

Consultation and Alterations Report

Water Allocation Plan for the River Murray
Prescribed Watercourse

March 2021



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For more information contact

Murraylands and Riverland Landscape Board
110A Mannum Road, Murray Bridge, SA 5253

Phone: (08) 8532 9100

Website: www.landscape.sa.gov.au/mr/home

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1 Introduction

This document is the consultation and alterations report for the draft Water Allocation Plan for the River Murray Prescribed Watercourse (draft River Murray WAP). This report outlines:

- The consultation process and responses received through consultation; and
- Any amendments proposed to the draft River Murray WAP as a result of the consultation process.

This report has been developed in accordance with the requirements of section 55 of the *Landscape South Australia Act, 2019* (the Landscape Act).

1.1 Background

The River Murray WAP was first adopted in 2002 with a review process undertaken in 2007. This led to an amendment process, resulting in the development of an amended River Murray WAP. Significant changes were made to the policies included in the River Murray WAP through this process, as a result of learnings from the Millennium drought and ensuring policies remained fit for purpose. This involved working at length with key stakeholders and the community to develop and finalise the policies included in the River Murray WAP. An amended River Murray WAP was adopted by the then Minister for Sustainability, Environment and Conservation on 3 October 2017.

A further amendment process was undertaken to ensure that the River Murray WAP met Basin Plan and Water Resource Plan requirements, and to progress community-driven changes to policies arising from the previous consultation process. An amended River Murray WAP was adopted on 28 February 2019 and this formed a component of the South Australian River Murray Water Resource Plan, required under the Basin Plan. The South Australian River Murray Water Resource Plan has now been accredited.

A further review of the River Murray WAP, specifically, the private carryover policy was undertaken in 2019-20. The current River Murray WAP was adopted by the Minister for Environment and Water on 15 April 2020.

Throughout these amendment processes the former South Australian Murray-Darling Basin Natural Resources Management Board (the former board) worked with the River Murray Advisory Committee (RMAC) and the Department for Environment and Water (DEW) to develop policies included in the River Murray WAP. Consultation with the River Murray community and key stakeholders was undertaken before finalising each amendment process.

During consultation on the Draft 2017 Water Allocation Plan for the River Murray, in response to community feedback the former board committed to undertaking a comprehensive review of how Environmental Land Management Allocations (ELMA) is used and administered. In addition, when ELMA licences were originally issued by the then Minister for the River Murray,

they were done so for a set period of time being 10 years so the effectiveness of the ELMA policy could be reviewed. The review of ELMA was jointly agreed to by DEW and the Board.

At present, the Murray-Darling Basin Agreement recognises a volume of 22.2 GL for environmental land management purposes in the Lower Murray Reclaimed Irrigation Area (LMRIA). This volume is reflected in the River Murray WAP and is available to landholders in the LMRIA to manage soil salinity and movement and cracking and secondly, to manage the impacts of acid sulfate soils which was evident during the Millennium Drought.

The former board worked with RMAC who recommended a sub-group of RMAC be established to support the review of ELMA. The ELMA review committee was established in May 2017 and consists of former RMAC members, community members from various geographic regions within the LMRIA and also includes the Chief Executive of the Regional Development Australia, Murray Lands and Riverland. The former board also worked with Ngarrindjeri through regular Statement of Commitment meetings. The Murraylands and Riverland Landscape Board (the Board) has continued to engage with Ngarrindjeri through regular working group meetings with Ngarrindjeri Aboriginal Corporation.

It was initially proposed to complete the ELMA review and include the updated policy in the 2019 River Murray WAP. Timeframes were revised after the scientific work undertaken by the Adelaide University indicated better land management outcomes by varying the current ELMA rates in the River Murray WAP.

In recognition of the importance of ensuring that scientific work was robust and defensible, and to allow sufficient time to engage with the community, the South Australian (SA) Murray-Darling Basin Water Planning Steering Committee and the former board agreed that the timeframes for the project would need to be extended outside those required for the development of the 2019 River Murray WAP.

2 Development of the draft River Murray WAP

The board has worked closely with the community throughout the development of the draft River Murray WAP. Since 2017 the board collaborated with the ELMA review committee on issues and options to improve the management of ELMA. Table 1 outlines the process and consultation activities undertaken during the development of the draft River Murray WAP.

Table 1. Timeline of when the community had input into the development of the ELMA policies for the draft River Murray WAP

Date	Activity
July 2017	A survey of licence holders regarding the use, benefits and barriers to the use of ELMA.
May 2017 – August 2020	Ten meetings were held with the ELMA review committee to identify options for the future management of ELMA.
April 2019 – December 2020	Individual meetings with First Nations to seek feedback on the management of ELMA.
October 2019	Community workshop for ELMA licence holders at Murray Bridge to discuss the review of ELMA and indicate preferred options for future management preferences.
October to November 2019	Draft River Murray WAP released for community consultation
October to November 2019	ELMA licence holders were invited to submit their feedback on drafted options. Submissions were received via an online survey or by written correspondence.
October to November 2019	Individual meetings with community members at Wall Flat and Cowirra to seek feedback on drafted options.
December 2019	Consultation Report was developed based on feedback received during submissions (Oct-Nov 2019) for the Board to consider options for drafting the ELMA policies for statutory consultation.
September 2020	Draft River Murray WAP released for statutory consultation
September to December 2020	ELMA licence holders were invited to submit their feedback on draft River Murray WAP. Submissions were received via an online survey or by written correspondence.
September to December 2020	Individual meetings with key stakeholder groups to seek feedback on draft River Murray WAP

3 Statutory Consultation on the draft River Murray WAP

The landscape board undertook statutory consultation on the draft River Murray WAP in accordance with section 55 of the Landscape Act 2019 and section 5 of the Landscape South Australia (Water Management) Regulations 2020 (Water Regulations 2020). The draft River Murray WAP was released for a two month public consultation period from 28 September until 2 December 2020 with the consultation process being guided by a consultation strategy.

The Board have sought to determine whether or not there is support to amend the River Murray WAP, with a focus on the redistribution of ELMA entitlements across the LMRIA region in line with the most recent scientific advice.

This report provides a quantitative analysis of comments received and summarises the main comments received during the submission period.

Since the commencement of the review, the former and current boards have consulted with the River Murray Advisory Committee (RMAC), the ELMA review committee, the ELMA Project Team (with representatives from water licensing, water policy, science and monitoring, the EPA, PIRSA and SA Water), the Ngarrindjeri Regional Authority through the Statement of Commitment Working Group, the Ngarrindjeri Aboriginal Corporation through working group meetings with DEW and Landscape Boards, and the SAMDB Water Planning Steering Committee.

3.1 Targeted consultation

A need for targeted consultation, and a two tiered approach was identified. The landscape board focused the consultation effort to those most affected i.e. the LMRIA community (tier one stakeholders) were consulted on the proposed changes to the ELMA policy.

