

# Consultation Report

## Water Security Statement 2022



**Government  
of South Australia**

Department for  
Environment and Water

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# 1 Introduction

The draft 2021 Water Security Statement (the statement) was prepared to meet the water planning requirements of the *Water Industry Act 2012* (the Act) and includes an overview of South Australia's water supplies, demands and the government's strategic priorities for ensuring long-term water security. Once finalised and tabled in Parliament, the statement will form the state government's State Water Demand and Supply Statement, as required under the Act.

To meet the full requirements of the Act, interested persons must be invited to make written representations on a draft statement. This consultation report provides an overview of the consultation process, feedback received and amendments made to the draft statement.

## 2 Consultation Process

The draft statement was released for consultation on 21 April 2021 and feedback was sought by 18 June 2021.

The consultation effort was primarily focused on peak bodies and targeted stakeholders with a direct interest in water security planning. These stakeholders were provided a copy of the draft statement via email and details on how to provide feedback. Public feedback was also sought via a YourSAy campaign. All submissions were invited via email or post to the Department for Environment and Water (DEW). Additional information on the draft statement was also published on the DEW website.

The following activities were undertaken to seek feedback on the draft statement:

- a copy of the draft statement was made available on the DEW Website on 21 April 2021
- heads of South Australian government agencies were provided a copy of the draft statement via email
- the consultation process was announced by the Minister for Environment and Water at the opening of the OzWater Conference, held in Adelaide in May 2021
- a letter was sent to key stakeholders and peak bodies by the Minister advising of the consultation process and providing a copy of the draft statement
- a letter was sent to stakeholders who made a submission on the 2020 review of the Act advising of the consultation process and where to find out more
- a letter was sent to licensed water entities under the *Water Industry Act 2012* advising of the consultation process and how to provide feedback
- landscape board water planning staff were provided a copy of the draft statement via email
- a media release was published to provide information to the general public
- a web story was published to provide information to the general public
- a Facebook post was shared on the River Murray SA Facebook page
- a tweet was shared on the DEW Twitter account
- DPC shared the YourSAy campaign on social media on four occasions.

When requested, department staff met with representatives of organisations to discuss the draft statement and also provided additional information over the phone and via email.

## 3 Submissions and amendments

A total of 37 written submissions were received during the consultation period. Four of these were via the YourSAy platform, with the remaining 33 being letters submitted via email. Submissions were received from state and local governments, water retailers, peak bodies, irrigation trusts, private industry and members of the public. A list of submitters is provided at Appendix 1.

Submissions were broken down into comments categorised by topic and each comment was considered when finalising the statement. Many comments resulted in amendment to the statement while others were more general in nature. An overview of the key issues raised and amendments made are set out in the sections below.

A table outlining all changes made to the statement as a result of consultation is provided at Appendix 2. Individual comments and responses will be published on the DEW website and submitters will be notified of the completion of the statement once the document has been tabled in Parliament.

### 3.1 Definition of water security

A number of comments received suggested that the definition of water security should explicitly consider social equity imperatives, balancing environmental, economic, social, human health and cultural outcomes and go beyond the lens of 'water security for sustainable growth'. This amendment would be in line with the draft recommendations made by the Productivity Commission's review of the National Water Initiative.

The definition of water security adopted explicitly considers the acceptability of water availability and quality for people, communities, industry and the environment, and as such the original definition for water security is considered appropriate. The statement, however, has been updated throughout to reinforce the importance of water for environmental, social and cultural values, including for health and wellbeing, as well as for sustainable growth.

### 3.2 Purpose/goals of the statement and the strategic priorities

Some feedback sought greater clarity about the overall purpose, goals and intent of the statement. It was recommended that the purpose of the document be more clearly articulated in the introduction and that the executive summary better define what the role of the state government is in water security, including what is in and out of scope for this program of work. Further feedback indicated that the purpose and goals could be better linked to the strategic priorities.

The statement has been updated to more clearly outline its purpose and goals. A list of the strategic priorities has now been included in the Executive Summary to provide clearer alignment between purpose and priorities.

### 3.3 Climate change

Feedback suggested that greater focus should be placed on climate change in recognition of its fundamental importance to water security, including providing stakeholders with useful and reliable information on their exposure to climate related risks. It was also recommended that reference and connection be made to the *Implementation Plan for the State Government Climate Change Action Plan 2021-25*, as there are several priorities and actions which closely align.

To help manage climate risks and realise opportunities, feedback recommended that the state government put in place governance arrangements to ensure water security can be maintained in a changing climate.

Additional information has been included in the statement regarding climate change. The 'South Australia's water resources' (now 'Water resource management in South Australia') and 'Regional water security' chapters have been amended to include new sections on the impacts of climate change.

A number of submissions requested that the impacts of climate change be highlighted in the description of each region's water resources. It was not possible to do this consistently across all regions. A number of projects, however, are underway to better understand the impacts of climate change on water resources across the state – information will be shared as these projects progress. As water security strategies are developed, the impacts of climate change will be assessed and options to adapt identified.

