

Consultation Report

Adelaide Plains Water Allocation Plan



Department for Environment and Water
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1 Introduction

1.1 Purpose

This consultation report for the Adelaide Plains Water Allocation Plan (the Plan) outlines how the Plan's policies were developed prior to statutory consultation and the consultation process that was undertaken. As required by section 56(4) of the *Landscape South Australia Act 2019* (the Landscape Act), the report provides information about the key matters raised during statutory consultation and the resulting amendments to the Plan.

The report describes:

- Engagement with stakeholders throughout the development of the draft version of the Plan (sections 2.3 and 3);
- The statutory consultation process and the key comments received (section 3);
- The amendments proposed to the Plan as a result of the feedback received during the consultation process (section 4); and
- The key issues raised during the consultation process which do not directly relate to the Plan (section 5).

1.2 Background to the water allocation plan

The Plan sets out the management arrangements for the allocation, use and monitoring of the prescribed groundwater and the management of wells within the Adelaide Plains, in accordance with section 52 of the Landscape Act, which incorporates the following three Prescribed Wells Areas – Central Adelaide, Northern Adelaide Plains and Dry Creek. These Prescribed Wells Areas are described collectively as 'the Adelaide Plains'.

The **Northern Adelaide Plains Prescribed Wells Area** has a long history of water licensing and has had a water allocation plan in place since December 2000. The Plan replaces the existing Water Allocation Plan for the Northern Adelaide Plains Prescribed Wells Area (2000).

The **Central Adelaide Prescribed Wells Area** was prescribed in June 2007. Existing water users in this area have been issued with water licences over the last two years. The Plan will be the first water allocation plan in this area, which will enable water transfers to occur and, where applicable, new water entitlements may be granted.

The **Dry Creek Prescribed Wells Area** is a small area which was separately prescribed due to the use of groundwater for salt production by Cheethams and Penrice. This area will be incorporated into the new Plan.

Underground water extraction supports the economically important horticultural industry in the Northern Adelaide Plains, as well as being used for major industrial purposes, irrigation of recreational and open spaces in the metropolitan area, and a variety of small agricultural enterprises along the hills face zone. The use of the aquifers for storage of water from other sources such as stormwater, known as Managed Aquifer Recharge, also plays an important role in ensuring Adelaide's ongoing water security. In some parts of the Adelaide Plains, underground water is also used for stock and domestic purposes and for mining or extractive industry purposes.

1.3 Location and hydrogeology

The groundwater resources covered by the Plan are located within three landscape regions – Green Adelaide, Northern and Yorke and Hills and Fleurieu.

The Plan's area covers the majority of the Adelaide metropolitan area (including the western hills face zone of the Mount Lofty Ranges). This area stretches from Kangaroo Flat in the north, to the Onkaparinga River in the south, to the coast in the west and to the top of the 'hills face zone' in the east covering a total area of approximately 1,455 km². Within this area groundwater is contained within two main type of aquifers – the sedimentary aquifers of the plains and the fractured rock aquifers of the foothills and western slopes of the Mount Lofty Ranges.

The main productive aquifers of the Adelaide Plains are deep, confined sedimentary layers that are not directly recharged by rainfall. When water is extracted from a well, a localised drawdown in level occurs but recovers quite quickly, due to the high pressure in the aquifers. Concentrated extraction in an area by a large number of wells can cause a major drawdown known as a 'cone of depression'. This can result in salinity increases. While a large permanent cone of depression exists around the Virginia area due to historical heavy extraction for horticulture since the 1950s, the salinity and water levels in this area are currently stable and are considered to have reached a new equilibrium. The sedimentary aquifers can withstand periods of increased extraction and then recover within a short time.

The fractured rock aquifers of the hills face behave differently, as the underground water is contained in fissures and cracks in the underlying rock rather than in layers of sediment. These aquifers are more responsive to direct rainfall and can be impacted by intense extraction.

2 Development of the draft Plan

2.1 Review and amendment

In October 2009, the (then) Adelaide and Mount Lofty Ranges Natural Resources Management Board (AMLR NRM Board) decided to develop a single water allocation plan covering the Northern Adelaide Plains and Central Adelaide Prescribed Wells Areas. In October 2010, the AMLR NRM board decided to include the Dry Creek Prescribed Wells Area in the water allocation plan.

