November 2018

South Australian Murray-Darling Basin
Natural Resources Management Board

Consultation and Alterations Report
Water Allocation Plan for the River Murray
Prescribed Watercourse
Contents

Contents........................................................................................................................................2
1. Introduction..................................................................................................................................3
  1.1 Background .............................................................................................................................3
2. Development of the draft River Murray WAP...........................................................................4
3. Statutory Consultation on the draft River Murray WAP .............................................................6
  3.1 Drop in sessions.......................................................................................................................8
  3.2 Key Stakeholder Meetings.......................................................................................................9
  3.3 Submissions............................................................................................................................10
4. Outcomes from consultation process.......................................................................................10
  4.1 Key issues identified during consultation.............................................................................13
Appendices/Attachments................................................................................................................18
1. Introduction

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

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

This report has been developed in accordance with the requirements of section 79(16) of the *Natural Resources Management Act 2004* (NRM Act).

1.1 Background

The River Murray Prescribed Watercourse encompasses the River Murray channel from the Victorian border down to and including Lake Alexandrina and Lake Albert. The River Murray in South Australia supports internationally significant ecosystems, economies, communities, culture and way of life. The River Murray is SA’s largest reliable surface water resource. The River Murray WAP was first adopted in 2002.

A review of the River Murray WAP was undertaken in 2007. This led to an amendment process, resulting in the development of a draft River Murray WAP that was released for public consultation between November 2014 and February 2015. Further changes to the draft River Murray WAP were made as a result of the consultation process, with an amended River Murray WAP being adopted by the then Minister for Sustainability, Environment and Conservation on 3 October 2017. Significant changes were made to the River Murray WAP through this process, which involved working at length with key stakeholders and the community to develop and finalise the policies included in the plan.

A further amendment process was undertaken to ensure that the River Murray WAP meets Basin Plan and Water Resource Plan requirements, and to progress community-driven changes to policies arising from the 2014-15 consultation process. Like the previous amendment process, the South Australian Murray-Darling Basin Natural Resources Management Board (Board) has worked with the River Murray Advisory Committee (RMAC) and the Department for Environment and Water (DEW) to finalise the draft River Murray WAP.

RMAC is a committee of the Board and represents water users and key stakeholders of the River Murray in South Australia. Members of RMAC provide expertise from a cross section of the community, including irrigation, environmental management, finance, social & community groups and Aboriginal representation. RMAC provided community input and advice throughout the preparation of the draft River Murray WAP.

The Board also worked closely with the South Australian Aboriginal River nations around amendments that reflect Aboriginal nations’ interests and worldviews as part of meeting Basin Plan requirements, and to improve recognition of Aboriginal values and perspectives. Amendments were developed in consultation with the First Peoples of the Murray and Mallee through River Murray and Mallee Aboriginal Corporation (RMMAC), Peramangk through Mannum Aboriginal Community Association Incorporated (MACAI) and Ngarrindjeri through Ngarrindjeri Regional Authority (NRA).
The revised plan builds on from the 2017 plan with Basin Plan requirements being incorporated and existing policies being reviewed to ensure they remain fit for purpose.

The River Murray WAP will form a component of the South Australian River Murray Water Resource Plan, required under the Basin Plan. The 2017 River Murray WAP made progress towards some of the requirements of the Basin Plan; the 2018 amendment process takes into account full requirements of the Basin Plan, with compliance required by 1 July 2019.

The areas updated since the 2017 River Murray WAP include:

**Basin Plan requirements**
- Compliance with Sustainable Diversion Limits (SDLs)
- Addressing growth in use
- Identifying Aboriginal objectives and outcomes relating to management of water resources (SA is doing this through incorporating recognition of Aboriginal water interests into its WAPs)
- Ensuring no net reduction in the protection of planned environmental water
- Having regard to connected water resources

**Community-driven policies**
- Private carryover policy
- Salinity zoning policy
- Water level variability and pumps on backwaters
- Upper Pike River anabranch

## 2. Development of the draft River Murray WAP

The Board worked closely with the community throughout the development of the draft River Murray WAP, through collaboration with RMAC. The Board also engaged with community members directly impacted by policy changes to seek involvement in policy development prior to finalising the draft River Murray WAP for community consultation. Table 1 identifies the policy topic and outlines the consultation activities undertaken during the development of the draft River Murray WAP.
**Table 1 – Policy topics and consultation activities**

