



Livestock SA Limited

ACN: 681 162 667 | ABN: 53 681 162 667

PO Box 211, Goodwood SA 5034

Adelaide Showground, Leader Street, Wayville SA 5034

P: 08 8297 2299 | E: admin@livestocksa.com.au | W: livestocksa.com.au

SUBMISSION

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Ms Nicole Hocking
Manager, Water Policy & Planning
Northern and Yorke Landscape Board
318 Main North Road
CLARE SA 5453
Via email: ny.landscapeboard@sa.gov.au

Dear Nicole

Re: **Draft Barossa Water Allocation Plan Amendment**

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. Supporting over 21,000 jobs, South Australia's \$4.3 billion livestock industry is a key economic contributor to the state and the nation.

We appreciate the opportunity to provide feedback on the *Draft Barossa Water Allocation Plan Amendment* (WAP).

Introduction

Secure and reliable access to water underpins animal welfare, food production, and regional economic resilience. Livestock SA acknowledges the statutory requirement to review the WAP and supports a contemporary, science-based approach that responds to climatic shifts and ensures long-term sustainability. However, the amended Plan must remain practical, proportionate, and equitable to maintain productive viability for primary producers while protecting environmental and cultural water values.

Context

The WAP recognises significant declines in rainfall, recharge, and streamflow across the Barossa Prescribed Water Resources Area (PWRA) over the past 30 years. To respond, the WAP introduces a new adaptive management framework based on three allocation tiers, revised climate baselines, and a suite of flow and groundwater triggers. This represents a substantive shift from the fixed-allocation model of 2009 to a more variable, risk-managed regime.

Livestock SA supports adaptive management in principle but seeks assurance that the framework will not compromise essential livestock watering or investment confidence in water infrastructure.

The adaptive management framework must also explicitly support drought preparedness and response. Flexibility in allocations should not translate into uncertainty for producers who must maintain reliable water supplies to safeguard animal welfare during extended dry periods. The current drought across large parts of South Australia has highlighted the need for water allocation plans to strengthen resilience, not reduce it, by maintaining minimum water reliability for animal welfare and core business continuity.

Impact on Livestock Production

Operational Water Security

Under the proposed tiers, producers relying on direct extraction may face allocations below 100% in most years, creating uncertainty for watering points, fodder irrigation, and animal handling facilities.

Under both the *Landscape South Australia Act 2019* and the *Animal Welfare Act 1985*, the provision of adequate water for livestock is a legal and moral obligation. Any reduction in stock and domestic access would directly conflict with these duties and expose producers and the state to animal welfare and reputational risks. The amended plan should therefore include a binding clause confirming that S&D access cannot be restricted below minimum animal-welfare thresholds under any allocation tier.

We recommend establishing a minimum-access safeguard, similar to ‘critical human needs’ provisions, to ensure sufficient stock-water access in all allocation tiers.

Infrastructure and Compliance

The proposed requirement for low-flow bypass retrofitting, spillway redesigns, and setback compliance could impose material costs of \$10,000 – \$50,000 per property, depending on site topography and dam number. For smaller mixed farms, this may exceed annual net farm profit. Without clear cost-sharing or offset mechanisms, such obligations risk driving perverse outcomes.

We recommend adopting a ‘maintenance and like-for-like replacement exemption’ for existing stock and domestic (S&D) infrastructure and create standard-conditions permits for minor works and any new regulatory or infrastructure requirement arising from the plan be accompanied by an equitable cost-recovery or incentive mechanism (e.g. grants, rebates, or tax offsets).

Economic and Social Considerations

The Barossa’s mixed grazing and wine-grape systems are interdependent. Water-security reductions in the grazing sector affect regional feed supply, agri-tourism, and processing capacity. These socioeconomic effects must be explicitly assessed in the plan’s implementation review.

The Plan flags multiple future actions, inside and outside its formal scope, that will significantly affect the security and usability of S&D water, including mandated passing of low flows around existing farm dams and watercourse diversions. The immediate question arises is who pays for this, as the test cases applied in the Murray-Darling Basin catchment were found to be cost prohibitive for producers.

Environmental Partnerships

We support voluntary catchment-rehabilitation programs (e.g. dam retrofits, revegetation, pest-plant control) as complementary measures delivering greater ecological benefit than allocation cuts alone. The plan should prioritise co-investment over regulation where possible.