There are approximately 100 licensees holding Class 8 ELMA entitlements (due to expire 30 June 2021) all directly impacted by an amendment to the Plan.

A number of communication materials were produced to provide information to the public and key stakeholders as detailed at Appendices A3, A4 and A5. Published communication materials included:

- ELMA proposed policy fact sheet
- Long Term Environmental Watering Plan updates fact sheet
- Water Affecting Activities, Drilling Wells proposed policy updates fact sheet
- A presentation outlining the proposed ELMA policy changes

Information was disseminated to the public and key stakeholders through a number of means, to provide a variety of opportunities for interested parties to find out more and provide comment. These included:

- Building on the existing consultation and engagement effort, and prior to statutory consultation, in July 2020, the Board informed the LMRIA community via a letter and newsletter, of the feedback received and how this feedback has been considered in drafting the ELMA policy. An overview of the draft ELMA policy was provided to give the community plenty of time to consider the proposed policy prior to statutory consultation.
- All information related to the proposed changes, including the ELMA review, were made available on the Murraylands and Riverland Landscape Boards website; <https://landscape.sa.gov.au/mr/water/water-allocation-plans/river-murray-wap>
- In accordance with section 5 (1)(a) of the Water Regulations 2020, in early September, Tier one stakeholders (licensees in the LMRIA) received written letters providing information about the nature and effect of the relevant proposal and details about how, and by when, a submission in relation to the proposed amendment must be made.
- Tier two stakeholders (those not directly affected by the proposed changes) received written letters outlining the proposed changes to the River Murray WAP, how to make a submission, how to arrange a meeting to talk through the changes and where to find out more.
- In addition, an email was sent to stakeholders outlining all consultation information.
- There was potential for additional community interest from landholders in the LMRIA region with plans for land development, as well as interest from other licence holders in the River Murray PW, all of which were kept informed of the amendment via the Boards website, other social media and a media release, including detail on how to make a submission.
- Submissions were invited in various formats including an online survey on the boards website and in hard copy and in writing (essay form) via email or post
- Emails or letters were sent to a number of organisations to advise of the consultation process, how to make a submission and where to find out more. These included:
 - Heads of State Government departments
 - All Councils in the landscape board region
 - Native title holders and claimants and other First Nations representative bodies
- A media release was prepared to advise the community of the draft River Murray WAP consultation process, and to encourage the public to make a submission.
- A radio interview was undertaken by the Chair of the Murraylands and Riverland Landscape Board, Dianne Davidson, with ABC Riverland Rural, Renmark.
- Articles advising of consultation and the public meetings were distributed to subscribers of The Drift (as a special bulletin), the River Murray campaign monitor and the DEW River Murray Update article.

- An article was included in The Flow Report, a weekly update that is provided to those with an interest in River Murray management, advising of consultation and the public meetings. Articles were included until the close of consultation.
- An article was included in the Murray Valley Standard regional newspaper advising of consultation.
- Tier one stakeholders were telephoned and given an opportunity to discuss the proposed policy changes and the upcoming consultation process.
- Two meetings were held in Murray Bridge in the form of public meetings, including a presentation outlining proposed policy changes, an opportunity to meet with board staff, ask questions and find out more about the proposed policy changes.
- Organisations and individuals were invited to make appointments with board staff to discuss the draft River Murray WAP (refer section 3.3). Landscape board staff were also available to answer telephone enquiries throughout the consultation period.
- Articles were included in The Drift (special bulletin) and The Flow Report in the two weeks prior to the close of consultation to remind community members to make a submission on the draft River Murray WAP.
- Information on how to make a submission was included in all communications materials distributed to the public, and in media releases. Written submissions were accepted by post, email, and via the landscape board website.
- A copy of the draft RM WAP consultation strategy was provided to the Minister for Environment and Water (the Minister).
- Printed copies of the draft Plan were available for mail out on request. Due to COVID-19 hard copies were not available at board offices.

3.2 Public meetings

To meet the statutory requirements in relation to the development of the draft River Murray WAP in accordance with section 55 (1) of the Landscape Plan, ELMA community public meetings were held on 13 October 2020, 10am and 1pm at the Murray Bridge Club. Each meeting was for a two hour period. All ELMA licensees (approx. 100) were invited to attend. Forty three community members attended the Covid safe public meetings.

The aim of the public meetings was to provide an opportunity to inform the community of the proposed changes to the ELMA policy and encourage submissions. Information provided in the ELMA newsletter prior to the meetings formed the basis for a detailed presentation on the proposed policy changes.

Board staff and DEW water licensing staff were available to answer questions and provide further information relative to ELMA application rates across the LMRIA region and associated issues. The meetings were chaired by landscape board chair, Dianne Davidson.

An ELMA public meeting report outlines the key issues raised and discussed with the community, provided at Appendix A.

3.3 Key Stakeholder Meetings

Landscape board staff were available throughout the consultation period to meet with key stakeholders, either individually or through presentations at meetings. Stakeholders were invited to contact staff should they want to find out more or discuss the draft River Murray WAP. Staff met with the following groups throughout the consultation period:

- Renmark Irrigation Trust (RIT) – Board meeting
- Ngarrindjeri Aboriginal Corporation (NAC) – working group meeting
- River Murray & Mallee Aboriginal Corporation (RMMAC) – Board meeting
- Mannum Aboriginal Community Association Inc. (MACAI) – community meeting
- South Australian Native Title Services (SANTs)

The ELMA review was originally flagged with Ngarrindjeri at the Statement of Commitment (SoC) meetings organised by the DEW in 2017, these discussions were re-instigated from April 2019. The former board discussed issues and options in regards to the River Murray Water Allocation Plan and the ELMA policy review and sought feedback from Ngarrindjeri Regional Authority through these regular SoC meetings. Ngarrindjeri and Others Native Title was determined in December 2017 which has seen a transition in engagement to Ngarrindjeri Aboriginal Corporation (NAC) via working group meetings which are a collaboration between NAC, DEW and landscape boards. Feedback from these representative bodies was considered in drafting the proposed ELMA policy.

4 Submissions received from consultation

To seek feedback on the draft Plan and proposed changes the public were invited to make submissions. A total of 64 submissions were received in a range of formats.

25 submissions were received via an online survey on the landscape board website. A number of questions were asked to gather views on the proposed policy changes.

36 written submissions were received via email and 3 were mailed. These submissions were in the form of essays, letters and survey forms.

4.1 Outcomes from consultation process

The landscape board received valuable feedback on the draft Plan through written submissions received via an online survey, email and mail. Submissions were summarised into 394 comments. Table 2 summarises the number of submissions supporting or opposing the key issues.

Of the 64 submissions received, 41 supported proposed ELMA policy changes, 19 opposed, 3 abstained and 1 was unclear.

