

Wakelin, Samantha (DEW)

From:

Subject: LOWER MURRAY WATER GRAB
Attachments: ELMA.pdf

Re: The Murraylands and Riverland Landscape Board making changes to the River Murray Prescribed Watercourse Water Allocation Plan, which deals with the way Environmental Land Management Allocation (ELMA) is distributed.

When ‘Restructuring and Rehabilitation’ in the Lower Murray occurred, the department converted the allocation for flood irrigation by the number of waterings to a volumetric amount and determined and separated ELMA from that amount. By identifying the need, in a sense, they were taking responsibility for environmental management of that land.

We understood at the time, that the ELMA entitlement, based on the rating of each individual swamp area to which it is attached, could not be separated from that land.

We have since left farming due to many factors including deregulation of the industry, following which the transition from dairying created a financial climate, where those, lucky to hang on to their farms, and finding new employment, needed a number of years to “get back on their feet”, and rarely had the capital available to upgrade, install and meet the cost of metering inbound flows to the reclaimed areas for environmental purposes.

While there was a rather ruthless campaign by the department to decommission sluice gates as wide as possible in the Lower Murray, there have not, to our knowledge, been incentives available for those exiting dairy farming, and were struggling to survive, to manage application of ELMA to the swamps.

There was a recent buy back proposition from the department, but we believe this has been closed down, and did not include the opportunity for landholders to ‘trade back’ part of the ELMA to finance infrastructure to enable the watering with the remaining allocation.

There appears to be an agenda to further the systematic closing down of the livelihood of families in the Lower Murray, and now “rip off” any remaining water, which was assigned to their land by an Act of Parliament.

Historically, the Lower Murray development was a population exercise, where dairying was championed as an industry, and the reclaiming of the swamp areas started to occur, with the construction of levy banks, early locking of the river, and with the settlement of people into those areas contributing to the agricultural development and subsequently the State’s economic expansion.

It was during World War I that, in South Australia, the decision was made to link the dairy industry and the Lower Murray dairy project, under Samuel McIntosh Director for Irrigation, to the Returned Soldier Settlement Scheme. Consequently the Pompoota Training Farm was set up in 1916 to train returned soldiers in agriculture, including dairying, before taking up land under the scheme.

Although there have been criticisms of the Solder Settlement Scheme which attracted controversy around its mixed results, in South Australia it still forms the basis of fifth generation dairy families operating today.

For example, where, through acquisition of neighbouring lands from exiting and retiring dairy farmers, remaining enterprises have ‘added on’ and remain relatively viable in the current economic climate.

The Lower Murray and the reclaimed swamps at the bottom of the Murray Darling Basin form the “fertile crescent” of our river system, with prior generations of decision makers funding levy banks, irrigation improvement, populations, and towns etc., and meeting the costs required to develop and sustain the early agricultural industry.

This area has been, and still needs to be, viewed as an agriculture asset to Australia. When we were milking, back some years ago, Lower Murray milk was being trucked to the east coast as, in that time, it was one of the few productive dairy areas of Australia.

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 current custodians aren’t financial enough to apply ELMA, assistance should be provided without resorting to a “water grab” exercise.

We purchased our Pompoota 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?

Yours Sincerely

A solid black rectangular box used to redact the signature of the sender.

ELMA Submission

From:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] supports the proposed changes to the WAP in the way ELMA is distributed

For the long-term viability I strongly believe ELMA should be distributed equally along the whole LMI area on a per hectare basis. Jervois was never issued enough ELMA, at 2.9MI/H. We look forward to 4.03MI/H. We have just invested approximately \$700,000 of our own (unsubsidised) money 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 the ELMA will be utilised effectively.

As an ELMA holder I believe the new WAP split is a fairer alternative to the current WAP. The full WAP conditions for ELMA never happened, leaving those below Woods Point at a disadvantage. Under the original, not implemented WAP, all ELMA licences should have been re-issued at 3.5ml/H on the sale of Class 3 water, no matter what irrigation area your land was in. If the WAP does not change the full original policy MUST be applied to all landowners immediately.

ELMA is an Environmental Land Management Application of water. It is for the long-term management and control of environmental issues. It is not the fix all solution but just part of the equation to help manage the environmental issues in the LMI area, particularly salinity

ELMA is as important to those in the LMI area as salt schemes are in the Riverland. Essential for the long term Lower Murray Reclaimed Lands health

As a Jervois Landowner I acknowledge the governments promise that ELMA will always be for Lower Murray Reclaimed Lands, as environmental water, AND cannot, AND will not, be moved away from the LMI area. We are disappointed that in the past ELMA has been move 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

[REDACTED] recognises the 10-year full implementation of the new rates for the north and believe it is a very generous adaption time.

I would like to see into the future:

- A factsheet issued to all new LMI landowners on transfer of ELMA. This should cover what ELMA is, usage, metering, and application. Trusts can only encourage the correct timing and application of ELMA, it cannot police it's application, timing, usage or where it is actually used. This needs to be EFFECTIVELY policed by DEW
- ELMA to 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'
- A policy/process that can be accessed for incorrect watering that is affecting neighbours or others within a district. There can be an issue with some landowners and how ELMA is applied, timing of application and the effect it can have on neighbours or on an irrigation district. WHO can people turn to for help. ELMA is not a trust issue. Correct policing by DEW of water application

- Is it possible for the state government to apply to CEW for additional water under the 'environment' title in dry times? Using the Class 5, ELMA details for application
- During dry times could unused ELMA be applied by those that are able to apply it

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 LMI area it is issued for.

Wakelin, Samantha (DEW)

From: [REDACTED]
Sent: Wednesday, 14 October 2020 3:33 PM
To: DEW:Feedback, RMWAP
Subject: ELMA Submission

To whom it may concern,

As a land holder in the Jervois trust area, I agree with the proposed changes to the way ELMA is distributed. I believe the Optimised ELMA rates and the guidelines and timelines are fair.

Kind regards,

[REDACTED]

[REDACTED]

Wakelin, Samantha (DEW)

From: [REDACTED]
Sent: Friday, 16 October 2020 10:20 AM
To: DEW:Feedback, RMWAP
Subject: Elma submission

Hi Landscape Board I agree the new optimised ELMA rates and guidelines should be adopted to make it fair for everyone in the LMRIA. Regards [REDACTED]

Reply all

[REDACTED] - submission [DLM=For-Official-Use-Only]

Junk
FR Freshwater, Rebecca (LandscapeSA)
Fri 16/10/2020 11:00 AM

Block

To: DEW:Feedback, RMWAP

For Official Use Only

Draft RM WAP submission

[REDACTED]

Feedback:

- Agree that ELMA should have fair distribution
- Current ELMA application rates limit acid sulfate soil problems but his personal experience is that he still has a problem with soil salinity and keeping groundcover
- The proposed ELMA rate will allow for an extra summer watering which will help with the salinity and groundcover problem when needed in summer
- He supports that irrigators in the north have 10 years to adjust their business's before going to the new (optimised) rate, 10 years is a fair time for people to adjust
- To be fair if it was a generational thing it would be fair to allow the ten years but if it was a new landowner they should go to the optimised rates
- To simplify ELMA rates; consider that close by areas have the same rates e.g. Woodspoint, Westbrook & Jervois all be on the one rate – only a minor figure but thought it would help to simplify

Note:

[REDACTED] requested that his submission be recorded by MR Board staff as he isn't comfortable with attending a public meeting during covid, and he is not confident with IT or writing a submission due to being an elderly farmer that left school at a young age.

Lyz Risby approved an over the phone submission, considering his circumstances. All the wording has been repeated back to [REDACTED] to ensure content has captured [REDACTED] intent correctly.

Hello, my name is [REDACTED] and I am the owner of [REDACTED]

We purchased this property as a drought effected property nearly ten years ago with the intension of repairing the property and replacing the infrastructure with more efficient methods to help bring it back to life. The [REDACTED] was to be our next project as soon as we finished building our poultry farm at Kepa.

After nearly 10 years the poultry farm was completed and sold in February 2020 allowing us to now focus on the flats .

As the [REDACTED] needed a lot of earth works and new flood gates installed, we were not able to use the all of the ELMA water in previous years as there wasn't an effective way of distributing the water evenly across the land.

With the sale of our poultry farm we have now been able to invest the time and dollars into the property with new Padman stops (irrigation gates) being installed across the property and a large amount of earth works still being done to maximise the efficient use of the water, and along with salt tolerant pastures (masina clover) to help repair the flats.

As this will be our first year applying water back onto the flats since the drought in 2009-10, we expect it to take more water to recover than less as the new optimum levels in the proposal would see happen.

If there is any question or queries that I cant help with please feel free to call me on [REDACTED].

Thank you

[REDACTED]

Wakelin, Samantha (DEW)

From: [REDACTED]
Sent: Tuesday, 3 November 2020 3:51 PM
To: DEW:Feedback, RMWAP
Subject: ELMA

I have attended the meeting and I agree with all the information put forward in changing the ELMA allocation and the scientific reasoning behind it all.

Kind regards,

[REDACTED]

Sent from my iPhone

ELMA at [REDACTED] Wetland

Submission to. Liz Risby / Rebecca Freshwater, Landscape SA
Mt Barker.

Submission on:

The benefits and requirement of the environmental water allocation for [REDACTED] Wetland.

by [REDACTED]
[REDACTED]

[REDACTED] wetland is 60 ha of reclaimed dairy pastures on the lower Murray. The land is below the [REDACTED] level and a maintained levee bank around the area, allows for ingress of water through a metered sluice gate. There are additionally 2 unmetered inlets that can be opened. All inlets are equipped with carp screens.

[REDACTED] a permanent allocation, but an allocation determined by land [REDACTED] SA wetland officer Kate mason and the Berri office.

Drying Cycle

Our current Water management plan is controlled in an attempt to replicate natural wetting and drying patterns, while minimising salinity inside the pond.

Our only method of reducing the pond level is closing the inlets and rely on evaporation. This ends in the salinisation of the of the pond soils should we take it to dry. (There is approximately 1.2 mm of evaporation annually)

Our water plan suggests that we undertake a drying cycle every 5 years, but with a recently commissioned report into the "Ecological Threat Abatement Through Hydrological Management Change" recommends that our drying cycle should be more frequent (3 4 years)

Drying out also depends on various factors. (The last drying out (2017) was premeditated by the breaching of our carp screen and the populating of the wetland by carp)

With the drying of the pond there is a necessary refill to occur. The first water application each year is [REDACTED] ELMA allocation, and this is an extremely important water application as it is the only source for [REDACTED] wetland.

All water application a [REDACTED] MA is determined by Landscape SA, and is determined on an annual basis with "need/requirement" being the only input from [REDACTED]

This function by LandscapeSA is still under the influence [REDACTED]s like river levels , allocations, drought status and other requirements for other environmental need in SA.

ELMA is the only secure water that [REDACTED] has.

Significance of [REDACTED].

[REDACTED] has been considered a wetland of Significance since 2012.

[REDACTED] strategic plan identifies the role of the wetland to support an aquatic and floodplain the species that depend on them.

[REDACTED] was used as a refuge for Purple Spotted Gudgeons during the 09/10 drought, and there [REDACTED] objective to improve the fish refuge function for native fish in the future.

[REDACTED] was also a wetland that supported research into the turtle populations of the River [REDACTED] and their scavenging effect on carp biomass should or when the carp virus is released.

[REDACTED] has recorded rare and endangered flora and fauna in the wetland habitat, and is possibly [REDACTED] captured wetland in SA, and this allows for increased ability to replicate the wetting and drying cycles of a floodplain area.

