Section 71 Report for South Australia 2013-14

Surface Water and Groundwater

PURPOSE

This report contributes to South Australia’s requirements under section 71 of the Water Act 2007 (Cth) for non-Murray surface water and all groundwater for 2013-14.

The water resource plan (WRP) areas under the Basin Plan are subdivided into Sustainable Diversion Limit (SDL) resource units for both surface water and groundwater. The information provided in this report is presented at the SDL resource unit level.

In July 2013 the Murray-Darling Basin Authority (MDBA) advised that:

- until additional work is undertaken on the definition of available water for section 71 reporting, no new information (other than that already provided through the Schedule E reporting process) is required; and
- as there are no currently accredited water resource plans setting out the methods for determining annual permitted take, further consultation is required before this matter can be reported on.

For 2013-14, South Australia has not reported on water available under s 71(1)(a) for surface water resources. For groundwater resources, the MDBA have determined that the recharge estimate for each SDL resource unit will represent the water available. In terms of annual permitted take under s 71(1)(b), this has been reported as the volume allocated for licensed purposes and an estimate for non-licensed purposes within those SDL resource units that cover prescribed areas.

WATER RESOURCE MANAGEMENT OVERVIEW FOR THE STATE

Water resource management at a State level is governed by the Natural Resources Management Act 2004 (SA) (NRM Act). Under the NRM Act, the State Natural Resources Management Plan (NRM Plan) is the overarching management plan that covers all geographical areas that are defined by the SDL resource units. Regional NRM Plans for the South Australian Murray-Darling Basin NRM Region, South Australian Arid Lands NRM Region and the South East NRM Region then cover one or more of the SDL resource unit areas. These plans provide general policies for managing the water resources within the areas they cover.

A number of the areas that represent the SDL resource units have been prescribed under the NRM Act and are managed under a Water Allocation Plan (WAP). Each SDL resource unit can therefore be categorised as being either prescribed or unprescribed. This description indicates the extent of water management (including monitoring and compliance) that is currently undertaken at a State level.

The SDL resource unit areas covered by this report are listed below.

Surface Water SDL Resource Units

- South Australian Non-Prescribed Areas (SS10)
- South Australian Murray (SS11)
- Marne-Saunders (SS12)
- Eastern Mount Lofty Ranges (SS13)
Groundwater SDL Resource Units (with aquifer sub-units denoted in italics)

- Angas Bremer (GS1)
  - Quaternary Sediments
  - Murray Group Limestone
- Eastern Mount Lofty Ranges (GS2)
- Mallee (GS3)
  - Pliocene Sands
  - Murray Group Limestone
  - Renmark Group
- Marne Saunders (GS4)
  - Fractured Rock
  - Murray Group Limestone
  - Renmark Group
- Peake, Roby and Sherlock (GS5)
  - Unconfined
  - Confined
- SA Murray (GS6)
- SA Murray Salt Interception Schemes (GS7)

Stock and Domestic

Stock and domestic take is generally unlicensed in South Australia and authorised under section 127 (1) of the NRM Act. All reported values for take (permitted or actual) in this report, other than South Australian Murray (SS11) are represented by an estimated value. In the South Australian River Murray (SS11) take represents the licenced use only.

State wide Authorisations for Prescribed Areas

A number of state wide authorisations under section 128 of the NRM Act authorise the take of water without a licence in prescribed water resource areas for the following purposes:

- underground water in the course of any operation or activity reasonably necessary for, or incidental to the drilling, construction or testing of a hydrocarbon exploration well pursuant to section 11 of the Petroleum Act 2000;
- fire-fighting;
- road making;
- for the purpose of the application of chemicals to non-irrigated crops and non-irrigation pasture and for the control of pest plants and animals;
- up to or equal to 500 KL per annum of surface water from a connected roof area; and
- native title purposes.

The actual take for these uses have not formally been quantified for each SDL resource unit. The volumes of water used for these purposes are variable from year to year and extremely small compared to the licenced and stock and domestic use in these areas.
SURFACE WATER OVERVIEW

Unprescribed Areas
The water resources within these areas are generally considered to be at a low risk from current or future development. Development across these areas is generally low due to a number of factors including low water availability, high evaporation and high groundwater salinity.

South Australian Non-Prescribed Areas (SS10)
The South Australian Non-Prescribed Areas (SS10) is unprescribed and no licences have been issued, allocations made or trade allowed. No metering or estimation of water use is currently undertaken. There are no environmental entitlements held in this SDL resource unit.

