



## Livestock SA Limited

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## SUBMISSION

14 February 2025

Andrew Solomon  
Program Manager Water  
Eyre Peninsula Landscape Board  
PO Box 2916  
PORT LINCOLN SA 5606  
[EPLBAdmin@sa.gov.au](mailto:EPLBAdmin@sa.gov.au)

Dear Mr. Solomon

### Re: Submission to Eyre Peninsula Water Allocation Plan Revision

Livestock SA is the peak industry organisation for South Australia's red meat and wool producers. Representing over 5,200 sheep producers, 2,700 beef cattle producers and several hundred goat producers across the state, we work to secure a strong and sustainable livestock industry. South Australia's \$4.3 billion livestock industry is a key economic contributor to the state which supports 21,000 South Australian jobs across the red meat and wool industries.

Livestock SA welcomes the opportunity to provide a submission to the Eyre Peninsula Water Allocation Plan Revision, which is important to our members and industries who rely on secure and equitable water access to operate efficiently and contribute to the South Australian economy.

Water security is becoming increasingly complex across South Australia, including the Eyre Peninsula, where depletions in groundwater storage are already impacting water availability. With the Eyre Peninsula currently in stage 2 water restrictions and facing increasing restrictions until the completion of the recently approved desalination plant, efficient management of water resources is becoming more critical.

To ensure the Eyre Peninsula Water Allocation Plan (WAP) is effective and supports livestock production in the region, the following factors must be considered.

### 1. Recognition of Livestock Water Needs

The WAP acknowledges stock and domestic water use; however, it is crucial that livestock producers are guaranteed access to sufficient and good-quality groundwater. Livestock farming is a major economic driver in regional South Australia, and any restrictions or reductions in water allocation must consider the industry's needs.

Livestock producers are efficient managers of resources, including water, and must be enabled to manage their stock and water allocations effectively. Water must not be allocated or restricted

based on commodity production (i.e. livestock or grains). Primary production businesses need autonomy and responsibility for water management on their properties to suit business requirements.

**Recommendation**

Guarantee an adequate baseline water allocation for livestock producers to ensure industry sustainability.

## **2. Impacts of Climate Variability**

The WAP highlights concerns about declining groundwater levels and reduced recharge due to climate change. Livestock SA supports adaptive management strategies that ensure continued access to water in dry periods, including flexibility in allocation rules during drought conditions.

Livestock producers have demonstrated the ability to continually adapt to climatic variability. The South Australian livestock industry, alongside government initiatives such as the Future Drought Fund, has invested in improving producer preparedness and resilience to climate challenges.

Even with this ongoing business preparedness and improved resource management, producers still face unexpected conditions, such as droughts, floods, and fires that impact water availability. In such cases, animal welfare must be a critical priority, and water must be available for stock and fodder crops.

**Recommendation**

Implement flexible water management policies during extended dry periods.

## **3. Security of Water Entitlements**

Livestock SA emphasises the need for long-term security of water entitlements for livestock producers. Any changes in allocation should be communicated well in advance, with transitional arrangements implemented to prevent sudden impacts on farming operations.

We are supportive of the primary producers' roundtables recently held by SA Water, Landscape Boards, and PIRSA to provide information on water security and proposed water management targets on the Eyre Peninsula. These roundtables have been critical in providing valuable insights into the use of water for livestock and the impacts of specific restrictions on livestock production. This model should continue to ensure transparent communication, allowing livestock producers to stay informed and plan effectively for changes in water availability.

**Recommendation**

Provide certainty around water entitlements to facilitate long-term planning required to effectively manage livestock operations.

## **4. Balancing Environmental and Agricultural Needs**

Livestock SA acknowledges the importance of maintaining groundwater-dependent ecosystems. However, policies should strike a fair balance between environmental water provisions and agricultural productivity. Overly restrictive environmental buffers may impose unnecessary limitations on livestock producers.

