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Sent via email to: Glenn.Shimmin@sa.gov.au

20 April 2011

Dear Glenn,



Conservation
Council SA

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As the peak conservation body for South Australia, representing over 50 of the State's environment and conservation organisations, the Conservation Council of South Australia (Conservation SA) is pleased to make comment on the Draft Limestone Coast Water Allocation Plan Policy Issues Discussion Paper.

The Department For Water (DfW) is to be commended for developing this discussion paper through the interagency Taskforce. Also the establishment of the Reference Group and their subsequent contribution to policy principles in this paper has been significant. Conservation SA appreciated the opportunity to participate in the Reference Group but was unable to identify an appropriate representative in the region. We are now able to contribute a suitable person to represent environmental concerns at subsequent meetings of the reference group in coming months, with the hope that we will be able to identify a permanent nomination.

Conservation SA appreciates that one of the key aims of this Issues paper is to explore options to achieve an equitable and sustainable system of ground water management. However we are concerned that groundwater dependant ecosystems cannot be maintained in an already seriously overallocated system where 10% for the environment is not guaranteed.

In light of the limited quantitative knowledge of how water diversions and extractions affect the environment and other uses, caution is necessary. A cautious approach is the only way to avoid the catastrophic environmental, social and economic consequences of decisions made in relation to the short term, for political expediency, or under pressure from interest groups. Every decision should be able to come with an assurance that it will not lead to a claw-back situation in the future.

With that in mind Conservation SA also has concerns for how the on-going implications of climate change have been factored into this document. Whilst this Draft Issues paper might be leading to a Water Allocation Plan which is reviewed every five years, the longer term impacts of climate change on plausible emissions

scenarios need to be factored into decision making now e.g. activities such as forestry that feature decadal life spans.

Further, potential impacts of climate change on the region have not been fully addressed therefore the precautionary approach must be followed.

Also we do not fully understand how reliant these ecosystems are on groundwater now to accurately prescribe a 10% allocation for the environment let alone to ensure resilience in future climate change scenarios.

Specific comments

Given the acknowledged state of a range of water dependent wetlands and ecosystems in the South East Conservation SA suggests that a more accurate statement in the background to this Issues paper is that '...there are growing signs that that the region **has reached** the limits of sustainable water use' (page 3).

Conservation SA has serious concerns about the environmental consequences of over extraction in key areas in the lower limestone coast, particularly over the last ten years with regards to the reduced rainfall and increased extraction.

Starting Positions for Policy Development

'Decision-making processes should effectively integrate both long-term and short-term economic, environmental and social equity considerations' (pg 5).

If environmental, social and economic factors were on an equal footing, perhaps giving them equal weighting would work. But this is not the case. The environment warrants priority in this Issues paper on two grounds.

Firstly, the environment is the resource base that **underpins** a range of industries in the South-East. It is misguided to think of environmental health as something that can be negotiated; it is a pre-requisite for much of the social and economic activity in the South-East.

Secondly, the environment is not on an equal footing in terms of the degree of decline that needs to be addressed. The South East contains some significant environmental assets including key areas of biodiversity, native vegetation and wetlands. There are a range of indicators that urgent action is needed, not only to halt environmental decline but to actively restore the systems to health.

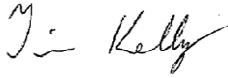
Therefore sustainable management of the water resource must be a standard not a point for compromise.

Conservation SA advocates strongly for environmentally sustainable levels of water provision that protect the integrity and environmental health in the South East.

Conservation SA welcomes the opportunity to comment on water management in the Lower South East and trusts these comments will be duly considered. We also acknowledge the opportunity for future involvement of Conservation SA in the Reference Group.

If you have any questions regarding this contribution please contact Jill Woodlands on 8223-5155 or via email: jill.woodlands@conservationsa.org.au.

Yours sincerely,

A handwritten signature in black ink that reads "Tim Kelly". The signature is written in a cursive style with a large, stylized 'T' and 'K'.

Tim Kelly
Chief Executive