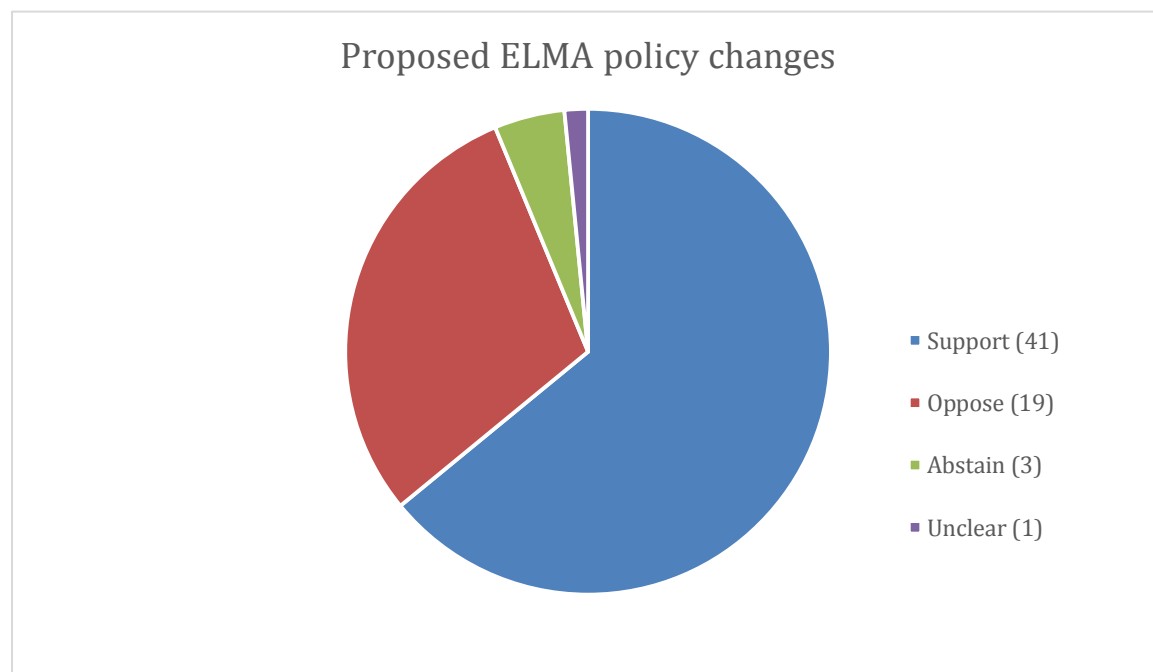


Table 2 - number of submissions supporting or opposing the key issues

Topic	Support¹	Oppose²	Other³
ELMA			
Redistribution of ELMA	36	18	3
Granting optimised rates where the current ELMA rate is less than the optimised rate	23	7	4
Granting current rates where the current ELMA rate is greater than the optimised rates (in the north)	22	4	1
Ten year transitional period or upon sale of the land (whichever occurs first) for eligible landholders to maintain the current rate (where qualified)	29	6	0
Allowance for the sale of land to a family member once within the ten year transitional period while maintaining eligibility for the current rate	23	8	0
Demonstrated ability to apply ELMA or significant legal/financial commitment to use ELMA to be eligible for ELMA	26	4	1
Removal of ELMA eligibility on permanently inundated areas or where licenses have been surrendered	26	3	0
If the total of all entitlements exceeds the 22.2 GL limit, then all licensees will receive a proportional reduction.	22	5	1
Entire ELMA proposed policy - a number of submissions made comments that were of a general nature and not specifically related to one ELMA sub-topic;	16	9	7
Other minor changes			
Drilling wells policy to minimise potential impacts associated with connected water resources	18	5	2
Updates to ensure consistency with the draft River Murray Long Term Environmental Watering Plan watering requirements	0	0	0
Updating references to the Landscape South Australia Act 2019 which has replaced the Natural Resources Management Act 2004	0	0	0

1 The submission provided clear support for the proposed change to the policy.

2 The submission was clear that it did not support the proposed change to the policy

3 The comments in the submission were either unrelated to the question at hand or provided a suggestion/statement which did not indicate support or opposition to the proposed policy change.

A number of submissions made valuable suggestions, statements and asked questions of a general nature, which did not fit specifically into a sub topic or were outside the scope of the review. These responses have included in section 4.2.2. All submitters will be provided with a letter addressing responses.

Table 3 - other responses

Other	
Questions	5
Suggestions	31
General statements	29

4.2 Key issues identified during consultation

Consultation sought to determine whether or not there was support to amend the Plan, with a focus on the redistribution of ELMA entitlements across the LMRIA in line with the most recent scientific advice. The key issues raised in the submissions related to the draft Plan in regards to ELMA were:

- Granting of the ELMA optimised rates
- Redistribution of ELMA
- Qualification for the current ELMA rate
- Ten year transitional period
- Transfer/sale of land to an immediate family member
- ELMA eligibility criteria
- Removal of ELMA eligibility
- ELMA proportional reductions

Consultation also addressed other minor changes including;

- Updating environmental water requirement tables consistent with the most recent version of the River Murray Long Term Watering Plan (LTWP)
- Provisions for water affecting activities related to drilling wells along the length of the River Murray
- Updating references to the Landscapes South Australia Act, 2019.

4.2.1 Comments received on key issues identified during consultation

The following summarises feedback on the key issues raised by the community during consultation. The statements have been collated to best represent all feedback, including statements taken directly from survey responses and submissions.

Redistribution of ELMA

ELMA are water allocations granted to landholders within the LMRIA to minimise the effects of soil salinity, acid sulfate soils, and soil movement and cracking. A scientific review found that environmental objectives for allocating ELMA cannot be met across the LMRIA under the current ELMA application rates in ML/ha, and recommended amending these rates to redistribute ELMA to improve land management outcomes.

Factors in support of the redistribution

- ELMA is for the environment not the individual
- I might not like the idea but it seems unbiased
- It is a fairer system
- Updated scientific evidence proves that current ELMA allocations are insufficient to sustain the environment in the southern area.
- Historical WAP conditions for ELMA were never implemented, leaving those below Woods Point at a disadvantage. Under the original WAP, all ELMA licenses should have been re-issued 3.5ML/ha on the sale of Class 3 water, no matter what irrigation area the land was in.
- I hope the new policies are implemented in full.
- Ten years to change farming practices is a lot better than buying land and not getting ELMA increased to 3.5ML/ha like we experienced. An increase to 3.5ML/ha should have happened when we bought the neighbours farm at conversion time.
- If the WAP does not change, the full original policy must be applied to all landowners immediately.
- If the original WAP had been implemented, those below Woods Point would have already seen an increase in ELMA on selling Class 3 water.
- The new ELMA conditions see everyone in a better position (than the 3.5 ML/ha that was not implemented).
- ELMA landholders should be treated equal and water spread equally over the LMRIA area it is issued for.
- For long-term viability ELMA should be distributed equally along the whole LMRIA area on a per hectare basis.
- We were never issued enough ELMA and look forward to the optimised rates. We have invested significantly (unsubsidised) to install pipes and risers for greater efficiency and greater environmental benefits and to ensure the ELMA will travel over our land. We have further plans to have all of our farm systems upgraded to ensure ELMA will be utilised effectively.
- I am a fourth generation farmer on our swamp land. I have watched my grandparents & parents farm. I hope to take over the family property in future years. I think the new guidelines are fair for all, we have land that we cannot get ELMA over because it is not enough. On some of our land we use our own irrigation water with ELMA, but some are just ELMA. This new policy seems a lot fairer than it has been in the past.