<table>
<thead>
<tr>
<th>Policy Topic</th>
<th>Consultation Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sustainable Diversion Limit (SDL) Compliance</td>
<td>Changes to the River Murray WAP to meet Basin Plan requirements were drafted by DEW and discussed with RMAC. RMAC supported the changes and the Board endorsed a new principle setting out the steps to be taken should non-compliance with SDLs become an issue in the future.</td>
</tr>
<tr>
<td>Identifying Aboriginal objectives and outcomes</td>
<td>Objectives and outcomes relating to the management of water resources were identified through individual and joint workshops on-Country with South Australian Aboriginal nations with an interest in the River Murray. The Board worked with The River Murray and Mallee Aboriginal Corporation (RRMAC), Mannum Aboriginal Community Association Incorporated (MACAI) and Ngarrindjeri Regional Authority (NRA) to prepare and update information in the River Murray WAP. Information has been included about Aboriginal water interests, cultural objectives, water needs and engagement as a result of working with Aboriginal nations.</td>
</tr>
<tr>
<td>Planned environmental water (PEW)</td>
<td>Changes to the River Murray WAP to meet Basin Plan requirements were drafted by DEW and discussed with RMAC. RMAC supported the changes which were then endorsed by the Board. The changes identify PEW and protect it from being used for other purposes.</td>
</tr>
<tr>
<td>Private carryover policy</td>
<td>Since adoption of the 2017 Plan, changes were developed with RMAC to improve clarity and to make the private carryover policy easier to understand. Changes to the policy were workshopped at RMAC meetings between October 2017 and June 2018, with an issues and options paper made available to the public on the Natural Resources SAMDB website prior to including a preferred policy position in the draft River Murray WAP. RMAC provided recommendations to the Board which the Board endorsed for inclusion in the draft River Murray WAP.</td>
</tr>
<tr>
<td>Salinity zoning policy</td>
<td>A Review Panel was established to oversee the review of the policy with representation from key stakeholders and technical experts with experience in irrigation and salinity management. The Review Panel met on six occasions between July 2016 and December 2017 and identified issues with the existing policy and identified options. An issues paper and a consultation paper were consulted on broadly with the public via the YourSAy website in April 2017 and October 2017 respectively. The Review Panel assisted with developing changes to the policy, with an updated policy being approved by the Minister in February 2018. This policy was then incorporated into the draft River Murray WAP. Changes to the salinity zoning policy were further consulted on with RMAC and changes were supported.</td>
</tr>
<tr>
<td>Water level variability and pumps on backwaters</td>
<td>Following presentations to RMAC on a new operating regime for the River Murray and based on comments received during the previous consultation exercise, it was timely to re-examine the water level variability and pumps on backwaters policy. RMAC discussed and assisted with development of the policy at meetings between October 2017 to June 2018. RMAC provided recommendations to the Board which the Board endorsed for inclusion in the draft River Murray WAP.</td>
</tr>
</tbody>
</table>
The Board worked with the Pike Community Reference Committee, a group with representation from community and land management groups in the Pike area, to identify issues with water management in the upper Pike River anabranch, and to develop objectives for the policy review. A workshop was held with the Pike community in March 2018 proposing potential management options, with outcomes from the workshop shaping the policy that has been included in the draft River Murray WAP. The policy developed by the Pike community was supported by RMAC and endorsed by the Board for inclusion in the draft River Murray WAP.

A sub-group of RMAC was established to undertake a review of the policy and determine any changes required. The sub-group met on four occasions and identified issues with the current policy. Further work is required and engagement with the affected community is proposed, after the completion of the current draft River Murray WAP. Only minor changes to the ELMA objectives are proposed in the draft River Murray WAP.

3. Statutory Consultation on the draft River Murray WAP

The Board has consulted on the draft River Murray WAP in accordance with section 79 of the NRM Act. The draft River Murray WAP was released for public consultation from 13 July 2018 to 14 September 2018 with the consultation process being guided by a communications strategy. The community was invited to make written submissions on the draft River Murray WAP, to attend a drop in session or make contact with staff to discuss the document. Meetings were also undertaken with key stakeholders to discuss policy changes, to hear initial thoughts on the changes and to encourage the provision of submissions.

A copy of the draft River Murray WAP as released for consultation is provided at Appendix A1.

Media releases were prepared to advise of the release of the draft River Murray WAP for consultation, and also to invite the public to attend the drop in sessions. The media releases are attached at Appendix A2.

