

Office of the Chief Executive

PDMS Ref: EC19-000871

The Hon. David Littleproud
Minister for Water Resources, Drought, Rural Finance,
Natural Disaster and Emergency Management
PO Box 6022
Parliament House
CANBERRA ACT 2600

Dear Minister

Accreditation of the proposed Eastern Mount Lofty Ranges Water Resource Plan

I am writing to give you the proposed Eastern Mount Lofty Ranges Water Resource Plan ('proposed WRP') submitted by South Australia on 12 August 2019 (**Attachment A**) and the Murray-Darling Basin Authority's recommendation on accreditation of the proposed WRP (**Attachment B**) in accordance with section 63(3)(c) of the *Water Act 2007* (Cth) ('the Act').

I have also provided:

1. a detailed assessment report (**Attachment C**), including the Authority's reasoning; and
2. a copy of the advice the Authority sought from the Murray Lower Darling Rivers Indigenous Nations (MLDRIN) on whether the proposed WRP is consistent with the requirements regarding Indigenous values and uses in Part 14 of Chapter 10 of the *Basin Plan* (Cth) ('Basin Plan') (**Attachment D**).

The Authority has undertaken its assessment of the proposed WRP and recommends you accredit this proposed WRP.

Officers from the MDBA have worked closely with the South Australian government to prepare the plan for accreditation. I would also like to acknowledge the genuine and effective consultation between the South Australian government and MLDRIN in relation to the proposed WRP. MLDRIN's advice to the Authority considers South Australia's engagement with Aboriginal people on the proposed WRP was appropriate (see Attachment D). I am pleased to note that the proposed WRP includes a commitment that

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South Australia will continue this engagement and is progressing work to better incorporate the knowledge and views of Aboriginal people into water planning, including with respect to risks to Aboriginal values and uses.

I understand the Commonwealth Department of Agriculture will be advising you on making your accreditation decision in relation to the proposed WRP in accordance with the Act.

There are some key issues that I would like to bring to your attention as outlined below.

Revised Baseline Diversion Limit (BDL) estimate

The Authority notes that the proposed WRP is based on a revised estimate of the BDL for the surface water resources of the Marne-Saunders SDL Resource Unit (SS12). The revised BDL re-estimate for the Marne-Saunders SDL resource unit is 3.0 GL/yr, an increase of 0.1 GL/yr from the Basin Plan 2012 BDL estimate of 2.9 GL/yr. This is the result of a change from 0 to 0.1 GL/yr for net take by commercial plantations, where information about the area of commercial plantations as at 18 January 2010 (the adoption date of the Marne Saunders WAP) is now available.

Minor boundary changes

There are minor boundary anomalies relating to small differences between the Basin Plan boundaries and the boundaries applying under state water management law. The Authority has assessed the impact of these anomalies and considers that these are consistent with the requirements of the Basin Plan (section 3.04) and notes that it will result in negligible water resource management issues.

Proportion of take measured to agreed standards

The proposed WRP has not included the proportion of take that is measured in accordance with agreed metering standards (AS4747) as recommitted to in the Basin Compliance Compact. South Australia recognises in the proposed WRP that it does not have this information, and since the Basin Compliance Compact was endorsed has demonstrated recommitment to improved metering by amending its state regulations to ensure all new and replacement meters from 1 July 2019 are in line with the agreed standards. The Authority expects that following accreditation of the proposed WRP and implementation of the state regulations, South Australia's on-going commitment to the Basin Compliance Compact will ensure that information regarding the proportion of take that is measured in accordance with the agreed standard will be available in the future.

Future legislative changes

The South Australian government has recently introduced legislative amendments which, if enacted, would affect key instruments that are included for accreditation. These changes would result in amendments to the Eastern Mount Lofty Ranges WRP that would need to be considered in accordance with s 65 of the Act.

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Implementation of the proposed WRP, including effective compliance arrangements, is of keen interest to the Authority. The MDBA will continue to work closely with the South Australian government to manage compliance against the proposed WRP and ensure it is appropriately implemented.

The Authority looks forward to achieving an important milestone in the implementation of the Basin Plan with you, through your consideration of this proposed WRP.

If you have any questions or require further information about this WRP accreditation package, please contact Dr Marcus Finn, A/g General Manager, Water Resource Plans Branch (marcus.finn@mdba.gov.au or 02 6279 0634) or Dr Peta Derham, A/g Executive Director, Water Resource Planning and Accounting Division (peta.derham@mdba.gov.au or 02 6279 0633).

Yours sincerely



Phillip Glyde

8 October 2019

List of Attachments

- Attachment A:** The proposed WRP
- Attachment B:** The Authority's recommendation on the proposed WRP
- Attachment C:** The assessment report relating to the proposed WRP
- Attachment D:** MLDRIN advice