- Previously our ELMA allocation was not enough to travel from the river all the way down the paddock.
- We hope the adjoining landowner now has enough ELMA to cover all their paddocks and maybe our end paddock will not crack, like it has every summer.

Factors not in support

- ELMA provides the only secure/guaranteed water for our wetland. The wetland is managed for environmental outcomes, including the replication of a natural wetting and drying pattern, while minimising salinity inside the pond. The first water application each year is ELMA and this is an extremely important water application. It is the only secure water for the wetland.
- The fact that someone years ago failed to do their maths correctly does not mitigate the fact that the land will need to be managed in the future to prevent deleterious effects on the river and the water supply to the vast majority of the state.
- The draft plan does not reflect the environmental differences (rainfall and temperature etc.) between the north and south LMRIA. The plan does not consider the wellbeing of irrigated land in the north that did not receive an ELMA allocation. Equitable and optimised are great words with many meanings not yet even considered.
- The south has more rainfall than the north and don't need as much ELMA. The evaporation levels are higher in the north and therefore need the same as past plans. The south had all this in front of them when the government measured water entitlements but the south wanted the same tradable water as everyone else and gave up some ELMA to do so. It doesn't seem fair that they now get more water especially when the difference between the proposed optimised rates (.4 ML/ha difference between north and south) is completely different to what the results say i.e. the north need more than the south of 1.70- 1.75 ML/ha.
- Rushing into major changes before any chances of neighbours or others taking over areas of swamps is very sad and selfish. Many people are still in no way able to repair themselves and land will eventually change hands.
- Disappointed in the lack of communication in the last 5 years and now we are informed that if we haven't used 90% of our ELMA in 1 of the last 4 years we will lose our ELMA and need to apply for an 'optimal rate' that isn't adequate to meet our needs. Not to mention we may have to wait 5 or 10 years to receive ELMA. Due to business restructure I feel I haven't been given a chance.
- Need to change the terminology to farming the swamps, not for environmental purposes only. Farming is the best environmental thing you can do. If we sell the property to a non-family member the ELMA water must stay with the land at the current rate which is significantly higher than the proposed optimised rate and NOT be decreased for the benefit of the Murray. In the big picture the dairy farmer is preserving the land. If this goes ahead there will be many dairy Farmers/irrigators that will walk away because they will not be able to survive which will have a huge flow on effect on the swamps and will have the potential to pollute and destroy the river which thousands of people depend on. You actually need to double the ELMA water to get

the dairy farmers back on the land to save the Murray. Good old cow manure is the best natural source to grow grass and breakdown the poisons.

- Removing the eligibility of this land from ELMA because of a date on a calendar and because others want more water neglects to recognise the needs of the entire system and puts the entire ecosystem at peril. It is akin to painting a wall with pictures still on the wall, eventually the deficit becomes apparent and when it does it is stark.
- You have a buffer, to gift that away because of a very limited research project conducted in a small location is simply perpetuating this history of making decisions without being properly informed and will continue the problems created with the last set of poor allocation decisions.
- There appears to be an agenda to further systematic closing down of the livelihood of families, and now "rip off" any remaining water, which was assigned to their land by an Act of Parliament.
- In regards to food security for the future, given all the uncertainties we currently face as a nation, these areas should be cared for, and if the current custodians aren't financial enough to apply ELMA, assistance should be provided without resorting to a "water grab" exercise.
- We purchased our dairy property as a Perpetual Lease Agreement which entitled us to fourteen watering's a year. Your department based the volumetric conversion on this, along with the established rated flood area, and then, the consequential separation of ELMA occurred. We have sold our flood entitlement to survive, but the ELMA entitlement remains attached to the land. Therefore, how can this water now be taken away from the original land, when sometime in the future, if the land may change hands, the full amount is again needed for access by the new custodian?
- Farmers in the north found that the rehabilitation costs of our swamps were considerably higher than in the south. We were encouraged to invest in the infrastructure because of the security of the ELMA water in future WAPs. I am deeply disappointed that the ELMA allocation could be even suggested to be changed and that the integrity of dozens of peer reviewed studies could be questioned.
- All areas that are ELMA eligible put this water into the cap. Why are we looking at taking this water away from those specific areas that it was intended for especially since it is environmental?
- We have been told at the meetings ELMA water is environmental water and can be changed by the minister at any time. I would like to know how this is so.
- Our Tradeable water + ELMA water = Allocation. If this statement is correct then how were climate, salt and evaporation differences worked out?
- Everyone from Wellington to Mannum got exactly the same amount of tradable water. ELMA water is part of our allocation and should not be altered, as it makes it very unfair. This allocation is what set the cap. This draft proposal is not equitable in any way you look at it.
- At the time the ELMA rates were set, it was based on the fact that irrigators towards the south were already compensated for climatic differences in their taking allocations and granted their 'highland opportunity' allocations. You should note that those allocations were also skewed in favor of people in the south because their increased

allocations can be traded, while ELMA is always tied to the land and can't be traded. We are now in the situation where those in the south get extra income from trading their water, and now they want extra (i.e. some of ours) to make up for what they traded off.