Prescribed Areas with a Water Allocation Plan
The water resources within these areas are under development pressure and require more active management. Water licences are issued and WAPs developed to sustainably manage and monitor the available resources. Licensed purposes generally include irrigation, industrial, intensive animal keeping, recreation and town water supply.

The South Australian Murray (SS11) SDL resource unit is managed under the River Murray Prescribed Watercourse WAP, the Marne-Saunders (SS12) SDL resource unit is managed under the Marne-Saunders WAP and the Eastern Mount Lofty Ranges (SS13) SDL resource unit is managed under the Eastern Mount Lofty Ranges WAP.

Permitted take [s 71(1)(b)]

South Australian Murray (SS11)
Permitted take is outlined in clause 7 of Schedule E of the Murray-Darling Basin Agreement 2008 and is in summary:

<table>
<thead>
<tr>
<th>Consumptive Purpose</th>
<th>Maximum Volume</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water supply purposes delivered to Metropolitan Adelaide and associated country areas through the Swan Reach – Stockwell, Mannum-Adelaide and Murray Bridge-Onkaparinga pipelines</td>
<td>650 GL over any five year period</td>
</tr>
<tr>
<td>Lower Murray Swamps irrigation</td>
<td>94.2 GL per year consisting of:</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>72 GL for irrigation, stock and domestic</td>
</tr>
<tr>
<td></td>
<td>22.2 GL for environmental land management</td>
</tr>
<tr>
<td>Country Towns water supply</td>
<td>50 GL per year</td>
</tr>
<tr>
<td>All other purposes</td>
<td>449.9 GL (long-term average annual diversion)</td>
</tr>
</tbody>
</table>

Marne-Saunders (SS12)
Permitted take is reported as the allocated volume, plus the estimated values for take used to determine the baseline diversion limit (BDL)/SDL. The following matters were considered in determining permitted take:

- allocations for take from a watercourse includes 0.0365 GL for carryover;
- allocations for take from runoff dams includes 0.1724 GL for carryover;
- net take by commercial plantations is negligible as established through determination of the BDL and the SDL;
- the estimate for stock and domestic use is from the Marne-Saunders WAP; and
the estimate for farm dam losses is the long-term average (1895 to 2009) that was calculated as part of the method used to determine the Basin Plan BDL and SDL.

Eastern Mount Lofty Ranges (SS13)

Since the previous Section 71 report, a WAP has been adopted for the Eastern Mount Lofty Ranges by the South Australian Minister for Sustainability, Environment and Conservation (December 2013). At the time of preparing this report, over 87% of the required licences have been issued, however permitted take will be available only when all the surface water licences are issued.

Actual take [s 71(1)(c)]

South Australian Murray (SS11)

All water taken in accordance with Schedule E of the Agreement as at 30 June 2009 is licensed and metered. The actual take reported is the metered use for 2013-14.

Marne-Saunders (SS12)

All licensed use is metered and actual take is reported as a combination of this metered use and estimates for non-licensed take (same values as for permitted take).

Some water users extract groundwater and pump it into a surface water dam from where it is extracted for use. It is therefore possible that part or all of a volume recorded against a groundwater allocation may also be subsequently recorded against a surface water allocation. No assessment is currently undertaken to separate this type of conjunctive use unless there is a potential over-use penalty. This may result in an overestimation of water take.

Some non-licensed use may be taken through the same meters for licensed use but no separation of purpose is currently undertaken, unless there is a potential over-use penalty.

Eastern Mount Lofty Ranges (SS13)

Actual take has been determined as outlined below.

An estimate for the 2013-14 water year is provided for all take from farm dams and watercourses. The method used is consistent with that used for both the Eastern Mount Lofty Ranges WAP and for determining the Basin Plan BDL and SDL. The estimate includes stock and domestic take, irrigation, take from commercial farm dams and watercourse extractions. It also includes modelled floodplain diversions in the lower Bremer River. This is determined individually for gauged and ungauged catchments based on:

- surface water modelling for those areas that are gauged and for which surface water models have been developed. The majority of the SDL resource unit, both in terms of area and volume of water take, falls into this category; and
- an estimate of maximum demand for those areas that are ungauged and for which no surface water models have been developed.

