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Improving Dam Management in South Australia

Feedback on the Draft Position Paper from Livestock SA

General Comment

Livestock SA commends the initiative to review the management of dams and supports many of the proposals set out in the Draft Position Paper.

Livestock SA highlights the conundrum and apparent contradiction associated with the proposals for on the one hand, seeking to “reduce red tape” and on the other to potentially “increase the level of regulation over time”.

Livestock SA’s membership will view this through the lens of ‘more red tape’ in their already highly regulated environment and will view management of their dams to be their responsibility in their best interest.

Accordingly, any increased regulation will require careful considerations of additional financial, work load and water resource burdens on farm businesses.

An observation is that much of the paper focusses on construction of dams. Our understanding is that few dams are now being constructed and there are existing regulatory arrangements in place which could be improved and streamlined. Livestock SA believes, the priority should be to focus mainly on the management of existing priority dams which pose a threat to public safety.

Specific Response to Position Paper Questions

1. *Do we support the proposed development of risk rating tools for dam failure based on reviewing and adapting the tool already developed in Victoria?*

The proposal for a risk rating is supported and adoption of the Victorian tool strongly recommended. A “simpler self-assessment tool” for dam owners would be valued. A question then would be if the self-assessment highlights a high risk, what would the dam owner be required / able to do. In many cases the issues will be an ‘inherited’ matter beyond the finances and resources of the business to amend, so should there be support to remedy?

2. *How can you ensure landholders prepare an emergency action plan for their dam?*

With the proposed register, it should be possible to triage those dams which have a high risk and for there to be a program, with some reciprocal obligations, to support the development of an action plan.

3. *Who should have access to what parts of a dam register?*

Such a register could be accessible to all. Where dam owners are supported to remedy high risk dams, the public could be made aware that a particular dam is at risk and be a part of the support (peer support) to have it remedied.

4. *Is there any other information other than location, size and flood risk rating that needs to be stored?*

It is understood that certainly for some regions there is information about storage volumes, catchment characteristics, whether licenced or not and information on usage etc.

Would there not be a case for a ‘one-stop-shop’ for dam information?

Our experience is that dam owners on the one hand are not surprised the Government knows so much about their dam and on the other are perplexed that they or the wider community can see what the Government’s understanding of their dam is.

This could be made more transparent.

5. *Do we support a general duty to maintain dam and enforceable requirement to rectify, repair or modify a dam that poses an unacceptable risk?*

Livestock SA believes this to be the most critical component of the proposal. We believe that most dam owners would not have a good understanding of the public responsibilities associated with their dam.

A communicated duty, which incorporates individual and public responsibilities could only be beneficial.

6. *What competencies or qualifications should be required from practitioners for dam with a higher dam failure risk rating?*

Livestock SA is not able to comment on this other than to indicate that dam design and construction is a specialised area and it appears as though this State has no current qualifications or need for such qualifications. In previous decades expertise resided in the Department of Agriculture (and its successors) and it is now not clear if or where this now resides. It could be a focus from this proposal.

7. *Are there any other issues?*

No

8. *Planning and Design Code vs the Landscapes SA legislation?*

Consolidation of responsibilities to one place is supported. Livestock SA suggests that given dams are principally built infrastructure that the Planning and Design Code is the most appropriate.

Your sincerely,

A handwritten signature in blue ink, appearing to read 'A Curtis', written in a cursive style.

Andrew Curtis