- When ELMA water was used to taper the climate difference between the north and the south, it made it part of the irrigators actual allocation. If this is altered as set out in the draft, wouldn't it also alter tradeable allocations? If this was not done, wouldn't the south be getting more water than they contributed to the CAP?
- The only outcome to this whole mess that would be truly fair is to either leave the rates as they are (and it was promised they were set in stone before), or to flatten the ELMA rate for everyone (so this situation can never come up again) but only if irrigators in the north are granted an increase in their taking allocations the same as the southern end were granted years ago. This would balance everything out.
- Twenty three different locations all with different percentages, some less than 1/2 km. apart. This is confusing, unfair and a nightmare to govern. To maximise the use of this water, one equal amount per hectare for the whole of the LMRIA should have been implemented from the start. Where an irrigator finds he cannot use his entire ELMA he can allow that water back into a pool system at no financial gain but with the confidence it is returned back to that license on the 1st of July.
- To be penalised for not having used the full amount of ELMA implies lack of 'environmental stewardship' by the landholder, and fails to recognize the whole array of other factors as to why this may be the case. According to the document 'ELMA review---Proposing a way forward' one of the 'keys themes' heard in consultation regarding unused ELMA is 'redistribution to those who do apply it'. This appears to reinforce that this is a water grab.
- It is totally wrong to take water allocation from my land which has no ELMA allocation to give it to land already receiving 2.9 ML/ha. The CAP of 22 GL is insufficient to meet the needs of the LMRIA. Land in the north is also suffering. The new scientific review is biased to the south. What makes land in the south more deserving of an increase when I have land not receiving any ELMA?
- ELMA should remain as set out for each district on historic scientific evidence as originally allocated. Allocations of water to sell had to be fair and equitable to all by means of adjusting ELMA to ensure all had adequate water to do the same job. ELMA was granted on a sliding scale of higher volume from north to south.
- Increasing water elsewhere or removing from the system becomes costly to some and beneficial to others, altering the climatic water balance to grow pasture, costing more for leased water for the northern irrigators. This proposed change will only make costs even higher in the north culling more dairy farmers.
- We have concern for the river red gums as a threatened species. At the moment the environment on our flats appears in balance, with the regrowth and emerging foliage on some of the stressed trees. Any watering needs to be carefully managed in relation to its salinity level. We are struggling to keep that water, which is rightfully ours from the time when we purchased our farm.

- It is a fact that houseboats damage the river environment, there are studies to support this. The water within the the marina is filtered back to the River Murray via wetlands. Water testing shows the quality of water being returned to the river is at least of the quality when it enters the marina. Water evaporation for the wetlands is covered by an ELMA entitlement agreed to by the State Government in the major project assessment process. If ELMA is not available the environmental infrastructure will not operate as intended to control the impacts of the houseboats within the marina. Wetlands will need to be closed and water quality will diminish.
- A solution needs to be found for the marina (other than closing wetlands) if ELMA water ceases to be available or is further reduced. Otherwise the environmental benefits of using wetlands to improve water quality from having houseboats in a controlled marina environment will be lost.
- Water allocations are an issue of national competition policy. I was told when ELMA was allocated that it was essential and would not be varied. Based on the scientific research we need to apply these amounts of water to the land. If ELMA is to be varied or changed without any scientific reasoning, surely national competition policy would override state considerations and this water be made tradeable and the property of the licence holder. I believe there is allocations on the river Murray for the environment in this and other states but ELMA is a very different thing and any changes to allocations of ELMA within the LMRIA would impact on the productivity of farmers rather than the environment in areas that would have an increase in ELMA allocations. I believe that this could trigger a breach of national competition policy with implications felt at a state level such as when the state only had one barley marketer etc.

Other factors

- buy back scheme (almost 20 years ago) cost us 60 ML., we should have kept this if ELMA is now to be changed
- while we were unable to take up the opportunity license offer, land owners downstream were able to due to less salinity
- too much salt in salt drains and increased river flats, un ratable at the time
- looked at 50 ha opportunity license however there was too much salt so were given permission to water and in time would change to ratable
- opportunity water was water drained off paddocks, this was changed to water directly out of the main stream river
- the difference in land AHD heights allows water to be applied faster in the south than in the north
- ELMA rates should have been tapered to rainfall, salinity and evaporation, as should have the tradeable water however all climate tapering was put on ELMA.

Granting of the ELMA optimised rates

Under the current water allocation plan, there is a variation in the ELMA application rates across the geographic range from north to south of the LMRIA. The scientific review has determined new optimised rates to meet the objectives of ELMA across the LMRIA. The draft plan proposes that where current ELMA rates are less than the optimised ELMA rates [and providing ELMA has been used by the landholder in the past], the optimised rates will be granted [upon application].

Factors in support

- The removal of SA Class 3 irrigation water by some property owners from their land within the LMRIA has no doubt negatively impacted management of the wider landscape. It is understood that previous scientific studies indicate that the application of 3.0 to 3.5 ML/ha to the LMRIA would resolve the large-scale land management issue. Water volumes per ha of this order should always be equally available to all the land requiring large-scale management within the LMRIA.
- A much fairer system that will have better environmental outcomes. I support the optimised rates where the current ELMA rates are less than the optimised rates.
- Every Landholder should have the optimised rate.
- Agree with all of the information put forward in changing the ELMA allocation and the scientific reasoning behind it all.
- I hope my neighbour will now have enough ELMA to water the paddock next to me and stop my end paddock from cracking and sinking. I wish my ELMA only paddocks had 3.5 ML/ha instead of what they have had from the start of ELMA. We purchased them in May 2007 without class 3 water so at conversion, water separated from the land, we should have had 3.5 ML/ha. I certainly could have used that extra water for ELMA over the past 15 years.

Factors not in support

- The draft Plan talks about optimised rates (which is only optimised for the south) but the north is compromised and victimised with issues the Board fails to recognise, acknowledge and action.
- The so called optimised rate does not truly represent the environmental differences between the north and the south.
- It is not fair to penalise irrigators that have been maintaining swamps well with our current rates and using 100% of ELMA every year to now have our rates reduced significantly (optimised rates) on the assumption that we don't need or use all of our allocation. If there are areas that need more water then the Government should obtain this water from another source. We use all of our ELMA each year plus a water license. It seems strange that with the new information our optimised rate is significantly less than the current rate.
- Every irrigation district is different. There is no accurate rainfall data for Toora. Often driving from Murray Bridge to Toora, just 8 kms distance and the rain just peters out. The rain heads south not north. I accepted the current allocation rate method when

originally done but to change to the new optimised rate, I totally do not accept. The difference in optimised rate between Jervois and Toora will be 0.11 ML/ha. Can you tell me how much rainfall this is? Mobilong, Toora and Mypolonga have very high groundwater salinity inflow to the districts, 2 1/2 times higher (25,000 EC units) as opposed to other districts. They named Salt Creek for a reason. Other districts have different salinity inflows. We need that extra for dilution and removal otherwise it will become a toxic poison with high acid and salinity. You won't need roundup. We need that extra water to manage the environment.

- Why will Kilsby (opposite Jervois) receive an optimised rate higher than Toora? I would like to know where the three test sites were done.
- Jervois receives more rainfall, lower evaporation, lower inflow of high saline water (which is not my fault) and a high acid sulphate problem. You need to go back and do your science again for all ELMA areas, not just the three you have done.
- The proposed optimised rates in the north significantly disadvantage ELMA users including land degradation, salinity already on the rise, and financial loss (water availability and value). We have never been consulted by the University regarding our rising salinity. This draft Plan is biased and the current ELMA allocations should remain. If the Board continue with disregard and bias recommendations, court action will be required.
- All regions should retain their allocation as in time it will be an incentive to manage the land, any change will destroy the incentive and dynamics to manage the land. The current allocations were agreed to by all irrigators and it is now greed to gain more value to their land.

