an overestimation - impacts on carryover
Need better support from NRM regarding water meters - recommended meters not working - who's responsibility is it to replace a faulty meter which has been recommended
Water meters - expensive - recommendation - specifications differences between manufacturers specifications and DEWNR specifications/requirements
Concern around accuracy of monitoring
Difficulties in individuals being able to estimate use needs - unwilling to transfer
Movement of water within/between zones is too restricted - system does not reward efficient use of irrigation
Transfer of water difficult
It is very difficult to transfer water - 2km radius
Pros of amalgamation
Avoid duplication of preamble consistent policy etc. - just need to recognise the differences across the region where they exist
Could transfer rules across the upper south east be freed up in an amalgamated WAP?
Cons of amalgamation
Because we are keeping the existing geographic boundaries regardless why change
Dilute the level of community ownership
More administrative issues with an amalgamated WAP
If changes are made administration may not cope with the complexity
As a community of irrigators worked collaboratively for the best WAP for everyone
Take ownership of WAP
We own the plan - mental health issue
Risk of a major industry (powerful group) dominating the WAP planning process - forestry in Lower Limestone Coast
Nothing to gain
Benefits for irrigators not understood
Not broken don't fix it
Can't see any advantages of amalgamation
No advantages
Not convinced workload overall would be reduced - not a money saver
Benefits are not obvious - leave as is
We got it right when we did our current WAP
What happens to the value of your water
Diversification in Padthaway different to Tintinara Coonalpyn - could lead to more administrative confusion
Environmentally the regions are all different - can't have the same policy for all areas
Strategic policy while allowing for local - if still allowing local issues to be addressed this may not be a real benefit
Not concerned about differences between Lower Limestone Coast and Padthaway
Different water resources to that of Padthaway
Different water uses e.g. vineyards
Different water quality different soil types unique and best studied water resource so managed accordingly
Border water sharing agreement could become an issue water amalgamation for Padthaway
Changing site specific issues is a much more difficult in a wider geographic
Padthaway uniqueness highlights the need for it to keep its own WAP

Padthaway Public Forum – Individual Verbatim Comments & Feedback
Don't like the one size fits all approach
Once amalgamation has been legislated it is very hard to make site specific changes
Padthaway's water resource is unique - to amalgamate with other regions could be to the detriment of ours
One region having to compensate for declining levels/poor management in another
Don't think one size fits all - variation across PWA
Areas are completely different - need to be treated differently
Big isn't better
Award winning WAP
Best researched aquifer over a number of years
Spent a lot of time research monitoring our aquifer very successful plan
More aware of water resource in Padthaway
Most important issue
Efficiencies should be passed to licensees
How do we better utilise/store excess surface water when available
Greater use into future years of carryover - over 2 years
Room for return of water
Need to understand what is sustainable use
compensation for loss of water rights
Align review dates
What about Morambro Creek
Landowners have significant assets associated with water licence - any changes to WAP need to consider this impact on equity
Ability to recognise specific regions and associated needs - soil types crop type delivery mechanisms
Plan would need to have e.g. appendix A Padthaway appendix B
Unbundling is a concern
More information needed - don't know exactly what it means - unbundling
Better knowledge of unbundling needed before progressing
Not convinced that unbundling should proceed
Unbundling - suspicious that it will lead to reductions
How will unbundling help us?
Community involvement
Suggested - timeline milestones for plan development on website
School newsletter and grape growers
Email with useful direct title on topic in subject line
Social media not a good medium
Letters/flyers ok - considered effective
Radio ABC
Social media and twitter not appropriate
Text reminders
Email effective
Don't discount local paper for getting message out
Engage with consultants/agronomists so they know what's going on
ABC Rural Report - help to convey information
Emails and letters as soon as an issue has arisen
Current information on website
Timeline through whole process of WAP - online schedule/calendar
Email updates concise to the point
Radio talk back on issues
Adverts/articles in local papers
Flyer in store
Timeline for consultation publicly available
Traditional mechanisms - papers radio group contacts publications
Email not always effective
Workshops a good approach in preparation and in finalising the WAP

Padthaway Public Forum – Individual Verbatim Comments & Feedback
Draft plan - allow the community to meet separately to discuss the plan
reference group - a concern if representation is not adequate - needs a good cross section of enterprises
Community needs to be involved at the beginning of the decision making process
Community representatives of stakeholders involved in the decision making process
Everyone needs to be heard
Form a groundwater committee with representatives of the different irrigator groups
Note - level of engagement would need to be at the local level anyway to ensure good input
Avoid emails phone interview/surveys
Workshop/forums work best - evening good - need to be aware of what's happening on farm and time accordingly - time around allocations coming out (fresh in peoples mind)
Need to have a community consultation where people can ask questions and get answers face to face
Workshops work well
NRM to attend industry groups/organisations meetings
Community meetings - not too frequent
Don't over consult
Consult early - identify important issues to better focus/prepare for consultation
Email survey monkey with key questions
Like group discussions to stimulate thoughts and consider responses
Work through stakeholder groups
Open forums with feedback on outcomes of meeting
Face to face meetings
Grape growers and irrigators - 2 representative groups
Work through existing groups
Online reference materials - availability to respond online
Adequate time to prepare submissions
Adequate research

Appendix 7.

