

Lower Limestone Coast WAP Stakeholder Advisory Group Minutes

Meeting No. 4, 22 February 2023, 9:00 am – 2:00 pm
Millicent Football Club

Objectives

- Revisit group roles and responsibilities.
- Revisit resource condition for the prescribed wells area.
- Summarise licencing components discussion and determine if a recommendation is required.
- Introduce and discuss forest water licencing components.
- Introduce risk management principles.

Attendees:

Group Attendees – Pete Bissell (Chair), Belinda Williamson, Claire Davies, Claire Harding, Graeme Hamilton, Kerry DeGaris, Kylie Boston, Michelle Irvine, Nick Hillier, Peter Balnaves, Terry Buckley, Wayne Hancock, Darren Shelden, Alan Rossouw.

Staff Attendees – Sue Botting, Liz Perkins, Ryan Judd.

Apologies – Penny Schulz (Chair), James Prescott, John Hunt, Melissa Herpich.

Welcome and agenda

The Chair welcomed everyone and thanked advisory group members and staff for their attendance.

Minutes

Minutes from Meeting 3 confirmed as true and correct. Moved by: Terry Buckley. Seconded by: Kerry DeGaris. All were in favour.

Action outcomes to note

No updates to actions.

Reminder about the process and role of Stakeholder Advisory Group

Sue Botting provided an overview of the groups roles and responsibilities.

Key Points:

- Reminder of who the group represents and that everyone brings their expertise, experience and knowledge to the process.
- There is a requirement to be respectful of divergent views.
- There is significant value and importance of divergent views to a robust evaluation process.
- The group were reminded of what role the Department for Environment and Water will undertake as part of the evaluation.

Discussion:

- Members of the group queried whether we are seeking to solve any issues at this point but were advised that the review part of the process is to identify issues that we may seek to address during an amendment process.
- It was noted by group members that the current water allocation plan is largely a transitional plan and it largely achieved what it set out to but there is a question around what that means from an ongoing implementation perspective.

Summary of licencing components discussion

Liz Perkins provided an overview of the licencing components discussion to date.

Discussion:

- Some group members view the current licence format provided by DEW Water licencing as not useful or logical
- Some discussion around the purpose of carryover in the plan versus the purpose carryover is used for by different industries
 - For some industries carryover is earned or built up in order to allow increased production in some years without exceeding allocation and being subject to over use fines.
 - This could be linked to seasonal climate variability (the purpose of carryover indicated in the plan) but may not be. The certainty it provides is the most important aspect to licensees.
 - In years where a business has no carryover water use tends to be less than full allocation in order to avoid running into a fine.
 - For industries like dairy and horticulture carryover is seen as an important principle that provides security.
 - For horticulture it allows confidence that they will be able to get their crops finished.
 - Viticulture noted that carry-over was of importance to their industry in a season where SPR is not sufficient to meet their needs.
 - While seasonal transfers have not been discussed in full, carryover was deemed more important than seasonal transfers.
 - Carryover notifications can take too long to come out to be adequate for business planning. Real-time metering data would be of benefit.
- The group discussed the pros and cons of recommending change to licencing components when what the change might look like is unknown.
- The group discussed the need to investigate how licencing components could be changed that would be better than the current system.

SAG DECISION: The Stakeholder Advisory Group recommends that the Limestone Coast Landscape Board undertakes a comprehensive review of the principles for licencing components to determine if amendment is required. Review should look at whether the principles could be simplified but must also consider risks to the environment or primary producers that changes could introduce. Review should also consider opportunities such as environmental allocations.

Resource condition for the Lower Limestone Coast Prescribed Wells Area

Sue Botting provided an overview of the resource condition for the prescribed wells area.

Key Points:

- Changes in groundwater levels map – past 30 years – long term condition trend.
- Observation well data for the last 5 years, up to 2021.

