



Government of South Australia

Department for Environment  
and Water

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Brent Williams  
A/Executive Director, Office of Compliance  
Murray-Darling Basin Authority  
[Brent.Williams@mdba.gov.au](mailto:Brent.Williams@mdba.gov.au)

Dear Mr Williams,

Thank you for the opportunity to provide a management response to the Murray-Darling Basin Authority's (MDBA's) findings in the 2019 Murray-Darling Basin Compliance Compact Assurance Report (the Report), on behalf of South Australia (SA). SA is committed to delivering high quality compliance programs, as demonstrated by the significant compliance reforms that have occurred in this state prior to the development of the Murray-Darling Basin Compliance Compact (the Compact) and the substantial progress towards achieving the commitments in the Compact over the past two years.

I note that SA has consistently maintained the view that Basin jurisdictions should be solely assessed against the commitments made in their schedules, rather than in addition to the main body of the Compact. As such, SA's Schedule (Schedule 5 of the Compact) reflects the commitments that SA could reasonably achieve with its current resources and funding.

Despite this, only three of the 26 actions in the Compact and Schedule 5 have been identified as being 'not complete' for SA and I am confident that incomplete actions can be well progressed or completed in 2020. I have taken the opportunity to address these actions, as well as those that SA is progressing below.

**1.2(b) Publish a work program to improve the transparency of water take under entitlements, to be completed by no later than 2025 ('not complete')**: In the original draft Report, this commitment was assessed by the MDBA as 'not complete, but progressing', however, this was later determined to be 'not complete' in the draft Report provided to Murray-Darling Basin Ministerial Council. I understand you advised that when reviewing the original assessment of this commitment, the MDBA found that SA's commitment to publish its exemptions by mid-2020 was not supported by any documentation or evidence. Therefore, the assessment was updated to 'not complete'.

SA was made aware of this after the Report had been provided to the Ministerial Council. As such, SA did not have the opportunity to publish a simple commitment statement on its website which would have rectified the matter. Whilst I am surprised that including a statement in SA's 2019 Compact report does not constitute evidence of a commitment, I would like to note that SA is committed to publishing its exemptions to 1.2(b) by mid-2020.

**3.10 Publish a review of water information requirements and publish a water information improvement program and 3.11 Report annually on the progress of the water improvement program ('not complete'):** SA has long had a number of processes in place to regularly review and improve water information, including proactive and reactive maintenance activities embedded into work programs. Given that SA has these processes in place and the remaining piece of work is likely to be the consolidation of existing information into a public summary document, SA feels that an assessment of 'not complete but progressing' would have been more appropriate for these actions. Notwithstanding this, SA is committed to working with the MDBA to understand what is required in order to complete action 3.10 and 3.11 during 2020.

**3.1, 3.7 and SA 3.8 Publish a meter implementation plan ('not complete, but adequately progressing against extended timeframes'):** During the past year, SA has reviewed and updated its metering framework to require that all new and replacement meters are to comply with the national metering standards. This was a significant achievement as the task included legislative changes, consultation with customers and industry, training and the development of a new meter specification that details technical requirements.


The remaining task is for SA to publish its Metering Improvement Plan, a draft of which has been provided to the MDBA. SA originally committed to publishing this document by the end of the current calendar year in its schedule, to allow time to make any amendments as a result of the 2019 assurance process. A further six months to publish this document was suggested by SA in its 2019 Compact report to allow for the MDBA's feedback to be included, as well as learning from recent national metering workshops.

The MDBA did not raise concerns about the proposed delay in publishing this document until after SA had the opportunity to provide its feedback on the draft Report (i.e. these concerns were first included in the version of the Report that was provided to Ministerial Council). Had SA been made aware of these concerns earlier, the document could have been approved and published so that this commitment could be completed prior to publication of the Report. SA will endeavor to publish this document as soon as possible.

**3.6 A timetable for the installation of telemetry ('not complete, but adequately progressing against extended timeframes'):** SA is committed to exploring the potential benefits of using satellite technology to enhance compliance programs and throughout the Compact process, only committed to *exploring* opportunities to mandate telemetry and would only implement telemetry if funding is secured. SA has and will continue to actively pursuing funding opportunities, but to date has been unsuccessful in several Commonwealth funding bids. One of the funding proposals submitted by SA in 2019 was an application to the Department of Agriculture for \$3 million, through the \$20 million Murray-Darling Basin Hydrometric Network and Remote Sensing Funding Program, in order to progress the implementation of telemetry in SA. The Department of Agriculture decided to increase the initial amount available to provide up to \$35 million for the delivery of four proposals submitted jointly by the MDBA, Queensland and New South Wales. SA takes this to indicate that the Australian Government views the installation of telemetry in SA as a lower priority activity. This is not a view shared by SA.

I understand that you have been in contact with Mr Mike Fuller, General Manager, Water Licensing within the Department for Environment and Water regarding the feedback above. If you wish to discuss any aspect of this response further, please do not hesitate to contact Mr Fuller on telephone: (08) 8463 7015 or email: [mike.fuller@sa.gov.au](mailto:mike.fuller@sa.gov.au).

Yours sincerely

A handwritten signature in black ink, consisting of stylized, overlapping loops and a long horizontal stroke extending to the right.

Ben Bruce

**EXECUTIVE DIRECTOR, WATER AND RIVER MURRAY**