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Chief Executive  
Department of Primary Industries and Regions  
Per email: [mehdi.doroudi@sa.gov.au](mailto:mehdi.doroudi@sa.gov.au)

Dear Professor,

**Re: Briefing – SADA – South Australian water matters – SA dairy industry**

We are taking the opportunity to write to you in advance of our meeting on 25 March 2022.

**Purpose of this letter**

From a dairy industry perspective water has been identified as one of the more pressing matters which will impact upon the industry in coming years.

Consequently, we are taking this opportunity to address water issues with you from a dairy industry standpoint.

While we appreciate that the management of water in South Australia falls under the umbrella of the Department of Environment and Water and the Landscape Boards, we nevertheless seek to outline some of the matters that are important to dairy.

**Introduction**

As you are doubtlessly aware, water is generally prescribed in South Australia and is administered through the nine Landscape Boards which have been established. The Landscape Boards cover the state however, SADA's interest originates from four of the board's areas of influence, namely, The Hills and Fleurieu, the Limestone Coast, Northern and Yorke and Murraylands and Riverland areas.

Each board is responsible for the development and review of a Water Allocation Plan (WAP) for their prospective area ensuring they step through the correct stages:

1. A risk assessment is undertaken to identify risks to the water resource and water users, including the environment.
2. The community is given opportunities to provide input into the content of the water allocation plan, based on the risks it is aiming to manage.
3. Based on the decisions made about the risks to the water resource, the environment and water users, a draft water allocation plan is prepared.
4. A consultation process is undertaken to seek community input and views about the draft water allocation plan.
5. The regional landscape board takes the community feedback into account when making decisions on any changes to the draft before submitting a final water allocation plan to the Minister for Environment and Water for adoption.
6. The adopted water allocation plan is reviewed within 10 years to ensure it is still effectively managing the risks to the water resource, the environment and the community.



Each of the areas are going through or due to be going through their 10 year review process in the near future.

### The Hills and Fleurieu

Within the boundaries of this Landscape Board, there are two water allocation plans (WAPs) which are of particular interest to SADA namely the Eastern Mount Lofty Ranges WAP and the Western Mount Lofty Ranges WAP.

The Eastern Mount Lofty Ranges WAP was commenced in September 2013 and amended in February 2018. The Eastern Mount Lofty Ranges also fall within the orbit of the Murray Darling Basin Plan as it is within the catchment of the River Murray.

The Western Mount Lofty Ranges WAP was commenced in September 2013 and amended in February 2019.



As part of the upcoming review process, the demands for water should be better known than at the time of the plans' original declarations. Presently, SADA is not concerned regarding water allocation amounts for its members within borders of the two WAPs.

The increasing demands that the government is placing upon water users with requiring farmers to read their own bore meters and test for salinity has raised the question as to what the farmers are gaining from the levies which are paid as part of the Landscape process. Farmers are also expected to meet the costs of installation and maintenance of authorised meters. The fact that the meters which are approved by government are not necessarily fit for purpose (i.e. they often are unreadable because of the build up of condensation inside the meter) is also of concern.

While convenient from an environment department's point of view, from a primary production point of view the demands of government are becoming intrusive.

Turning to the Eastern Mount Lofty Ranges WAP in particular, the science was well established at the time for the original plans. However, SADA is aware that there is a mindfulness among modelers in some quarters who are concerned that the 2008 models which were originally used for the WAP may potentially have become, because of changes in rainfall patterns, less certain. Consistent with SADA's approach in the rest of this document SADA urges planning which provides commercial certainty built on precise science that supports realistic modelling.

### Limestone Coast

The Limestone Coast Landscape Board manages 5 WAPs for their district. These are:

- Padthaway
- Tatiara
- Tintinara-Coonalpyn
- Lower Limestone Coast
- Morambro Creek.



Upon coming to power the previous Government commissioned the “*Independent review of science underpinning reductions to licensed water allocation volumes in the Lower Limestone Coast water allocation plan*”, conducted by the Goyder Institute for Water Research (Tech report Series No 19/01), (The Goyder Review).

This report produced mixed findings over the six management areas it reviewed. In its conclusions it identified that there had been widespread water declines and recoveries in the observation bores in the respective areas. In some instances the recovery had been substantial and in other areas less so. Further the Goyder Review also observed that in some instances there had been a measurable increase in salinity in a number of the observation bores.

Notably the Goyder Review’s most consistent finding was that while a substantial amount of science had been done it was still too general and insufficiently granular. Furthermore, the six review areas did not account for the whole of the Limestone Coast area.

While SADA is mindful of the proper management of Groundwater Dependent Ecosystems (GDEs), SADA is concerned that there are some efforts being made by the local officers of the Department or Landscape Board to influence a conservative approach to water allocation moving forward ahead of the required science.

It is clear that the Goyder Review, while comprehensive, cannot amount to a document upon which the water allocations moving into the future should be truncated in any way. There is no doubt that there are concerns for GDEs however, the purpose of the water policy of the South Australian Government is to balance environmental, social and economic outcomes. Relying on thin science to justify greater retardation of water allocations for environmental preservation is in the opinion of SADA too onerous to be justifiable, considering the balance.

The Government should adopt the clear recommendation of the Goyder Review and improve the quality of the information upon which better and more specific planning can occur.

### **Northern and Yorke**

The Northern and Yorke Landscape manage three WAPs, namely, Clare Valley, Baroota and Barossa as well as sharing a WAP with the Adelaide Plains.

There are only a small number of dairy farms in the area, the Northern most being located just north of Balaklava.

SADA does not raise any issues of fundamental importance to dairy farmers who are working within the boundaries of the Northern and Yorke Landscape area.

### **Murraylands and Riverland**

As with the Hills and Fleurieu Landscape Board plans, the Murraylands and Riverland board are impacted by the Murray Darling Basin Plan and are subject to the Commonwealth’s Water Act.

It governs five WAPs:

- Eastern Mount Lofty (shared with Hills and Fleurieu)
- Mallee
- Marne Saunders



- Peake Roby and Sherlock, and
- Murray River

The position of SADA is that the Murray Darling Basin Plan should be maintained without alteration.

As with the other states within the Plan area SA has been provided with an allocation. In total, South Australia has an annual entitlement of 1,850 gigalitres (GL) under the Murray–Darling Basin Agreement. South Australia does not automatically receive 1,850 GL every year. While access to the full 1,850 GL is available at the start of most water years, it may be reduced when conditions are dry and water availability is limited. In these years, South Australia receives a third share of the available River Murray resources.

Coupled with the conservative settings of water allocations in South Australia, (settings which has enabled SA to return more than required to the environment), farmers have been able to enjoy 100% allocations, even during the recent and pronounced drought.

Nevertheless, the recent drought in Australia saw a number of political assaults on the Plan including the errant notion of the introduction of a “lock zero” at Wellington and arguments for the removal of the barrages. These attacks were misguided and ill informed but nevertheless resonated with desperate people up stream.

SADA’s position is that the Plan must be protected and remain undiluted by pressures from upstream states.

## **Conclusion**

SADA expresses its gratitude to you for your time and attention to these matters in particular. The previous government adopted the South Australian Dairy Industry Action Plan 2019-2024. This plan is about ensuring a future for SA dairy by building partnerships for premium outcomes.

As the Chief Executive of PIRSA we consider you an important partner in the development of our industry as a sustainable industry doing its bit for the future true welfare of the people of South Australia.

Yours sincerely

Andrew Curtis  
CEO SADA