2.2 Scientific investigation phase

The Plan is based on extensive scientific investigation and modelling. It required the development of a specific Adelaide Plains groundwater numerical model commissioned and funded by the AMLR NRM Board. This was used to model various scenarios of groundwater extraction to provide guidance on the capacity of the underground water to support short term and long term extraction in terms of both the quantity and quality of water. Additional investigation looked at the volumes of water extraction for non-licensed purposes. The results helped to inform the principles on the limits to extraction and how extraction can be managed both spatially and temporally.

Other investigations focussed on environmental water requirements and surface water/groundwater interactions. The results informed the development of policies to ensure the groundwater-dependent ecosystems are maintained in a similar condition to their current status.

2.3 Consultation during development of the draft Plan

During the development of the draft Plan, the AMLR NRM Board engaged with stakeholders through the establishment of two advisory committees – one each for the Northern Adelaide Plains (NAP) and the Central Adelaide Prescribed Wells Areas. The NAP committee included irrigators, community leaders and industry representatives. The Central Adelaide committee included representatives of the Managed Aquifer Recharge sector, the turf irrigation sector, a number of industries that use groundwater and SA Water. The two committees advised on water resource management issues, proposed policy approaches and the approach to engage with stakeholders and the community.

Information was also provided and feedback sought on proposed policy approaches through a number of meetings with established community and industry groups including the Vietnamese Farmers Association, Sports Turf Association and the Managed Aquifer Recharge Users Group. Information about the forthcoming draft Plan and its potential policies was also provided at key community events such as the Northern Adelaide Plains Water Open Day in 2019, Science Fairs and World Environment Day events.

Information about the development of the draft Plan was also provided by letter to existing water licence holders in the Northern Adelaide Plains Prescribed Wells Area and to licence applicants in the Central Adelaide Prescribed Wells Area in conjunction with licence application processes.

The Department for Environment and Water has been closely involved with the development of the draft Plan through the (then) Adelaide and Mount Lofty Ranges Water Planning Steering Committee, and the Adelaide Plains Water Allocation Plan Project Team, each with representatives from the AMLR NRM Board and the water policy, water licensing and water science branches of the Department for Environment and Water.

2.3 Key policy issues

In order to develop the draft Plan, several policy issues needed to be addressed so that groundwater resources could be managed sustainably to meet the environmental, social, cultural and economic objectives. The key issues were:

- Ensuring there is no decline in resource condition in areas where water entitlements were high and there was a risk of increased uptake of currently unused water entitlements;
- Providing the ability for irrigators to use more water to respond to seasonal conditions;
- Developing principles for managing Managed Aquifer Recharge allocations to support the industry whilst protecting the groundwater resources and minimising the impact on other water users; and
- Ensuring there is an acceptable level of environmental water provisions for groundwater-dependent ecosystems.

The draft Plan set out the proposed approach to address these key issues by outlining:

- how groundwater extraction is managed at the scale of a number of smaller zones or 'consumptive pools'. These are mostly based on the main aquifer groups, with smaller consumptive pools in some aquifers;
- the maximum annual acceptable extraction limits for each consumptive pool;
- the types of water management tools (licences, entitlements and allocations) used to manage groundwater extraction;
- how these water management tools may be issued, varied or transferred to other people;
- in two consumptive pools (T1 Northern Adelaide Plains and T2 Northern Adelaide Plains), how water extraction will be managed if the condition of groundwater declines below identified thresholds;
- buffer zones to limit extraction in close proximity to groundwater-dependent ecosystems and other water users;
- how bores must be constructed and maintained;
- how Managed Aquifer Recharge activities will be licensed and managed; and

- how the groundwater resources should be monitored.

3 Statutory consultation on the draft Plan

Statutory consultation on the draft Plan was undertaken in accordance with Section 55 of the Landscape Act. The draft Plan was released for public consultation on 27 September 2021 and formally closed on 28 November 2021.

The consultation process was guided by an Engagement and Communications Strategy and the key activities included:

- A two-month period inviting written submissions from the public;
- Promotion of the consultation on the draft Plan on numerous websites, including YourSAy, and invitation to make submissions;
- Provision of the draft Plan and five information sheets through links on the websites;
- Letters sent to key stakeholders, including all water licence holders and industry sector groups, state agencies and local governments, and local members of parliament, to inform them that the draft Plan and supporting material was available for review, and inviting them to make written submissions on the draft Plan;
- Meetings with key industry stakeholders including Managed Aquifer Recharge operators, horticultural sector groups in the Northern Adelaide Plains and the turf and open space irrigation sector;
- Discussions with Kaurna through Warpulai Kumangka, Green Adelaide's Kaurna advisory group, and letters to the Kaurna Yerta Aboriginal Corporation.