An advertisement (Appendix A3) seeking comments on the draft River Murray WAP and inviting the community to attend drop in sessions throughout the regions was placed in print media from 15 July 2018. The advertisement appeared in the following publications:

- The Advertiser
- The Waikerie River News
- Loxton News
- Murray Valley Standard
- Victor Harbor Times
- Murray Pioneer (Renmark)
A number of publications were produced to provide information to the public and key stakeholders. Publications included:

- A postcard detailing how to make a submission on the draft River Murray WAP (Appendix A4)
- An overarching information sheet outlining the preparation and contents of the draft River Murray WAP (Appendix A5)
- Detailed information sheets outlining the policies included in the draft River Murray WAP (Appendix A6)
- A flyer to be sent to licensees reminding them to make a submission on the draft River Murray WAP (Appendix A7)

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

- Detailing relevant information on the Board’s website including a copy of the draft River Murray WAP and copies of all information sheets.
- Providing information on yoursay.sa.gov.au – the SA Government’s online portal for the community to provide input on government decisions. This site provided an online option to make a submission and linked to the Board’s website for further information.
- Hard copies of the draft River Murray WAP for public viewing were made available at Board offices.
- A flyer was sent to all 3500 licensees advising of the consultation process, how to make a submission and where to find out more (Appendix A7).
- An email was sent to key stakeholders to advise of the consultation process, how to make a submission, how to arrange a meeting to talk through the changes and where to find out more.
- Emails or letters were sent to a number of organisations to advise of the consultation process, how to make a submission and where to find out more. These included:
  - Heads of State Government departments
  - The LGA and all Councils in the SAMDB region.
  - Aboriginal representative bodies
  - Environmental Groups
  - Water Supply Companies
  - LAP groups
- A radio interview was undertaken by the Presiding Member of the Board, with ABC Riverland, Renmark.
- An article was included in The Drift, the Board’s community newsletter, advising of consultation and the drop in sessions.
- An article was included in The Flow Report, a weekly update that is provided to those with an interest in River Murray management, advising of consultation and the drop in sessions. Articles were included until the close of consultation.
- A number of articles were included in regional newspapers throughout the consultation period.
- Three meetings were held in the region in the form of drop in sessions, providing the public with the opportunity to meet with Board staff to find out more about the draft River Murray WAP, and provide comment.
Organisations and individuals were invited to make appointments with NR SAMDB staff to discuss the draft River Murray WAP (refer 3.2 Key Stakeholder Meetings below). NR SAMDB staff were also available to answer telephone enquiries throughout the consultation period.

A media release was made two weeks before consultation closed to remind community members to make a submission on the draft WAP.

Information on how to make a submission was included in all communications materials distributed to the public, and in all advertising and media releases. Written submissions were accepted by post, email, at the drop in sessions and via the YourSay website.

A copy of the draft River Murray WAP and consultation material was provided to the Minister for Environment and Water (the Minister) and organisations listed in section 79(6)(a) of the NRM Act.

### 3.1 Drop in sessions

To meet the statutory consultation requirements in relation to the development of the draft River Murray WAP in accordance with section 79(6)(b) of the NRM Act, drop in sessions (public meetings) were held throughout the region, as follows:

- Monday 30 July 2018, 12:30pm-3:30pm, Berri Bowling Club, Berri
- Thursday 2 August 2018, 12:30pm-3:30pm, Imperial Football Club, Murray Bridge
- Friday 3 August 2018, 12:30pm-3:30pm, Langhorne Creek Football Club, Langhorne Creek

The drop in sessions provided the opportunity for community members to find out more about the draft River Murray WAP and other projects underway along the river. Staff from the water allocation planning team and other related projects were available to answer questions and provide further information.

Each session was for a three hour period, with community members invited to drop in between 12.30pm and 3.30pm to seek information and ask questions about River Murray projects. A light lunch and afternoon tea was provided at each of the sessions.

Individual stations were set up for each project/topic, with communications materials at each station and staff available to answer questions. A concierge was located at the door to guide people to a table of interest as they arrived.

An advert advising of the start of the consultation period and promoting the drop in sessions was placed in local papers the week before the event. A media release was also issued by Natural Resources SA Murray-Darling Basin. An article about the drop in sessions was placed in The Drift and The Flow Report, and key stakeholders were sent an email providing details about the sessions.
Overall, the drop in sessions had low attendance, however those who came along stayed for a number of hours and there were good discussions around the room.