[REDACTED] is also an example of the improvements to the environment that could be achieved [REDACTED] more areas are opened up into a floodplain structure rather than the current leveed waste land that has resulted from the exit the irrigated dairy production systems.

END

ELMA Submission

From: [REDACTED]

Jervois is a district of approx. 1,460 hectares of ELMA applicable land (approx. 28% of the LMI area) 20 landowners, 14 individual farming properties, a mix of irrigated & dry cropping, cattle, dairy, and horses.

[REDACTED] supports the proposed changes to the WAP in the way ELMA is distributed

For the long-term viability of the individual landowner [REDACTED] strongly believe ELMA should be distributed equally along the whole LMI area on a per hectare basis. [REDACTED] was never issued enough ELMA, at 2.9MI/H. We look forward to 4.03MI/H, that hopeful will travel over all the ELMA land as intended.

[REDACTED] believe the new WAP split is a fairer alternative to the current WAP. The full WAP conditions for ELMA never happened, leaving those below Woods Point at a disadvantage. Under the original, not implemented WAP, all ELMA licences should have been re-issued at 3.5ml/H on the sale of Class 3 water, at conversion if no class 3 water was issued or when land was sold in all irrigation areas. If the WAP does not change the full original policy MUST be applied to all landowners immediately.

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ELMA is as important to those in the LMI area as salt schemes are in the Riverland. Essential for the long-term Lower Murray Reclaimed Lands environmental health

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I wish to remain anonymous

I agree with the changes to the ELMA WAP guidelines

I think it has taken into consideration the main aim of ELMA, Environmental Land Management!

ELMA is not for growing crops but for land management

The original FULL conditions of ELMA DID NOT get implemented and I hope these new ones are followed through in full. If 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 ALL in a better condition than the proposed 3.5 mL/H that was not implemented.

Column 1 Irrigation Area	Column 2 Currents rate (ML/ha)	Column 3 Optimised rates (ML/ha)	Column 4 Historic rates (ML/ha)
Northern LMRIA			
Cowirra	6.35	4.49	3.5
Baseby	6.30	4.49	3.5
Neeta	6.10	4.49	3.5
Wall Flat	5.93	4.49	3.5
Neeta	6.01	4.44	3.5
North			
Pompoota	5.74	4.42	3.5
Mypolonga	5.38	4.35	3.5
a			
Paiwalla	5.04	4.35	3.5
Glen	4.99	4.19	3.5
Lossie			
Toora	4.77	4.14	3.5
Mobilong	4.58	4.14	3.5
Burdett	4.46	4.14	3.5
Long Flat	4.37	4.10	3.5
Long	4.13	4.10	3.5
Island			
Southern LMRIA			
Swanport	4.06	4.10	3.5
Yiddinga	4.04	4.10	3.5
River Glen	3.90	4.10	3.5
Kilsby	3.53	4.16	3.5
Monteith	3.79	4.05	3.5
Woods	3.50	4.05	3.5
Point			
Westbrook	3.39	4.04	3.5
Jervois	2.90	4.03	3.5
Seymour	2.28	3.97	3.5

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 get not implemented.

Regards

██████████

I ask for this to remain anonymous

I agree with the new ELMA changes.

The 10 year 'adaptation' time is very generous for those that will see ELMA decrease

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/h 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/h.

I certainly could have used that extra water for ELMA over 15 years!!!!

Regards

██████████

██████████████████

██████████

I wish to remain anonymous

I am the fourth generational 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 even get ELMA over because it is not enough. 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.

10 years to change your farming practices is a lot better than buying land and not getting your ELMA increased to 3.5ML/h like my parents & grandparents got treated! Increase to 3.5ML/h should have happened when they bought the neighbours farm at conversion time!

ELMA is for the land and I want to see good environmental land management on ALL our land, and everyone around me, not just the land we use our irrigation water on because our ELMA allocation will not even go over the paddock.

██████████

Wakelin, Samantha (DEW)

From: [REDACTED]
Sent: Tuesday, 17 November 2020 8:51 PM
To: DEW:Feedback, RMWAP
Subject: ELMA Submission
Attachments: Jervois_ELMA Final Submission.docx

Hi, we would like to fully endorse the comments in the attached document.

Regards

[REDACTED]

Sent from [Mail](#) for Windows 10

ELMA Submission

From: [REDACTED]

Jervois is a district of approx. 1,460 hectares of ELMA applicable land (approx. 28% of the LMI area) 20 landowners, 14 individual farming properties, a mix of irrigated & dry cropping, cattle, dairy, and horses.

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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 LMI area it is issued for.

Elma Water Submission.

Elma water has been an important part of the irrigation of the Murray Swamps since the first reclaiming of swamps. The geographical and terrestrial differences in the swamps has been an issue that has been noted and addressed by the differing numbers of irrigation events and the differing elma volumes in more recent years.

As you are well aware the swamps north of Murray Bridge have lower rainfall as easily proven by the Bureau of Meteorology. This difference was well known by early farmers and the early issuers of water allocations on the river swamps.

The issue of why the water allocation was different was explained to me in the early 1990's by the late Jack Wundenberg. He clearly stated that the water allocations were different because the government officials had done years of research and testing on all the swamps. The swamps north of Murray Bridge had issues centred around water access, because of the higher elevations relative to sea level. The soils North of Murray Bridge were more friable (and still are) and the importance of shortened irrigation intervals was crucial in driving productivity with irrigation normally commencing in September or earlier in the vast majority of years. He also explained that the reason the gum trees existed on the river at Wall Flat is because of the lower levels of salinity present North of Murray Bridge and the differing soils.

Initial and subsequent laser grading trials on the swamp showed large productivity gains. The gains North of Murray Bridge were because of the ability to get the water on to the bays quicker and complete a full irrigation cycle of an entire farm in a shorter time allowing for another cycle to recommence. The access to larger flow rates has never been an issue in normal years south of Murray Bridge because of the larger difference between the river height and paddock height and a full irrigation cycle was normally able to be finished faster than North of Murray Bridge without the need to pump the water on. The productivity gains from laser grading south of Murray Bridge were more linked to the ability to drain the paddocks properly and dry the much less friable soil. These studies were carried out by Department of Agriculture of SA.

He, and many others, talked about the significance of the Wall Flat/Ponde area to the local aboriginal tribes of the region. Ponde was the meeting place where tribes from near and far met, traded, and performed initiation. Why? Because the area always had fresh water, good hunting and fishing, etc. The name Pompoota is Ngarrindjeri for "rivers end". It was well known fact that Pompoota was the most southerly point where fresh water was available. It was also mentioned in the book "All The Rivers Run" that Wall Flat/Pompoota was the last place to take on water for the boilers to run the paddle steamers.

The importance to the local aboriginal tribes of maintaining the water and land in this region as fresh cannot be underestimated to the local culture. Generations of local Aboriginals have fished and caught yabbies in my channels and many others. It has long been seen as a rite of passage for many youth in the area to catch the yabbies and bring a feed to the elders and learn about the cooking and sharing of food and learning the oral history of the region.

Many people talk about the terrestrial differences of the land but few talk about the differences, and probably little is known, about the differences in the bed of the river. The river near our farm is metres deeper than the river a few hundred metres down stream and this has much to do with the breeding of native fish stocks which has been recorded and documented over many years by Landscapes SA and NRM.

Jack also explained about the thought processes of the government in the extra waterings and the siting of the pump sheds for Adelaide. The Wundenberg family were not only the original settlers but Jack was a former mayor of Mannum. The pumps were sited at Murray Bridge and Mannum because of the access to fresh water and the low salinity levels. The government at the time acknowledged the continuing importance of the irrigation of the swamps in maintain the low levels of salinity and the natural environment in this region and the need for more waterings of the swamps North of Murray Bridge than South of Murray Bridge.

The need for more irrigation, greater pumping costs, higher labour costs, etc has long been reflected in the differing land values for swamps since the initial reclaiming of the swamps. Lands title records will show a difference of @ \$500 per acre for the last 40 years because the swamps south of Murray Bridge were deemed more productive. Higher rainfall has long been a management opportunity for the farmers nearer Wellington to dilute and wash their salinity issues away.

Farmers such as myself found that the rehabilitation costs of our swamps were considerably higher. 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.

Water allocations are an issue of National Competition Policy. I was told ELMA was allocated that it was essential and would not be varied based on the scientific researched need to apply these amounts of water to this 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 Lower Murray 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.

My former father in-law, the late [REDACTED] was the son of an original irrigator at Wellington. He always made much a do about the need for less irrigation at Wellington rather than Wall Flat, the increased stocking rates that were possible in the Wellington area, and the increased land value because of all of this.

His father and their neighbours gained more productivity in that area out of improving drainage rather than increasing irrigation. Driving through this area on 30/09/20 it was evident that there is water laying on the ends of bays near of Wellington because of the higher rainfall events experienced in that area than we received North of Murray Bridge. He always talked about the vast amounts of water underneath the swamp at Wellington and the fact you could feel the paddocks move under foot and push a star dropper in by hand.

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.

I quantify this by my own personal experience in Wall Flat. My swamps have not become saline because of the lack of myself applying irrigation rather they have not become excessively saline because the neighbours have irrigated. The two [REDACTED] families until recently have both irrigated regularly and efficiently to grow feed for their dairy herds. When a swamp is flood irrigated the friable soil must wet up enough to seal to allow the water to flow over the top of the bay. I have talked a lot about the differences in soil between North and South of Murray Bridge and the soils in Wall Flat are very friable and have deep cracks if left to dry out. 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 when irrigating 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 allocations and the first water through the trust meters be ELMA. If a farmer then has not used their ELMA to the very 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.

I like many other farmers have not applied all of my ELMA water in recent years. My reasons include my health limitations, enterprise change and a divorce. I intend on using my allocations going forward. ELMA is essential to my farm's future in the Lower Murray.

[REDACTED]

To whom it may concern,

I am writing this submission VERY MUCH AGAINST this draft as it does not go back to where and how the water, both tradable and ELMA originated.

The studies by the Adelaide University Do not seem to relate to the issue of how the ELMA originated. This in my opinion is very disappointing as I hold a great deal of admiration for Universities. I am wondering how they got this so wrong?

What needs to be looked at..

1. 1993 How the allocation was set?
2. 2 Meetings shut down if debating heated up. (when people need to be heard they should have a forum to voice their opinions without being shut down).
3. Why are people not using their ELMA? Why have they not been able to voice their concerns and how could the ELMA be put on land?

I have always thought ELMA was a good idea. It was done for the environment and it was always available for use on areas where it was issued for (this part of allocation 1993). The University studies have not shown anything to alter this.

In regards to salinity, the studies have not been done in areas of bigger problems.. Mypolonga, Toora, Mobilong to name a few? The University studies need to be related back to **1993** where the cap originated from, which they don't seem to have done.

Extra Factors include:

- Buy back scheme cost us 60ML. We should have kept this if ELMA is changed. (Almost 20years ago)
- Opportunity license – While we were unable to take up this offer, land owners down stream were able to due to less salinity.
- To much salt in salt drain. Increased River flat, unratable at the time.
- Looked at 50 HA Opportunity License. There was to much salt so were given permission to water and in time would change to rateable.
- Opportunity water was water drained off paddocks. This was changed to water directly out of the main stream river.
- Difference in land AHD heights allow water to be put on faster in the South than the North.
- ELMA water should have been tapered to Rainfall/salinity/Evaporation, as should have the tradeable water. All Climate tapering put on ELMA.

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 is this so? Our Tradeable water + ELMA water = Allocation. If this statement is correct then how was climate/salt/evap differences worked out? Everyone from Wellington to Mannum all 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.

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?

