

# Basin Plan Water Resource Plan Requirements Position Statement 3B Double counting

<b>POLICY ISSUE</b>	<b>To what degree must a WRP show a relationship between the various components of the method of determining permitted take and actual take to ensure there is no double counting?</b>
<b>REFERENCES</b>	Basin Plan s1.07, s1.11, s6.12, s10.10–10.15, s10.44, <i>Water Act 2007</i> s71

<b>MDBA POSITION STATEMENT</b>
<p>Each WRP must set out:</p> <ol style="list-style-type: none"> <li>1. how the quantity of water permitted to be taken, and the amount actually taken, for consumptive use by each form of take is to be determined;</li> <li>2. the methods may be different for each form of take, or two or more forms of take may be covered in a single method (e.g. a model) for each SDL resource unit. This is a decision for the state proposing the WRP however all forms of take will need to have methods for determining permitted and actual take;</li> <li>3. there may be more than one method for a form of take, e.g. a proportion of take from farm dam runoff may be modelled while another proportion of the take may be determined through remote sensing;</li> <li>4. that the permitted take and actual take for each form of take are capable of being validly added together. The WRP methods will need to demonstrate that there is no double counting within a form of take if using two or more methods or among the forms of take when determining permitted and actual take (see s1.11); and</li> <li>5. to avoid doubt, although each form of take must be capable of being adding together, there is no requirement for an overall integrated relationship covering all forms of take to be developed as part of this requirement.</li> </ol> <p>The MDBA will seek a demonstration in the supporting evidence to confirm that there has been no double-counting when the methods for determining permitted take and actual take are assessed for accreditation, based on the information supplied to support the methods.</p>

## **Rationale**

A method or methods for determining annually the permitted take and the actual take for each form of take will need to be put forward within a WRP.

The Basin Plan defines the forms of take in s1.07.

<b>MDBA Reference:</b>	D15/15079	<i>Accessed:</i>
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The **form of take** means any of the following forms of take:

- (a) take from a watercourse;
- (b) take from a regulated river;
- (c) take by floodplain harvesting;
- (d) take by runoff dams;
- (e) net take by commercial plantations;
- (f) take from groundwater;
- (g) take under basic rights.

The forms of take may vary from SDL resource unit to SDL resource unit. The WRP needs to set out the method or methods for both permitted take and actual take for *each* form of take. Take for certain forms of take must remain at BDL levels except in certain circumstances (see s10.13).

In setting out the method or methods for determining permitted take and actual take for a particular SDL resource unit, the WRP must clearly describe the form(s) of take being determined to avoid double counting. Section 1.11 of the Basin Plan sets out the obligation to avoid double counting.

<b>MDBA Reference:</b>	D15/15079
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