A number of key groups whose stakeholders had been impacted by severe storms in October 2021 were offered the opportunity to provide input or have discussions after the formal closing date. Discussions with Warpulai Kumangka also continued after the formal closing date.

The consultation activities are summarised in Table 1 below.

Table 1: Summary of Consultation Activities

Consultation Activity	Detail
Web presence with invitation for written submissions.	<p>The release of the draft Plan for consultation was publicly communicated through the following websites:</p> <ul style="list-style-type: none"> • YourSAy • Department for Environment and Water • Green Adelaide • Northern and Yorke Landscape Board • Hills and Fleurieu Landscape Board. <p>The draft Plan and five information sheets were available on these websites.</p>
Five information sheets were developed and made available on the websites listed above.	Provision of five information sheets:
Hard copies of the five information sheets were also made available at the Virginia Horticultural Centre.	<ol style="list-style-type: none"> 1. Introducing the draft Adelaide Plains Water Allocation Plan 2. Managing High Risk Areas under the draft Adelaide Plains Water Allocation Plan

Consultation Activity	Detail
	<ol style="list-style-type: none"> 3. Transferring water under the draft Adelaide Plains Water Allocation Plan 4. Water licensing under the draft Adelaide Plains Water Allocation Plan 5. Managed Aquifer Recharge in the draft Adelaide Plains Water Allocation Plan. <p>An information sheet that provided a simple overview of the draft Plan was translated to Vietnamese and hard copies were made available at the Virginia Horticultural Centre.</p>
Opportunity to speak to a team member by phone	<p>Approximately 30 phone calls were received and verbal responses were provided to questions.</p> <p>Key stakeholder groups also advised they had received phone calls directly from their interested members to find out more about the draft Plan.</p>
Stakeholder meetings	<ul style="list-style-type: none"> • Turf and Open Space Irrigation Sector groups • Managed Aquifer Recharge Users Group (2 meetings and other discussions) • Northern Adelaide Plains Food Cluster • Community leaders from the former Northern Adelaide Plains Advisory Committee and the Chair of the former Central Adelaide Advisory Committee • Warpulai Kumangka (Green Adelaide's Kurna advisory group) (2 meetings and other discussions).
Letters were sent to the following stakeholders to inform them that the draft Plan and supporting material was available for review and inviting them to make written submissions on the draft Plan.	<ul style="list-style-type: none"> • All water licence holders in the Adelaide Plains • 28 key organisations representing the horticultural, industry and environment sectors, and First Nations • Environment Protection Authority, Department for Energy and Mining, Department of Primary Industries and Regions, SA Water and Department of Education and Children's Services • 21 councils within the Adelaide Plains area • All state and federal members of parliament within the Adelaide Plains area.

Following the invitation for written submissions on the draft Plan, a total of 18 written submissions were received. No submissions or responses were received directly via the YourSAy website.

Approximately 30 phone calls were received primarily to check whether water entitlements would change as a result of the Plan or to obtain a copy of the draft Plan.

4 Response to key issues raised – within scope of the Plan

All the verbal comments received through phone conversations or in meetings with stakeholders and the feedback in the written submissions have been considered. The feasibility of any proposed changes to the draft Plan were considered based on the technical, administrative, legal and policy aspects of the proposals. Some of the proposals have resulted in amendments to the Plan, whereas other proposals have not resulted in amendments.

An overview of the key issues raised in the feedback and the responses to these issues is provided.

Managed Aquifer Recharge issues raised

The majority of the feedback through discussions with stakeholders and in the written submissions was in relation to Managed Aquifer Recharge. The key issues raised regarding Managed Aquifer Recharge in the Plan are outlined below.

- **10 year period for extraction of Managed Aquifer Recharge ‘available balance’**

The rationale for the 10 year period for extraction of the ‘available balance’¹ for Managed Aquifer Recharge water allocations was queried. A number of submissions requested that the time limit of 10 years be removed to increase the long term security and flexibility for Managed Aquifer Recharge users, and so that Managed Aquifer Recharge operators do not lose water that has been ‘banked’.

Response: The 10 year period for the extraction of the Managed Aquifer Recharge ‘available balance’ was consistent with authorisations for some existing Managed Aquifer Recharge schemes.

Based on the feedback, principle 11 in the Plan has been amended to remove the 10 year period for extraction of the Managed Aquifer Recharge ‘Available Balance’. In other words, there will be no time limit on the period for extracting the available balance.