While most attendees did not put forward an opinion on the principles in the draft River Murray WAP, questions were asked and materials were taken away. Conversations were often broader than the draft River Murray WAP, with general river management and the implementation of the Basin Plan and water recovery being of key interest. The key concern raised at the Berri drop in session was around the upper Pike River anabranch policy; while the policy itself was supported, changes to principles was flagged to improve clarity and transparency. No major concerns were raised with principles included in the draft River Murray WAP at the other sessions. It was expected that submissions would be made once the community had had time to reflect on the discussions from the sessions.

A summary of each of the drop in sessions is provided at Appendix B.

### 3.2 Key Stakeholder Meetings

**Project** staff were available throughout the consultation period to meet with key stakeholders, either individually or through presentations at committee meetings. Emails were sent to key stakeholders inviting them to contact staff should they want to find out more or discuss any component of the draft River Murray WAP. Staff met with the following groups throughout the consultation period:

- Ngarrindjeri Regional Authority – Board Meeting and Statement of Commitment (SOC) Meeting
- First People’s Directors - Directors Meeting
- SA MLDRIN – Committee Meeting
- MLDRIN – Committee Meeting
- Angas Bremer Water Management Committee Inc – Committee Meeting
- Riverland Local Government Forum – quarterly meeting
- Victor Harbor Council – Council Meeting
- Loxton Waikerie Council – Council Meeting
- Mid Murray Council – Council Meeting
- Coorong District Council – Council Meeting
- Berri Barmera Council – Council Meeting
- Renmark Paringa Council – Council Meeting
- District Council of Murray Bridge – Council Meeting
- Alexandrina Council – Council Meeting
- Elders Barmera – meeting with key staff
- Nature Conservation Society of South Australia – meeting with key staff
- South Australian Murray Irrigators (SAMI) – meeting with chairperson
- CIT – meeting with CE
- RIT – meeting with Presiding Member
These meetings provided the opportunity for specific policies to be discussed, and additional information to be provided based on the organisations interest and needs. Detailed discussions were undertaken and informal feedback was provided during these meetings on the changes to the draft River Murray WAP.

### 3.3 Submissions

A total of 20 written submissions were received. Two written submissions were received through completion of a hard copy survey form, seven were provided through the online survey via YourSAy.gov.au, with the remaining eleven being received via email. A list of the submitters and a copy of each submission is provided at Appendix C1.

A summary of individual comments in each submission is provided at Appendix C2. Comments are grouped by topic. In total, 140 comments have been identified and considered. For further information on the changes made as a result of comments received during consultation, refer to Section 4.2.

The comments received through consultation were varied, and while most related directly to the policies contained in the draft River Murray WAP, many were general in nature or related to other River Murray matters. DEW has assisted in responding to comments which relate to DEW policies or business.

### 4. Outcomes from consultation process

The Board received valuable feedback on the draft River Murray WAP through comments provided at the drop in sessions, through meetings with key stakeholder groups and organisations, and through written submissions.

Figure 1 and Table 2 provide a breakdown of the comments received per topic. Many comments provided general support for changes to the River Murray WAP, with a number raising issues against specific policy areas. The main topics covered in submissions were private carryover (14%), salinity zoning (14%), upper Pike River anabranch (12%), the water allocation framework (12%), planned environmental water (11%), water level variability (10%), sustainable diversion limits (10%) and Aboriginal objectives and outcomes (8%).

Many general comments were received around the management of the river and the health of the river.
Figure 1 – Breakdown of comments per topic

Comments related to WAP by topic

- Aboriginal objectives and outcomes: 8%
- Adelaide Desalination Plant: 3%
- Allocation announcements: 1%
- Artificial Water Bodies: 2%
- MERI: 3%
- Private Carryover: 14%
- Salinity zoning: 14%
- SDLs: 10%
- Upper Pike: 12%
- Water allocation framework: 12%
- Water Level Variability and pumping infrastructure: 10%
- PEW: 11%
Table 2 – Number of comments per topic