Qualification for the current ELMA rate

Where current ELMA rates are greater than optimised ELMA rates [and 90 -100% of ELMA has been used at least once during the 2014/15 – 2018/19 period] then the landholder will initially qualify for the current rate rather than the optimised rate.

Factors in support

- a system fair to all
- seems fair but some have had an advantage for a long time
- fairer than what I was expecting
- supportive however if a whole area is calculated in this and 3 hobby farmers decide not to water they will never use 90% of water

Factors not in support

- I don't think the ELMA usage data is right so it would be hard to be accurate.

Ten year transitional period

Landholders who qualify for the current ELMA rate will remain eligible for this rate for 10 years or until the land is sold/transferred, whichever occurs first. The intent of this policy is to give licensees sufficient time to transition to the optimised rates.

Factors in support of the ten year transitional period

- provides a transition time
- fairer than I was expecting
- 10 year adaptation time is very generous
- that's a long time, I agree with the ten year grace period
- support that irrigators in the north have 10 years to adjust their business's before going to the optimised rate, 10 years is a fair time to adjust
- it should not be about south v north, it is about being fair to all and I believe the 10 years and 'family' transfers are very fair for those that will see a decrease in ELMA
- 10 years is very generous when you think of those who have been worse off, for years, because original guidelines did not get implemented.

Factors not in support

- current rates have not been fair on irrigators downstream and I don't agree with the ten year grace period proposal
- it needs to stay the same for the people in the north
- To reduce the area that we irrigate to transition to the new reduced optimised rate would cause other issues that the Government are trying to prevent (increased salinity and acid sulfate soils etc.) because we would have to stop irrigating some of our swamp. At the end of the 10 year period it would no longer be viable and we would just have to walk away.
- The property would not be viable in the long term because the optimised rate is significantly less than the current rate and would not be enough to manage the swamps properly.

Transfer/sale of land to an immediate family member

If granted the current ELMA rates, the proposal allows for the transfer/sale of land to an immediate family member once within the 10 year period and this new family member will still be eligible for the current application rates up to 2031.

Factors in support

- if it was generational purchase it would be fair to allow the ten years but if it was a new landowner they should go to the optimised rates
- family transfers are very fair for those that will see a decrease in ELMA

Factors not in support

- nil

ELMA eligibility / criteria

The draft plan requires landholders to demonstrate they have applied or have the ability to apply ELMA to the land before they will be granted a new ELMA licence (landholders must have suitable infrastructure and/or be able to demonstrate prior use or significant financial or legal commitment to use ELMA). This policy enables ELMA to be redistributed to landholders who are using it at both the current and optimised rates.

Factors in support

- licensees should have to demonstrate that they are currently using ELMA as they may have the infrastructure and never actually use it
- we are and will continue to invest in better infrastructure to ensure we have the ability to apply ELMA. At our current rate of 2.9 ML/ha it is not viable to do so
- support the proposal that ELMA application or the ability to apply ELMA needs to be demonstrated before being granted ELMA

Factors not in support

- we have already demonstrated this when we rehabilitated the land
- need to know that you will receive an ELMA license before you spend big money
- the infrastructure may be there but if not used it's irrelevant

Removal of ELMA eligibility

Removal of ELMA eligibility on permanently inundated areas and where licences have been surrendered (e.g. Finniss). This also enables redistribution of ELMA to those who are using it.

Factors in support

- what about Mannum Marina? I support removal of ELMA eligibility on permanently inundated areas and where licenses have been surrendered
- support removal of ELMA eligibility on permanently inundated areas and where licenses have been surrendered
- supportive if licenses have been surrendered

Factors not in support

- ELMA should stay on the land to encourage maintaining the swamps
- if licenses are stolen no definitely not

ELMA proportional reductions

Once all new ELMA licence applications have been processed and entitlements determined, if the total of all entitlements exceed the 22.2 million shares (i.e. 22.2 GL) limit for ELMA, then all licensees will receive a proportional reduction.

Factors in support

- everyone i.e. north & south get the proportional reduction
- proportional is fair

Factors not in support

- I support proportional reductions as long as all applications are processed at optimal rates. I feel this is a chance to make things fair across the board and if upstream still receive higher than optimal rates it will still not be fair.
- could this mean Toora could go even below the optimised rate ?
- it should come off the licensees who are getting too much
- The existing ELMA users should not be disadvantaged when ELMA is allocated. If our allocations are deduced further I think the Government may end up with a much bigger environmental problem. It should be the new users of ELMA that get a reduction in ELMA not the existing ones.

4.2.2 Other issues raised during consultation on the draft Plan

Drilling wells

The proposed rules allow for drilling wells for the purpose of irrigation where the activity would benefit the resource but would not permit the activity where impacts to the River Murray or groundwater dependent ecosystems would likely result.

There were no comments received on this matter except that the policy proposed needed further explanation.

First Nations

First Nations support that ELMA is used for environmental benefits in the LMIRA to address soil salinity, acid sulphate soils and water quality of the river because Ngarrindjeri's living cultural landscape includes the area defined as the LMIRA.

The following questions were submitted in regards to Aboriginal water interests:

- How will Native Title rights and interests be incorporated into the revised River Murray WAP?
- How will cultural Heritage Interests and cultural values be incorporated into the River Murray WAP so that they align with the amendments to Aboriginal Heritage Act where PBC bodies are identified as having responsibility?

- SA Water have ELMA eligible land & water at the Mobilong & Toora locations and First Nations will continue discussions to develop future projects and partnerships.

The planning and implementation of ELMA watering priorities can have potential impacts on Native Title rights and interests and cultural Heritage, these can be beneficial or detrimental for First Nations. As such First Nations are required to be engaged and included into planning processes so that Ngarrindjeri values and interests are captured.

Basin Plan Sustainable Diversion Limits (SDLs)

Significant concern was expressed that all SA River Murray water entitlement holders are at risk of adverse outcomes associated with the full implementation of Basin Plan SDLs. Implementation of regulatory change resulting in increased annual water use, such as is most likely under the proposed ELMA changes, only intensifies this risk. In proposing such changes the SA government must also consider actions to negate any increased negative impacts on existing water rights holders.

Water literacy

It was suggested that an ELMA factsheet should be issued to all new LMRIA landowners to cover what ELMA is, usage, metering, and application. Trusts can only encourage the correct timing and application of ELMA, it cannot police its application, timing, usage or where it is actually used. This needs to be effectively policed by the DEW.

Mental health

A concern was expressed that many irrigators have issues with reduced neighbours, contacts, lack of enthusiasm and the will to go again after the drought. We should be mindful that there is a lot of anxiety and depression still out and about.