Lots of people are unable to use their ELMA water as there is no infrastructure. One of the main problems.. the structures under the levee were filled with concrete. There is also no information on how to get the water over the land.. This should have been a priority when looking at ELMA as environmental water.

Debates are not being done at meetings as these days seems to be regarded as disrupting the meeting. In my opinion debates on matters are really needed, especially with the people and the land it actually involves.

ELMA water was part of the water used in 1993 and was not added on top. All areas had the same tradeable water. ELMA water was used to level the climate differences. If ELMA was made the same all up the river, the southern end would have had less tradeable water.

Environment water should stay with the areas it was designated for. The climate differences are a lot greater than the one meg difference as set out in the draft. We should concentrate on trying to get all people to use it how and where it was originally intended because this is ENVIRONMENTAL water.

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 favour of people at the Southern end 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.

I have also heard rumours that irrigators in the South are encouraging everyone who will benefit from this draft proposal to put in submissions to support it, to stack the numbers in favour of getting it approved. The proposal will have major impacts on many irrigators in the LMRIA, not just me, whose lives and businesses are already tightly controlled. Many people in the Northern areas I have spoken to, feel there is not much point in objecting to the proposal because they feel it is already decided, and when they have tried to speak up they have been cut off. Also, 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.

Therefore, I request a meeting to ensure that my views (and others in the North if I can encourage them to come with me) can be fully heard without being interrupted. As it stands, I think the only outcome to this whole mess that would be truly fair are to either leave the rates as they are already (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.

Please advise when a meeting would be suitable to discuss this properly.

Kind Regards

██████████

████████████████████

████████████████

Wakelin, Samantha (DEW)

From:

[REDACTED]

Tuesday, 24 November 2020 2:27 PM

To:

DEW:Feedback, RMWAP

Subject:

ELMA SUBMISSION

Dear Team,

We support the proposed changes to the WAP in the way ELMA is distributed.

Updated scientific evidence proves that current ELMA allocations are insufficient to sustain the environment in the south area.

[REDACTED]

Re: The Murraylands and Riverland Landscape Board making changes to the River Murray Prescribed Watercourse Water Allocation Plan, which deals with the way Environmental Land Management Allocation (ELMA) is distributed.

25th November 2020

We believe future direction for any policy review should be about how to get ELMA onto areas that have not been applying the water, and not simply a water grab, giving those already using it, more water for free. The 22.2GL exists purely because of the rating of the reclaimed swamp areas, predominantly dairy at the time, and cannot be redistributed to any other part of the river system.

We find the notion of 're-granting ELMA' absurd, as the water is part of those original earlier fourteen watering's when originally purchasing the farm. 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 the unused ELMA is 'redistribution to those already who do apply it'. This appears to reinforce that this is a water grab, and raises the question of whether this comes from people on the review committee.

In relation to the discussion in the same document, about 'risks' to not achieving the current policy proposal, with the future recommissioning of any rated reclaimed area for full irrigation use, the ELMA right must be recognized for the licensed landholder, whether it be newly acquired venture capital or the change of landholder that is driving the paddocks being put back into production.

This is a point made in an earlier submission (11thOctober 2020) that dairy farmers at the time of Restructuring and Rehabilitation understood that ELMA was determined and attached to the rated area of their swamps.

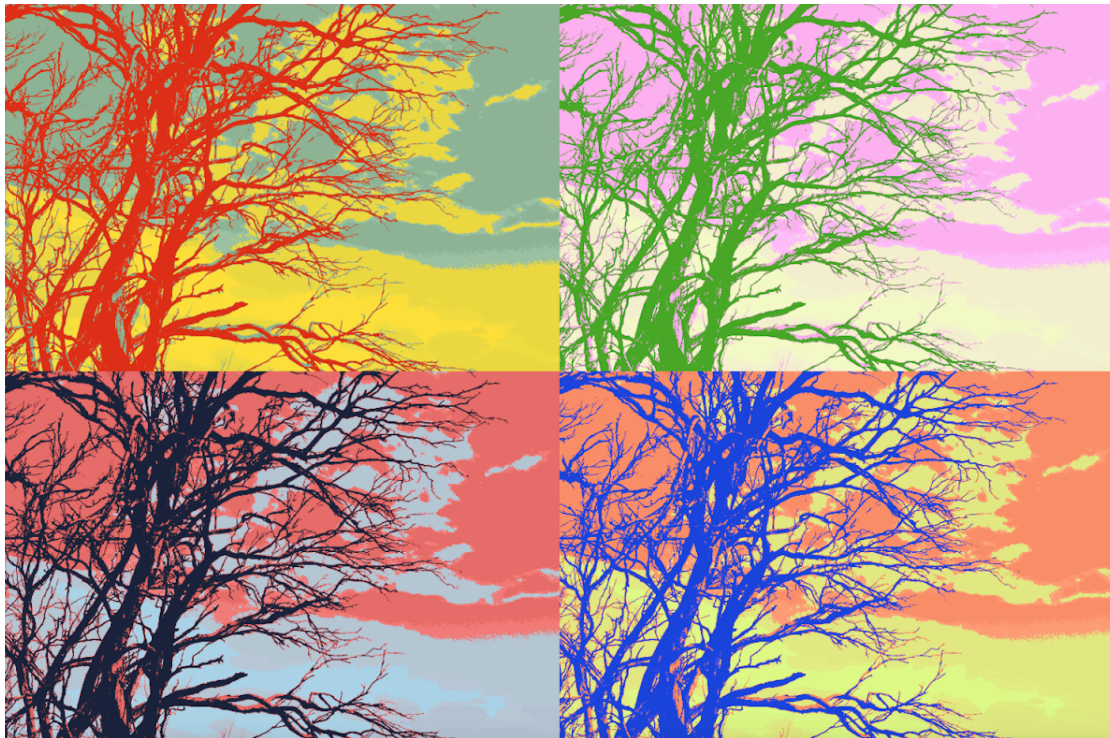
On our farm we have the benefit of being at the top end of the swamp just under a river bend and have deep topsoil, which was revealed in testing back in the rehabilitation days. Until sluice decommissioning stopping the application of ELMA, the flats were cut for hay and used for cattle agistment. We had pulled out of dairying.

Cracking was minimal and we managed it with heavy disc ploughing and slashing for change of grass domination and became reliant on seasonal rains. A family of kangaroos has settled in the area now, but we do not experience the variety of bird life supported when the area was in full irrigation production.

We have a billabong between the main stream and the levy bank and a riparian area extending down river. Both support a large population of river reds, which

also extends to the reclaimed area 'the swamps' within the levy bank along the supply channel and paddock channels.

Since managing the swamps post dairying, approximately one hundred and twenty two river red gums have grown. They are juvenile with trunk diameters of 200-300 mm's. There are approximately one hundred and seventy thriving mature river reds. Another eighteen are dead and these were concentrated along the main drain, when we bought the farm in 1998. There are now about eight to ten river reds with emerging foliage, which has occurred since leveling the backlands supply channel.



'Dead Icons - The plight of the river red gums'

Photographer: [REDACTED]

The plight of the river red gums is alarming. An article I read at the time in *The Sydney Morning Herald* revealed some figures published in the journal 'Biological Conservation, volume 184, April 2015, pages 346-356', about a long-term research work. The article outlines the findings from the published research paper titled 'Inundation requirements for persistence and recovery of river red gums (*Eucalyptus camaldulensis*) in semi-arid Australia' by K. Catelotti, R.T. Kingsford, G. Bino and P. Bacon.

It outlines that in New South Wales one of the largest freshwater wetlands in the Murray-Darling Basin.... *"The Macquarie Marshes, a Ramsar-listed wetland in eastern Australia is located in a catchment with a long history of water resource development. It is also a catchment in which there has been a strong focus on wetland recovery using environmental flows. We investigated changes in the condition of 212 river red gum trees (*Eucalyptus camaldulensis*), a long-lived flood*

dependent species, at 17 sites, over 18 years (1993–2011). Four variables were measured for each tree: crown density, crown size, dead branches and epicormic growth. More than half (56.13%, 119) of the healthy trees first measured in 1993, showed no signs of life by 2011.”

In a response to this and seeing the threat in many parts of the river system, I decided to take a series of photographs and exhibited them with other local artists and craft people as an 'Eco Art Group'.

In the early 1960's the artist Andy Warhol used a silkscreen technique to produce his pop art portraits of famous cultural icons of that period including Elvis Presley, Marilyn Monroe and Jackie Onassis who have since died.

The above is one of a series of photographs I shot, of dead river reds in the Lower Murray River area of South Australia. They were 'photo shopped' in a pop art technique, and hopefully reinforce and resonate my feelings about the plight of the remaining populations of iconic river red gums.

The photographs were part of a local 'Eco Art Group' travelling exhibition in the Lower Murray region, and prints have since been sold in an exhibition at Gallery One, Lower Mitcham.

We have a concern about the river reds as a threatened species and at the moment our environment on the 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 it's salinity level, but importantly, for now we appear to be struggling to keep that water, which is rightfully ours from the time when we purchased our farm.

Yours Sincerely

A solid black rectangular box used to redact the signature of the sender.

Wakelin, Samantha (DEW)

From: [REDACTED]
Sent: Thursday, 26 November 2020 2:55 PM
To: DEW:Feedback, RMWAP
Subject: ELMA Distribution submission

To Whom It May Concern,
I agree with the proposed changes to the way ELMA is distributed.
Kind Regards,

[REDACTED]

Wakelin, Samantha (DEW)

From: [REDACTED]
Sent: Thursday, 26 November 2020 3:22 PM
To: DEW:Feedback, RMWAP
Subject: ELMA Distribution Submission

To whom it may concern,

I agree with the proposed changes to the way ELMA is distributed

Kind regards,

[REDACTED]

Sent from my iPhone

Wakelin, Samantha (DEW)

From: [REDACTED]
Sent: Thursday, 26 November 2020 11:28 PM
To: DEW:Feedback, RMWAP
Subject: ELMA Distribution Submission

To Whom It May Concern,

I agree with the proposed changes to the way ELMA is distributed.

Kind Regards,

[REDACTED]

Wakelin, Samantha (DEW)

From: [REDACTED]
Sent: Friday, 27 November 2020 10:04 AM
To: DEW:Feedback, RMWAP
Subject: Submission to the draft River Murray Water Allocation Plan on the proposed ELMA policies

To Rebecca Freshwater

[REDACTED] would like to make the following submission to the draft River Murray Water Allocation Plan on the proposed ELMA policies.

[REDACTED] 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 [REDACTED] living cultural landscape includes the area defined as the LMIRA.

[REDACTED] would like to submit the following questions:

1. How will Native Title rights and interests be incorporated into the revised River Murray WAP?
2. How will Ngarrindjeri 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?
3. SA Water have ELMA eligible land & water at the Mobilong & Toora locations and [REDACTED] will continue discussions to develop future projects and partnerships with Ngarrindjeri.

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

Regards

[REDACTED]

[REDACTED]



2020 River Murray WAP consultation - ELMA

The Murraylands and Riverland Landscape Board is proposing changes to the Water Allocation Plan for the River Murray Prescribed Watercourse. A copy of the draft plan can be viewed on the board's web page. Community feedback will be considered by the landscape board so it is important that you have your say.

The closing date for submissions is 5.00pm, 2 December 2020.

Written submissions can be emailed to rmwap.feedback@sa.gov.au or posted to:

Rebecca Freshwater, Murraylands and Riverland Landscape Board, Upper level, CNR Mann and Walker Streets, Mount Barker SA 5251

Or you could complete the electronic survey form available online;

<https://landscape.sa.gov.au/mr/water/water-allocation-plans/river-murray-wap>

Thank you for taking the time to respond to this survey.