Stakeholder Groups

List of Stakeholder Groups

Stakeholder Groups invited to participate in the engagement
Upper South East NRM Group
Tatiara District Council
South East Aboriginal Focus Group
Padthaway Wine Region
Lucerne Australia
Coorong District Council
District Council of Tatiara
Cannawigra Water Conservation Group
McKillop Farm Management Group
Coorong Tatiara Local Action Planning Group
Primary Industries & Regions SA
Dairy SA
South East Potato Growers Association
Conservation Council SA
Regional Development Australia Limestone Coast
PPSA Natural Resources Committee
Limestone Coast Local Government Association
EPA South East

Stakeholder Meetings – Comments & Feedback

Upper South East NRM Group – 25 November Natural Resources South East Office Keith
Several members of the Group indicated that they had attended one of the Public meetings held on the 14 and 15 th November.
An interest expressed in seeing both 10 year and 5 year resource condition reporting undertaken for the PWAs in order to pick up on longer term trends in resource condition.
Group members took away a feedback form to submit to NRSE if they had additional feedback on the questions proposed.
Tatiara District Council -13 December, Tatiara District Council Chambers Bordertown
Comment was made that the public meeting process captured the views of the community in attendance, several members of the Council attended the public meetings held between 14-15 Nov.
The key message from the meeting was that Council is keen to ensure the Water Allocation Plan ensures the sustainable ongoing water dependent industries and public water supply for the region.
South East Aboriginal Focus Group 19 December, Lacepede Bay Motel, Kingston
Comment was made that the groundwater allocation plans should consider and acknowledge the cultural needs of Aboriginal Traditional Owners for ground waters.

Appendix 8.

Written Submissions – Individual Comments & Feedback

What has been working well in the current policy and why?
Created awareness and greater efficiency of irrigation practices. Reasonably flexible (depending on location).
The plans have been adapted to suit each individual area and should stay like that. The plan has been running the longest and there was teething issues but now its working good. Our area is unique in what we do, there is no need to complicate it.
The plan as a whole seems to be working well at the moment. The carryover component allows us to be able to water our seedling crops sufficiently in that first year even in very dry years.
Annual temporary transfers.
Volumetric records present real data in terms of actual extraction versus the previous hectare based allocation- which was an estimate at best.
Actual measurement provides a greater awareness of individual use which encourages increased efficiencies. It provides a useful foundational basis from which future adjustments may be made.
We believe the current allocation plan with some adjustments will serve well.
Having the 75% rule amended last year works well and has been of great benefit to our business allowing us to purchase more water and increase production.
A lot of the terminology within the plan is easy to follow and makes it reasonably easy for the user.
What needs improvement and what change is needed?
I have a concern with the Minister overriding the findings of the hydrological survey to allow temporary water. Consideration to be given to efficient users who had already invested in long term infrastructure (e.g. vineyards). The current WAP and restrictions do not reflect this and are therefore not equitable. Wirrega management zone could be separated in halves to better manage the problems in the western side.
Its ok let the irrigators in the area make decisions. Not government bureaucrats dictating what needs to happen.
Few monitoring well so records of trends in groundwater level are sparse. Hydrological test considered conservative for deeper groundwater and does not take into account local variability in soil types. Amendment in WAP to allow greater flexibility for temporary transfers.
We firmly believe that quantitative equal reductions to allocations over all industries did not reflect the efficiencies (or relative inefficiencies) of different practices, nor the expense incurred to achieve efficiencies in the first place and therefore the reductions are simply not equitable for reasons discussed below.
We believe the cutbacks were inequitable and consideration needs to be given to: <ul style="list-style-type: none"> a) High cost of establishment and infrastructure including already efficient irrigation systems b) The fact that such a significant area of irrigated vines uses this little water. c) The high ongoing input costs - of considerable economic significance in our region. d) Delivery components of 18% for flood irrigators at commencement of the plan, which is disadvantageous. This was within itself inequitable and inconsistent with the “across the board” volumetric cutback measures deemed as “equitable”. e) The investment already made in efficient irrigation systems within a permanent, immovable infrastructure and compulsory ongoing commitment to necessary and expensive management.
We consider that within the Wirrega management area and sub area 2 in particular should be divided into two management zones because of the differences in use and the considerable “water cone” present in the western section which is due to the large scale flood irrigation practices in that area and further west.