- **Boundaries of Consumptive Pools**

As individual wells of some Managed Aquifer Recharge schemes crossed boundaries of consumptive pools, it was suggested to adjust the boundaries so that the Managed Aquifer Recharge wells related to individual Managed Aquifer Recharge schemes, and where possible all schemes owned by an individual operator, are within a single consumptive pool, rather than crossing consumptive pool boundaries. This would enable more holistic management of the Managed Aquifer Recharge schemes.

Response: The location of the wells from individual Managed Aquifer Recharge schemes that potentially crossed consumptive pool boundaries was investigated. It was identified that for one Managed Aquifer Recharge scheme that is primarily located within the T2 NAP Consumptive Pool, there was one outlying Managed Aquifer Recharge well located within the T2 Regional Consumptive Pool directly adjacent to the boundary of the T2 NAP Consumptive Pool. Subsequently, the boundary of both consumptive pools was amended slightly to enable all the wells associated with the Managed Aquifer Recharge scheme to be located within a

¹ The ‘available balance’ is the total volume of water drained or discharged under a permit issued pursuant to either section 104(3)(c) of the [Landscape Act](#) or an environmental authorisation issued under section 40(1) of the [Environment Protection Act 1993](#) throughout the life of the scheme’s operation, minus any volume that has been extracted over that same period. Also known as a recharge water access entitlement.

single consumptive pool. This relatively minor change does not affect the management of the different aquifers, nor will it impact other existing users.

The investigation also confirmed that all wells related to any other individual Managed Aquifer Recharge scheme were located within the same consumptive pool.

In the cases of other Managed Aquifer Recharge operators who have more than one Managed Aquifer Recharge scheme across multiple consumptive pools), no changes have been made to enable all their Managed Aquifer Recharge schemes to be within the same consumptive pool due to the differing characteristics of the target aquifers.

- **Trade for Managed Aquifer Recharge water allocations across consumptive pools**

A number of submissions were seeking the ability to enable water allocations in the Managed Aquifer Recharge Consumptive Pool to be transferred to another consumptive pool with a different spatial extent from where the draining or discharge activities have occurred. It was argued that this would improve the economics of the Managed Aquifer Recharge schemes and provide water in areas of need where the water resource is not stressed. Conversely some submissions did not support the transfer of water allocations from the Managed Aquifer Recharge Consumptive Pool to other consumptive pools.

Response: After thorough consideration of the technical and policy feasibility of this proposal, the Plan has not been amended. Consumptive Pools have been established to effectively manage the aquifers, including the management of potential risks to the resource in the T1 NAP and T2 NAP Consumptive Pools. The transfer of ordinary water allocations is not permitted between the other consumptive pools and it is considered appropriate that a consistent approach applies to water allocations from the Managed Aquifer Recharge Consumptive Pool.

- **Capacity for Managed Aquifer Recharge**

It was suggested that the aquifers underneath Adelaide can store much more water and that Managed Aquifer Recharge schemes can help improve water security.

Response: The Plan enables the further development of Managed Aquifer Recharge schemes across the Adelaide Plains in circumstances where it can be demonstrated that the draining or discharge and subsequent recovery of water from the aquifer via the Managed Aquifer Recharge scheme will not adversely affect existing users of the resource, any ecosystems dependent on the resource, or the aquifer itself. The principles in the Plan therefore enable further storage of water within the aquifers for future use where it is sustainable.

- **Water quality**

There was some concern regarding the quality of the water drained or discharged into the aquifers through the Managed Aquifer Recharge schemes and suggestions that this should be managed through the Plan.

Response: Legislative responsibility for management of the quality of the water drained or discharged into the aquifer through Managed Aquifer Recharge schemes is addressed through licensing requirements by the Environment Protection Authority and therefore is not addressed in the Plan.

Other issues raised in relation to the draft Plan

Salinity

There were numerous comments querying the need for the assessment of salinity for the allocation and/or transfer of water allocations. It was suggested that high salinity in some areas, such as in the Northern Adelaide Plains, has more to do with leaky wells rather than natural salinity trends. It was recommended to remove the need to consider the salinity of the groundwater in the assessment of trade. The value of the need for licensees to provide annual salinity samples was also questioned. There was also a comment that the benefits of Managed Aquifer Recharge in reducing salinity were not recognised in the Plan.