Discussion:

- Coastal discharge at coast is 50% below pre-millennial discharge, groundwater levels are not the only important indicator of resource condition.
- Some group members expressed an interest in seeing the trends at a finer scale. Purpose of this higher level resource condition was to consider resource condition at the prescribed wells level.
- The group queried who resources monitoring? Department for Environment and Water resources a state wide monitoring network. LC Landscape Board builds on this monitoring by resourcing monitoring in strategic locations or to address specific questions. Some accelerated funding was obtained from the South Australian Government to support the implementation of additional monitoring.
- Group members highlighted that in regards to the confined aquifer some recovery has occurred due to the confined aquifer well rehabilitation project.
- Group members discussed the need to set a benchmark or a past baseline groundwater level. This would be the baseline that we then compare resource condition to. It was discussed an alternative method that is perhaps more meaningful is to manage the resource condition to certain outcomes through adaptive management. This allows a more adaptive and meaningful approach in light of a changing climate and that outcomes might vary across the prescribed wells area.
- It was noted that salinity trends were not provided at this point.
- It was raised whether nutrients be a consideration in future iterations of the plan, nutrients are not currently included/considered in the plan.

Overview forestry principles

Sue Botting provided an overview of forest water licencing principles.

Key Points:

- What's in the Act
 - Who owns the water - can apply to the land or the forest manager, creates a complexity in ownership of water.
 - Must have an allocation.
 - The Act allows transfers but other policy e.g. border zone may prevent transfer.
 - Transfer of allocation – need to hold a licence before you can have an allocation.
 - It was queried does forestry require a hydro test? Forestry do also have a hydro test around trades and transfer.
 - Interception vs extraction was discussed by group members.
- Forest licences
 - Range of licence volumes from very large licences e.g. 20 giga litre to less than 1 mega litre
 - When a licence moves from an area where groundwater is less than 6 metres depth vs greater than 6m deep direct extraction is no longer included in the deemed rate calculation so forest area can increase (approximately double in the move).

- Some discussion around reductions and how these are taken and the impact to a business.
- Area set aside – plantation threshold – taken away in management areas that were requiring reductions.
- Some unique elements of the forestry industry were discussed by the group such as the need for forest managers to lease land for the long term which can be difficult to find, different to other industries that can use lease land for short term periods.
- Principles in the water allocation plan
 - Some principles had the purpose of moving forestry into the plan, don't necessarily serve a purpose ongoing
 - Hydro test for forestry vs hydro test for irrigation – hydro test could prevent conversion from one use to the other or prevent the use of all the water
- Deemed rates
 - A significant difference between irrigation and forestry is forestry doesn't have a meter
 - Trees are efficient, they'll use rainfall and then put roots down seeking groundwater
 - Site productive rates or site quality, one is the highest rate – fastest growing e.g. around Mount Gambier, 5 is lowest, slowest growing, 3 is the middle ground
 - Blue gums don't undertake thinning which is reflected in the deemed rate for bluegums
 - Use of revised deemed rates – alternate deemed rate calculator – applicable to softwood mostly – essentially alters water use based on silviculture practices. About reporting as accurately as possible – no bearing on the operational decisions such as harvesting – doesn't drive decisions around forest management. Rotations generally coming shorter in softwood – economic driver not water driver, economic outweighs the water driver. Wood properties also drive rotation length. Key driver is highest value timber – large diameter structural timber. And market drivers are also important.
 - When deemed rate first came in had certain silviculture assumptions – not necessarily the same practices now
 - Standard deemed rate may not reflect current standard practices but plan allows alternate deemed rates to account for this
- Farm Forestry
 - The group expressed strong interest in discussing this in detail. Topic will be revisited in Meeting 5.

Darren Shelden, Alan Rossouw and Belinda Williamson presented the forest industry perspective on the current water allocation plan

Key Points:

- Industry overview
- Deemed rates over estimating recharge interception
- Deemed rates in terms of estimating extraction spot on from the perspective of the revised science
- Number of plots used in the Benyon work is a sample size
- Variable rate by management areas increases the complexity from an administration perspective
- Eriita Jones research is quite new – used as a check to see if we've got it right.
- Group queried whether the hardwood plantation estate had kept the plantations they've wanted. Response was the industry has lost some good plantations that would have been replanted if reductions hadn't occurred.