What needs improvement and what change is needed?
This is not an improvement to the plan as such but I think that our carry overs and licences for the year need to be sorted out much earlier. Last year everyone was irrigating in August due to the extremely dry conditions but still did not know their exact water budget for the year.
I feel that you could ask for meters to be read by end of May instead of July so the process is speed up. This may then allow the carry overs and licences to be done by the end of August/early September.
What are your views about amalgamation of all or any of the WAPS?
Not favourable because of the large area involved and diversity of uses and variability of recharge and storage and the variable load on the resource.
It isn't broke so leave it as is. It is uncomplicated now leave it that way.
I think all these areas are very different and probably need individual attention. Amalgamation could take the focus off issues that are specific to each WAP at the moment. Even the crops grown are very different.
This could work providing there is more community consultation so we have more of an understanding of what the facts are and how it may impact on our businesses.
I think with amalgamation it allows for streamlining of terms within the plan but I feel that the three areas still need to be considered separately because they each have different issues and challenges.
If they were amalgamated it could be an issue if one area wants something changed which may be detrimental to another area.
Amalgamating could also really complicate the plan which would make it harder for irrigators to understand the plan.
A positive outcome is that it may allow irrigators and the NRM board to have more lobbying power due to it being a bigger identity.
Do you have any other feedback or comments about the current WAP or the process for the review?
Consideration given to the pilot study on recharge and the models arising that might impact on restrictions and allowances given variability of seasons to allow sufficient buffer to carry on business uninterrupted where allowable.
Drop the 2.25Km radius circle from the hydrological assessment process and just measure the actual impact in terms of water table lowering and salinity increasing.
I do not understand how a water licence management fee is being applied to all licences. My licence is not being used yet this fee still applies not sure how this can be justified? A licence that was \$40.90 in 2015 is now \$240.90 for the next year, this seems to be a huge unjustifiable price rise in one year for an unused licence!
If we meet all the hydro stuff leave it alone. Change will create tension between groups and we don't need that.
On the basis of the following points we believe that vineyards need to be considered apart from other irrigation developments.
Efficient use of water: We believe we have already fulfilled an obligation towards the most efficient use by means of irrigation using dripper reticulation from establishment. Much of our land could have been developed using inefficient flood systems as were used as late as the early 1990's in Padthaway in order to reduce irrigation installation costs and to grow bigger crops. Instead we spent in the order of \$5,000/ha to install dripper systems which involve pressure pumps, filtration, underground mains networks and dripper line. For this, we were "rewarded" with a 12% delivery supplement while flood irrigators were awarded 18%. At that time we were told this was to allow a suitable buffer period for flood irrigators to change to more efficient irrigation methods. Now we are being told it is to reflect an amount of water returning to the water table, however, with a depth of around 27 – 30 metres to the water table in our locality, this seems most unlikely.

Do you have any other feedback or comments about the current WAP or the process for the review?

We also note that delivery supplements are granted at the discretion of the Minister on an annual basis, meaning these could be reduced. According to the 2008/2009 water report, Vineyards in the Tatiara PWA comprise some 16% of the total irrigated area and yet take only 3% of the total water used. In comparison during 2008/2009 Lucerne enterprises (seed, hay and pasture production, all irrigated with flood or pivot) used 84% of the water. Those reports are no longer provided; we would like to see these reports still sent out to irrigators.

Rotational Crops: There is built in flexibility for rotational crops (such as grown under pivots). The key difference between vineyards and pivot irrigation lies within the fact that a pivot can be relocated for the purpose of rotating crops or to locate water. Water can even be imported from another management area. Some are dismantled and relocated regularly, others are left while cropping and grazing is carried on about them until they are shifted or recommissioned. If the activity becomes non-viable they can be dismantled and relocated or sold and the land readily reused for cropping or grazing. In comparison, vineyard infrastructure is non-relocatable. It is established for a life of at least 30 years at high cost. Inaccessibility to a vineyard renders the land virtually useless for any other purpose. The vineyards were developed in good faith of a reliable water supply and were planned according to the water that was available to enable management with a sufficient buffer included.

Rotational crops referred to in the plan: In addition to the aforementioned flexibilities of land use for other enterprises, there are flexibilities allowed in the WAP which provide advantages to pivot users in particular.

84. A licensee may apply in writing to the Minister to vary a water licence for the purposes of irrigating a rotational crop, subject to principles 58-63 (Hydrogeological effects and assessment) and principles 3-5 (Ecosystems dependent on underground water).

85. An allocation of water may be taken from another management area to irrigate a rotational crop for a maximum period of 5 years.