Response: The intention of the principles related to salinity in the T1 NAP, T2 NAP consumptive pools, the T2 aquifer within the Kangaroo Flat consumptive pool and the Managed Aquifer Recharge Consumptive Pool (where it overlaps with the aforementioned consumptive pools) is to protect the integrity of the aquifer by maintaining appropriate water levels which avoid the intrusion of sea water into the aquifer or cause downward leakage of more saline water into the deeper aquifers.

The trigger mechanism in the T1 aquifer has been set to mitigate the risk of causing downward leakage from the more saline upper aquifer, such that if extraction starts to increase and the water levels drop then the allocations will be reduced until the aquifer recovers to a sufficient level again. The trigger management approach aims to maintain acceptable salinity within the aquifer by avoiding this downward leakage in the T1 NAP Consumptive Pool and the saline encroachment of the interface in the T2 NAP Consumptive Pool.

Given the trigger management approach aims to maintain the salinity at acceptable levels, draft principles 49(c)(ii) and (iv) regarding salinity levels in the assessment for transfers have been removed. The requirement for water licensees to provide salinity samples as a condition of their licences had already been removed, except for licensees in the Kangaroo Flat Consumptive Pool due to the increased risk of salinity due to the downward movement of more saline water from the overlying aquifer (as there is no trigger management approach for this consumptive pool and no confining layer to reduce the risk of this downward leakage).

The Plan has also been amended to recognise the benefits of Managed Aquifer Recharge in potentially reducing groundwater salinity.

Aboriginal Water Interests

There was feedback that the Plan could be strengthened to better recognise Aboriginal water interests and the importance of the groundwater resources to their culture.

Response: There has been a refocus of the contextual information to better recognise the Aboriginal water interests and the importance of the groundwater resources to their culture. Discussions with Warpulai Kumangka (Green Adelaide's Kaurna Advisory Group) will continue with the view to incorporate a more meaningful cultural narrative into the Plan in future.

Carryover

It was suggested to extend the principle for the carryover of unused water allocations to the high risk consumptive pools (i.e. T1 NAP and T2 NAP) to provide water users with the same flexibility as in other consumptive pools.

Response: After consideration of the feasibility of this proposal, no amendment was made due the high risk to the groundwater resource in these areas, based on scientific evidence,

and the potential for the use of carryover to contribute to the introduction of the trigger management scheme.

Water for mining purposes

There was comment that mining is not explicitly mentioned in the Plan, and mining and quarrying activities are users of the groundwater resource. There was also comment for further clarification on how the buffer zones for groundwater-dependent ecosystems would apply to open pits or quarries.

Response: The Plan does not specify every industry sector that may use groundwater in the Adelaide Plains. In response to the feedback, sections 3, 5 and 7 have been amended to clarify that water for mining purposes is a current and potentially future demand for groundwater in the Adelaide Plains and may require a water allocation where groundwater is intercepted.

The definition of buffer zones for groundwater dependent ecosystems has been amended to clarify that the entire open pit or quarry needs to be outside of the buffer zone to minimise any impact on the groundwater dependent ecosystems (unless otherwise agreed by the Minister under principle 58).

Further information and clarification

There were numerous comments seeking further information or clarity relating to information in the introductory sections and in some principles, particularly in relation to Managed Aquifer Recharge. The description of the aquifers in the Kangaroo Flat area was queried.

Response: A number of non-substantive changes have been made in the Plan to provide further context information and to better clarify statements or principles. Amendments were also made to update references to other legislation and to refine the description of T2 Kangaroo Flat Consumptive Pool to include all of the aquifers located within the Kangaroo Flat region (T2, Quaternary and fractured rock aquifers) and rename it "Kangaroo Flat Consumptive Pool".

5 Response to key issues raised – outside scope of the Plan

A number of topics were raised in the verbal comments and written submissions, which are out of scope for the Plan and will be addressed through other processes, as outlined below.

Impact of the Plan on water users

The main issue raised in the 30 phone calls that were received was clarity regarding the impact of the Plan on existing water users and whether the Plan would result in any changes to the current volume of allocations. There were also a few questions about how the transfer rules would work.

- **Response:** During the phone conversations, the majority of people asked if existing water entitlements would change and if there are any changes to transfer rules. Clarification was provided that the current water entitlements would not change. As the majority of the callers were from the Northern Adelaide Plains, it was explained that the trigger management approach in the T1 NAP and T2 NAP Consumptive Pools may trigger a temporary reduction in annual allocation until the resource has recovered. It was also clarified how the unbundled licences and transfers would work. People seemed to be satisfied with the explanations and there were no written submissions received in relation to the questions raised during the phone calls.

