

# Basin Plan Water Resource Plan Requirements Position Statement 3D Changes to BDL

<b>POLICY ISSUE</b>	<b>What is the process for settling an alternative estimate of a surface water Baseline Diversion Limit (BDL)?</b>
<b>REFERENCES</b>	Basin Plan s7.23 and s10.10

<b>MDBA POSITION STATEMENT</b>
<p>This position statement applies to the development of alternate estimates of BDL for surface water SDLs only. Surface water BDLs are specified in Schedule 3 of the Basin Plan. Volumetric estimates of the BDLs, made by the Authority at the time the Basin Plan was made, are included in Schedule 3 as Notes.</p> <p>If a case emerges that a revision to an estimate of a BDL is desirable the following preliminary checklist will be used to establish the necessity of a revision:</p> <ul style="list-style-type: none"> <li>a) evidence that the alternate estimate is scientifically robust and reflects the best available information;</li> <li>b) evidence that the method is an improvement to the current methods to estimate take under BDL (see method criteria below); and</li> <li>c) that the magnitude of change in the estimate of the BDL is significant enough to warrant consideration and an improvement to the current estimate of BDL.</li> </ul> <p>Subject to meeting each item on this checklist a revision will be progressed and formalised as part of a WRP assessment process.</p> <p>The method for developing an alternate estimate (see point b above) for a BDL will be assessed against the following criteria:</p> <ol style="list-style-type: none"> <li>1. The method meets the definition of the BDL in Schedule 3 of the Basin Plan, including by reflecting the level of development as at 30 June 2009 and all the entitlements and rules that were current in water planning instruments as at June 2009 (or as otherwise specified in Schedule 3).</li> <li>2. The method incorporates all relevant data for the form/s of take.</li> <li>3. The method is sufficiently documented such that estimates of take under the BDL can be reproduced.</li> <li>4. The method is sufficiently documented such that any limitations and uncertainties in the method are known.</li> <li>5. Where the method involves a model to support the demonstration of meeting the SDL (s10.10), the model will be assessed using criteria from position statement 3C.</li> </ol>

<b>MDBA Reference</b>	D15/15117	<i>Accessed:</i>
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Revisions to the BDL estimates specified in Notes in Schedule 3 may only be altered by amending the Basin Plan. Amendments agreed through the WRP process described here will be formally considered for specification in the Basin Plan during the next scheduled review.

If a state proposes to change the BDL estimate, after a WRP is accredited, this will only be formally considered at a scheduled review of the Basin Plan. The MDBA may however, provide for an update of such estimates to be published in annual diversion reporting along with the context/purpose of such estimates.

## **Rationale**

The SDL for an SDL resource unit is a formula:  $SDL = BDL - \text{local reduction amount} - \text{shared reduction amount}$ .

The BDL for an SDL resource unit is the sum of take by the relevant forms of take as per Schedule 3 of the Basin Plan.

The local reduction amount for each unit is set in the Basin Plan as a specific fixed volume (Schedule 2). The shared reduction amount is a default number, calculated under s6.05, which will be applied in the absence of the state nominating how the shared reduction amount will be applied within a zone (s7.23).

The BDL estimates, developed by the MDBA at the time of preparing the Basin Plan and included as Notes in Schedule 3, may be improved by a state. If a state proposes a new estimate for a BDL, and subject to the process outlined above, the MDBA is satisfied with the revised estimate, this will result in an amendment to estimated volume of the SDL (as set out in Notes to Schedule 2). However, it does not change the water recovery target (i.e., the reduction amounts). No amendment to the Basin Plan is required.

States are encouraged to bring forward any case for revising the estimate of a BDL in the 'assist' phase of the WRP accreditation process to ensure a smooth passage through the 'assess' phase.

A revision to a groundwater BDL would require an amendment of the Basin Plan and involves a different process from a revision to surface water BDL estimates. Revisions to groundwater BDLs are not the purpose of this position statement.

A change in the modelling platform from IQQM to SOURCE may trigger a consideration of bringing forward an alternate estimate for BDL. This may require MDBA to assist in providing the supporting information needed to demonstrate the new method. If identified by the state that this is the case there are provisions within the Water Act that allow MDBA to provide this assistance (see s67).

<b>MDBA Reference</b>	D15/15117
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