Questions 1-7 collect general information, questions 8-16 relate to the proposed changes to how the Environmental Land Management Allocations (ELMA) are distributed in the Lower Murray Reclaimed Irrigation Area (LMRIA), and questions 17-18 concern drilling new wells.

1. All submissions will be publically available. Do you want to remain anonymous?

Yes

No

2. Please complete your contact details if you want us to respond to your submission (optional).

Name

Company

Address

City/Town

State / Postal Code

Email Address

Phone Number

3. Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Yes

No



4. Are you a River Murray irrigator?

Yes

No

5. Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Yes

No

6. Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Yes

No

Comments

7. The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives:

- Provide allocations that contribute to the water needs of water-dependent ecosystems
- Allocate water in a sustainable and equitable manner between users
- Promote efficient use of water from the prescribed watercourse
- Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation
- Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance
- Contribute to the prevention of adverse impacts on water quality
- Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue

Do you understand the objectives of the water allocation plan?

Yes

No

Comments



8. Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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.

Do you support the proposed redistribution of ELMA in the draft plan?

Yes

No

Comments

9. Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area.

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]. Do you support this proposal?

Yes

No

Comments

10. 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.

Do you support this proposal?

Yes

No

Comments



11. 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. Do you support this proposal?

Yes

No

Comments

12. If you were 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. Do you support this proposal?

Yes

No

Comments

13. 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. Do you support this proposal?

Yes

No

Comments



14. The draft plan proposes to remove 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. Do you support this proposal?

Yes

No

Comments

15. 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. Do you support this proposal or do you have an alternative equitable solution?

Yes

No

Comments

16. Do you have any other feedback regarding the proposed ELMA policy?

on back page.

17. The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Yes

No

Comments



18. Do you have any other comments?

See below.

Thank you for completing this survey.

23 different locations. Different percentages. Some less than 1/2 a 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 to that licence on the 1st. of July.

Wakelin, Samantha (DEW)

From: Freshwater, Rebecca (LandscapeSA)
Sent: Monday, 30 November 2020 7:49 AM
To: DEW:Feedback, RMWAP
Subject: FW: ELMA [DLM=For-Official-Use-Only]

Security Classification:
For Official Use Only

For Official Use Only

-----Original Message-----

From: [REDACTED]
Sent: Sunday, 29 November 2020 10:25 AM
To: Freshwater, Rebecca (LandscapeSA) <Rebecca.Freshwater@sa.gov.au>
Subject: ELMA

I agree with the proposed changes to the way ELMA is distributed.

[REDACTED]

Sent from my iPhone

Wakelin, Samantha (DEW)

From: Freshwater, Rebecca (LandscapeSA)
Sent: Monday, 30 November 2020 7:49 AM
To: DEW:Feedback, RMWAP
Subject: FW: ELMA [DLM=For-Official-Use-Only]

Security Classification:
For Official Use Only

For Official Use Only

-----Original Message-----

From: [REDACTED]
Sent: Sunday, 29 November 2020 10:23 AM
To: Freshwater, Rebecca (LandscapeSA) <Rebecca.Freshwater@sa.gov.au>
Subject: ELMA

I agree with the proposed changes to the way ELMA is distributed

[REDACTED]

Sent from my iPhone

To Murraylands and Riverland Landscape Board

29/11/20

Submission regarding new policy proposal.

Elma should remain as set out for each district on historic scientific evidence as originally allocated. As fair and equitable to all. Historically eg. Cowirra required more water to grow an acre of grass than in eg. Wellington on scientific and actual rainfall. 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 same job.

Elma was granted on a sliding scale higher volume from north to south.

So increasing water else where or removing from system becomes costly to some and beneficial to others altering the climatic water balance to grow pasture.

Costing more for leased in water for the northern irrigators this proposed change with only make costs even higher in the north culling more dairyfarmers.

Our property became drought affected like many of us that didn't own outright their properties, found it unbearable to see everything that was so fantastic to disaster from rehab to drought.

Biting the bullet and relocating rather than starting again and using our only asset [water] to establish a new place to dairy. Devastating as it has been for all irrigators especially the ones with large treed areas that were very costly to repair.

Irrigators in the far north to bridge still need to purchase more water today to grow the same pasture as an irrigator in the south.

Also, water level is higher in the south a totally different climatically.

Where is fair and equitable to all now, seems lots of hay making nowadays with lifestylers taking over swamps rather than dairyfarmers. Now farming practises have become large machinery hammering the paddocks rather than cattle grazing with not much biodiversity in mind nor trees for birds to shelter.

Considering the north and central areas have quiet substantial river red gums biodiversity and fauna, our bird life especially big birds of prey and owls have replenished since our swamp has been partial beef grazing ,waiting for new owners to start purchase and rehabilitate. This has taken us 12 years.

So rushing into major changes of peoples Elma before any chances of neighbours or other taking over areas of swamps if very sad and selfish many people are still in no way able to repair themselves, land will eventually change hands.

Lots of irrigators have lots of issues with reduced neighbours, contacts, lack of enthusiasm and will to go again, and a lot of anxiety and depression still out and about that should be mindful of with lots of people.

Thank you for hopefully taking an interest.

Yours sincerely

[Redacted signature]

[Redacted address]



30 November 2020

Rebecca Freshwater
Murraylands and Riverland Landscape Board
Upper Level, Cnr Mannum & Walker Street
MOUNT BARKER SA 5151

VIA EMAIL
rmwap.feedback@sa.gov.au

Dear Rebecca

We are writing in response to the Draft Water Allocation Plan proposal to amend the water allocation plan in relation to Environmental Land Management Allocations (ELMA).

[REDACTED] is being developed under a Major Development approval with work well advanced. We have a growing understanding of the difficulties that will need to be faced under the present water allocation intentions. On completion, the development will have areas of public water bodies, private water bodies and extensive wetlands. All of which occupy an area of original River Murray floodplain which has been subject to severe salinization following the cessation of dairy activities. The water bodies for [REDACTED] other than those used for wetlands, have been assessed as artificial even though they occupy land which originally was true floodplain, lying some 500 to 750mm below sea level. Isolated from the river, the original floodplain suffered severe degradation and loss of habitat. This is being reclaimed by the current development.

Short background to the [REDACTED]

In 2005, Tallwood Pty Ltd undertook the preparation of an Environment Impact Statement and Major Project Approval application for [REDACTED] Residential Marina. This process ran concurrently with the SA State Government's formulation of their proposed

houseboat and marina strategy¹. One of the objectives of the Government's strategy was for all houseboats to be required to have their own home port in a controlled marina environment.

Tallwood Pty Ltd was granted Development Authorisation in 2008 and construction of the \$12 million 150 berth marina and associated wetlands infrastructure commenced in 2010 during difficult financial times post the Global Financial Crisis. The eminent release of the strategy led to strong demand for off plan sales of marina berths.

The SA State Government subsequently abandoned their strategy and marina berth prices collapsed by up to 70% (\$92k down to \$35k). They have since recovered somewhat and are now approximately 40% below the peak prices achieved during the presale processes. Many marina berth purchasers have suffered financial loss.

Tallwood estimates the State government has to date collected in excess of \$4 million from the development, This includes Stamp duty, LTO transfer fees, land taxes, ESL, SA Water contributions and GST (indirectly) on housing construction. The State Government has not made any financial contributions to the project.

Environmental benefits of [REDACTED] marina and the use of ELMA

It is a fact that houseboats damage the river environment. There are studies to support this. The water within the [REDACTED] 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 EMLA 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.

SA Water Mannum Sewerage Plant

It is a major frustration that next door [REDACTED] the neighbour, SA Water, is allowed by the SA State Government to continue 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.

¹ Houseboat, Mooring and Marina Strategy and Guidelines for the River Murray in South Australia November 2008
<https://drive.google.com/file/d/0B4pMUXNStZXQU2RMYV95ZDRFeDA/view?usp=sharing>

Our suggestions for your consideration

- 1) The State Government offsetting some of the taxation revenue it receives from the [REDACTED] development to finance environmental improvement water use.
- 2) Measurable stormwater runoffs and improved creek flows be allowed as credits towards water use at [REDACTED]
- 4) The Mannum SA Water waste water treatment plant is promptly relocated off the floodplain to improve the environment.

A solution needs to be found for [REDACTED] (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.

We request that you give serious consideration to our suggestions as we believe that a long term solution needs to be found for environmental friendly developments along the River Murray in South Australia, We would be grateful to discuss this submission further with you.

Yours faithfully

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Ms Rebecca Freshwater
Senior Project Officer - River Murray Water Allocation Plan
Natural Resources SA Murray-Darling Basin
Department for Environment & Water
Cnr Mann & Walker Streets
MOUNT BARKER SA 5251

Dear Rebecca

Re: ELMA Allocation for [REDACTED] Irrigation Area

Thank you for your presentation at the Murray Bridge Community Club a few weeks back. I apologise for the delay in replying however I have been busy preparing for harvest and running our family property.

I note with some concern your proposal to work towards ending eligibility of property owners rights to access ELMA (Environmental Land Management Allocation) for land owners in the Lower Murray Reclaimed Irrigation Area where they have not applied, obtained and distributed their ELMA Allocations by the 'use by date' you have selected. I'm disappointed in the lack of communication in the last 5 years as I now have been informed if we haven't used 90% of our ELMA in 1 year in 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 may have to wait 5 or 10 years to receive ELMA. Due to business restructure I feel I haven't been given a chance.

I own a proportion of land in the [REDACTED] Irrigation Area, which I would like to return to a healthy state of care in the future, however, I also run a property, on the locally termed highland and I have had to deal with the passing of my father. Add to this we have endured 11 of the last 20 years of significantly below average rainfall, 15 years of regionally below average rainfall, two drought declared years where rainfall was less than 55% of the regional average and the impact of the millennium drought on the Murray Darling Basin which resulted in the dramatic removal and reduction of access to irrigation allocations. To say the last few years have been trying would be putting a mild slant on the situation.

Yes, it breaks my heart to see the [REDACTED] blocks deteriorating and yes, I would like to invest in the holding in the [REDACTED] Irrigation Area, installing appropriate

monitoring and delivery systems and returning the site to production but my immediate concerns are stabilizing the infrastructure on the highland property to the level where I can afford to start work on the Irrigation blocks. If we received good seasons for the next couple of years then I could be looking at meeting the deadlines outlined in your presentation, however if we receive a glitch to the weather this will stall our development plans.

As I understand it, the ELMA water was for the care of the land. It was an allocation developed to meet the environmental needs of the land and mitigate any effects of salinisation, acidification and other issues to help protect the River Murray from the flow on effects of these issues. 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.

I fully understand that some irrigators have a need for greater ELMA Allocations to combat the draw down of adjoining land and mitigate the long term effects of no water. This issue is in the forefront of my mind when I am planning for any improvement works on the [REDACTED] block. I understand that I may very well have to obtain additional water over an above the ELMA to bring the land back into a healthy condition, especially in the first few years. I am also aware that the adjoining properties are currently not irrigating which means I have to consider the additional draw down on the land that this will cause.

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 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 Lower Murray Reclaimed Irrigation Area. 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 neighbours 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 there were results of a short three year study 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 down at Jerois.

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.

In conclusion I am informing you of my intention to pursue rehabilitation on my irrigation land on [REDACTED] and inform you that these works are subject to eligibility to a suitable ELMA. Should you wish to discuss this matter further with me I can be contacted by email [REDACTED].

Yours sincerely

[REDACTED]
[REDACTED]

1 December 2020

Rebecca Freshwater
Murraylands and Riverland Landscape Board
Upper Level, Cnr Mann and Walker Street
Mount Barker SA 5151

Sent via email: rmwap.feedback@sa.gov.au

Dear Rebecca

I reply to the letter from Dianne Davidson, Chair of the Murraylands and Riverland Landscape Board, addressed to Chief Executive, [REDACTED].