In further recognition of the importance of climate change in South Australia, the statement now includes a more explicit strategic priority in relation to climate change. This priority highlights the need to invest in understanding climate change impacts to support adaptive decision-making and increase resilience. Consistent with the *South Australian Government Climate Change Action Plan 2021 – 2025*, this will include working with scientific experts, resource managers and water users to better understand projected changes in water availability and the impacts on communities, key industries, the environment and water entitlement reliability.

### 3.4 Water security risks

A number of submissions were received emphasising the importance of future water security. Themes related to:

- identification of future water security actions, including increasing use of alternative water sources, increasing water use efficiency and reducing demand
- achieving the right balance between utilising water for economic benefit and health of ecosystems
- making the entire state a prescribed water resource area
- provision of more region-specific information on water security including volumes, location, and quality of water supplies and details about how different industries may be affected.

These themes, particularly addressing region-specific water security risks, can be most effectively addressed through developing targeted water security strategies (priority 2). The state government is investing in water security planning by developing targeted water security strategies where evidence shows water supplies of a suitable quality will be insufficient to meet established or credible potential demands, including in response to climate risk. Through this planning, water security risks will be considered and evaluated at a regional scale. Information will be shared as the strategic priority work progresses and we will work towards incorporating this information into the next statement.

In addition a new priority has been included in relation to the development of data, analytics and insights for the digital water future (priority 9). The focus of future activity in relation to this priority will be investment in data management, analytics and decision support tools to efficiently monitor and manage emerging water risks and opportunities, increase transparency, and support timely decision-making. This builds on upgrades to the state's water licensing system that are currently being undertaken; improved water registry arrangements; updated surface water information management system; new online River Murray water calculator; and improved access to geoscientific, mineral and groundwater data to support investment in SA.

### 3.5 Aboriginal water interests

A number of submissions received suggested the draft statement should include recognition of the rights and aspirations of First Nations peoples and further discuss the importance of water for health and cultural needs. Submissions emphasised the need to have a sense of urgency and planning for the delivery of clean and safe water to Aboriginal communities.

In response to comments, the statement has been amended to include further detail and discussion around the importance of water to First Nations peoples for health, cultural and economic purposes. The statement now references *Closing the Gap*, the work the state government is undertaking to support a revised National Water Initiative, and the progress made towards including First Nations peoples' values and needs for water in water allocation plans (WAPs).

The state government is committed to engaging with Aboriginal communities on the development and implementation of reforms under both *Closing the Gap* and the NWI. A dedicated national Committee on Aboriginal Water Interests has also been set up for the purpose of advising governments on these reform agendas and the state government is working closely with this committee. A new strategic priority has been included to progress ensuring First Nations peoples have equitable access to water resources for cultural purposes, including economic purposes (priority 6).

### 3.6 Provision of critical human water needs, including in remote communities

A common theme across submissions received was that there was strong support for the strategic priority ensuring all South Australians have access to water for Critical Human Water Needs (CHWN). Recognising the importance of CHWN, it was recommended that the draft statement acknowledge the negative health outcomes inherent in not providing access to safe, affordable and reliable drinking water. It was indicated that CHWN should be prioritised with an emphasis on planning and on investments to enhance liveability, water efficiency, water recovery and integrated water management.

Submissions received viewed the draft statement as an opportunity to take a leadership position and fix long standing issues of access to safe drinking water in South Australia, including addressing drinking water supply challenges and committing to developing a basic level of service for all South Australians.

In response to the feedback received, changes have been made throughout the statement to explicitly recognise the importance of water for people and communities. This change has further been reflected in strategic priority 4 (formerly priority 2) – ensuring all South Australians’ CHWN are able to be met, including for remote communities. This priority seeks to ensure that CHWN are prioritised appropriately in WAPs and that, where required, water investment and planning processes support the implementation of objective water security standards.

In addition to comments received regarding the importance of water for people and communities, comments were also received specifically in relation to water supplies in regional and remote communities. Feedback recommended that the draft statement should include a more ambitious vision to set up long-term sustainable outcomes for regional and remote communities rather than dealing with issues reactively as they arise. Further information has been included in the statement setting out the state government’s commitment to further investigate the case for additional water security investments in self-supplied remote communities, including the development of a basic level of service. To support strategic priority 4, a stocktake of water supplies in remote communities commenced in 2021.

### **3.7 Water for the environment**

Comments suggested that the draft statement should have a greater emphasis on water for the environment and its importance in supporting healthy, working landscapes. Other comments indicated that there was no mention of the trade-offs or tensions between water security for people and production and for the environment. Recommendations were made to amend the draft statement to more meaningfully have regard to environmental water requirements, including in a changing climate.

The statement has been updated to include a greater emphasis of the importance of water for the environment throughout. This additional information includes a section in the introduction chapter and further detail around how WAPs manage water for the environment in the ‘Water resource management in South Australia’ chapter. Case studies have been included to demonstrate different approaches to managing environmental water. Strategic priority 3 (formerly priority 4) has been amended to better reflect the importance of ecologically sustainable water resource management.