<table>
<thead>
<tr>
<th>Topic</th>
<th>No. comments</th>
<th>Support&lt;sup&gt;1&lt;/sup&gt;</th>
<th>Oppose&lt;sup&gt;2&lt;/sup&gt;</th>
<th>Neutral&lt;sup&gt;3&lt;/sup&gt;</th>
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</thead>
<tbody>
<tr>
<td>Aboriginal objectives and outcomes</td>
<td>8</td>
<td>6</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Adelaide Desalination Plant</td>
<td>3</td>
<td>0</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Allocation announcements</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Artificial Water Bodies</td>
<td>2</td>
<td>0</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Background</td>
<td>3</td>
<td>0</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td>Climate change</td>
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<td>0</td>
<td>1</td>
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<tr>
<td>Connected water resources</td>
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</tr>
<tr>
<td>Consultation</td>
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<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Deferred water</td>
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<td>0</td>
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</tr>
<tr>
<td>ELMA</td>
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<td>1</td>
<td>0</td>
<td>0</td>
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<tr>
<td>EWRs</td>
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<td>0</td>
<td>2</td>
</tr>
<tr>
<td>General</td>
<td>12</td>
<td>1</td>
<td>4</td>
<td>7</td>
</tr>
<tr>
<td>Improving how River Murray is managed in SA</td>
<td>7</td>
<td>1</td>
<td>1</td>
<td>5</td>
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<tr>
<td>Legislation</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>MERI</td>
<td>3</td>
<td>0</td>
<td>0</td>
<td>3</td>
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<tr>
<td>Overall</td>
<td>7</td>
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<tr>
<td>PEW</td>
<td>11</td>
<td>9</td>
<td>1</td>
<td>1</td>
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<tr>
<td>Pre-requisite policy measures</td>
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<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Private Carryover</td>
<td>14</td>
<td>6</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Return flows</td>
<td>1</td>
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<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Salinity zoning</td>
<td>14</td>
<td>6</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>SDLs</td>
<td>10</td>
<td>5</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>Upper Pike</td>
<td>12</td>
<td>7</td>
<td>4</td>
<td>1</td>
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<tr>
<td>Water allocation framework</td>
<td>12</td>
<td>6</td>
<td>2</td>
<td>4</td>
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<tr>
<td>Water Level Variability and pumping infrastructure</td>
<td>10</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td>140</td>
<td>63</td>
<td>34</td>
<td>43</td>
</tr>
</tbody>
</table>

<sup>1</sup> The comment provided clear support for the current policy  
<sup>2</sup> The comment disagreed with the current policy, or suggested a significant change to improve the policy  
<sup>3</sup> The comment was either unrelated to the WAP or provided a suggestion which did not indicate support or opposition to the current policy
4.1 Key issues identified during consultation

Table 2 identifies the number of comments received per topic, and from these comments the key issues identified were around the following topics:

- Adelaide Desalination Plant
- Artificial water bodies
- Private carryover
- Salinity zoning
- Upper Pike River anabranch
- Water level variability

The key issues are detailed below.

**Adelaide Desalination Plant**
A total of three submissions were received with comments provided around the use of the Adelaide Desalination Plant (ADP). The key issue raised was around whether principle 15 should include a provision for metropolitan Adelaide’s growth in use, thereby potentially reducing the volume available to other consumptive users in times where water availability is less than full Entitlement of 1,850 GL. It was noted that other sources of water are available for metropolitan Adelaide and innovative solutions should be found for growth in use, rather than an increase in use being at the expense of another sector (i.e. irrigation).

**Artificial Water Bodies**
One submission was received around the artificial water bodies policy, primarily around the inequitable application of the policy (as only one marina is affected) and also due to the impacts of the policy during dry times. It was suggested that policy settings be reconsidered including whether an allocation to replace evaporative losses is the best policy option. It was noted that the current policy settings could impact on the establishment of new marinas in the future.

**Private Carryover**
A total of eleven submissions were received providing comments on the private carryover policy. Most submissions supported the changes made to the River Murray WAP, however a number of issues were raised. All of the submissions supported (or made no comment on) adopting a trigger based on opening allocations, making carryover announcements by mid-April, making the net volume of water traded into South Australia in the late-season available to be allocated for carryover in the next water use year, confirming that carryover will not be reduced after it is granted and accounting for evaporative losses of water held in storage for carryover at the bulk level.

The key issues raised were around the frequency of carryover availability and whether the carryover trigger should be raised from 40 percent to 50 percent, and whether the cap on allocations at 100 percent should be maintained.
Comments were also received around clarification and implementation of the principles in the River Murray WAP, as well as requesting greater transparency around decisions to defer and store water.

Salinity Zoning Policy
A total of nine submissions were received that related to the salinity zoning policy. Of these submissions, six supported the principles, two were neutral and one suggested further amendments to the policy.

The key issues raised were:
- Whether there should be differentiation between the high and low impact zones due to the lower impacts of development in the low zone and the higher cost of developments further from the river;
- That greater transparency is required around SUA conjunctive applications to connect buyers and sellers; and
- That alternative options to salinity management be considered (eg revegetation) to support engineering solutions.