Net take from commercial plantations and the estimate for farm dam losses are the long-term averages (1895 to 2009) that were calculated for the Eastern Mount Lofty Ranges WAP and for determining the Basin Plan BDL and SDL.

Water allocations [s 71(1)(d)]

South Australian Murray (SS11)

For the 2013-14 water year, there was a 100% allocation against water access rights in the Water Allocation Plan for the River Murray Prescribed Water Course.
Critical Human Water Needs Carryover

Allocation to SA Water of preserved carryover for Critical Human Water Needs – 172GL. This annual allocation has been made since 2011-12.

Background: During 2008-09 and 2009-10 the Government granted approval for SA Water to purchase seasonal water allocations to be used for critical human water needs in future years. In May 2012, Cabinet approved the water allocations being preserved beyond 2011-12. Use can only occur with Cabinet (South Australia) endorsement. In both 2012-13 and 2013-14 no endorsement was sought.

Marne-Saunders (SS12)

For the 2013-14 water year, there was a 100% allocation against water access rights.

Eastern Mount Lofty Ranges (SS13)

As all licences are not yet issued, it is not possible to report on allocations for 2013-14.

Other decisions that permit water to be taken [s 71(1)(e)]

Allocation decisions are not normally made outside of a WAP, unless specific circumstances occur (such as drought) and / or additional authorisations are made under section 128 of the NRM Act.

South Australian Murray (SS11).

In addition to the state wide authorisations issued pursuant to section 128 of the NRM Act there is an authorisation to create or enlarge an artificial water body with a surface area equal to or less than 190 m² or maintaining the water level of an artificial water body with a surface area equal to or less than 190m² (including to compensate for water lost from the artificial water body through evaporation) in the River Murray Prescribed Watercourse.

Private Carryover

The South Australian Government has a policy for the allocation of private carryover to South Australian River Murray water access entitlement holders which will ultimately be incorporated into the Water Allocation Plan for the River Murray Prescribed Watercourse during the next revision. In 2013-14 private carryover was not granted to South Australian River Murray water access entitlement holders.

Carryover is permitted under the Marne-Saunders WAP and will also be available to licensed users under the Eastern Mount Lofty Ranges WAP once licences are issued.

No other decisions outside of any of the three WAPs permitted water to be taken in 2013-14.

Trade details [s 71(1)(f)]

South Australian Murray (SS11)

All water access entitlements and allocations can be traded within the SDL resource unit and interstate within the Murray-Darling Basin as enabled by Schedule D of the Murray-Darling Basin Agreement 2008 with the exception of entitlements issued for

- water supply purposes delivered to Metropolitan Adelaide and associated country areas through the Swan Reach – Stockwell, Mannum-Adelaide and Murray Bridge-Onkaparinga pipelines; and
- environmental land management in the Lower Murray Swamps.

Marne-Saunders (SS12) and Eastern Mount Lofty Ranges (SS13)

Trade is only permitted within the individual SDL resource units but will only be available to licensed water users under the Eastern Mount Lofty Ranges WAP once licences are issued.
GROUNDWATER OVERVIEW

Partially prescribed or unprescribed areas
The water resources within these areas are generally considered to be at a low risk from current or future development. Development across these areas is generally low due to a number of factors including low water availability, high evaporation and high groundwater salinity.

SA Murray (GS6)
The area is not prescribed so no licences have been issued, allocations made or trade allowed. No metering or estimation of water use is currently undertaken. There are no environmental entitlements in this SDL resource unit.

SA Murray Salt Interception Schemes (GS7)
This SDL resource unit incorporates the River Murray floodplain and adjacent areas, extending west from the South Australian – Victorian border to the east of Morgan. Parts of this SDL resource unit are contained in the Noora Prescribed Wells Area and the Designated Area defined under the Groundwater (Border Agreement) Act 1985 (SA).

The single water access right within the Noora Prescribed Wells Area was made in 2009 and is for extraction from the Pliocene Sands aquifer for the Murtho salt interception scheme. In 2012-13 this allocation was reported as being within the Mallee (Murray Group Limestone) (GS3) SDL resource unit as per the BDL/SDL calculations. However, as the allocation is for extraction from the Pliocene Sands aquifer for the purpose of salt interception it should be included in the SA Murray Salt Interception Schemes SDL resource unit and in 2013-14 has been reported as such.