### **3.8 Urban water management and the proposed Urban Water Directions Statement**

Comments on the proposal to develop an Urban Water Directions Statement (the Directions Statement) indicated broad support noting that this work has the potential to offer significant environmental, economic and social benefits to South Australia as well as an opportunity to collaborate with local government. It was recommended that the Directions Statement be focused on actions and achieving outcomes as well as defining roles and responsibilities.

It was also recommended that, within the draft statement, fit for purpose water solutions for industry should be emphasised rather than using potable water for most applications. It was also suggested that the draft statement is an opportunity to identify wastewater as a resource that could be leveraged by industry and to provide clarity on improving efficiency of water use.

Feedback received in relation to the draft statement has been reflected in amendments to strategic priority 7 (formerly priority 9) – integrated urban water management. Specific feedback on urban water will inform the development of the Directions Statement. Engagement with stakeholders on a series of urban water discussion papers was undertaken in 2021.

### **3.9 Water Industry Act Review**

As part of the consultation process, feedback was also received regarding the review of the WI Act, which aims to drive innovation and competition in the water industry. Comments indicated that there is support for further investigating the influence of price and price setting as a barrier to innovation and competition.

Many specific comments were made regarding the WI Act review, including around cost recovery for the provision of water supplies, the disadvantages faced by smaller operators, access to Community Service Obligation subsidies, third party access arrangements, the challenge of governance arrangements and compliance gaps, planning for water security and licensing and exemptions.

In response to feedback received, strategic priority 8 (formerly priority 9) on the WI Act has been updated to highlight some of the issues that will be considered throughout the implementation of the review's recommendations.

### **3.10 Strategic priorities**

Submissions indicated broad support for the strategic priorities; however, a number of amendments were recommended including providing more succinct wording and tying priorities to the content of the draft statement.

A number of additional priorities were also recommended, including:

- engaging the community to raise awareness of the use of recycled water around the world
- engaging regional water retailers on issues that could benefit from collaboration
- developing a statewide policy framework for managing water resources affected by climate change
- actively protecting essential water catchments (groundwater and surface water) to optimise yield and protect water quality.

To reflect feedback received, a number of amendments have been made to the strategic priorities. Amendments include making the priorities easier to understand. Reference to each priority has also been integrated throughout the statement to more clearly identify how they fit in the current water security landscape and how they will be considered into the future. Further discussion in the earlier chapters has also been included to address feedback provided, particularly around the landscape and water planning framework that is in place to protect and manage catchments across the state.

### **3.11 Consultation process**

Feedback was received from stakeholders regarding the extent and timing of the consultation process for the development of the draft statement. It was recommended that, given the importance of water security, increased stakeholder consultation, engagement and collaboration should be undertaken by DEW with key stakeholders. It was also noted that there is an expectation that critical industries that rely on secure water supplies for current operations and future growth be closely engaged in the development of the draft statement.

The State Government will work with partners and stakeholders on the implementation of the strategic priorities within the statement to ensure effective input, collaboration, implementation and ownership.

### **3.12 Appendices**

Appendix 1 – List of Submitters

Appendix 2 – Table of changes

# Appendix 1 – List of submitters

Submission #	Name / Organisation
1	Department for Infrastructure and Transport
2	Alinytjara Wilurara Landscape Board
3	Department for Trade and Investment
4	Wendy Deinum
5	Eyre Peninsula Landscape Board
6	Essential Services Commission of South Australia (ESCOSA)
7	Arabana Aboriginal Corporation RNTBC
8	University of Adelaide
9	Limestone Coast Landscape Board (LCLB)
10	Summerfruit SA
11	Renmark Irrigation Trust
12	South Australian Arid Lands Landscape Board
13	Nature Foundation
14	Northern and Yorke Landscape Board
15	AquaterreX Pty Ltd
16	SOURCE Global, PBC
17	South Australian Council of Social Service (SACOSS)
18	Deans Wine Consulting
19	Green Triangle Forest Industries Hub
20	Conservation Council of South Australia (CCSA)
21	SA Water
22	Healthy Rivers Ambassador for MDB
23	Association of Mining and Exploration Companies (AMEC)
24	Central Irrigation Trust
25	Alexandrina Council
26	Hills and Fleurieu Landscape Board
27	Murraylands and Riverland Landscape Board
28	City of Salisbury
29	Local Government Association
30	Mid Murray Council
31	Barossa Infrastructure Limited
32	Limestone Coast Local Government Association
33	AquaterreX Pty Ltd (via YourSAy)
34	Lerami (via YourSAy)
35	Rosanna Cent (via YourSAy)
36	Mark (via YourSAy)
37	McLaren Vale Grape Wine & Tourism Association