We thank you for the opportunity to provide our views or a submission in relation to the proposed changes in the Water Allocation Plan.

[REDACTED] has been involved in the policy discussions so on this occasion, we have a nil response.

Regards



2020 River Murray WAP consultation - ELMA

The Murraylands and Riverland Landscape Board is proposing changes to the Water Allocation Plan for the River Murray Prescribed Watercourse. A copy of the draft plan can be viewed on the board's web page. Community feedback will be considered by the landscape board so it is important that you have your say.

The closing date for submissions is 5.00pm, 2 December 2020.

Written submissions can be emailed to rmwap.feedback@sa.gov.au or posted to:

Rebecca Freshwater, Murraylands and Riverland Landscape Board, Upper level, CNR Mann and Walker Streets, Mount Barker SA 5251

Or you could complete the electronic survey form available online;

<https://landscape.sa.gov.au/mr/water/water-allocation-plans/river-murray-wap>

Thank you for taking the time to respond to this survey.

Questions 1-7 collect general information, questions 8-16 relate to the proposed changes to how the Environmental Land Management Allocations (ELMA) are distributed in the Lower Murray Reclaimed Irrigation Area (LMRIA), and questions 17-18 concern drilling new wells.

1. All submissions will be publically available. Do you want to remain anonymous?

Yes

No

2. Please complete your contact details if you want us to respond to your submission (optional).

Name

Company

Address

City/Town

State / Postal Code

Email Address

Phone Number

3. Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Yes

No

4. Are you a River Murray irrigator?

Yes

No

5. Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Yes

No

6. Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Yes

No

Comments

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.

7. The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives:

- Provide allocations that contribute to the water needs of water-dependent ecosystems
- Allocate water in a sustainable and equitable manner between users
- Promote efficient use of water from the prescribed watercourse
- Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation
- Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance
- Contribute to the prevention of adverse impacts on water quality
- Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue

Do you understand the objectives of the water allocation plan?

Yes

No

Comments

The Plan does not reflect the environmental differences (rainfall and temperature etc) between the north and south LMRIA. The Plan does not consider the well being 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.

8. Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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.

Do you support the proposed redistribution of ELMA in the draft plan?

Yes

No

Comments

It is totally wrong to take water allocation from my land which has no ELMA allocation to give it to land already receiving 2.9ML/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.

9. Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area.

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]. Do you support this proposal?

Yes

No

Comments

The Draft Plan does not consider the problems associated with the ability to apply ELMA to land not yet rehabilitated since the drought (land degradation).

10. 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.

Do you support this proposal?

Yes

No

Comments

By supporting this proposal we would not agree to the optimised rates – not even in line with the new science.

The so called optimised rate does not truly represent the environmental differences between the north and the south.

11. 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. Do you support this proposal?

Yes

No

Comments

I don't agree to the optimised rate, so how can I support the 10 year transition period.

12. If you were 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. Do you support this proposal?

Yes

No

Comments

The current ELMA rates should remain.

13. 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. Do you support this proposal?

Yes

No

Comments

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 previously and it is now greed to gain more value to their land.

14. The draft plan proposes to remove 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. Do you support this proposal?

Yes

No

Comments

If licences have been surrendered – YES. If licences are stolen – NO Definitely NOT!!

15. 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. Do you support this proposal or do you have an alternative equitable solution?

Yes

No

Comments

Each Region should retain their current allocation.

16. Do you have any other feedback regarding the proposed ELMA policy?

Unfortunately the mind and attitude of the ML/RL Landscape Board was already determined in favour of the south. All meetings and previous submissions, have had little regard to the issues of the north by the Board. Unfortunately the Board disregards important information from 1993 but still chooses to be selective only with information they wish to use.

The Board and staff are listening but not hearing and responding to the real issues associated with ELMA.

17. The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Yes

No

Comments

I don't believe anyone really knows what the consequences of this will actually be.

18. Do you have any other comments?

The proposed optimised rates in the north significantly disadvantage ELMA users, land degradation, salinity already on the rise, financial (loss of volume availability and value of water).

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 ML & RL Landscape Board continue with disregard, bias recommendations, court action will be required.

Thank you for completing this survey.

Wakelin, Samantha (DEW)

From: [REDACTED]
Sent: Wednesday, 2 December 2020 10:59 AM
To: DEW:Feedback, RMWAP
Subject: ELMA Proposal [REDACTED]

To Murraylands and Riverland Landscape Board

Submission for Elma consultation new policy proposal to Rebecca Freshwater, Senior project officer- River Murray.

We Farm in Pompoota and strongly disagree that any changes to our Elma water needs to occur.

We are 4th generation Dairy Farmers with the 5th generation onboard. we have just brought another farm in Pompoota with the Elma water attached, which brought the land value up in price.

We have done all our rehab on our farm and intend to do the same on the new purchased farm as well, but we are needing the Elma to stay the same to do so.

Yours Truly

[REDACTED]

[REDACTED]

Wakelin, Samantha (DEW)

From: [REDACTED]
Sent: Wednesday, 2 December 2020 11:13 AM
To: DEW:Feedback, RMWAP
Subject: ELMA proposal-[REDACTED]

To Murraylands and Riverland Landscape Board.

Submission for Elma consultation new policy proposal
To Rebecca Freshwater, senior project officer- River Murray.

We have property in Pompoota and strongly disagree that any changes to Elma water need to occur.

We have plans for what we would like to do with help from family who also farm in Pompoota, but we need the Elma to stay the same. We both work on the only Dairy Farm still in Pompoota. As of now the land on both sides aren't being watered with Elma so therefore our land dries out a lot quicker. Our family have just brought next to us so we can then all work together.

Yours Truly

[REDACTED]

[REDACTED]



2020 River Murray WAP consultation - ELMA

The Murraylands and Riverland Landscape Board is proposing changes to the Water Allocation Plan for the River Murray Prescribed Watercourse. A copy of the draft plan can be viewed on the board's web page. Community feedback will be considered by the landscape board so it is important that you have your say.

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Written submissions can be emailed to rmwap.feedback@sa.gov.au or posted to:

Rebecca Freshwater, Murraylands and Riverland Landscape Board, Upper level, CNR Mann and Walker Streets, Mount Barker SA 5152

Or you could complete the electronic survey form available online;

<https://landscape.sa.gov.au/mr/water/water-allocation-plans/river-murray-wap>

Thank you for taking the time to respond to this survey.

Questions 1-7 collect general information, questions 8-16 relate to the proposed changes to how the Environmental Land Management Allocations (ELMA) are distributed in the Lower Murray Reclaimed Irrigation Area (LMRIA), and questions 17-18 concern drilling new wells.

1. All submissions will be publically available. Do you want to remain anonymous?

Yes

No

2. Please complete your contact details if you want us to respond to your submission (optional).

Name

Company

Address

City/Town

State / Postal Code

Email Address

Phone Number

3. Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Yes

No

ELMA WATER TO STAY AS IS.

NO NO NO NO NO

WHAT PART DO YOU NOT UNDERSTAN
DUM ARS.



4. Are you a River Murray irrigator?

- Yes
 No

5. Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

- Yes *I AM AGAINST THIS DRAFT*
 No

6. Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

- Yes
 No *NO TO ANY DRAFT TO CHANGE*

Comments

THE CURRENT 1993 DRAFT.

7. The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives:

- Provide allocations that contribute to the water needs of water-dependent ecosystems
- Allocate water in a sustainable and equitable manner between users
- Promote efficient use of water from the prescribed watercourse
- Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation
- Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance
- Contribute to the prevention of adverse impacts on water quality
- Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue

Do you understand the objectives of the water allocation plan?

- Yes
 No

Comments



8. Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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.

Do you support the proposed redistribution of ELMA in the draft plan?

Yes

No

Comments

9. Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area.

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]. Do you support this proposal?

Yes

No

Comments

10. 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.

Do you support this proposal?

Yes

No

Comments

IM VERY MUCH AGAINST THIS
DRAFT ITS BIG NO
FROM
ME



11. 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. Do you support this proposal?

Yes

No

Comments

12. If you were 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. Do you support this proposal?

Yes

No

Comments

13. 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. Do you support this proposal?

Yes

No

Comments



14. The draft plan proposes to remove 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. Do you support this proposal?

Yes

No

NO

Comments

15. 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. Do you support this proposal or do you have an alternative equitable solution?

Yes

No

NO

Comments

16. Do you have any other feedback regarding the proposed ELMA policy?

U DONT WANT TO LIGEND TO ANY BODY
SD NO

17. The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Yes

No

NO

Comments



18. Do you have any other comments?

NO

Thank you for completing this survey.

FOR WHAT U CANT DO
WHAT U ARE TRYING TO DO

NO

X

Rebecca Freshwater
Senior Project Officer, River Murray Allocation Plan
Murraylands and Riverland Landscape Board
Cnr Mann & Walker St
Mount Barker SA 5251
rmwap.feedback@sa.gov.au

30 November 2020

Submission on Draft Water Allocation Plan for the River Murray

██████████ is appreciative of the opportunity to provide a submission on the draft SA Water Allocation Plan for the River Murray (the WAP) currently out for consultation. The Trust believes it is important for all stakeholders in the SA River Murray to be engaged with, and understand, the matters dealt with under the WAP. Our submission relates to the Environmental Land Management Allocations (ELMA) for the Lower Murray Reclaimed Irrigation Area (LMRIA). The Trust thanks Lyz Risby and Rebecca Freshwater from the Murraylands and Riverland Landscape Board for making the time to discuss the proposed changes with our Board.

The Trust provides the following observations, comments and suggestions.

1. *Ongoing land management support is unavoidable*

The LMRIA has changed large sections of the lower River Murray natural landscape. Individual property owners are heavily impacted by what irrigation practices are occurring, or not occurring, on their neighbouring properties. As such, the altered landscape requires ongoing large-scale management and individual property owners cannot be abandoned by Government.

2. *ELMA addresses the negative impacts if equally available*

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 of water per 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.

3. *ELMA provides an opportunity to incentivise property owners (or lease holders) to bring as much LMRIA land as possible back into high value productivity*

It is understood the 22.2GL of ELMA water was initially provided out of SA's water entitlement used for the environment.

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 per 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.

Incentivisation could be done through a mechanism such as the Minister offering a five year water lease at a cost that is less than SA Class 3 allocation market rates, provided the land holder (or lease holder) returns the land to viable productive use. After the five years, the business should be able to stand on its own in the water market, given there is an ongoing additional 3.0 to 3.5 ML per ha of ELMA water always available to the business. This approach would provide some return to government to manage the program. For example, at a very affordable lease cost of \$100 per ML, income could be in the order of \$0.4m to \$0.67m. Over time, as viable productive land use returns to properties, ELMA water no longer required could be returned for the benefit of SA's section of the River Murray.

Incentivising owners to return more of this potentially highly productive land to high value crops would also contribute to achieving both governments' policy of expanding agricultural production. Fully utilising established agricultural land would also reduce pressure to create greenfield sites with the associated loss of habitat. Government funding for growing the agriculture sector could be explored to assist the community in restoring the lands productivity.