No other allocations are made and the take reported relates solely to the metered salt interception scheme use for Woolpunda, Waikerie, Sunlands-Qualco, Bookpurnong, Loxton, Pike and Murtho salt interception schemes. With the exception of Sunlands-Qualco all of the above salt interception schemes are managed through the joint venture and the volume pumped from these salt interception schemes is provided annually to the MDBA.

Prescribed Areas with a Water Allocation Plan

Permitted take [s 71(1)(b)]

Angas Bremer (GS1)
Since the previous Section 71 report, a WAP has been adopted for the Eastern Mount Lofty Ranges by the South Australian Minister for Sustainability, Environment and Conservation (December 2013), which incorporates the Angas Bremer WAP and the Angas Bremer (GS1) SDL resource unit.

There is currently no licensed use from the Angas Bremer (Quaternary Sediments). Stock and domestic take is small and has been included with take from the Angas Bremer (Murray Group Limestone) aquifer, as under the Eastern Mount Lofty Ranges WAP there is no separation between the two aquifers for stock and domestic take.

Permitted take is reported as the allocated volume plus the estimated values for take used to determine the BDL/SDL. The following matters were considered in determining permitted take:

- allocation for water access rights includes 1.907121 GL for carryover;
- the estimate for stock and domestic use is taken from the Eastern Mount Lofty Ranges WAP; and
- other permitted take includes aquifer recharge volumes.
Eastern Mount Lofty Ranges (GS2)
This SDL resource unit area is prescribed but implementation of the WAP, including the issue of licences and installation of meters, is still in progress. As such, permitted take from water access rights is not available and the reported permitted take for 2013-14 only includes the estimated take values used to determine the BDL/SDL which are:

- the estimate for stock and domestic use from the Eastern Mount Lofty Ranges WAP; and
- net take by commercial plantations from the Eastern Mount Lofty Ranges WAP.

Mallee (GS3)
There is no permitted take for the Mallee (Pliocene Sands) and Mallee (Renmark Group) as no licences have been issued. There is also no non-licensed take.
Permitted take for the Mallee (Murray Limestone Group) is reported as the sum of the allocated volume, the estimate for stock and domestic use from the Mallee WAP (used to determine the BDL/SDL) and a section 128 authorisation under the NRM Act for up to 42.92 GL to be taken for a 10 year period until 2016-17, with a maximum of 6 GL in any year.

Marne-Saunders (GS4)
Permitted take for both the Marne-Saunders (Fractured Rock) and Marne-Saunders (Murray Group Limestone) aquifers is reported as the allocated volume plus the estimated take values used to determine the BDL/SDL. The following matters are considered:

- allocations for take from the Fractured Rock aquifer includes 0.364 GL of carryover;
- allocations for take from the Murray Group Limestone aquifer includes 0.0133 GL of carryover;
- the estimate for stock and domestic use from both aquifers from the Marne-Saunders WAP; and
- net take by commercial plantations is negligible as established through the development of the Marne-Saunders WAP and the BDL/SDL.

There is no permitted take from the Marne-Saunders (Renmark Group) aquifer. No licences have been issued and any stock and domestic take is very small and has been included in the estimate for the Marne Saunders (Murray Group Limestone) aquifer as per the Marne Saunders WAP. In the WAP, there is no separation between the two aquifers for stock and domestic take.

Peake-Roby-Sherlock (GS5)
Permitted take for both the Peake-Roby-Sherlock (unconfined) and Peake-Roby-Sherlock (confined) aquifers is represented as the allocated volume plus the stock and domestic estimate from the Peake, Roby and Sherlock WAP.

Actual take [s 71(1)(c)]

Angas Bremer (GS1)
All licensed use is metered and actual take is reported as a combination of this metered use and estimates for non-licensed take (same values as for permitted take).
Take relating to aquifer recharge occurs through the same meters as for other licensed take. While in the future it is intended to use a prescribed order of take to account for use against the various allocation purposes, this was not possible for 2013-14.

There was no take from the Angas Bremer (Quaternary Sediments) aquifer.
Eastern Mount Lofty Ranges (GS2)

The SDL resource unit area is prescribed but implementation of the WAP, including the issue of licences and installation of meters, is still in progress. As such, the actual take for 2013-14 only includes the estimated take values used to determine the BDL/SDL.

Mallee (GS3)

All licensed use is metered and actual take is reported as a combination of this metered use and estimates for non-licensed take (same values as for permitted take).

Some non-licensed use may be taken through the same meters for licensed use but no separation of purpose is currently undertaken, unless there is a potential over-use penalty.