Upper Pike River Anabranch
A total of nine submissions were received providing comments on the upper Pike River anabranch policy. All submissions supported including an extraction limit in the River Murray WAP, however a number of issues were raised and changes suggested to current principles.

The key issues raised were:
- that the extraction limit is too high and should be lowered to be equal to the current level of extraction, especially until all proposed environmental infrastructure is in place;
- that the monitoring trigger could be more conservative, and a review should at least occur every 5 years;
- that daily extractions should be reported by water users; and
- that clarity should be provided around principles, in particular principle 79b, to remove potential for misinterpretation.

Water Level Variability
A total of eight submissions were received providing comments on the water level variability policy. The majority of the submissions supported the changes made to the River Murray WAP, however one main issue was raised. All of the submissions supported (or made no comment on) removing the constraint on pumps on backwaters and anabranches to maintain their existing capacity, maintaining no new pumps on backwaters, and changes that support water level variability projects.

The key issue raised was around the provision that allows new stock and domestic pumps to be approved in the upper Pike River anabranch where there is no alternative access to water. It was suggested that this could increase extraction beyond current levels, with a question over whether this is sustainable.
4.2 Alterations to the draft River Murray WAP

As a result of the consultation process, all comments requesting changes to information in the draft River Murray WAP have been considered by the Board. A number of changes have been recommended to the draft River Murray WAP by the Board as a result of the review of comments. All changes and the reasons behind each change are detailed at Appendix C3.

A number of changes are to provide additional information in background sections and don't affect the implementation of policies. The changes to address the key issues raised, through amendments to principles and how policies are proposed to operate, are set out in this section. Not all comments resulted in a change being made, and the reasons for this are set out below.

The draft River Murray WAP has been revised to reflect the recommended changes; Appendix C4 contains a version of the draft River Murray WAP showing these amendments as track changes, and Appendix C5 contains a version of the draft River Murray WAP incorporating these changes.

In addition, many comments were of a general nature, or were not directly related to the requirements of a water allocation plan. These have been noted and a response prepared, but no change has resulted. The comments have been useful to indicate the concerns within the community around the use of the River Murray, and where applicable have been provided to relevant areas within DEW for information.

Adelaide Desalination Plant

The Board reviewed the comments related to the use of the ADP and considered whether to remove the provision for metropolitan Adelaide's growth in use. The Board agreed to change the principle to remove the provision for metropolitan Adelaide's growth in use as this reflects the community views that were heard during consultation. The Board also agreed that supporting the regional community through dry times, by making an additional 50GL available to water users, would best support economic outcomes for the SA Murray-Darling Basin region and South Australia more broadly. This decision also reflects that metropolitan Adelaide has other sources of water available to access during dry times. The Board noted that it is ultimately the Minister's decision around metropolitan Adelaide's growth in use and whether an allowance should be included in the WAP.

Artificial Water Bodies

In reviewing the comments provided on the artificial water bodies policy, the Board considered the following objectives in regards to changes to the policy:

- Support regional economic development by minimising business costs
- Avoid third party impacts (to other entitlement holders)
- Minimise the impacts to the environment
- Ensure consistency with the requirements of the NRM Act and Water Act/Basin Plan

The Board agreed that the policy shouldn't hinder development in the region, and that new marinas would have social, economic and environmental benefits. It was also noted that all businesses that use water are impacted by increasing costs of water, and equity between water using businesses is important.
The Board also agreed that a policy to account for the water taken by artificial water bodies is required, as per any other business taking water from the River Murray for commercial purposes. The construction of the water body increases losses from the river and these need to be accounted for as part of South Australia's Entitlement.

The Board has revisited how the allocation for artificial water bodies is determined, and agreed to use a mean (50th percentile) evaporation rate rather than a worst case (90th percentile) evaporation rate. As evaporation varies along the length of the river separate evaporation rates have been determined for above and below Lock 1.

The Board also noted that the Minister has powers under the NRM Act to assist operators of artificial water bodies through drought, should this be deemed preferable to support the continued development of marinas.

Changes to the artificial water bodies principles are detailed at Appendix C3.

Private Carryover
The Board considered the comments provided on the private carryover policy and whether to increase the carryover trigger to 50 percent. The Board agreed that the policy should reflect the objective of being a drought management measure and endorsed maintaining the current trigger of 40 percent. The decision recognises that a lower carryover trigger is likely to reduce the risk of carryover being granted and then spilling, or being granted and then effective allocations being capped. While this option is more conservative than a 50 percent trigger, it means that carryover water is more likely to be in storage when it is most needed for very dry years.