Wetlands

Paiwalla is a captured wetland with the ability to replicate wetting and drying cycles. It has been considered a wetland of significance since 2012 and plays the role of a wetland in supporting habitat particularly for fish refuge, turtle populations and other rare and endangered flora and fauna. It is also an example of the environmental outcomes/ improvements that can be achieved when an area is opened up into a floodplain structure rather than being left as leveed waste land that results from the exit of irrigated dairy production systems.

Marinas

- the current WAP is not favorable for Marinas and development work
- there are financial impacts including losses for marina berth purchasers
- It is a major frustration that next door to Mannum Waters, a stand out environmentally beneficial piece of marina and wetlands infrastructure, the neighbour, SA Water, is allowed by the SA Government to operate a wastewater treatment plant on the floodplain after 52 years of operation and contrary to current state government policy. The plant suffers regular blue green algae blooms, has insufficient storage capacity for

treated effluent, is located below the 1956 flood level and has been identified as a major risk for water quality.

- measurable storm water runoffs and improved creek flows should be allowed as credits towards water use
- The state government should offset some of the taxation revenue it receives from the marinas development to finance water use for environmental improvement.
- We are disappointed that in the past ELMA has been moved off the land and re-directed to places like marinas. ELMA was never intended for boats to park in, recreation playgrounds or houses to enjoy water frontage.

ELMA application on neighboring properties

- A policy/process for incorrect watering that is affecting neighbours or others within a district would be good. There are issues with landowners and ELMA application, timing and the effect on neighbours / irrigation districts. Who can people turn to for help? ELMA is not a trust issue. There should be correct policing by DEW on ELMA application.
- It has been noticed at Wall Flat and other areas that when applying water on a bay adjacent to a former irrigated one that the water will travel underground and wet up a paddock a considerable distance away. I have no doubt that the neighbours regularly irrigating has mitigated any salinity issues. They have used undoubtedly more water because of my paddocks. Isn't it only fair that the ELMA water that I didn't apply be recompensed to them because they have effectively applied my ELMA using their tradeable water? This scenario was discussed in negotiations for rehabilitation and it is the only fair and equitable way to distribute ELMA water, using the Irrigation Trust to administer and allocate ELMA and the first water through the trust meters be ELMA. If a farmer has not used their ELMA by the end of the season, the trust is responsible to make sure that the tradeable water used on top of the ELMA in the area is correct. This is a job for trusts, not water licensing and individuals have legal recompense against the trust if they wish.
- Some irrigators have a need for greater ELMA allocations to combat the drawdown of adjoining land and mitigate the long term effects of no water. I may have to obtain additional water over and above the ELMA to bring the land back into a healthy condition. Adjoining properties are currently not irrigating which means I have to consider the additional draw down on the land.

Environmental

- Since managing the swamps post dairying, approximately 122 River Red Gums have grown. They are juvenile with trunk diameters of 200-300 mm. There are approximately 170 thriving mature River Red Gums. Another 18 are dead and these were concentrated along the main drain, when we bought the farm in 1998. There are now about 8 – 10 River Red Gums with emerging foliage, which has occurred since levelling the back lands supply channel. The plight of the River Red Gums is alarming.

- The ELMA matter has become increasingly complex, especially with regard to changes and meetings which are, to even the most casual observer, dominated by irrigators and those with vested commercial interests, rather than any proportionate number there to represent the environment. The Basin Plan clearly states the intention to achieve regular natural flows in the Basin and in particular to ensure the flow of the River Murray out of the Murray mouth to dump up to 2 tonnes of accumulated salts and other contamination acquired on its long slow journey.
- I continue to read incorrect reports on the history of The Lower Lakes and reiterate that historically it was a fresh water system with occasional incursions of salt water when river flows were exceedingly low. This was a rare, rather than a normal occurrence but today can be dictated at will by the plethora of irrigators making claim to 'water rights'.
- The present number of irrigators cannot be maintained on the system and need to be cut back drastically to the year 1970 which is not impossible. This would cease irrigation from such high evaporation areas as The Hay Plain, avoid massive water storage in a couple of monster dams which should never have been constructed and return the Gwydir and Balonne River Basins to grazing, not irrigated horticulture, as they were in the early 1970s, when they were prosperous and bountiful.
- It is insane to continue to perpetuate new irrigation schemes and license more and more irrigators (e.g. the tens of thousands of almond trees planted since the 'millennium' drought).
- Please consider environmental flows for the River Murray and make this your prime consideration. We all lived well before the current number of irrigators and there is no benefit to be gained by destroying our ancient River systems for the existing number of irrigators. As with industry, last on, first off and so it should be with irrigators.

Infrastructure

- Lots of people are unable to use their ELMA water as there is no infrastructure, this is one of the main problems. The structures under the levee were filled with concrete. There is no information on how to get the water over the land, this should be a priority when looking at ELMA as environmental water.
- We should concentrate on trying to get everyone to use ELMA how and where it was originally intended because this is environmental water.
- We believe future direction for any policy review should be about how to get ELMA onto areas that have not been applying the water.

Other ELMA related comments

- Most importantly, the new WAP is followed up and not just left like the current one and all ELMA landholders are treated equal and water is spread equally over the LMRIA area.
- The draft Plan does not consider the problems associated with the ability to apply ELMA to land not yet rehabilitated since the drought.
- ELMA should be increased above 100% at times of high water flow to help get the flood effect and most importantly after low allocations to allow 'wetting up'

- Is it possible for the state government to apply to CEW for additional water under the 'environment' title in dry times?
- During dry times could unused ELMA be allocated to those that are able to apply it?
- To simplify ELMA rates consider that close by areas have the same rates e.g. Woodspoint, Westbrook & Jervois all be on the one rate, this is only a minor figure but would help simplify
- My original understanding was that ELMA was allocated to the area not the individual and the irrigation trusts were responsible to divide up and proportion ELMA water. It was always intended that the first water through the meter was ELMA. I cannot see any other fairer way of doing this.
- Salinity studies have not been done in areas with bigger problems such as Mypolonga, Toora, Mobilong. The University studies need to be related back to 1993 where the cap originated.
- Irrigators from the far north to Murray Bridge still need to purchase more water today to grow the same pasture as an irrigator in the south.
- You made it clear that there is a percentage of ELMA currently not taken up for a number of reasons. I strongly recommend you advise the Minister to retain this allocation as a buffer to address specific needs across the LMRIA. I strongly recommend the Minister uses the unallocated ELMA to offer a temporary land rehabilitation system where those who are experiencing draw down from neighbouring blocks can apply for additional water to mitigate the effects of the neighbour's inability to water. This unallocated water could also be made available for research work into determining additional needs for those irrigation areas that currently receive very low ELMA and claim it is insufficient.
- I understand results of a three year study were presented at the meeting but to put that into context, we have experienced five years of below average rainfall and we also need to ascertain the effect of draw down due to adjoining unirrigated land, varying soil types, relation of the reclaimed area to the pool level and undertake this work on land across the irrigation region rather than just at Jervois
- ELMA provides an opportunity to incentivise property owners (or lease holders) to bring as much LMRIA land as possible back into high value productivity. If a goal is set to ensure ELMA is equally available to the total 5,200 ha of land needing large scale land management in the LMRIA and the water is applied at the scientifically backed rate of 3.0 to 3.5 ML/ha, the total volume of water required would be in the order of 15.5GL to 18.2GL. The balance of the ELMA water (between 4.0 and 6.7 GL) would then be available to incentivise land holders, or persons leasing the land, to return the land to high value productive use. If an income is being derived from the land, the land will be looked after, thereby resolving the long term landscape management issues.
- ELMA should be accessible to land parcels and applied evenly across the land. Water usage is heavily dependent on the amount of rainfall in our area and historically, the Glen Lossie area has a lesser rainfall than downstream areas and even less than Murray Bridge.
- Bore research hasn't been conducted to a level of which would indicate that it is a viable option due to the increase of salinity levels. We intend to use our full allocation