Marne-Saunders (GS4)

All licensed use from the Marne-Saunders (Fractured Rock) and (Murray Group Limestone) aquifers is metered and actual take is reported as a combination of this metered use and estimates for non-licensed take (same values as for permitted take).

Some non-licensed use may be taken through the same meters for licensed use but no separation of purpose is currently undertaken, unless there is a potential over-use penalty.

There is no licensed take for the Marne-Saunders (Renmark Group) aquifer. Any stock and domestic take is very small and has been included in the estimate for the Mallee (Murray Group Limestone) aquifer. In the WAP, there is no separation between the two aquifers for stock and domestic take.

Peake-Roby- Sherlock (GS5)

All licensed use is metered and actual take is reported as a combination of this metered use and estimates for non-licensed take (same values as for permitted take).

Some non-licensed use may be taken through the same meters for licensed use but no separation of purpose is currently undertaken, unless there is a potential over-use penalty.

Water allocations [s 71(1)(d)]

For the 2013-14 water year there was a 100% allocation against water access rights.

Other decisions that permit water to be taken [s 71(1)(e)]

Allocation decisions are not normally made outside of a WAP, unless specific circumstances occur (such as drought) and / or additional authorisations are made under Section 128 of the NRM Act.

Mallee (GS3).

In addition to the state wide authorisations issued pursuant to section 128 of the NRM Act there is an authorisation for no more than 42,920 ML over ten years and a maximum of 6,000 ML per annum to be taken from the Murray Group Limestone Aquifer for mineral sands operations in the Hundreds of Mindarie, Chesson, McPherson and Allen.

Carryover is permitted under the Marne-Saunders WAP and Angas-Bremer WAP, and will also be available to licensed users under the Eastern Mount Lofty Ranges WAP (outside the Angas-Bremer SDL resource unit) once licences are issued. No other decisions outside of any WAPs permitted water to be taken in 2013-14.

Trade details [s 71(1)(f)]

Trade is only permitted within the individual SDL resource units but will only be available to licensed water users under the Eastern Mount Lofty Ranges WAP once licences are issued. There are no environmental entitlements held in these SDL resource units.
ENVIRONMENTAL WATER

Held Environmental Water – South Australian Water Access Entitlements

An analysis of all South Australian water access entitlements (WAEs) purchased and/or acquired for environmental purposes has been undertaken. A list of WAEs transferred to HEW licences by year and licence number is contained in “MDBA 30 June 2014 HEW database – SA only – with Cap Valley.xlsx”, under the tab “SA HEW”. This spreadsheet also contains the extract of the ‘MDBA HEW database for South Australia’ provided by Carol Bruce (MDBA) on 7 April 2015.

General points relating to the data presented and how they should be used are as follows:

- The WAE shares identified are regarded as held environmental water (HEW) each year, unless an active decision is made in a given year to trade or use allocations against these entitlements for consumptive purposes.
- Class 9 WAEs are not part of any Cap or Cap valley, nor part of the BDL or accountable under the SDL. Cap valley field for these is stated as N/A – not applicable.
- The appropriate Cap valley for the HEW WAEs has also been inserted into the extract of the ‘MDBA HEW database for South Australia’. However, there were a number of issues in doing this due to the current setup. This potentially makes this database inappropriate as the source of HEW WAE information for making adjustments to annual diversion limits. These are outlined as follows:
  - The South Australian licensing system contains details of all trades / transfers made to and from all South Australian licences and hence is the “point of truth” for when WAEs recovered for the environment are transferred to those HEW licences.
  - The date of transfer explicitly determines when the allocations against those HEW WAEs are available to be used.
    - Bundled licences - until the end of 2008-09, WAEs were available to use in the current year of the transfer to the licence.
    - Unbundled licences – from 2009-10, the transfer of the WAEs does not automatically include the transfer of the allocation against those WAEs. Therefore, the allocations against WAEs are not available until the following year.
  - The above makes the water year in which the trade of WAEs to the HEW licences occurs important. The calculation of annual diversion limits should ensure that any reduction as a result of HEW only occurs once the WAEs (bundled) or allocations against those WAEs (unbundled) are able to be used by the HEW licence holders.
  - The EWR date either needs to reflect the date that the entitlements were transferred to the HEW licence OR there needs to be another column representing the transfer date as well as a column relating to when allocations against those WAEs became available (e.g. activation year).
  - There were issues with entries that accumulated entitlement volumes that were obtained over multiple years and from multiple licences and Cap valleys, in a single entry. This was a particular issue for the CEWH (licence number 153066) HEW (see below).