## Appendix 2 – Table of key changes

Section	Page No.	Comment or reason for change	Change made
Throughout	NA	Editor review of the final version of the statement for publishing	Minor edits for formatting, grammar and punctuation.
Executive Summary	iii & iv	Various comments requesting that the purpose and goals of the statement be more clearly articulated and that these be more clearly aligned to the strategic priorities	Executive Summary updated to clearly state the purpose of the document (to meet the requirements of the <i>Water Industry Act 2012</i> ), what it aims to achieve and the issues it proposes to address. Strategic priorities are now included in the Executive Summary.
Introduction	2	Page 2 - the word "areas" at the end of the first paragraph under "Why we need to consider water security" should be replaced with "communities"	Sentence updated: "Significant investment has also been undertaken or is planned by SA Water in many regional areas, including for its customers in remote <i>communities</i> ".
Why we need to consider water security	2	Various comments requesting greater focus on water for people and communities and water for the environment	New headings and content added for 'Water for people and communities' and 'Water for the environment'.
		Text box moved to better align with new 'Water for people and communities' heading	Text box 'Delivering affordable water to South Australians' on page 5 moved to page 2.
Growth in a changing climate	3	Heading updated to better reflect other changes made to this section	'Growth in a changing climate' updated to 'Water security in a changing climate'.
Water security in a changing climate	3	Page 4 (now page 3) - Growth in a changing climate should indicate that we are experiencing hotter and drier conditions "and greater variability" as a result of a changing climate	Sentence updated: We are experiencing hotter and drier conditions <i>with more frequent and intense extreme weather events</i> as a result of a changing climate (DEW, 2018)".
		Various comments related to the importance of climate change	The text box 'Changes in South Australia's climate' has been removed from this section. Additional information has been added to the section 'South Australia's Water Resources' (see page 14) of the statement to provide more discussion on climate change, detail some of the changes expected and what is being done in regards to water resource management.
Why a water security statement?	4	Various comments requesting clarity around the purpose of the document	Section updated to note that the draft statement has been prepared to meet the water planning requirements of the <i>Water Industry Act 2012</i> .

Section	Page No.	Comment or reason for change	Change made
	5	Figure 1 – minor updates to clarify roles and responsibilities	Figure updated to clarify DEW and Landscape Board roles and responsibilities.
South Australia's water resources	6	Chapter title updated to better align with the additional content included in this chapter	'South Australia's water resources' chapter title changed to 'Water resource management in South Australia'.
Where do we get our water from?	7	Page 8 (now page 7) footnote - Could this be based on total volume of licensed allocation rather than metered use?	Footnote 3 updated to note that a volume of 49GL is licensed for the Far North region.
		The Diamantina River should be referred to as the Georgina-Diamantina when encompassing Qld or Diamantina-Warburton for SA	Updated to state 'Diamantina-Warburton River System'.
Where do we get our water from? Surface water	8	Page 9 (now page 8) - recommended amendment to wording. "River flows in the Lake Eyre Basin are highly variable; characterised by the "boom and bust" dynamics of arid and semi-arid environments and these variable, largely unregulated flows, are vital for the health and ecology of the system."	Sentence updated: "River flows in the Lake Eyre Basin are highly variable <i>and characterised by the 'boom and bust' dynamics of arid and semi-arid environments. These variable, largely unregulated flows are vital for the health and ecology of the system.</i> "
Where do we get our water from? River Murray	8	Page 9 (now page 8) - Clarify statement that the water sharing arrangements have been in place for the last 100 years.	Sentence updated: "The water sharing arrangements that are in place today, <i>as set out in the Agreement</i> , have largely been in place for the last 100 years."
How are water resources managed in South Australia? Desalination	9	Desalination pop out box - Is it worth noting that there has been investment in smaller desalination within the farming/pastoral sectors in recent years?	The desalination text has been removed and the text in the desalination section updated to note that small-scale desalination is providing stock water supply and irrigation water at the farm scale.
New section - Water for people and communities	9	Various comments requesting greater focus on the importance of water for people and communities	A new section has been added setting out the importance of water for people and communities, the investments being made in water supplies for regional and remote communities, and the challenges that require addressing. Text box included 'Opening reservoirs for recreation'.
New section - Aboriginal Water Interests	10	Various comments requesting greater recognition of the rights and aspirations of First Nations peoples and the importance of water for health and cultural needs, including economic purposes	A new section has been added discussing the importance of water for First Nations peoples' health, cultural and economic needs. Reference is now made to the National Agreement on Closing the Gap and the state government's commitment to a renewed National Water Initiative.

Section	Page No.	Comment or reason for change	Change made
New section - Water for the environment	10	Various comments requesting greater focus on water for the environment. Greater detail is also provided later in this chapter around how water allocation plans (WAP) provide water for the environment	Section on Water for the Environment moved from page 12 to page 10, minor updates made to align with the information on page 11.
		It would be useful to have a couple of lines on providing for Groundwater Dependent Ecosystems such as the GAB Mound Springs	Additional information added about the importance of water for groundwater dependent ecosystems.
		Surface water focussed statement - expressions of groundwater also provide important critical refugia and are culturally and socially important (including amenity, recreational, heritage)	Additional information added about the importance of environmental water provisions in groundwater systems to support cultural and social values.
New section - Landscape and water planning framework	11	Various comments discussing broader landscape and water management and the role of landscape boards	New section added describing the landscape and water planning framework and the role of landscape boards in integrated landscape management.
Prescribed water resources  Prescribed water resources	11	To better reflect changes in the remaining sections of this chapter	Section updated to provide additional context around water allocation planning and future considerations in a changing climate.
		Appendix B doesn't appear to be referenced in the document	A new paragraph has been included setting out the requirement for WAPs to be reviewed. This paragraph notes that the status of WAPs across the state and timeframes for their review are set out at Appendix B.
New section - Environmental water provisions	11	Various comments requesting greater focus on water for the environment	New section added describing how WAPs manage water for the environment and some examples of how different WAPs do this in practice.
New section - Incorporating Aboriginal values and needs into water allocation plans	14	Various comments requesting greater recognition of the rights and aspirations of First Nations peoples and the importance of water for health and cultural needs, including economic purposes	New section added describing how Aboriginal water interests and needs are being incorporated into WAPs and the importance of engaging with First Nations in water management. Also noted that an objective for Aboriginal people is to own water entitlements that can be used for cultural, spiritual and economic purposes.
Water markets	14	To better reflect changes in the remaining sections of this chapter	Section moved from page 11 to page 14.