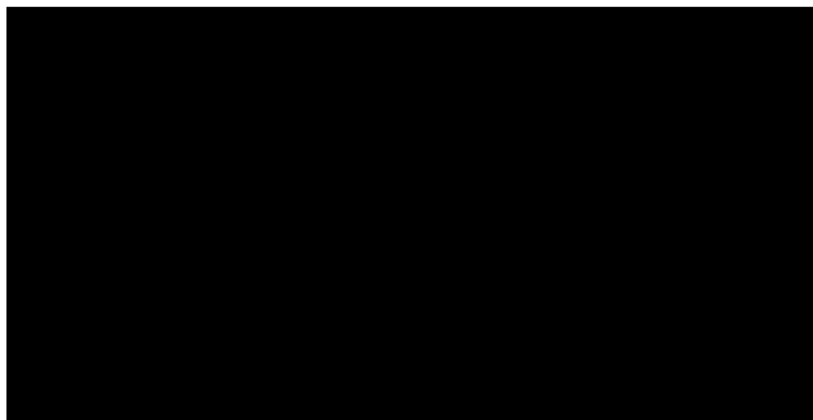
Summary

We encourage the Government to exercise sound judgement in the long-term interests of all sectors of SA River Murray stakeholders, including the environment, when determining if this proposed policy change proceeds. The Trust is of the view that Murray Darling Basin water policy must ensure we are using our scarce water resource sustainably and wisely.

Good water stewardship is the use of water that is socially and culturally equitable, environmentally sustainable and economically beneficial, achieved through a stakeholder-inclusive process that includes both site and catchment-based actions.

The Trust seeks that the test of good water stewardship is applied to the proposed changes to the WAP.

Thank you for the opportunity to contribute towards wise and conservative water management policy in South Australia and we are available to discuss any aspect of this submission.



Dear Landscape Board,

I am writing to you regarding the ELMA draft plan proposed changes.

Firstly, I would like to thank you for the opportunity to discuss this matter. We reside in the Glen Lossie area and these proposed changes would directly affect myself, my family, neighbours and friends.

Secondly, I would like to indicate that we do not agree with the proposed changes. 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 seem to benefit more from it however, it does not consider the impacts that it would have on the lands where the water allocation is to be reduced.

Seeing as ELMA water is allocated specifically to manage issues in the LMRIA, it should be accessible to land parcels in this area 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.

Please do not hesitate to contact me should you need. You can reach me on [REDACTED] or at

[REDACTED]

Yours Sincerely,

[REDACTED]

[REDACTED]




2 December 2020

Rebecca Freshwater
Murraylands and Riverland Landscape Board
Upper level, CNR Mann and Walker Streets
Mount Barker SA 5152

Dear Rebecca,

DRAFT RIVER MURRAY WATER ALLOCATION PLAN

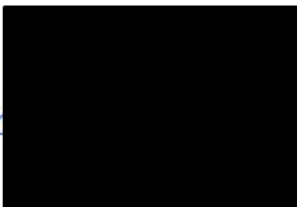
I refer to the draft River Murray Water Allocation Plan (WAP) that has been released for public consultation.

 and the 12 Irrigation Trusts under our management have no specific issue with the individual changes proposed in the draft WAP. The most significant change principally impacts Environmental Land Management Allocations (ELMA) licensees or potential licensees, and that group would be best placed to inform the consultation process on the specific ELMA changes proposed.

We do however continue to have significant concern that all South Australian River Murray water entitlement holders are at risk of adverse outcomes associated with the full implementation of Basin Plan Sustainable Diversion Limits. Implementation of regulatory change resulting in increased annual water use, such as is most likely under the proposed EMLA 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.

Should you require further information do not hesitate to contact me.

Yours sincerely,



Wakelin, Samantha (DEW)

From: [REDACTED]
Sent: Wednesday, 2 December 2020 4:58 PM
To: DEW:Feedback, RMWAP
Subject: Draft Water Allocation Plan for the River Murray

Dear Sirs,

This will be my briefest ever submission on anything, since, while I have strongly supported the Murray Darling Basin Plan from the start and attended countless meetings over the years in support of “Saving the River Murray” the 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 and the clearly stated intention of The Plan 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 2tonnes of accumulated salts and other contamination acquired on its long, slow journey. I continue to read incorrectly and wrongly based reports on the history of The Lower Lakes and re-iterate that it historically 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, - I have always suggested to the year 1970 - which is not impossible but 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 indeed were in the early 1970s. In those days those areas were prosperous and bountiful - and it is insane to continue to perpetuate new irrigation schemes and licence more and more irrigators (e.g. the tens of thousands of almond trees planted since the ‘millenium’ 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 present existing number of irrigators. As with industry, - last on, first off - and so it should be with irrigators.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]



2020 River Murray WAP consultation - ELMA

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Rebecca Freshwater, Murraylands and Riverland Landscape Board, Upper level, CNR Mann and Walker Streets, Mount Barker SA 5152

Or you could complete the electronic survey form available online;

<https://landscape.sa.gov.au/mr/water/water-allocation-plans/river-murray-wap>

Thank you for taking the time to respond to this survey.

Questions 1-7 collect general information, questions 8-16 relate to the proposed changes to how the Environmental Land Management Allocations (ELMA) are distributed in the Lower Murray Reclaimed Irrigation Area (LMRIA), and questions 17-18 concern drilling new wells.

1. All submissions will be publically available. Do you want to remain anonymous?

Yes

No

2. Please complete your contact details if you want us to respond to your submission (optional).

Name

Company

Address

City/Town

State / Postal Code

Email Address

Phone Number

3. Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Yes

No



4. Are you a River Murray irrigator?

Yes

No

5. Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Yes

No

6. Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Yes

No

Comments

7. The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives:

- Provide allocations that contribute to the water needs of water-dependent ecosystems
- Allocate water in a sustainable and equitable manner between users
- Promote efficient use of water from the prescribed watercourse
- Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation
- Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance
- Contribute to the prevention of adverse impacts on water quality
- Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue

Do you understand the objectives of the water allocation plan?

Yes

No

Comments



8. Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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.

Do you support the proposed redistribution of ELMA in the draft plan?

Yes

No

Comments

You are going to create a problem somewhere else

9. Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area.

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]. Do you support this proposal?

Yes

No

Comments

10. 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.

Do you support this proposal?

Yes

No

Comments



11. 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. Do you support this proposal?

Yes

No

Comments

12. If you were 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. Do you support this proposal?

Yes

No

Comments

13. 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. Do you support this proposal?

Yes

No

Comments

You need to first know that you will receive an ELMA licence before you spend big money and then be rejected



14. The draft plan proposes to remove 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. Do you support this proposal?

Yes

No

Comments

It depends if you want water applied to these areas down into the future,

15. 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. Do you support this proposal or do you have an alternative equitable solution?

Yes

No

Comments

Could this mean for me at Toom could go even below the optimised rate on how you do it,

16. Do you have any other feedback regarding the proposed ELMA policy?

17. The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Yes

No

Comments

I need this explained to me, my situation location & purpose



18. Do you have any other comments?

Every Irrigation District is different
There is no accurate rainfall data for TOORA. I have driven many of times from MURRAY BRIDGE to home at Toora, JUST 8kms distance and the rain just peters out (hoping we would have received what MURRAY BRIDGE did) The rain head south not north.

Thank you for completing this survey.

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 & Toora will be 0.11 mg/ha. Can you tell me how much rainfall this is?

MORIKONG, TOORA & MYPOLONG have a very high groundwater salinity. Inflow to the districts. 2½ times higher 25000 EC units as opposed to other districts. They don't name salt creeks, salt creek for a reason and where does it and others inflow to. Other districts have different salinity inflows. ~~long that~~ We need that extra for dilution & removal otherwise it will become a toxic poison high acid + ~~the~~ very high salinity. You want need roundup. We need that extra water to manage the environment.

Can you please explain why Kilsby (opposite Jervois) will receive an optimised rate higher than TOORA

I would like to know where the 3 test sites were done??

Jervois receives more rainfall, lower evaporation, lower inflow of ~~sa~~ highly saline water (which is not my fault) and a high acid ^{suphate} problem.

You need to go back and do your science ^{again} for all ELMA areas not just the 3 you have done.

Perhaps the 22.2 g/lts should have been higher from the start.

#1

COMPLETE

Collector: survey form (Web Link)
Started: Friday, October 02, 2020 6:22:21 PM
Last Modified: Friday, October 02, 2020 6:26:40 PM
Time Spent: 00:04:18
IP Address: 116.250.198.7

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2 **Respondent skipped this question**

Please complete your contact details if you want us to respond to your submission (optional).

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**Yes,**

Comments:

ELMA is for the environment not the individual.

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**Yes**

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10

Comments:

Seems fair BUT some have had an advantage for a long time!

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. Do you support this proposal?

<p>Q11</p> <p>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. Do you support this proposal?</p>	<p>Yes</p>
<p>Q12</p> <p>If you were 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. Do you support this proposal?</p>	<p>Yes, Comments: No longer.</p>
<p>Q13</p> <p>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. Do you support this proposal?</p>	<p>Yes</p>
<p>Q14</p> <p>The draft plan proposes to remove 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. Do you support this proposal?</p>	<p>Yes, Comments: What about Mannum Marina</p>
<p>Q15</p> <p>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. Do you support this proposal or do you have an alternative equitable solution?</p>	<p>Yes, Comments: ALL - north & south get the proportional reduction</p>
<p>Q16</p> <p>Do you have any other feedback regarding the proposed ELMA policy?</p>	<p>Respondent skipped this question</p>

Q17

Respondent skipped this question

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#2

COMPLETE

Collector: survey form (Web Link)
Started: Sunday, October 04, 2020 3:32:25 PM
Last Modified: Sunday, October 04, 2020 3:42:09 PM
Time Spent: 00:09:43
IP Address: 116.250.198.7

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

<p>Q1</p> <p>All submissions will be publically available. Do you want to remain anonymous?</p>	<p>Yes</p>
<p>Q2</p> <p>Please complete your contact details if you want us to respond to your submission (optional).</p>	<p>Respondent skipped this question</p>
<p>Q3</p> <p>Are you an ELMA licensee or do you own an ELMA eligible land parcel?</p>	<p>No</p>
<p>Q4</p> <p>Are you a River Murray irrigator?</p>	<p>Yes</p>
<p>Q5</p> <p>Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?</p>	<p>Yes</p>
<p>Q6</p> <p>Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?</p>	<p>Yes, Comments: After talking to a friend</p>

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**Yes,**

Comments:

Think some will not like but does seem fair

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**Yes,**

Comments:

it does seem fair

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10**Yes,**

Comments:

From what I understand

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. Do you support this proposal?

Q11

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. Do you support this proposal?

Yes,
Comments:
that's a long time

Q12

If you were 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. Do you support this proposal?

No

Q13

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. Do you support this proposal?

Yes

Q14

The draft plan proposes to remove 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. Do you support this proposal?

Yes

Q15

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. Do you support this proposal or do you have an alternative equitable solution?

Yes

Q16

Do you have any other feedback regarding the proposed ELMA policy?

I think it will depend on the farmer and their land if they will like this. As a non ELMA farmer looks fair for everyone

Q17

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

No,

Comments:
would it have meters

Q18

Do you have any other comments?

Respondent skipped this question

#3

COMPLETE

Collector: survey form (Web Link)
Started: Friday, October 09, 2020 3:44:52 PM
Last Modified: Friday, October 09, 2020 3:52:24 PM
Time Spent: 00:07:32
IP Address: 116.250.198.7

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2

Please complete your contact details if you want us to respond to your submission (optional).

ZIP/Postal Code **5238**

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **No**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes,**
Comments:
read papers sent out

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**Yes,**

Comments:

I might not like the idea but it seems unbiased

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**Yes**

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10**Yes,**

Comments:

fairer than what I was expecting

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. Do you support this proposal?

Q11

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. Do you support this proposal?

Yes,

Comments:
fairer than I was expecting.

Q12

If you were 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. Do you support this proposal?

Yes

Q13

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. Do you support this proposal?

Yes

Q14

The draft plan proposes to remove 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. Do you support this proposal?