of ELMA water in the upcoming years. In the 2018 year our meter failed, which led to our watering cycles being put back many weeks until repairs and threw the allocation target out. Due to the unpredictability of yearly circumstances, would the Landscape Board consider purchasable tradable water from year to year, if people need their own environmental top up? Amendments to the current WAP need to benefit all parties.

- This draft does not go back to where and how the water, both tradable and ELMA originated.
- Studies by Adelaide University do not seem to consider how ELMA originated. This is very disappointing and I am wondering how they got this so wrong. What needs to be looked at:
 - 1993 - how the allocation was set
- Unfortunately the mind and attitude of the Board was already determined in favor of the south. All meetings and previous submissions have had little regard to the issues of the north. Unfortunately the Board disregards important information from 1993 but still chooses to be selective only with information they wish to use. The Board are listening but not hearing and responding to the real issues associated with ELMA
- We acknowledge that the proposed changes are of good intention and aim to make better usage of ELMA water by supplying it to areas that would benefit from it however, it does not consider the impacts it would have on land where the allocation is to be reduced.
- The proposal will have major impacts on many irrigators in the LMRIA whose lives and businesses are already tightly controlled. Many people in the northern areas feel there is not much point in objecting to the proposal, they feel it is already decided. When they tried to speak up they have been cut off. People simply don't have the time to say everything they want to say in a written submission because the history is so full of details it would take a book to explain it all.

5 Alterations to the draft River Murray WAP

All comments received during the consultation period have been considered by the Board. The Board have recommended to not make any major changes to the ELMA policies within the draft River Murray WAP. The rationale for the Boards decision was based on the following factors:

- The board has confidence in the drafted policy that was co-designed with the community after three years of engagement and consultation.
- The board acknowledged that no matter what policy decision was made that there would be gains and losses for the community.
- The board decided that the draft Plan was less complicated than an alternative approach which could hinder implementation of the policy.

The main change to the draft Plan was that the ELMA licences will not be partially unbundled as originally considered, instead the ELMA licences will remain fully unbundled as they currently exist. Other minor changes to the draft Plan are recommended for clarification purposes (to correct errors, provide additional information etc.). In some cases there have been minor drafting changes for the purpose of clarity as a result of legal advice through the Crown Solicitors Office.

Appendix A – Summary of consultation event

Murray Bridge Club, 13 October 2020

Session 1 (10am) – 23 registered / 21 attended

Session 2 (1pm) – 19 registered / 22 attended

Summary of the Q&A / discussion topics are provided below.

New science

- New science demonstrates salinity can be managed with the optimised rates across the entire LMRIA
- We now have science and acquired knowledge that we didn't have when the original policy decisions were made, we need to accept this
- Why can't we move on, we have the science now, it is time to accept it and get on with it.
- The scientific proof is there, why can't we just implement it?
- Was rainfall variation considered?
- Some irrigators don't believe that deep irrigation is achievable
- If the science has been modelled on a deep irrigation it is irrelevant i.e. are the optimised rates correct

Proposed policy

- Why did the review start?
- Not everyone is going to be happy with the science findings but we need to accept the most recent understandings and move past historical decisions that were made without good science.
- Early decisions lacked scientific baseline information
- The proposed policy acknowledges the history, recognises the science and offers an equitable outcome. It is better than what the existing policy offers.
- The ten year grace period makes the adjustment easier, this is a game changer for me
- Need more resilience in the system, we are running too close to the 22.2GL cap.
- Need to take the history of the 93/94 allocation into place
- The un-used portion will be used in the initial ten year period to maintain the north at the originating rate
- A lot of land in the north and south has been sold/purchased based on the originating rates
- Will land parcels that were originally ELMA eligible maintain eligibility?
- An alternative policy may not be as attractive

- In years of excess flood can we have increased ELMA instead of it running out to the sea?
- Can we explore options to re-set the land using environmental water after drought and on previously unwatered land so that ELMA can achieve its objectives?
- Is the rumor that SA Water will be exempt from the new rules true? No. This is not correct, everyone will be required to meet the criteria i.e. SA Water will be required to demonstrate significant legal and/or financial commitment
- What about the whole of the LMIRA not being available for ELMA e.g. 7000 ha?
- What happens if the submissions don't support the policy?

Application of ELMA

- Impossible to do a 'deep irrigation', a flood is a flood, how do we do a 'deep irrigation'?
- ELMA is to be applied to the entire eligible land parcel at least once every three years
- Has there been an increase in ELMA use?
- Issues with getting ELMA water across the entire area. What if I can't get water across my entire parcel?
- Have we considered the impact on irrigated blocks when ELMA isn't applied on neighboring properties?
- Can we consider deferring the take of water for later use?

Licensing / ongoing monitoring

- Is metered usage being accounted for properly compared to last year?
- How will ELMA be monitored / how will compliance on using ELMA water as intended be achieved?
- Annual irrigation reporting (when requested)
- ELMA use needs to be more closely monitored across the LMRIA
- Who is ELMA licensed to, the individual or the trust? The individual
- When I apply for ELMA do I apply in my name or the trust name (I currently have the ELMA) but I would like my daughter who is a trustee to have the ELMA, so should I apply in my trust name?
- What will the licensing process be? Everybody will need to re-apply. The application fee is \$254.

Consultation

- Why do we need more consultation? We have already covered everything, we know what is needed now.
- Why are we creating more turmoil with further questioning and feedback?
- It is good that people are being asked for their feedback, the community need the opportunity to have their say, and this process is good.

Water literacy

- We didn't understand the policy at the time, we are all busy farmers and there needs to be more effort in understanding the policy decisions.