Section	Page No.	Comment or reason for change	Change made
Non-prescribed water resources	14	To better reflect changes in the remaining sections of this chapter	Section moved from page 10 to page 14.
Figure 6	14	Figure 5 (now Figure 6) - Far North 50GL figure - it's not clear how this number has been determined in Appendix A. 50GL is less than the total authorised take quoted in the 2021 WAP. The WAP has a figure of 64.5GL for Annual volumes of water authorised for taking from all aquifers in the Far North PWA as at May 2019	Figure 6 updated to reflect the total authorised volume of 64.5GL. Figure moved to from page 11 to page 14.
New heading - Water management in a changing climate	15	Various comments related to the importance of climate change	A new section has been added setting out the projected impacts of climate change and the state government's approach in terms of water resource management.
Figure 10	21	Figure 10 updated to reflect current information	Figure 10 updated to show the extent of suburbs that may receive water from the Adelaide Desalination Plant.
Adelaide's water balance	25	Minor edit to Figure 15 to add clarity	Figure 15 updated to reflect that wastewater is recycled and exported to agriculture (i.e. it becomes recycled water). Capacity of the Adelaide Desalination Plant also added.
Long-term water security outlook	28	Various comments related to the importance of climate change	Heading update to 'Long-term water security outlook in a changing climate' to better reflect that this section discusses impacts of climate change scenarios.
A water-secure, cool and green Adelaide	29	New text box added to provide information about Adelaide becoming the second National Park City after London, and how this will promote Adelaide as a liveable, green and cool city	New text box added 'Adelaide as a National Park City'.
Regional water security - Overview	31	Various comments related to the importance of water for the environment	Reference added to the importance of regional water resources for 'supporting important local ecosystems' in the first paragraph of this section.
Figure 20	31	Comment querying the volume attributable to the Far North	The volume authorised in the Far North Prescribed Wells Area (PWA) has been added to the figure, and a footnote added explaining that the authorised volume has been used in absence of metered data.

Section	Page No.	Comment or reason for change	Change made
Regional drinking water	32	On page 29 (new page 32), the document indicates Sleaford Bay as the location for the new desalination plan on the Eyre Peninsula, however this is no longer the case	Sentence updated: "It will include new desalination plants at Penneshaw <i>and near Port Lincoln (exact location to be confirmed)</i> to address water security and supply issues on Kangaroo Island and <i>the Eyre Peninsula</i> respectively."
New section - Regional water security and climate change	32	Various comments related to the importance of climate change	A new section has been added to discuss the impacts that climate change is likely to have on regional water resources and research proposed to improve understanding and fill knowledge gaps about regional impacts.
Regional urban centres - Murray Bridge	33	Page 30 (now page 33) - The statement identifies that "any increase in demand (for the town of Murray Bridge) will be met from the River Murray." This statement gives the impression that water is still available for allocation, not acknowledging that the River Murray Prescribed Water Resource Region is already over allocated	Sentence updated: "Any increase in demand will be met from the River Murray <i>within existing licensed volumes</i> ".
Regional urban centres - Port Lincoln	32	Port Lincoln - mining/industry improvement in water recycling stormwater management and reuse for the Iron Knob area	A new sentence has been added noting that improvements in the use of reclaimed water within mines is reducing the amount of groundwater needed in the supply mix for mining activities.
Remote communities	33	To reflect update to strategic priority around provision of critical human water needs	Final sentence of this section updated to refer to 'developing a basic level of safe and reliable water services for self-supplied remote communities'.
Water for primary industries	34	The forestry sector would welcome additional commentary about the significant contribution it plays to the economic, social and environmental needs of our communities	A new paragraph has been added to the statement recognising the potential for growth in the forestry industry and the plans set out in the GTFI strategic plan.
Water for primary industries	34	Simple measures such as farm-gate value in primary industry can understate by many-fold the real contribution an industry may make to the overall economy. One example of a (relatively) complex value chain is Barossa wine	New sentence added at end of third paragraph: "Irrigated agriculture also supports value adding and service industries, such as packing sheds and food processing."