Yes

Q15

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. Do you support this proposal or do you have an alternative equitable solution?

Yes,

Comments:
proportional is fair

Q16

Do you have any other feedback regarding the proposed ELMA policy?

i might not like it but it is better than i thought it would be, especially the 10 years to change

Q17

Respondent skipped this question

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#4

COMPLETE

Collector: survey form (Web Link)
Started: Sunday, October 11, 2020 6:12:02 PM
Last Modified: Sunday, October 11, 2020 6:23:05 PM
Time Spent: 00:11:02
IP Address: 118.210.110.237

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2 **Respondent skipped this question**

Please complete your contact details if you want us to respond to your submission (optional).

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Yes,

Comments:

Yes very clear objectives, but get a little lost in the details

Q8

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Yes,

Comments:

ABSOLUTELY!!!

Q9

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Yes**Q10**

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. Do you support this proposal?

Yes

Q11

Yes

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. Do you support this proposal?

Q12

Yes

If you were 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. Do you support this proposal?

Q13

Yes

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. Do you support this proposal?

Q14

Yes

The draft plan proposes to remove 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. Do you support this proposal?

Q15

Yes

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. Do you support this proposal or do you have an alternative equitable solution?

Q16

Do you have any other feedback regarding the proposed ELMA policy?

this makes the elma allocation fairer for all

Q17

Yes

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#5

COMPLETE

Collector: survey form (Web Link)
Started: Tuesday, October 13, 2020 2:16:22 PM
Last Modified: Tuesday, October 13, 2020 2:21:27 PM
Time Spent: 00:05:04
IP Address: 101.174.33.229

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2 **Respondent skipped this question**

Please complete your contact details if you want us to respond to your submission (optional).

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**No**

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**No,**

Comments:

I don't think the rates are correct

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10**No,**

Comments:

I don't think they have the right numbers for the usage of Elma so it would be hard to be accurate

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. Do you support this proposal?

Q11

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. Do you support this proposal?

Yes,

Comments:

It needs to stay the same for the people in the north

Q12

If you were 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. Do you support this proposal?

Yes

Q13

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. Do you support this proposal?

No,

Comments:

The infrastructure maybe there but if the don't use it it's irrelevant

Q14

The draft plan proposes to remove 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. Do you support this proposal?

No

Q15

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. Do you support this proposal or do you have an alternative equitable solution?

No

Q16

Do you have any other feedback regarding the proposed ELMA policy?

Respondent skipped this question

Q17

No

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#6

COMPLETE

Collector: survey form (Web Link)
Started: Wednesday, October 14, 2020 10:45:21 AM
Last Modified: Wednesday, October 14, 2020 10:55:25 AM
Time Spent: 00:10:03
IP Address: 49.178.11.216

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **No**

All submissions will be publically available. Do you want to remain anonymous?

Q2
Please complete your contact details if you want us to respond to your submission (optional).

Name	[REDACTED]
Company	[REDACTED]
Address	[REDACTED]
City/Town	[REDACTED]
State/Province	[REDACTED]
ZIP/Postal Code	[REDACTED]
Email Address	[REDACTED]

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes,**
Comments:
I support the proposed changes

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**Yes,**

Comments:

I strongly support a fairer system

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**Yes,**

Comments:

A much fairer system that will have better environmental outcomes.

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10**Yes,**

Comments:

A system fair to all

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. Do you support this proposal?

Q11

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. Do you support this proposal?

Yes,

Comments:
this provides a transition time.

Q12

If you were 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. Do you support this proposal?

Yes

Q13

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. Do you support this proposal?

Yes,

Comments:
we are and will continue invest in better infrastructure to ensure we have the ability to apply ELMA. at our current rate of 2.9ml/Ha it is not viable to do so.

Q14

The draft plan proposes to remove 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. Do you support this proposal?

Yes

Q15

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. Do you support this proposal or do you have an alternative equitable solution?

Yes

Q16

Do you have any other feedback regarding the proposed ELMA policy?

a very good plan that is much fairer.

Q17

Yes

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#7

COMPLETE

Collector: survey form (Web Link)
Started: Thursday, October 15, 2020 5:42:02 PM
Last Modified: Thursday, October 15, 2020 5:43:29 PM
Time Spent: 00:01:26
IP Address: 116.250.198.7

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2 **Respondent skipped this question**

Please complete your contact details if you want us to respond to your submission (optional).

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **No**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**Yes**

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**Yes**

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Q10**Yes**

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. Do you support this proposal?

Q11**No**

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Q12**No**

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Q16**Respondent skipped this question**

Do you have any other feedback regarding the proposed ELMA policy?

Q17

Respondent skipped this question

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Q18

Respondent skipped this question

Do you have any other comments?

#8

COMPLETE

Collector: survey form (Web Link)
Started: Thursday, October 15, 2020 5:43:48 PM
Last Modified: Thursday, October 15, 2020 5:44:59 PM
Time Spent: 00:01:11
IP Address: 116.250.198.7

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2 **Respondent skipped this question**

Please complete your contact details if you want us to respond to your submission (optional).

Q3 **No**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **No**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

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Q10**Yes**

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. Do you support this proposal?

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Q16

Respondent skipped this question

Do you have any other feedback regarding the proposed ELMA policy?

Q17

Yes

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#9

COMPLETE

Collector: survey form (Web Link)
Started: Friday, October 16, 2020 8:00:11 AM
Last Modified: Friday, October 16, 2020 8:01:05 AM
Time Spent: 00:00:53
IP Address: 1.124.106.185

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2 **Respondent skipped this question**

Please complete your contact details if you want us to respond to your submission (optional).

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**Yes**

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**Yes**

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10**Yes**

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. Do you support this proposal?

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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. Do you support this proposal or do you have an alternative equitable solution?

Q16

Respondent skipped this question

Do you have any other feedback regarding the proposed ELMA policy?

Q17

Respondent skipped this question

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#10

COMPLETE

Collector: survey form (Web Link)
Started: Saturday, October 17, 2020 10:24:45 AM
Last Modified: Saturday, October 17, 2020 10:27:50 AM
Time Spent: 00:03:05
IP Address: 101.174.4.204

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2

Please complete your contact details if you want us to respond to your submission (optional).

Name

██████

Q3 **No**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **No**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

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The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**Yes**

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Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10**Yes**

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Q16

Respondent skipped this question

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The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Do you have any other comments?

this seems the sensible thing to do

#11

COMPLETE

Collector: survey form (Web Link)
Started: Saturday, October 17, 2020 10:32:16 AM
Last Modified: Saturday, October 17, 2020 10:34:12 AM
Time Spent: 00:01:56
IP Address: 101.174.4.204

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2

Please complete your contact details if you want us to respond to your submission (optional).

Name

██████████

Q3 **No**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **No**

Are you a River Murray irrigator?

Q5 **No**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

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Q15

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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. Do you support this proposal or do you have an alternative equitable solution?

Q16

Respondent skipped this question

Do you have any other feedback regarding the proposed ELMA policy?

Q17

Yes

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Do you have any other comments?

I have lived on the river at mypo then murray bridge. I hear a lot about water from my children who farm on the river. This seems to equal things up for the environment

#12

COMPLETE

Collector: survey form (Web Link)
Started: Sunday, October 18, 2020 9:01:18 AM
Last Modified: Sunday, October 18, 2020 9:16:00 AM
Time Spent: 00:14:41
IP Address: 203.45.127.163

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2 **Respondent skipped this question**

Please complete your contact details if you want us to respond to your submission (optional).

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**Yes**

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**Yes**

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10**Yes**

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. Do you support this proposal?

Q11

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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. Do you support this proposal?

Q12

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Q13

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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. Do you support this proposal?

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Q18

Respondent skipped this question

Do you have any other comments?

#13

COMPLETE

Collector: survey form (Web Link)
Started: Thursday, October 22, 2020 3:17:31 PM
Last Modified: Thursday, October 22, 2020 3:21:49 PM
Time Spent: 00:04:18
IP Address: 101.174.4.204

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

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Q2 **Respondent skipped this question**

Please complete your contact details if you want us to respond to your submission (optional).

Q3 **No**

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Q4 **Yes**

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Q18

Respondent skipped this question

Do you have any other comments?

#14

COMPLETE

Collector: survey form (Web Link)
Started: Thursday, October 22, 2020 3:23:28 PM
Last Modified: Thursday, October 22, 2020 3:25:26 PM
Time Spent: 00:01:58
IP Address: 101.174.4.204

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2
Please complete your contact details if you want us to respond to your submission (optional).

Name [REDACTED]

Q3 **No**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

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Q16

Do you have any other feedback regarding the proposed ELMA policy?

This is water for the environment not for individuals

Q17

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Comments:

?

Q18

Do you have any other comments?

Respondent skipped this question

#15

COMPLETE

Collector: survey form (Web Link)
Started: Wednesday, October 28, 2020 8:58:10 AM
Last Modified: Wednesday, October 28, 2020 8:59:40 AM
Time Spent: 00:01:29
IP Address: 61.69.79.206

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2

Please complete your contact details if you want us to respond to your submission (optional).

Name

██████████

Q3 **No**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

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Q10

Respondent skipped this question

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Q18

Do you have any other comments?

Listenening to my mates this looks good

#16

COMPLETE

Collector: survey form (Web Link)
Started: Wednesday, October 28, 2020 9:05:52 AM
Last Modified: Wednesday, October 28, 2020 9:08:34 AM
Time Spent: 00:02:41
IP Address: 61.69.79.206

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2

Please complete your contact details if you want us to respond to your submission (optional).

City/Town **swanport**
 State/Province **5253**

Q3 **No**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **No**

Are you a River Murray irrigator?

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Comments:

It should come off the ones who are getting too much

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about time

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Comments:

?

Q18

Do you have any other comments?

I can't work out why some have been treated better than others because of government decisions that have never been right

#17

COMPLETE

Collector: survey form (Web Link)
Started: Saturday, November 07, 2020 5:44:21 PM
Last Modified: Saturday, November 07, 2020 5:45:10 PM
Time Spent: 00:00:48
IP Address: 49.178.51.49

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2 **Respondent skipped this question**

Please complete your contact details if you want us to respond to your submission (optional).

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Q18

Respondent skipped this question

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#18

COMPLETE

Collector: survey form (Web Link)
Started: Saturday, November 07, 2020 5:48:15 PM
Last Modified: Saturday, November 07, 2020 5:48:52 PM
Time Spent: 00:00:37
IP Address: 1.136.109.0

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2

Please complete your contact details if you want us to respond to your submission (optional).

Name

██████████

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Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**Yes**

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**Yes**

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10**Yes**

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. Do you support this proposal?

Q11

Yes

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. Do you support this proposal?

Q12

Yes

If you were 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. Do you support this proposal?

Q13

Yes

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. Do you support this proposal?

Q14

Yes

The draft plan proposes to remove 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. Do you support this proposal?

Q15

Yes

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. Do you support this proposal or do you have an alternative equitable solution?

Q16

Respondent skipped this question

Do you have any other feedback regarding the proposed ELMA policy?

Q17

Yes

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#19

COMPLETE

Collector: survey form (Web Link)
Started: Monday, November 16, 2020 7:15:18 AM
Last Modified: Monday, November 16, 2020 7:32:27 AM
Time Spent: 00:17:09
IP Address: 101.187.165.202

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2 **Respondent skipped this question**

Please complete your contact details if you want us to respond to your submission (optional).