The information contained in the "SA HEW" tab has been incorporated into the MDBA HEW database extract tab as much as possible. Specific changes or comments are highlighted (different colour for each licence number).
Specific points regarding the identification of HEW by Cap Valley as being either All Other Purposes (AOP) or Lower Murray Swamps (LMS) are detailed below.

- **The Living Murray - SA Held - 160029**
  - The “Date on EWR” field is stated as 30 Jun 09 - water year 2008-09. Many of these entitlements were acquired prior to 2008-09 as indicated in the comments.
  - HEW has generally been identified by the Cap valley of origin. An exception was required for some HEW from the LMS that has been required to be incorporated into the permanent consumptive trade calculations and will therefore be accounted for under the AOP Cap.
  - There was a large volume (4.2 GL) of HEW mistakenly accounted for as being from the LMS, when it was actually acquired from efficiencies in systems in the AOP Cap Valley. It should have a LTCE of 1.0 but needs to be accounted for under the AOP Cap.
  - The above have necessitated a number of changes to the TLM entries.

- **The Living Murray - MDBA Held - 184306**
  - All TLM HEW held by the MDBA was acquired from the AOP Cap Valley.
  - There are a number of date issues, as indicated above.

- **Desalination Plant Agreement - SA held - 213146**
  - All HEW was acquired from the AOP Cap Valley.
  - There are a number of date issues, as indicated above.

- **Commonwealth Environmental Water Holder - 153006**
  - The entries for the CEWH make it very difficult to identify the acquisition of WAEs from particular Cap valleys or licences. The year assigned to the information is also not consistent, e.g. it is not always a year later than acquired. This needs to be adjusted to ensure that the correct volume of HEW is applied in each year (past and future) for the calculation of annual diversion targets. The data provided by SA will enable these changes to be made.
  - Overall, the entries should reflect the WAEs held on licence at the end of each water year, not recovery statements provided by the Commonwealth at six month intervals if this is what is being used. In some cases there are significant delays from the time that a WAE is transferred to licence 153066 before it appears on this HEW database.
  - As none of the entries correspond with the transfers from LMS licences, the WAEs purchased for the LMS were assigned as close to the relevant year as possible.
  - The total HEW for the AOP in any given year in the spreadsheet does not reflect what is was actually held on licence at the end of that year and hence would have been available for use the following year. However, I have not re-aligned this data. It is suggested that the MDBA consider a different set up support calculations of annual diversion limits (including using the proposed scaling methods).
  - Class 1 and 4 have only been purchased from the AOP Cap valley – these have been identified as such. Note correction to entitlement identified as Class 7 but is actually Class 4. There is no Class 7 water on licence number 153066.
  - 2008-09 is the first year that transfers occurred to licence number 153066. In that year, no entitlement was transferred from LMS licences. However, the entitlement volume of 0.7965 GL transferred to the CEWH from AOP licences in 2008-09 is represented under two entries:
0.4265 GL in 2008-09 and 0.37 GL in 2009-10. These should both be 2008-09 with the use of these entitlements from 2008-09.

- In 2009-10, 1.0343 GL was obtained from LMS licences. There is no appropriate entry in this year in the spreadsheet. There is a relevant entry with a date of EWR as 2010-11. It should be 2009-10, with use of allocations against these entitlements from 2010-11. The total volume obtained from AOP licences in 2009-10 is too low.

- In 2010-11, 2.3092 GL was obtained from LMS licences. The relevant entry has date of EWR as 2010-11. The total volume obtained from AOP licences in this year is too low.

- In 2011-12, 0.5594 GL was obtained from LMS licences. The relevant entry has date of EWR as 2011-12. There is a higher volume obtained from AOP licences in this year than actually occurred i.e. some from previous years.

- In 2012-13 there was no entitlement transfer from LMS licences.

- In 2013-14, 0.483 GL was obtained from LMS licences. It is unclear whether there is a relevant entry currently listed under EWRs for 2013-14. A separate entry has been added.

**PROGRESS ON WATER REFORM**

Please refer to South Australia’s submission to the National Water Commission against the milestones set out in Schedule A of the *National Partnership Agreement on Implementing Water Reform in the Murray-Darling Basin*. 