As part of the implementation of the Plan, further engagement and explanatory information will be provided regarding the unbundled water licences and the trigger management scheme in the T1 NAP and T2 NAP Consumptive Pools.

Alignment of legislation

An issue highlighted during discussions with Managed Aquifer Recharge operators and in some written submissions concerned the complexities of existing legislation, policies and procedures for the approval of Managed Aquifer Recharge schemes. Separate approvals are required, where the Environment Protection Authority manages approvals for the drainage of water into an aquifer to manage water quality risks, and DEW manages approvals for the take of water to manage the impact of extraction.

It was also highlighted that current groundwater models do not adequately regulate, manage or mitigate risks associated with cumulative risks of multiple Managed Aquifer Recharge schemes at a regional level. This is particularly the case for the uncontrolled flow of water from a well or wells as a result of Managed Aquifer Recharge scheme operations, declining groundwater use and wells that are not constructed for the artesian conditions that can result from Managed Aquifer Recharge operations and impact other water users and the environment.

Response: The Environment Protection Authority and the Department for Environment and Water work collaboratively in the regulation of Managed Aquifer Recharge operations within the existing legislation. Managed Aquifer Recharge operators are required to prepare a Risk Management and Monitoring Plan which does include elements related to the management of artesian conditions and potential risks associated with uncontrolled flowing wells. The Risk Management and Monitoring Plan is used by both the Environment Protection Authority and the Department for Environment and Water in their respective approval processes for individual Managed Aquifer Recharge schemes.

It is acknowledged that the existing legislation does not adequately provide the framework for the assessment of cumulative risks from multiple schemes and the safe and coordinated operation of all adjacent schemes, and that neighbouring Managed Aquifer Recharge operators do try to coordinate operations to manage the risk. The Plan alone cannot fully address these issues and alternative and additional mechanisms may be required. The Environment Protection Authority and the Department for Environment and Water are aware of these matters and will work together to consider options for improved regulation of Managed Aquifer Recharge operations.

Readability of the Plan

There was some feedback that the Plan can be hard to understand, especially for those people where English is not their first language. Further explanatory information about the Plan will be important.

Response: As the Plan is a legal document, it is acknowledged that it may not be easy to fully understand in isolation. During the implementation phase of the Plan, there will be continued engagement with water users and explanatory materials in simpler language will be developed.

Access to information

Some submissions highlighted the importance of having access to groundwater status information and results of the monitoring of trigger wells. Some submissions also questioned the science underpinning the draft Plan and or requested more evidence to be made publicly available.

Response: Groundwater monitoring data and other related information will be publicly available through [WaterConnect](#). The science that underpins the Plan is provided in numerous technical reports that are available on [WaterConnect](#).

Process for permits for imported water or effluent

There were some concerns raised regarding the need for a permit for the use of imported water or effluent, where some landowners do not understand the purpose of the permit and may be confused about the roles of different agencies supplying and regulating water use. Other comments were received in relation to the permit application fee, which may discourage people from applying for a permit, and others suggested a more streamlined approach to accounting for imported water use.

Response: The Water Licensing Branch in DEW will consider the feedback in reviewing and streamlining the process for administering permits for use of imported water or effluent. DEW is open to discussions with stakeholders to assist in streamlining these processes.

Ongoing community engagement

It was suggested that there is a need for an ongoing community water advisory group to support the implementation of the Plan and ongoing management of the groundwater in the Adelaide Plains.

Response: As part of the implementation phase of the Plan, an engagement plan will be developed which will include how the community will continue to be engaged as the Plan is implemented, to identify any key issues related to the management of the groundwater in the Adelaide Plains and to help inform the review of the Plan in the future.

Release of available water entitlements

Although it was recognised that the process for the release of available water entitlements is outside the scope of the Plan (as indicated in the Plan), some stakeholders requested that the process be finalised and communicated to stakeholders as soon as practical and ideally before the approval of the Plan.

Response: It is proposed that the process for the release of any available water entitlements from the consumptive pools that are not already fully allocated be finalised shortly after the Plan becomes operational.

Changes to entitlement shares in a consumptive pool

In relation to Principle 3, it was requested that there be clarifying statements that outline the circumstances in which there is an increase in the number of entitlement shares within a consumptive pool.

Response: Principle 3 is intended to enable an increase in the number of entitlement shares within a consumptive pool if there is further technical evidence that this would not adversely affect the reliability of supply or quality of water accessed by existing water users, or will present only a low level of risk to the present and future health and maintenance of groundwater-dependent ecosystems.