In response to the request to remove the cap on allocations at 100 percent, thereby allowing allocations of up to 120 percent in a water use year, the Board considered the implications and does not propose making a change to the principle. This decision considered the risk to SDL compliance in the longer-term, and the implication of all entitlement holders being potentially affected should action need to be taken to address non-compliance. This supports the objective of maintaining the integrity of entitlements, over carryover allocations.

No changes are proposed to the private carryover principles.

Salinity Zoning Policy
The Board considered the request to provide differential approval timeframes between the low salinity impact zone and the high salinity impact zone and noted the comments provided. In response to the issues raised, the Board supported amending the policy to provide for site use approval volumes to be issued for 60 years in the low salinity impact zone (rather than 30 years as per the high salinity impact zone) to encourage development in this area. The timeframe was proposed as it reflects the longer timeframe for salt to reach the river from the low salinity impact zone, and it provides for up to two crop lifecycles within the approval period.

While a request was made to maintain permanent site use approvals in the low salinity impact zone, this was not recommended as this could put at risk South Australia's salinity management obligations under the Murray-Darling Basin Agreement. It was noted that a review of the salinity zoning policy in the future can revisit the decision based on the status of salinity credits at that time. A review point is included in the draft River Murray
A 60 year approval in the meantime will provide some concession to prioritise irrigation development in the low salinity impact zone.

Changes to the salinity zoning principles are detailed at Appendix C3.

**Upper Pike River anabranch**
The Board considered the issues raised and in relation to the request to lower the extraction limit to current levels of extraction, supported leaving the extraction limit as per the draft River Murray WAP. This was because the policy was developed in collaboration with the Pike community and was broadly supported. While it is recognised that there is still environmental infrastructure complimentary to the regulators yet to be constructed, there is protection via the monitoring trigger – a review will be undertaken before extraction reaches the upper extraction limit and if detrimental impacts are identified due to extractions, action can be taken at that time.

In regards to lowering the monitoring trigger, the Board did not recommend this suggestion, however did recommend including a 5 year review point. The monitoring trigger is considered suitable as water use has remained steady for the last few years and it is considered low risk that the current monitoring trigger will be reached in a short timeframe. If the trigger isn’t reached within 5 years, including this review point will provide the opportunity to check in on the policy and review monitoring and water use data at this time.

The Board supported providing clarity around principles to reduce the chance of misinterpretation. Principles have been revised and examples have been included to explain principle 79b. The intent of the policies has been maintained.

In regards to requiring daily meter readings from water users taking water from the upper Pike River anabranch, the WAP already facilitates this should it be required. While daily meter readings would be useful to monitor extractions and ensure that ecological triggers are not being breached, it is not currently feasible as infrastructure is not in place to support this. In future, options will be explored through implementation of the policy.

Changes to the upper Pike River anabranch principles are detailed at Appendix C3.

**Water Level Variability**
The Board considered the request to remove the principle allowing for the approval of new stock and domestic pumps in the upper Pike River anabranch, in limited circumstances. The Board did not recommend this change as the Pike community supported the principle and, due to the requirement to operate pumps within the water levels set out in the Pike Operational Plan, it is considered low risk that the potential increase in stock and domestic water use will impact on the area. It is also noted that the direction of the policy is to provide greater flexibility to water users while ensuring water users are aware of the responsibility to operate pumps within variable water regimes. Removing the principle would not progress this objective. No changes are proposed to the water level variability principles.
Appendices/Attachments

Appendix A - Consultation Material
A1 – Draft River Murray WAP – consultation version
A2 – Media releases
A3 – Advertisement
A4 – Postcard
A5 – Overarching Information Sheet
A6 – Package of Information Sheets
A7 – Reminder flyer

Appendix B – Public Meetings
B1 – Public meetings summary

Appendix C – Submissions and Board analysis
C1 – List and copies of submissions
C2 – Submission comments per topic
C3 – Summary of recommended amendments to River Murray WAP arising from submissions
C4 - Draft River Murray WAP showing recommended amendments
C5 – Draft River Murray WAP incorporating recommended amendments
Appendix B: Public Meetings

Drop in sessions were scheduled at Berri, Murray Bridge and Langhorne Creek from 12.30pm-3.30pm, allowing the opportunity for members of the community to attend and meet with staff to find out about the changes to the River Murray Water Allocation Plan.