Section	Page No.	Comment or reason for change	Change made
		Comments requesting greater emphasis on importance of primary industries to the economy	First sentence in fourth paragraph updated to reflect 'food, wine and agribusiness as the state's largest export sector, largest manufacturing sector and the largest economic contributor and employer of the state's nine Growth State Sectors'.
Water for energy and mining	34	Page 31 (now page 34) - dewatered water missing from sentence	The term 'dewatered' added to the sentence detailing the uses of water in mining.
		Mining approvals may also contain conditions for water affecting activity permits - does this include water take approvals?	Sentence updated to note that condition monitoring may apply to the 'water resource' rather than 'groundwater resource'.
Regional Water Security - South East	36	The delineation between groundwater and surface water is, and will continue to be, a significant challenge to the management of water resources in the Limestone Coast. The Limestone Coast has very little surface water and predominately surface water is in fact the surface expression of groundwater - yet current policy dictates we manage them separately. This policy must be reconsidered. The LCLB would support this complexity being acknowledged within the Statement.	The paragraph discussing the South East drains has been updated to add more context. It is noted that surface water and groundwater are managed separately, which is challenging as the sources are in constant exchange with each other and are integrated parts of the regional water system.
Regional Water Security - South East	36	The forestry sector would welcome additional commentary about the significant contribution our sector plays to the economic, social and environmental needs of our communities in this visionary plan. The GTFI strategic plan also provides great resource for this commentary	A new sentence has been added noting that the potential for growth in the forestry industry is recognised in Growth State, under the Food, Wine and Agribusiness Plan for Growth.
Regional Water Security - South East	37	Page 34 (now 37) - Improved Water Security for farmers in the South East - the box refers to one new area of concern being identified in the 2019 risk assessment. There were 2 new areas of concern identified, the statement refers to MacDonnell but excludes Joanna, which also moved to high risk, though with low confidence	Sentence updated: "The risk assessment also identified two new areas of concern where irrigation is impacting seasonally on coastal ecosystems."

Section	Page No.	Comment or reason for change	Change made
Regional Water Security – Murraylands and Riverland	38	The descriptors for the other regions particularly the Murraylands and Riverland are much less flattering and we would like to see this changed. The Riverland is an economic powerhouse for the state as outlined in the Statement “in 2017/2018 the gross value of irrigated agricultural production in the South Australia was \$1.9 billion with \$1.2 billion of this generated in the Riverland.”	Introduction updated to note that “The Riverland is a major horticultural region and is well known for producing wine, citrus, almonds, pasture and vegetables. Water is also used for dairies and other livestock.”
		Text box updated to provide additional information about progressing trade options as an outcome of the <i>Water for Fodder</i> program, to free up volumes for other River Murray water users	Text box ‘More water for River Murray irrigators in dry years’ updated.
Regional Water Security - Murraylands and Riverland	39	Page 36 (now 39) - It is recommended that the statement is amended with regard to the following sentence: “SA Water supplies water from groundwater resources for public water supply purposes” To: “SA Water and local councils supply water from groundwater resources for public water supply purposes.”	Sentence updated: “SA Water and local councils supply water from groundwater resources for public water supply purposes.”
Regional Water Security - Eastern Mount Lofty Ranges	40	Page 37 (now 40) - The statement “Dams across the region provide water for stock and domestic purposes” requires amendment to reflect that direct watercourse extraction, dams and underground water provide water for stock and domestic purpose, collectively	Sentence updated: “Dams, watercourses and wells across the region provide water for stock and domestic purposes.”
		Page 37 (now 40) - It is recommended that the statement “Historically, flood waters from the Bremer River have been used to irrigate properties and natural flooding has been harnessed to support irrigated crops” be amended to: “Historically, flood waters from the Bremer River have been used to irrigate properties. Natural flooding has proven effective for managing salt accumulation in the root zones of plants (as a result of efficient irrigation practices) as well as providing essential environmental flows to the now stranded red gum swamps located on the floodplain.”	Sentence updated: “Historically, flood waters from the Bremer River have been used to irrigate properties to support irrigated crops. <i>Natural flooding has proven effective for managing salt accumulation in the root zones of plants (as a result of efficient irrigation practices) as well as providing essential environmental flows to the now stranded red gum swamps located on the floodplain.</i> ”

Section	Page No.	Comment or reason for change	Change made
	40	There is no mention in this section of managed aquifer recharge (MAR). MAR commenced in the 1970s in this region with the current WAP encouraging MAR use to store water during times of high availability. The MAR has been found to have an overall benefit to the groundwater resource by reducing groundwater salinity. It is a more efficient way to store water in a way which avoids evaporative loss. There are policies in the WAP to also manage the risk of rising shallow water tables through planting deep rooted perennial vegetation which is a site use approval/licence condition. This community have been leaders in innovation, irrigation efficiency and water resource management and it should be recognised in the water security statement. This community has diverse sources of water available and have actively worked to reduce their risk to climate change and reduced water availability	Text updated to note the benefits of natural floods to manage salt accumulation in root zones, to note that MAR occurs resulting in reduced evaporative losses from storing water and reducing groundwater salinity, and to note that policies are in place to manage local risks of rising shallow water tables - planting of deep rooted perennial vegetation is required.
Regional Water Security - Barossa Valley	42	Page 39 (now 42) - With regard to the sentence "The government is supporting plans to deliver additional water to the Barossa and Eden Valleys", it should be made clear that Eden Valley is part of the Marne Saunders Prescribed Water Resource Area (PWRA), or preferably include a section on the Marne Saunders in the Murraylands and Riverland section (page 35) that discusses the potential options for delivery of additional water to the Marne Saunders region	Footnote added to note that Eden Valley water resources are within the Marne Saunders PWRA and managed via the WAP for the Marne Saunders PWRA. Additional information provided around the water supply options being considered to bring water into the Barossa and Eden Valleys. Reference to the targeted water security planning approach being trialled in the Barossa and Eden Valleys added.
		To include information about the projects underway to bring alternative water into the Barossa region	Sentence added noting that investigations are underway regarding 'the supply of additional water to Eden Valley via the Mannum-Adelaide pipeline and bringing recycled water into the Barossa from the Bolivar Wastewater Treatment Plant'.
		Minor edit to update the information included	Volume of water that could be delivered from Bolivar updated from 14 GL to 8 GL to reflect the current information available.