Comparatively, the only flexibility for vineyards is contained within the temporary leasing of water which is restricted to a maximum of 20% of the allocation and can be applied for in three years out of five.

Furthermore, Carryover water is also limited to 20% of allocation only to be held for the one season. Currently, we cannot have more than 140% of our allocation for use in any one year, and it can only be taken from the 4km hydrological radius- if the application is approved, not another management area as for a rotational crop.

Our suggestions for the next plan:

i. We can afford no further cutbacks in the next plan. In fact, we would rather see 50% of what we've had taken from us restored back in recognition of the water efficiencies that were not taken into account in the first place. To do this would increase the total extraction in the Tatiara by just (approximately) 800 mega litres. This is a minimal impact for maximum benefit. Such an allocation for vignerons still encourages restraint on resource use but is more manageable.

ii. Equalize the delivery supplement. To reduce the supplement availability back by just a few percent provides plenty of water to allow for the changes.

iii. Increase the allowable carryover percentage from 20%-30% of allocation and increase the term to hold the balance of any carryover water from 1 to 3 years. Increase the quantity of temporary lease water to 30% of allocation according to the existing 3 of 5 years in order to provide greater flexibilities to manage more difficult seasons.

iv. We remain concerned that the degradation of the resource is mainly attributable to large scale flood irrigation in the western side of the Tatiara PWA as stated in the last plan, and firmly believe that if the extent of such high water use activities were to be reduced it would have the greatest and most immediate measurable positive response in the resource.

Do you have any other feedback or comments about the current WAP or the process for the review?

From an economical and business standpoint, we have concern with the loss of equity in our businesses and the resultant financial hardship this creates while Lucerne irrigators continue to flourish around us in comparison. Further impositions placed on us with the reduction of water will result in serious questions of business sustainability and direct repercussions on our local economy and on our state.

I am very concerned how the unbundling is going to take place for this WAP. It is a lot more complicated than the river Murray which is like a huge "bucket". There needs to be community engagement and steering committees to work through this if it must be part of the new plan.

My number one concern from the meetings was that the Department did not seem to have a great understanding of what the changes meant for the Tatiara WAP therefore how irrigators are supposed to understand it.

The suggested Consumptive pool also concerns me. At the meeting I did not get a great grasp or understanding of what the Consumption Pool was all about so once again I feel we need to have more irrigator consultation and involvement so we as a team and community can get the best outcome for everyone. We must clearly understand any changes made.

I would like to see that there is a steering committee for the update of the Tatiara WAP so that irrigators are involved in the decision making and have a representative voice.

From the night meeting, the ideas brainstormed at the tables all need to be addressed. These issues need to be talked about and discussed in greater depth.

Currently I think the WAP allows irrigators good flexibility for purchasing water since principle 118 was deleted and I am very pleased that the NRM board pursued with getting this rule changed. It shows that growers and irrigators can get things changed within the Government.

How would you like to be involved in the WAP review?

Mundulla Vignerons Assoc. would appreciate being kept informed of and having a say in the consultancy process to try and ensure proper equitability in any changes affecting allocations.

Make sure there is plenty of time for consultation. Keep the stakeholders informed through LA, agronomists, seed agents etc.

Appendix 9.

Feedback Form

2016 Water Allocation Plans Review

Your feedback and comments are important to help shape the Water Allocation Plans of the future.

Please circle the WAP(s) to which your comments are relevant:

Tatiara

Tintinara-Coonalpyn

Padthaway

If there is insufficient space to provide your comments in any of the comment boxes please use a separate sheet and attach it to the form. If your comments relate to more than one WAP please specify which one.

What do you think works well with the current policy and why?

What do you think needs improvement and what is the change you think is needed?

What are your views about amalgamating any or all of the Tintinara Coonalpyn, Padthaway and Tatiara WAPs?



Natural Resources
South East



Government
of South Australia

Do you have any other comments or feedback concerning the current Water Allocation Plans or the process for reviewing the plans? Please also specify how you would like to be involved in the review.

How would you like to access or receive information about the review? (Please tick box/es)

<input type="checkbox"/> Natural Resources SE Website	<input type="checkbox"/> From the Ground Up	<input type="checkbox"/> Ag connect eNewsletter
<input type="checkbox"/> Email	<input type="checkbox"/> Newspaper	<input type="checkbox"/> Radio

Contact Details (optional)

Complete this section to receive direct feedback on the next steps planned for the review of the Water Allocation Plans

Name	
Postal Address	
Email Address	

For further information and to download this form visit www.naturalresources.sa.gov.au/southeast.

Post your completed form to Water Allocation Plans Review, SE NRM Board, PO Box 1046 Mount Gambier, SA, 5290 or scan and email to DEWNR.SENRMBoard@sa.gov.au by **Friday 16 December 2016**.

Thank you for your feedback