Sharon Starick, Presiding Member of the South Australian Murray-Darling Basin Natural Resources Management Board, oversaw each of these sessions.

Each of the sessions was set up with ‘stations’ for each policy topic, with policy staff available to talk through each of the topics changing in the plan. For each geographic area, staff from other projects of interest to the community also attended. A brief presentation was provided to those interested in hearing a run through of the changes to the water allocation plan.

The water allocation plan topics at each session included:
- General Water Allocation Planning & Water Licensing
- Salinity Zoning Policy
- Water Level Variability and pumping infrastructure
- Private Carryover & the Water Allocation Framework
- Aboriginal Water Interests
- Sustainable Diversion Limits
- Upper Pike River Anabranch (Berri)
- Environmental Land Management Allocations (Murray Bridge and Langhorne Creek)

Other topics included:
- The Basin Plan and Water Resource Plans
- Commonwealth On-Farm Further Irrigation Efficiency Project (COFFIE)
- Riverine Recovery Project (RRP) and South Australian Riverland Floodplain Integrated Infrastructure Project (SARFIIP) (Berri)
- Weir Pool Manipulations (Berri and Murray Bridge)
- Wetlands (Langhorne Creek)
- Barrage Operations Strategy (Langhorne Creek)

A summary of each of the sessions is provided below.
Session 1 - Berri

<table>
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<tr>
<th>Location</th>
<th>Berri Bowling Club, Monday 30 July 2018, 12.30pm – 3.30pm</th>
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<tbody>
<tr>
<td>Attendees</td>
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Summary:
The majority of people attending were interested in the policy to manage extractions from the upper Pike River anabranch. Other attendees were seeking general information and an overview of the changes and how they may impact them. Attendees were either irrigators or key stakeholder representatives.

Discussions around the upper Pike River anabranch were focused on the wording of the principles – clarity was requested as it was raised that principles could be misinterpreted. It was indicated that the intent of the principles is supported, provided that further clarity is given.

Other areas of interest included:
- the impact of water buybacks and what this may mean for water prices in the next drought. Concerns were raised that the price of water could increase significantly now that less water is available for consumptive purposes. In addition, what will be the impact of having more permanent plantings in the ground?
- General concern around the impacts of large new developments upstream of South Australia and how this may impact on water supply to South Australia.
- Support for the pumps on backwaters policy
- Support for the water allocation framework and how it applies in dry times

A number of attendees stayed for up to 2 hours, speaking to a variety of staff and circulating the room. Materials were provided, and one submission was provided on the day. Feedback from attendees was that they appreciated the opportunity to discuss concerns one on one with staff, and have questions answered directly as well as have solutions proposed to the concerns.
Session 2 – Murray Bridge

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<th>Location</th>
<th>Imperial Football Club, Thursday 2 August 2018, 12.30pm – 3.30pm</th>
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Summary:
At this session the majority of attendees were seeking general information and an overview of the changes and how they may impact them or their constituents. Attendees were irrigators and representatives of local and state government.

Discussions at this session were spread across policies and included discussions around:

- Use of the Adelaide Desalination Plant and whether it should be used to support interstate allocations during drought (articles on this topic were in the media that morning)
- Environmental Land Management Allocations (ELMA) and the future process to review this policy
- Artificial water bodies and the impact on existing marina operators
- Support for the Aboriginal content included in the draft plan
- Concern around the impacts of large new developments upstream of South Australia, and how these may impact on water supply to South Australia

Materials were provided, and it is expected that submissions will be received once attendees have had time to read information and think about the changes proposed.

Session 3 – Langhorne Creek

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<th>Location</th>
<th>Langhorne Creek Football Club, Friday 3 August 2018, 12.30pm – 3.30pm</th>
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Summary:
The majority of people attending wanted to find out more about the Water Allocation Plan and how the proposed changes affect them. Attendees covered a range of sectors including irrigators, local government representatives, and those interested generally in water resource management and river health.

Discussions at this session varied and included:

- General discussion around the salinity zoning policy and how it operates along the river
- Variable water level projects in particular below Lock 1 – benefits of a wetting and drying regime around the lake fringe
- Impact of wind on water levels in the Lower Lakes – an issue that needs to be considered in managing the Lower Lakes
- Interest in wetlands management and how licensing of wetlands works in practice
- Concern around activities upstream and compliance issues interstate
- Comfortable with the level of detail around Aboriginal history, objectives and outcomes

Materials were provided, and it is expected that submissions will be received once attendees have had time to read information and think about the changes proposed.