It is increasingly apparent that agriculture and the environment must be considered holistically in land and water management. Livestock producers recognise their role in resource stewardship, as

highlighted in the SA Red Meat and Wool Blueprint 2030<sup>1</sup> (our industry’s strategic plan and roadmap) environmental targets. To ensure the most efficient use of water, both environmental and agricultural needs must be considered together.

**Recommendation**

Ensure a balanced approach to environmental water allocations, recognising the needs of agricultural uses.

## **5. Monitoring and Compliance Measures**

The monitoring framework outlined in the WAP should include practical and cost-effective compliance measures for livestock producers, as they already face increasing regulatory burdens. The daily water intake of livestock is well known and easily calculated so producers do not require unnecessary monitoring and compliance measures. We support the method used to estimate stock water use (i.e. 7.14L/DSE/d); but this is only relevant when you know the stock numbers a producer is carrying. Simply applying the dry sheep equivalent assigned to a parcel of land does not consider current land use or stocking levels, which will vary for a range of reasons, and is not appropriate.

While we recognise that monitoring water use is crucial, especially where water is limited, any monitoring mechanisms must be evaluated for necessity, practicality, and validity before implementation.

**Recommendation**

Stock and domestic use should remain non-licensed water and administrative burdens related to compliance and monitoring for stock water users must be kept to a minimum.

## **6. Infrastructure and Innovation for Water Efficiency**

Investments in water infrastructure, such as improved bores, desalination, rainfall harvesting, and efficient stock watering systems, should be supported to enhance water use efficiency in the livestock sector.

Livestock SA supports the State Government’s recently released ‘On-farm Drought Infrastructure Rebate Scheme’<sup>2</sup> that will assist some producers invest in on-farm water management tools. Further investment in infrastructure support measures is needed, particularly in regions like the Eyre Peninsula that are facing increasing water shortages. Programs need to offer a rebate amount that enables meaningful improvements to critical on-farm water infrastructure.

For example, the ‘On-farm Emergency Water Infrastructure Rebate Scheme’ which closed in June 2024, enabled producers to claim up to 25% of the cost of approved critical infrastructure, up to a maximum total rebate of \$25,000. Proportionally, South Australian producers’ participation in this program was greater than their counterparts in other states<sup>3</sup>.

**Recommendation**

Support investment in water efficiency infrastructure and innovation to improve water security for livestock producers.

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<sup>1</sup> SA Red Meat and Wool Blueprint 2030

<sup>2</sup> <https://pir.sa.gov.au/funding/on-farm-drought-infrastructure-rebate-scheme>

<sup>3</sup> SA producers accessed \$8.8 million under this scheme, which is relatively much more than in larger agricultural states like Victoria (\$4.8 million) and WA (\$7.6 million): <https://www.dcceew.gov.au/water/policy/programs/completed/on-farm-infrastructure-rebate#text-version-of-infographic>

## 7. Producer Education

Efficient management of water on livestock properties requires significant knowledge and preparation. As water resources become more limited and climate patterns more unpredictable, livestock producers need ongoing education and tools to manage water efficiently.

Investment in producer education during times of increased water availability is crucial to ensuring preparedness for future shortages. It is essential for livestock producers to develop on-farm management strategies that enable them to adapt to periods of low water availability. Ongoing education and support will help producers improve water storage and management methods.

### **Recommendation**

Invest in education and upskilling livestock producers on efficient water management and preparedness for times of low water availability.

Livestock SA appreciates the opportunity to provide comment on the Eyre Peninsula Water Allocation Plan revision and supports an approach that ensures the long-term sustainability of the livestock industry.

Water policy is complex and requires several competing priorities to be balanced. Through our engagement in this process, there is currently limited understanding of livestock production and the red meat and wool supply chains.

We look forward to continued engagement on this issue to provide insights into the needs of the livestock sector within South Australia's broader water management framework.

Please contact the Livestock SA office on (08) 8297 2299 or via email at [admin@livestocksa.com.au](mailto:admin@livestocksa.com.au) if you would like to discuss this submission further.

Yours sincerely

Travis Tobin  
Chief Executive Officer