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Draft Far North Prescribed Wells Area Water Allocation Plan 2019-2029

Dear Jodie,

Livestock SA was formed in 2013 to represent the interests of beef cattle, sheep and goat producers across South Australia, including the pastoral region of South Australia. Currently Livestock SA has over 3,500 members.

It is on behalf of its pastoral members that Livestock SA seeks to comment on the draft Far North Prescribed Wells Area Water Allocation Plan 2019-2029. Virtually all the pastoral leases in this area are held by pastoralists who are members of Livestock SA.

Need to delay

The timing of the draft is very unfortunate. The current ten-year plan was adopted in 2009, so it is more than ready to be updated. However, this coincides with the change from the Natural Resources Management Act 2004 to the Landscape South Australia Act 2019 which will supposedly fully commence on July 1, 2020. As the legislation and NRM Board that started this process no longer exist, there is now no local body (with local representation) overseeing the development of the new plan. It is felt that in this vacuum that the development of the new plan is now being done completely by the Department for Environment and Water without input or oversight from an appropriate regional body.

In addition, currently the Pastoral Land Management and Conservation Act 1989 is under review. Livestock SA in its submission to the review of this Act recommended doing away with a time limited lease in its entirety, suggesting a better position would be to possess a lease in perpetuity. There may also be changes in how stocking rates can be set. If these changes happen, there will then be changes needed in the Water Allocation Plan. Currently a pastoral lease in effect determines stocking numbers and hence the water allocation. As the release of the replacement Act is expected to occur in the very near future, it is argued that it would be appropriate to wait for its adoption before concluding consultation for the Water Allocation Plan.

It is also noted that consultation has been curtailed firstly due to heavy rain across the North East pastoral region, and then because of COVID-19.

Livestock SA recommends that the process of developing the Far North Prescribed Wells Area Water Allocation Plan 2019-2029 be paused until the South Australian Arid Lands Landscape Board is fully operational and the new Pastoral Land Management and Conservation Act is established. Following this a further period of consultation should be undertaken.

Unbundling water rights opposed

The greatest concern is the proposal in the draft plan to unbundle water rights from pastoral leases so that allocations can be traded within 'consumptive pools.' A key management principle under the previous plan was that water allocated for pastoral use was not allowed to be permanently transferred to be used for another purpose. These rules were created to ensure that pastoral leases had ongoing access to water. This needs to remain in the next plan.

In this arid environment with prolonged periods of little to no rainfall, no reliable surface water and no economically viable alternatives to access other water sources, and with pastoralists' livelihoods dependent on water from the Great Artesian Basin, pastoral activities and town water supplies must be exempt from consumptive pools and metering.

Livestock SA recommends that water licenses must be permanently attached to pastoral leases.

Water access entitlements

The proposed water access entitlements in the draft plan are questioned. There needs to be more explanation to justify them for this region with limited and sporadic rainfall.

Where do these figures come from?

It would seem to be that the water access entitlements for stock purposes has been calculated based on Queensland data. Is this correct, and more importantly, is this appropriate?

The domestic water access entitlements appear to be based on the national average of around 340 litres per person. Domestic usage in more arid areas is known and documented to be more than double this average. If this is correct, why is it being based on the average?

Livestock SA is concerned about the science that sits behind the calculated entitlements and believes both need to be increased substantially.

Equity

In contrast to the needs of pastoralists, their businesses and their families and staff, the needs of the mining and petroleum and exploration appear to be well catered for in the draft plan.

As an example, in section 27, the petroleum sector is allowed up to 21,900 ML per year of water that can be lost through evaporation which is a huge amount. On the other hand, pastoralists are chastised for evaporating a miniscule portion of the take from the Great Artesian Basin.

Metering concerns

While it is noted that currently water meters are not proposed in the draft plan, in sections of the plan it is implied these are already in place. For example, in section 7.6 it states in part b: "water taken from the well authorised by this approval must be taken through a water meter approved by the Minister or the Minister is satisfied that the taking of water is consistent with the Meter Implementation Plan for the Far North PWA."

There is considerable concern and unease about the possibility of water meters being required, and this issue certainly needs full and frank consultation before the industry would accept this imposition for any parts of this region.

Other considerations

There are many other aspects in the draft plan that need further consultation. This includes: the need for a management plan to reduce flows on existing man-made wetlands to enforce the health of the Great Artesian Basin; that water use be categorised appropriately such as tourism, wetlands, etc as not all use on pastoral leases is only for stock and domestic; the suggestion of separate water licences for wetlands/tourism; ensuring existing water user rights are protected; the need for the Department for Environment and Water to ensure that appropriate systems are in place for record keeping, notification, categorisation of water use, etc before the plan begins; differentiation between sub-artesian and artesian aquifers is required; and the need to review the boundaries of the Far North Prescribed Wells Area, particularly where water is being extracted from adjacent areas.

Consultation process

While the original consultation process was well planned with considerable effort made to ensure that there would be local meetings in as many regions as possible, unfortunately this was compromised by process and by circumstances beyond the Department's control.

Information presented at different meetings varied based on previous discussions in a district. This has resulted in some confusion regarding what is likely to change with further iterations of the draft plan.

While efforts were made to replace the remaining planned meetings with video conferences, there were difficulties in promoting these which meant some were unaware until after these were held.

There have also been comments made from some who were not aware that there was even a draft plan and a consultation period. The question has been asked about why the YourSAy portal has not been used? This is an online consultation hub, well recognised as the place to find out about consultations open across the SA Government. Many issues of importance to pastoralists have been addressed on YourSAy including the current consultation regarding the revised wild dog management policy, as well as the draft SA commercial kangaroo management plan 2020 – 2024, planning for the future of South Australia's pastoral rangelands, and the draft outback bushfire management area plan. As YourSAy allows for comments to be easily made and gives update alerts, consideration should be given in future to using this communication vehicle.

Conclusion

There is considerable concern that if the draft plan is accepted as published, this will make sustainable, environmentally sound pastoral management more difficult and expensive. The ability to continue to drought-proof properties will be severely restricted, which is considerable concern against a backdrop of climate change extremes.

The Great Artesian Basin in South Australia underpins the pastoral industry, and it is essential that this is well managed and cared for, but at minimal cost so that the viability of pastoralists is not put at risk.

Livestock SA wishes to express its disappointment that this plan appears to essentially be a departmental-driven plan. There are many instances where there is no choice (such as with licensing and metering) or the choice is of only limited options. And certainly, the pastoral industry has had very little influence over the content of the plan.

Yours sincerely



Joe Keynes
President