- Some discussion around reductions – was it an administrative reduction vs a physical reduction of the plantation? Further clarity and discussion required on these reductions under risk management discussions.
- Reductions are occurring in some management areas in a way due to the commercial arrangements between forest companies (land owner vs forest manager and who owns the water) e.g. in management areas like Short, even though reductions are on hold.
- Depth to groundwater has changed over the life of the plan in terms of where groundwater is above or below 6 metres depth – this impacts whether the forest is extracting – needs to be the most up-to-date information for accuracy.
- Group queried whether salinity will become an issue if groundwater levels are replenished? Salinity is being monitored, significant differences between how salinity works in the in upper Limestone Coast in comparison to lower Limestone Coast.
- A lot of wetlands within forestry estates are perched or surface water – most groundwater dependent wetlands have been lost some time ago in forestry estate.
- If deemed rate was to be updated – does this apply to existing estate or apply to new greenfield plantations?
- If further reductions required – updated deemed rates should be applied – best available science should underpin these.
- Group queried whether information could be provided from a global perspective on groundwater management – some group members shared their knowledge of different places – a lot of places in the world are seeing widespread declines in groundwater and management practices not as advanced as in this region.

Introduction to risk management

Sue Botting provided an introduction to the principles that support risk management.

Key Points:

- *Landscape South Australia Act 2019* (the Act)
 - Relevant part is Section 109 of the Act
- Group members expressed an interest in explore the following elements as part of the risk management discussion.
 - Is it possible to reduce complexity by removing some of the different definitions e.g. TAR, TML, PAV.
 - Water Affecting Activities – should this be included from a risk management perspective e.g. mining developments.
 - Mid-term risk assessment – some thought that mid-term risk assessment might be able to increase reductions but it could only halt reductions – should the mid-term risk assessment be able to add reductions given a plan runs over 10 years.
 - Trends and conditions of GDEs
 - When is a GDE a GDE or not GDE, complexity of GDEs.
 - Border Groundwater Agreement.
 - Risk assessment process.
 - Goyder science review.

Next steps

- Finish discussion of forestry principles and consider any recommendations.
- Discussion of risk management principles.

Close of meeting

Meeting closed at 2:00 pm

The Chair thanked the stakeholders and staff for attending.

CONFIRMED

Lower Limestone Coast WAP Stakeholder Advisory Group Action Table

Action	LLC WAP Stakeholder Advisory Group Actions	Status	Meeting 3 Update
1.1	Provide an overview of the Science Review process, outcomes and the work that has occurred since then at Meeting 2.	Ongoing	Summary of current status of work addressing recommendations presented. Further updates will be provided as needed.
1.2	LC Landscape Board Staff to provide relevant papers on the project portal for Stakeholder Advisory Group members to access	Ongoing	Papers provided. Ongoing operating procedure for the Group.
1.5	Convey stakeholder concerns around the Australian Rare Earths Limited development to the LC Landscape Board Governing Body.	Ongoing	To remain ongoing on the Action List and revisit when discussing mining related principles.
2.2	Session in future meeting on Groundwater Dependent Ecosystems to assist with stakeholder clarity.	Ongoing	
2.4	Provide summary report that takes recommendations from the Plan and places them against actions that have been undertaken.		
2.6	Arrange a presentation from industry representatives around how useful they have found the different licencing components and how they have used them in their businesses.	Ongoing	Started in Meeting 3, to be revisited in Meeting 4.

Action Table – Closed Items

Action	LLC WAP Stakeholder Advisory Group Actions	Status
2.1	Provision of presentation, provision of reports from presentation	Complete
2.3	Paddock Tree report to be provided on the project portal.	Complete
2.5	Arrange a presentation from DEW Water Licencing on licencing components and their experiences and perspectives as the body that administers them.	Complete
1.3	Ground rules to be drafted and provided back to group	Complete
1.4	LC Landscape Board Staff prepare recommendation for the LC Landscape Board Governing Body on behalf of the Stakeholder Advisory Group. Recommendation to be considered by the LC Landscape Board Governing Body at its 28 October 2022 Meeting.	Complete

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Lower Limestone Coast WAP Stakeholder Advisory Group Decision Register

Issue	Meeting	Decision
Licencing components principles	Meeting 4	The Stakeholder Advisory Group recommends that the Limestone Coast Landscape Board undertakes a comprehensive review of the principles for licencing components to determine if amendment is required. Review should look at whether the principles could be simplified but must also consider risks to the environment or primary producers that changes could introduce. Review should also consider opportunities such as environmental allocations.
Volumetric conversion and bridging volume principles	Meeting 2	Recommend that the LC Landscape Board remove the volumetric conversion and bridging volume principles from the water allocation plan under amendment.
Representativeness of Group	Meeting 1	Group agreement that a nomination should be sought from hardwood plantation forestry for representation on the Stakeholder Advisory Group.