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

No,

Comments:

the south has more rainfall then the north and dont need has much also the evaporation level are higher in the north and therefore need the same as past plans . the south had all this in front of them when the gov measured water entitlements but they wanted the same tradable water as everyone else and gave up some elma to do so, doesnt seem fair that they now get more water especially when the difference between the proposed rates of .4 diffrencece between north and south are completely different to what the results say the north need more than the south of 1.70- 1.75

Q9**No**

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10**Yes,**

Comments:

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. Do you support this proposal?

but only one thing a whole area is calculated in this so if 3 hobby farmer decides not to water they will never use at least 90% of water

Q11**Yes**

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. Do you support this proposal?

Q12**Yes**

If you were 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. Do you support this proposal?

Q13**No,**

Comments:

we have already done this when we rehabilitated the land

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. Do you support this proposal?

Q14**Yes**

The draft plan proposes to remove 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. Do you support this proposal?

Q15**Yes**

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. Do you support this proposal or do you have an alternative equitable solution?

Q16**Respondent skipped this question**

Do you have any other feedback regarding the proposed ELMA policy?

Q17

Yes

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#20

COMPLETE

Collector: survey form (Web Link)
Started: Tuesday, November 17, 2020 8:52:22 PM
Last Modified: Tuesday, November 17, 2020 8:55:53 PM
Time Spent: 00:03:30
IP Address: 118.211.9.104

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **No**

All submissions will be publically available. Do you want to remain anonymous?

Q2
Please complete your contact details if you want us to respond to your submission (optional).

Name	[REDACTED]
Address	[REDACTED]
City/Town	[REDACTED]
State/Province	[REDACTED]
ZIP/Postal Code	[REDACTED]
Email Address	[REDACTED]
Phone Number	[REDACTED]

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**Yes**

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**Yes**

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10**Yes**

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. Do you support this proposal?

Q11

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Q13

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Q15

Yes

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. Do you support this proposal or do you have an alternative equitable solution?

Q16

Respondent skipped this question

Do you have any other feedback regarding the proposed ELMA policy?

Q17

Yes

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#21

COMPLETE

Collector: survey form (Web Link)
Started: Wednesday, November 18, 2020 11:10:08 AM
Last Modified: Wednesday, November 18, 2020 11:19:00 AM
Time Spent: 00:08:52
IP Address: 118.210.12.152

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2 **Respondent skipped this question**

Please complete your contact details if you want us to respond to your submission (optional).

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**Yes**

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**Yes**

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10**No**

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. Do you support this proposal?

Q11**No**

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. Do you support this proposal?

Q12**No**

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Q13**Yes**

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. Do you support this proposal?

Q14**Yes**

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Q15**Yes**

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. Do you support this proposal or do you have an alternative equitable solution?

Q16**Respondent skipped this question**

Do you have any other feedback regarding the proposed ELMA policy?

Q17

Yes

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#22

COMPLETE

Collector: survey form (Web Link)
Started: Thursday, November 19, 2020 2:52:24 PM
Last Modified: Thursday, November 19, 2020 6:31:49 PM
Time Spent: 03:39:25
IP Address: 1.124.111.177

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2
Please complete your contact details if you want us to respond to your submission (optional).

Name	[REDACTED]
Company	[REDACTED]
Address	[REDACTED]
City/Town	[REDACTED]
State/Province	[REDACTED]
ZIP/Postal Code	[REDACTED]
Email Address	[REDACTED]
Phone Number	[REDACTED]

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6**Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**Yes**

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**Yes**

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10

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. Do you support this proposal?

No,

Comments:

Every Landholder should have the optimised rate.

Q11

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. Do you support this proposal?

No,

Comments:

Current rates have not been fair on irrigators downstream

Q12

If you were 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. Do you support this proposal?

Yes

Q13

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. Do you support this proposal?

Yes

Q14

The draft plan proposes to remove 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. Do you support this proposal?

Yes

Q15

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. Do you support this proposal or do you have an alternative equitable solution?

Yes,

Comments:

Yes I support this 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.

Q16

Respondent skipped this question

Do you have any other feedback regarding the proposed ELMA policy?

Q17

Yes

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#23

COMPLETE

Collector: survey form (Web Link)
Started: Thursday, November 26, 2020 9:26:14 PM
Last Modified: Thursday, November 26, 2020 9:44:00 PM
Time Spent: 00:17:45
IP Address: 101.173.7.96

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **No**

All submissions will be publically available. Do you want to remain anonymous?

Q2
Please complete your contact details if you want us to respond to your submission (optional).

Name	[REDACTED]
Address	[REDACTED]
City/Town	[REDACTED]
State/Province	[REDACTED]
ZIP/Postal Code	[REDACTED]
Email Address	[REDACTED]
Phone Number	[REDACTED]

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7**Yes**

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Q8**No**

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

Q9**Yes**

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

Q10**Yes**

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. Do you support this proposal?

<p>Q11</p> <p>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. Do you support this proposal?</p>	<p>Yes</p>
<p>Q12</p> <p>If you were 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. Do you support this proposal?</p>	<p>Yes</p>
<p>Q13</p> <p>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. Do you support this proposal?</p>	<p>Yes</p>
<p>Q14</p> <p>The draft plan proposes to remove 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. Do you support this proposal?</p>	<p>Yes</p>
<p>Q15</p> <p>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. Do you support this proposal or do you have an alternative equitable solution?</p>	<p>Yes, Comments: Receive more water entitlement from interstate.</p>
<p>Q16</p> <p>Do you have any other feedback regarding the proposed ELMA policy?</p>	<p>Respondent skipped this question</p>

Q17

Yes

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#24

COMPLETE

Collector: survey form (Web Link)
Started: Wednesday, December 02, 2020 2:50:45 PM
Last Modified: Wednesday, December 02, 2020 4:48:58 PM
Time Spent: 01:58:13
IP Address: 1.124.111.153

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **Yes**

All submissions will be publically available. Do you want to remain anonymous?

Q2
Please complete your contact details if you want us to respond to your submission (optional).

Name [REDACTED]
Address [REDACTED]
City/Town [REDACTED]
State/Province [REDACTED]
ZIP/Postal Code [REDACTED]
Email Address [REDACTED]
Phone Number [REDACTED]

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

Q6 **Yes**

Have you read any of the information relating to the changes to the draft plan that is published on the landscape board's website or has been sent directly to ELMA licensees?

Q7

The water allocation plan guides the take and use of water from the River Murray prescribed watercourse that aims to meet the following objectives: Provide allocations that contribute to the water needs of water-dependent ecosystems Allocate water in a sustainable and equitable manner between users Promote efficient use of water from the prescribed watercourse Contribute to fulfilling South Australia's obligations under Basin-wide plans and legislation Contribute to the prevention of decline in condition, number and extent of refuge habitats and dependent aquatic biota of floodplains, wetlands, and sites of significance Contribute to the prevention of adverse impacts on water quality Contribute to the prevention of increased soil salinity and acid sulfate soils, and associated land management issue Do you understand the objectives of the water allocation plan?

Yes,

Comments:

Yes & No. With the new optimised rates proposed for our irrigation area which is less than our current rate...it will not be enough water allocation to prevent the increased soil salinity and acid sulfate soils, and associated land management issues from occurring. In fact the water required will be more because the less you water the bigger the cracks the more water that will be required to maintain it.

Q8

Environmental Land Management Allocations (ELMA) are water allocations granted to landholders within the Lower Murray Reclaimed Irrigation Areas (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. Do you support the proposed redistribution of ELMA in the draft plan?

No,

Comments:

It is not fair to penalise us as irrigators that have been maintaining our swamps well with our current rates and using 100% of the ELMA every year to have our rates reduced significantly with the new 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. In our case we always use all our ELMA each year plus a water licence. It seems strange that with their information that our New optimised rate is significantly less than the current rate.

Q9

Under the current water allocation plan, there is a large variation in the ELMA application rates. The scientific review has determined new optimised rates to meet the objectives of ELMA across the Lower Murray River Irrigation Area. 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]. Do you support this proposal?

No,

Comments:

We only support it if we are not disadvantaged in the process!!

Q10

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. Do you support this proposal?

Yes,

Comments:

100% support this!!!

Q11

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. Do you support this proposal?

No,

Comments:

To reduce the area that we irrigate to transition to the new reduced optimised rate would cause all these other issues that the Government is trying to prevent like (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.

Q12

If you were 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. Do you support this proposal?

No,

Comments:

The property would still not be viable in the long term because our new optimised rate is significantly less than the current rate and would not be enough to manage and the maintain the swamps properly.

Q13

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. Do you support this proposal?

Yes,

Comments:

They should have to demonstrate that they are currently using it. People may have the infrastructure and never actually use it.

Q14

The draft plan proposes to remove 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. Do you support this proposal?

No,

Comments:

Elma should stay on the land to encourage others to maintain the swamps.

Q15

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. Do you support this proposal or do you have an alternative equitable solution?

No,

Comments:

The existing ELMA uses should not be disadvantaged when the 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.

Q16

Do you have any other feedback regarding the proposed ELMA policy?

Need to change the terminology to farming the swamps not for environmental purposes only. Farming is the best environmental thing you can do. We do not want to destroy the river, we are here to look after it.

If we sell the property to a none 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 polute 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.

In the current proposal we are on Baseby swamp and we are going to be significantly disadvantaged going from the current rate to the optimised rate in 10 years.

Q17

No

The draft plan proposes rules for drilling wells along the length of the River Murray to minimise potential impacts associated with connected water resources (e.g. drawing more water from the River Murray). The new rules will 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. Do you support these changes?

Q18

Respondent skipped this question

Do you have any other comments?

#25

COMPLETE

Collector: survey form (Web Link)
Started: Wednesday, December 02, 2020 4:47:08 PM
Last Modified: Wednesday, December 02, 2020 4:57:37 PM
Time Spent: 00:10:29
IP Address: 1.143.168.250

Page 1: Proposed amendments to the Water Allocation Plan for the River Murray Prescribed Watercourse

Q1 **No**

All submissions will be publically available. Do you want to remain anonymous?

Q2
Please complete your contact details if you want us to respond to your submission (optional).

Name	██████████
Company	████████████████
Address	████████████████
City/Town	██████████
State/Province	██
ZIP/Postal Code	██
Email Address	████████████████████
Phone Number	██████████

Q3 **Yes**

Are you an ELMA licensee or do you own an ELMA eligible land parcel?

Q4 **Yes**

Are you a River Murray irrigator?

Q5 **Yes**

Have you read the draft Water Allocation Plan for the River Murray Prescribed Watercourse (the draft plan) or viewed the amendments to the draft plan on the landscape board's website?

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Q18

Do you have any other comments?

No

A4630743


Ms Dianne Davidson AM
Chair
Murraylands and Riverland Landscape Board
PO Box 2343
MURRAY BRIDGE SA 5253



Via email: mr.landscapeboard@sa.gov.au

Dear Ms Davidson,

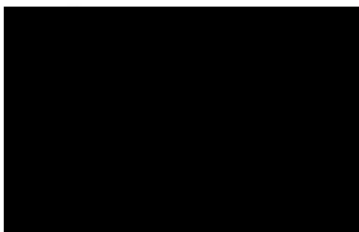
Thank you for the opportunity for to consider the proposed changes to the Water Allocation Plan for the River Murray, including redistribution of Environmental Land Management Allocations across the Lower Murray Reclaimed Irrigation Area.

 has been represented on the ELMA Project Team for a number of years and accordingly, I am advised the department has been adequately consulted on the proposed changes to the Plan.

In a broader context, I look forward to future opportunities to work with you in support of primary producers and regional communities. Our recently released 'Food, Wine and Agribusiness Plan for Growth' has 'Grow Sustainability' as one of its six strategies (<https://www.23billionby2030.com.au/>).

I thank the Murraylands and Riverland Landscape Board for its invitation and wish you well in your consultation process.

Yours sincerely



6/12/2020