Section	Page No.	Comment or reason for change	Change made
	43	To include information about the targeted water security planning underway in the Barossa, and link this to strategic priority 2	New paragraph added setting out the targeted water security planning underway in the Barossa.
Regional Water Security – Clare Valley	43	To provide updated information about funding for water security in the Clare Valley	Last paragraph updated to note that the funding for a business case for new water infrastructure for the Clare Valley has recently been announced.
Regional Water Security - Eyre Peninsula	45	Suggest text updated in Eyre Peninsula Desalination Plant text box	Text updated in Eyre Peninsula Desalination Plant text box. Reference to timeframes and costs removed due to ongoing location investigations.
		Consideration should be given to providing a comment regarding intention of how water security issues will be addressed for the Musgrave PWA. Groundwater levels in this PWA are approaching historic lows and under the new WAP, allocations are likely to be reduced to just 12% for the 2021-22 period, with SA Water planning to access additional unallocated water to secure town water supply for Elliston in the 2021-2 season	Text updated to note that SA Water is considering options to secure a long-term water supply to Elliston.
		A statement in relation to the condition of the Musgrave PWA resource and SA Water future plans that they will be constructing a pipeline from Poldia to Elliston to link up the rest of the system should be included to provide some certainty for both licensees and communities	Text updated to note that SA Water is considering the potential to extend the existing trunk main to Elliston in order to source water from either the River Murray or Uley South.
Regional Water Security - Far North	46	Suggested to not use the term "fresh" when referring to "Groundwater is the only reliable source of <i>freshwater</i> for central Australia..."	The term 'fresh' has been removed.
		The WAP for the Far North is no longer being amended and was adopted in February 2021. Additional context included around the importance of water to Aboriginal cultural and ecological values	Sentence updated: "A water allocation plan is in place to <i>manage the taking and use of groundwater within the prescribed wells area, including ensuring the natural discharge of groundwater through springs is maintained to support Aboriginal cultural and ecological values.</i> "
		Suggested to explain the term leasehold	Footnote added to explain what a leasehold is.

Section	Page No.	Comment or reason for change	Change made
		In the sentence that begins "The GAB Springs" remove the word essentially at the beginning and include social/heritage value at the end of the sentence	The word 'essentially' removed and a sentence added to note that the GAB springs have cultural, social, heritage and ecological importance.
		Provide context of the Coongie Lakes Ramsar site as part of the Lake Eyre Basin (LEB) system	Updated to add that the site is within the LEB.
		The far north systems, when wet, provide habitat for not only birds but other species including fish, frogs, invertebrates etc. and should be listed	Updated to note that fish, frogs and invertebrates are also supported. Additional information added about the significance of ecological communities.
		Concern raised that at page 42 (now page 46) the draft statement says stock use 9.78GL/year. The information we have is that the water from the pastoral bores, including free-flowing water, exceeds the amount of the petroleum co-produced water of 92.2 GL/year	Minor amendment to clarify that 9.78 GL is the amount of water that is authorised for stock use.
		Include "across the GAB states" at the end of "Historically, water for pastoral use has been through the uncontrolled flow of artesian wells..."	"across the GAB states and territory" added to this sentence.
		Last sentence in the first paragraph on page 43 (now page 46). Start the sentence "In SA the Water Allocation Plan for the Far North..."	Suggested change made.
		The sentence between page 42 and 43 reads as though in the far north, consider context by GAB across QLD, NT, NSW	Text updated to clarify the South Australian context.
		There is not enough focus on the Far North and concern is raised that the statement does not adequately examine the water usage from the Great Artesian Basin. Over the last 200 years the GAB is losing pressure which is having a significant impact on GAB Mound Springs and in particular the Mound Springs which are within the Arabana area	Additional text has been added to strengthen the statements regarding the importance of GAB pressure to support Aboriginal culture and ecological values.
		Reconsider the minimal amount of regulation and commentary on the GAB	Amendments have been made to strengthen the statements for managing the groundwater water resources.

