

## Comments on the draft Wimmera Mallee Water Resource Plan.

Thank you for the opportunity to provide comment on the draft Wimmera-Mallee Water Resource Plan.

South Australia is in the process of finalising its draft Water Resource Plan for the SA Murray Region for accreditation and has had extensive discussions with the MDBA throughout the development. These discussions and the written advice from the MDBA have given us an improved understanding of what is necessary to get a plan accredited.

Throughout the extensive comments South Australia received from the MDBA there was a common theme which was around explicit statements and detailed referencing – Victoria’s approach to statements addressing Basin Plan will need greater within document referencing, demonstration of controls i.e specific provisions in Victoria’s legislation (even if this is in the supporting information or paraphrased) and more explicit statements against each of the sub section of Chapter 10 provisions. In additions, many of the statements for accreditation need to say “how” – this could be by linking to the relevant explanation in supporting text.

In addition to more explicit referencing and detail, the following list provides some further comments that Victoria may find useful:

1. 1.2.2 – Source based approach - excluding towns, ecological assets, etc, within the boundary that use water from outside the boundary is logical to the extent that the water use will need to be accounted for from another WRP area but there will still need to be an explanation of the connections and why the water of the WRP where the town, asset, etc, is located is not being considered – SA has a similar issue with the Coorong in the SA Murray Region.
2. South Australia is unsure how compliance with SDL can be demonstrated when there is no volume estimated for domestic and stock take – Table 3
3. Figure 3 on page 28 - dot points above the figure – suggest changing to “Tertiary Confined Sand Aquifer (also referred to as the Renmark Group Aquifer)” as the diagram is labelled Renmark Group Aquifer and not the Tertiary Confined Sand Aquifer – also consistent with language in the other 2 dot-points.
4. Page 147 – “due to inherent uncertainties in estimating take of water by runoff dams, it is not currently possible to determine if future growth of runoff dams poses a significant risk.” – The Victorian risk assessment considers the risk of a 4GL increase in interception - What was the risk and what is in place to make sure the risk is managed? South Australia is introducing a farm dam limit across the SA Murray region to demonstrate SDL compliance and to deal with the interception risk – statutory controls rather than monitoring.
5. Section 7.6 – if rules that protect low flows are there to protect breeding cycles and the like, are these not PEW rules?
6. Page 151 – “Given the existing arrangements in Victoria described above, it is not necessary for the Wimmera-Mallee WRP to set out additional rules” – this is an example where the referencing to the existing arrangements needs to be more explicit.
7. The risk assessment outcomes don’t seem to be informing the response to Basin Plan requirements and if they are it isn’t obvious.

8. The approach to deal with Water Quality Management Plan requirements for groundwater (Sec 4.2 on page) is basic, but seem like a reasonable approach.

We would be happy to discuss any of our comments with you in detail. Looking forward to catching up on Monday.

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