Consistency and Integration Across Plans

A consistent, statewide approach to water management for primary production is needed. Producers often operate across multiple prescribed areas, including Barossa, Marne Saunders and Northern Adelaide Plains, and currently face inconsistent definitions and thresholds for S&D water, captured runoff and WAA permits.

A harmonised framework would reduce administrative burden, avoid inequities between neighbouring catchments, and enhance transparency and efficiency for cross-regional livestock enterprises.

Producer Cost Impacts

The WAP introduces multiple direct and indirect costs for livestock producers:

- Infrastructure compliance – retrofitting dams, bypass structures, and metering;
- Permitting and administrative fees – new WAA permits for low-risk works;
- Reduced reliability – allocation variability requiring larger storages or alternate supplies;
- Operational risk – potential forced reductions in livestock numbers during dry years.

Without phased implementation or financial offsets, these obligations will substantially increase producer costs. For many mixed livestock farms, compliance with low-flow bypass retrofits or setback conditions could exceed \$20,000 – \$50,000 per property; unrecoverable costs delivering limited environmental gain. A full Regulatory Impact Statement (RIS) to quantify both direct compliance costs and indirect productivity impacts on primary producers should be undertaken before gazettal of the amended plan.

Recommendations

1. Animal Welfare Safeguard

Introduce a management buffer within the adaptive framework to avoid automatic allocation reductions from minor, short-term ecological trigger breaches. This would provide operational certainty for essential stock-water access while still allowing adaptive response to sustained environmental changes.

Include an explicit clause ensuring uninterrupted access to essential stock water during all allocation tiers and drought contingencies.

2. Primary-Production Runoff Exemption:

The captured-runoff provisions, while appropriate for high-density or impervious urban environments, are ill-suited to rural properties where runoff from sheds and yards is limited, intermittent, and integral to animal-husbandry systems. Requiring licensing for such capture imposes disproportionate transaction costs for negligible hydrological gain. The plan should explicitly

exempt on-farm roof and yard runoff used for livestock watering and storage under a higher threshold ($\geq 5,000$ kL/yr) and treat it as a building/plumbing matter, not a water-licensing issue.

This is consistent with the *Barossa Water Security Strategy* (Action 1.4) which seeks to optimise on-farm storage capacity as a resilience measure. Regulating minor roof runoff used for stock watering would contradict that objective and undermine the state's drought-resilience commitments.

3. Streamlined WAA Permitting:

Develop a simplified Water Affecting Activity (WAA) process with fixed low fees and self-assessment for small-scale S&D works that do not increase total storage capacity.

4. Grandfather Existing Uses:

Formally protect all existing S&D dams, bores, and diversions from retrospective permitting or capacity reduction obligations.

Any future regulation or enforcement around dam modification, low flow bypasses, or environmental releases must be subject to genuine consultation and cost-benefit analysis that accounts for regional variability, enterprise needs, and the critical role of S&D water in animal welfare and business continuity.

5. Implementation Transition:

Provide at least 12 months between gazettal and enforcement of new provisions, and co-design practical guidance with industry. The implementation phase should also be underpinned by cost-sharing principles, recognising that benefits from improved catchment management accrue to both public and private interests. Financial support (e.g. rebates, grants, or tax offsets) should be made available where producers are required to retrofit infrastructure or install new environmental protection measures.

6. Socio-Economic Monitoring:

Integrate producer impact indicators (e.g. livestock water security index, farm income variability) into the MERI framework to ensure environmental outcomes are not achieved at disproportionate economic cost.

7. Ongoing Consultation:

Establish co-design processes with industry to develop practical implementation guidelines and avoid unintended impacts on livestock enterprises.

Conclusion

Livestock SA supports the intent of the amended Barossa WAP to promote sustainable water management under a changing climate. However, a workable plan must recognise stock and domestic water as a non-negotiable baseline, avoid applying urban stormwater-style regulation to rural operations, and ensure that any new regulatory or infrastructure requirements are both cost-shared and economically tested.

Consistency with broader state drought-resilience and water-security frameworks will be critical. Livestock SA looks forward to collaborating with the Northern and Yorke Landscape Board and the Department for Environment and Water to ensure implementation measures maintain both environmental integrity and the long-term viability of South Australia's livestock industry.

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

Yours sincerely

Travis Tobin
Chief Executive Officer