



Comments on

South East

**Natural Resources Management Board
Draft
Regional NRM Plan**

by

**SOUTH AUSTRALIAN FARMERS FEDERATION
(SAFF)
NATURAL RESOURCES COMMITTEE**

On

February 2010

CHAIR: Sharon Starick

Level 1, 67 South Terrace
Adelaide SA 5000

CONTACT: Natural Resources Executive Officer
Ms Sandra Keane
Email: skeane@saff.com.au

PO Box 6014
Halifax Street SA 5000
Telephone: (08) 8410 7233
Facsimile: (08) 8211 7303
Website: www.saff.com.au

General Comments:

The South East Natural Resources Management (NRM) Board is congratulated on the work undertaken in preparing and developing its draft Regional NRM Plan.

The Plan has significant amounts of information but could have benefited from being more concise and less repetitious in some areas, eg people and demographics. It is difficult at times to follow the logic from the information regarding assets (Regional Description) to the activities proposed (Business Plan). The Plan would have benefited from greater information around the activities.

Some maps referred to within the appendices were not in the printed copies of the Plan, eg. areas of high biodiversity.

Great context could be provided up front to indicate how it relates to the State NRM Plan.

SAFF has 5 priorities in regarding to water planning and management in the South East that it would like to reiterate. These priorities were originally highlighted in a letter to Minister Weatherill in April 2009:

1. Integrity of water allocations as property rights must be maintained (including holding licences, farm forestry and unused portions of allocations).
2. The whole forest estate meeting their full obligations (interception and extraction) and getting secure property rights in the form of water allocation.
3. The South East NRM Board being able to develop the percentage share concept, in line with National Water Initiative (NWI) expectations (the South East could be a priority project region).
4. Water for the environment must be secured and accounted for volumetrically. The impact on Environmental Protection Zones (EPZ's) must be clearly understood.
5. The South East is severely impacted by the SA/Vic Border Water Sharing Agreement. This agreement is higher than our NRM Act and only recognises water taking licences expressed in ML. Despite this, those wanting to prevent proper sustainable water resources management have been trying to devise plans to create alternative permits, or area based licences to grow forests making them invisible to this agreement. This would significantly impact on our very large meat, seed, wine and dairy irrigation based industries located in the Border Water Management Agreements.

There needs to be a process of management of both surface water and ground water. For example, investigatory work on adding weirs to major drains (eg. Drain M) to maintain water levels and allow better management (eg. Andersons weirs on Mt Bruce and Furner Road).

Wetlands:

The need for more research into wetlands is critical. Quantities of water needed for wetland maintenance must be expressed in an open and transparent manner (eg. volumetric form) and properly accounted for. Where possible, the impact should be shared across the management area and a flexible approach given for those severely impacted on. Where individual landowners assets have been devalued, they should receive full commercial compensation (eg. Marshes/Ellisons).

Volumetric Conversion:

The process as it appears is a flawed one and must be made more transparent. Questions of what, when and how have not been answered. Stakeholders need to know 1. where they start, 2. where they finish and 3. how they relate to their neighbours. There must be equity in this process.

SAFF has always used DWLBC data and has a major concern in some of the NRM Boards questionable figures used for add-ons (eg. flood delivery supplement) compared to a DWLBC report (2008/23, table 6.4, pg83). These differences have the ability to severely distort overall property right allocations (see SAFF produced table (attached) which will be used in more detail in SAFFs Tatiara WAP submission). SAFF is of the view that all add-ons should be of a temporary nature and not a permanent property right. Note: The proposed delivery allowance of 11-18% can not be a tradeable property right in its current form.

The change to volumetric licences outside of the border zone should be implemented immediately and issues related to the border zone agreement made a matter of the highest priority for resolution.

As unbundling of water rights occurs, the integrity of holding licences must be maintained, and anomalies eliminated (eg. a farmer is not able to activate a holding licence in a stressed water management area but it can be used by forestry for offsetting their water). With reductions of over allocation to be implemented, transfer provisions need to be simplified, particularly for temporary transfers. The 16 km sq test change from a square to a circle seems unnecessary and restrictive and not hydrologically justifiable as it is only a measure of recharge and not a measure of the status of the resource.

Water Levy:

The levy process needs to be restructured with the process delivering more equity. The contiguity system delivers really bad outcomes (eg. Gunns only pay \$100 dollars). A structure that reflects a more accurate accounting of use needs to be developed. For example, forestry uses 15% of the land in lower limestone coast area and therefore should pay 15% of land based levy. Forestry uses 30% of water in the same area and there should pay 30% of the water levy.

Specific Comments:

Water affecting activities – SAFF supports the inclusion of plantation forestry as a water affecting activity until such a time that plantation forestry is required to have a water licence. SAFF is strongly supportive of plantation forestry being required to have a water licence within the South East.

Over abundant native species – The plan is relatively silent on the Board's responsibility for the management of overabundant native species, particularly kangaroos. To develop sensible management strategies, the Board needs to work in conjunction with DEH.

Part 1, page 26 – South Australia Farmers Federation – missing the 'n' from Australian

Part 1, page 34 – headings in table different to title heading – heading says table is of 'industry of employment, by age, by sex', but the table is 'Industry % SENRM region and % state'.

Part 1, section 2.3.2, 3rd line – NRN Board – have NRN instead of NRM.

Part 2, MAT D.6 – use stewardship payments as an incentive for landholders to support biodiversity on private lands.

Part 2, A.14 & A.15 – need to include adaptation of landholders and farming systems to climate change.

Impact of volumetric conversion with reductions on different irrigation type allocations

		Tatiara - 7A		
		drip	spray	flood
current area based allocation	opening base area allocation - ha IE	100	100	100
	applicable ML/IE	6.34	6.34	6.34
	current notional volumetric allocation - ML	634	634	634
proposed new allocation	opening base area allocation - ha IE	100	100	100
	proposed applicable - ML/IE	8.1	8.57	8.57
	tradeable allocation - ML	810	857	857
	flood delivery supplement - ML/ha IE	n/a	n/a	6.1
	volume of delivery supplement - ML	n/a	n/a	610
	total notional volumetric allocation - ML	810	857	1467
reduction required	notional allocation to be reduced by	46.80%	46.80%	46.80%
	represents reduction - ML	379	401	687
	residual allocation - ML	431	456	780
residual allocation as share of area based volume (IE)		68.00%	71.90%	123.10%