Section	Page No.	Comment or reason for change	Change made
		The number in this Far North section align reasonably with the WAP. Need to check the co-produced authorised take of 29.2 GL as this appears high. Currently 60 ML/day or 21.9 GL year authorised plus the Sec 105 (128) authorisation for Beach Petroleum (Aug 2019).	Volume of authorised co-produced water amended to 21.9 GL/year.
		Page 43 (now page 46), paragraph 2 (now 4) - Start paragraph with context regarding mining and petroleum - what is the percentage of use given the water for stock included percentage	Reference to percentage of total use added.
		The questions of usage is dealt with briefly but leaves many questions unanswered, in particular in relation to petroleum wells and the production of petroleum and water. Clarification requested around the volume authorised to be taken from the GAB, including the water currently authorised for taking by Olympic Dam Mine	Additional text has been added to the Far North section to clarify the authorisations for water use for mining.
		Provide a reference and context to the statement that "Tourism is also likely to increase in the region."	Paragraph amended to provide clarification around tourism.
		The statement that "the improvements in town water supplies...may encourage population growth" is a long bow to draw not sure population growth will be linked to increasing use of secure groundwater supplies. Water quality is the issue for town water supplies as need to supplement with rainwater or more fit for purpose water	Paragraph amended to remove reference to population growth and discusses potential increases in use of groundwater resources.
		Page 43 (now page 46) – "excessive ground water use may have unacceptable impacts on water pressure..." The use of the word <i>may</i> is incorrect because it is clearly already having an impact that is unacceptable to the Arabana People	This statement has been amended to note that the provisions of the Far North Water Allocation Plan aim to ensure that groundwater use does not have unacceptable impacts on the water pressure or level.
Strategic priorities for water security and next steps	48	Text moved up from under the 'Next steps' heading to better summarise this section	Next steps section combined with the heading 'South Australian Government strategic priorities for water security <i>and next steps</i> '.

Section	Page No.	Comment or reason for change	Change made
South Australian Government strategic priorities for water security and next steps	48 to 50	Request for more succinct and clear strategic priorities, with a brief summary set out in text underneath	All priorities updated to have a heading and a succinct summary, with further detail provided as text underneath each priority.
		Strategic priorities updated to reflect comments received in submissions	Priority 1 (formerly priority 2) has been updated to better reflect the work needed to better understand climate impacts to support adaptive decision-making and the opportunities for adaptation to increase resilience.
			Priority 2 (formerly a priority 1) has been updated to note that targeted water security strategies will be undertaken in partnership with key stakeholders with the outcome to enable sustainable economic growth.
			Priority 3 (formerly priority 3 & 4) updated to build in the importance of ecologically sustainable water resource management and ensuring that water planning processes operate efficiently and effectively.
			Priority 4 (formerly 5 & 6) updated to reflect that the provision of critical human water needs is important for all South Australians and will be progressed via WAPs and through work to investigate the case for additional investment in water supply to remote communities.
			Priority 5 (formerly priority 7) - minor updates for formatting, to note that the River Murray provides CHWN for over 90% of South Australians, and to note the status of the Basin Plan.
			Priority 6 added as a new priority to reflect the importance of equitable access to water for First Nations people for cultural purposes, including economic purposes.
			Priority 7 (formerly priority 8) - minor updates to reflect comments received and updated timeframes around the Urban Water Directions Statement.
			Priority 8 (formerly 9) updated to better reflect the key issues that will be progressed through implementation of the recommendations under the review of the <i>Water Industry Act 2012</i> .

Section	Page No.	Comment or reason for change	Change made
			<p>Priority 9 added as a new priority (also incorporates part of former priority 3) to reflect the importance of investing in data, analytics and decision support tools to efficiently monitor and manage emerging water risks and opportunities, increase transparency and support timely decision-making.</p> <p>Priority 10 - minor updates for formatting and updated timeframes included.</p>
References	51	Minor updates made	References added where new content has referenced existing documents, minor updates to formatting.
Glossary	52	New terms added to the glossary due to additional content included as a result of consultation feedback. Other terms removed where relevant.	<p>New terms added: Held Environmental Water, Planned Environmental Water, Water Resource Plan.</p> <p>Terms removed: Bundled water rights, Un-bundled water rights, Maximum long-term volume available for use, Long-term sustainable level of take.</p>
Appendix A	53	Footnote should be included to say that allocations include carryover, rollover, recharge etc	A paragraph has been added at the start of the appendix to clarify that allocations set out in the table include carryover volumes, rollover volumes and recharge volumes. Explanation added as to why volumes used tend to be significantly lower than the volume allocated.
	54	Marne Saunders data should be moved from EMLR to Murraylands and Riverland section	Marne Saunders data moved from under Mount Lofty Ranges heading to under Murraylands & Riverland heading.
	55	Forestry use should be included in the table	Forestry use volumes added to the table.
		Footnote should be included to say that Morambro Creek allocations are based on a share of the resource, allocations only derived when the creek is flowing	Footnote added as suggested.
Appendix B	55	Update Far North adoption date, Barossa WAP information, Baroota WAP information and Peake, Roby and Sherlock WAP information	The table has been updated to reflect the current status and review timeframes for each WAP. As the actions are time bound, the table has been updated to provide simplified information about each prescribed water resource and corresponding WAP, the landscape region responsible for each WAP, the adoption date of the current WAP and the next review/amendment date.

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