



Draft Business and Operational Plan for the Adelaide and Mount Lofty Ranges Natural Resources Management Region

Thank you for the opportunity to make comments on the proposed amendments to the draft of the Adelaide and Mount Lofty Ranges Natural Resources Management Plan, and particularly the proposed amendments to Volume 2 “Business and Operational Plan.”

This invitation followed on almost immediately after receiving the letter from the Adelaide and Mount Lofty Ranges Natural Resources Management Board about “Establishing an equitable NRM water levy across the Adelaide and Mount Lofty Ranges.”

Livestock SA had previously made a submission strongly opposing the introduction of a NRM water levy for the Western Mount Lofty Ranges. But neither the letter nor the draft Business and Operational Plan makes any mention until the very last page of the appendix to the Plan when it is stated: “*This is a new levy for the Western Mount Lofty Ranges prescribed water resources area.*”

Livestock SA is aware that there were other submissions, letters and petitions also strongly opposing any introduction of a water levy in the Western Mount Lofty Ranges. We wonder how much notice was taken of this consultation process.

At the consultation meeting held at Belair on 16 September 2014 there had been a letter already prepared indicating this water levy was to be introduced. Those present also question whether the comments made opposing any introduction were even considered.

That meeting followed on from another meeting held on 26 November 2013 at McLaren Vale, to discuss figures prepared by consultants employed by the NRM Board on the economics of irrigated beef to assist the Board assess the impact of the introduction of a water levy. These figures clearly showed that producers did not have the financial capacity to pay another levy.

In the appendix to the draft Business and Operational Plan, it is admitted that “*The analysis showed that for small and medium sized farms the levy will not add significantly to operating costs **although it will add to the losses currently experienced by many farmers in the region.***” Why is the NRM Board still going ahead and imposing this levy, when its own figures are showing that people in this area will have difficulty in paying?

The NRM Committee of Primary Producers SA (of which Livestock SA is one of the six members) met on 19 January with Chris Daniels, Chair of the Adelaide and Mount Lofty Ranges NRM Board, and Stephen Smith and Kym Good from the Adelaide and Mount Lofty Ranges Region of DEWNR to discuss the Western Mount Lofty Ranges WAP levy and business plan. At this meeting it was indicated that financial hardship will be considered and the refund of levies could be a possibility. As

part of this, a discussion paper is to be prepared. However, until such time as procedures are in place to handle hardship, imposing a water levy will only make for more administrative nightmares and add further red tape procedures for producers to cope with.

At this meeting a number of points were raised by the Adelaide and Mount Lofty Ranges NRM representatives in justification of the water levy. This included the following:

- *Water levy does not apply to all – it is not on livestock or domestic water users*
When Livestock SA has passed this point onto members we receive feedback such as “they mention that this does not apply to domestic or livestock users, yet I have a dam used purely for domestic and livestock which they have made me licence, this is a cost to me.” Are the water levies in other parts of the Adelaide and Mount Lofty Ranges NRM region currently being incorrectly charged?
- *Bound by legislation to have a water levy*
The sections of the *Natural Resources Management Act 2004* dealing with water levies, particularly Section 101 Declaration of levies, indicate that water levies may be payable. There is no requirement by legislation to have a levy.
- *Have done more consultation than required*
What is the cost of this consultation? If the consultation is being ignored, Livestock SA agrees that this is been a waste of not only funds but also the time spent by all involved in the consultation.

Livestock SA wish to again refer you to our previous submission strongly opposing the introduction of a NRM water levy for the Western Mount Lofty Ranges, and to further argue that hardship provisions need to be in place before any further changes are even considered.

12 February 2015