Australian Government

MURRAY–DARLING BASIN AUTHORITY

Water Resource Plan assessment report

Proposed South Australian Murray Region Water Resource Plan

December 2018

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Acknowledgement of the Traditional Owners of the Murray–Darling Basin
The Murray−Darling Basin Authority pays respect to the Traditional Owners and their Nations of the Murray−Darling Basin. We acknowledge their deep cultural, social, environmental, spiritual and economic connection to their lands and waters.

The guidance and support received from the Murray Lower Darling Rivers Indigenous Nations, the Northern Basin Aboriginal Nations and our many Traditional Owner friends and colleagues is very much valued and appreciated.

Aboriginal people should be aware that this publication may contain images, names or quotations of deceased persons.

This document forms the report of the Murray-Darling Basin Authority's assessment of South Australia proposed water resource plan for the SA Murray Region WRP area against the requirements of Chapter 10 of the Basin Plan version F2017C00078.

Part 1 of Chapter 10 is a simplified outline of the chapter only and therefore there is no requirement to assess. The Assessment Report presents the assessment of Parts 2 to 14.

Table that outlines which documents were received and considered during the assessment of the proposed WRP, with dates and HPE numbers.

Document title	Date provided to MDBA	HPE References	Abbreviation used in this assessment
South Australian Murray Region Water Resource Plan	13 November 2018	D18/52667	WRP
South Australia Natural Resources Management Act 2004 **4 July 2016**	29 October 2018	D18/52707	NRM Act
Environment Protection Act 1993 **22 June 2017**	29 October 2018	D18/52710	EP Act
Groundwater (Border Agreement) Act 1985 **31 October 2006**	29 October 2018	D18/52714	Border Groundwaters Agreement
Development Act 1993 **18 September 2014**	29 October 2018	D18/52712	Development Act
Environment Protection (Water Quality) Policy 2015 **(Subordinate legislation to the EPA)** **1 January 2016**	29 October 2018	D18/52709	Environment Protection (WQ) Policy
Natural Resources Management (General) Regulations 2005 **1 July 2018**	29 October 2018	D18/52705	NRM (General) Regulations
Natural Resources Management (Financial Provisions) Regulations 2005 **1 July 2018**	29 October 2018	D18/52706	NRM (Financial Provisions) Regulations
Development Regulations 2008 **1 July 2018**	29 October 2018	D18/52713	Development Regulations

Document title	Date provided to MDBA	HPE References	Abbreviation used in this assessment
South Australian Arid Lands Natural Resources Management Board, Regional Natural Resources Management Plan for the SA Arid Lands Natural Resources Management Region, Volume 2, Business and Operational Plan 2017/18 – 2019/20, Appendix 1: Water affecting activities policy	29 October 2018	D18/52694	SAAL NRM Plan
South Australian Murray-Darling Basin Natural Resources Management Plan, Volume A, Strategic Plan	29 October 2018	D18/52765	
South Australian Murray-Darling Basin Regional Natural Resources Management Plan, Volume B, Board Business and Operational Plan 2016/17 – 2018/19 Version 4.0	29 October 2018	D18/52692	SAMDB NRM Plan
Amended South East Natural Resources Management Plan Part 4: NRM Policy February 2010 ***as revised 2017***	29 October 2018	D18/52715 D18/52684	South-East NRM Plan 2017
Water Allocation Plan for the Mallee Prescribed Wells Area (2017)	29 October 2018	D18/52708	Mallee WAP 2017
Water Allocation Plan for the Peake, Roby and Sherlock Prescribed Wells Area (2017)	29 October 2018	D18/52704	PRS WAP 2017
Water Allocation Plan for the River Murray Prescribed Watercourse (2017)	29 October 2018	D18/52703	River Murray WAP
South Australian Murray Region Water Resource Plan Risk Assessment (2017)	29 October 2018	D18/52702	SAMR Risk Assessment
Assessment of the groundwater resources in the non-prescribed areas of the South Australian Murray-Darling Basin **DEWNR Technical Report 2015/09**	29 October 2018	D18/52751	Groundwater report 2015
South Australian Arid Lands Natural Resources Management Board, Regional	29 October 2018	D18/52750	SAAL NRM – Strategic Plan

Document title	Date provided to MDBA	HPE References	Abbreviation used in this assessment
Natural Resources Management Plan for the SA Arid Lands Natural Resources Management Region, Volume 1, Ten Year Strategic Plan			
South Australian Arid Lands Natural Resources Management Board, Regional Natural Resources Management Plan for the SA Arid Lands Natural Resources Management Region, Volume 3, Biodiversity Strategy 2017/18 – 2019/20	29 October 2018	D18/52749	SAAL NRM – Biodiversity Strategy
Transition to Basin Plan Sustainable Diversion Limits for the SA Murray Region Water Resource Plan Area 3 March 2015	29 October 2018	D18/52748	SDL Transition – SA Murray Region
Sustainable Extraction Limits Derived from the Recharge Risk Assessment Method – South Australia CSIRO Report to the MDBA Dec 2010	29 October 2018	D18/52747	SW-GW Connectivity Report
Long-Term Environmental Watering Plan for the South Australian Murray Region Water Resource Plan Area December 2017	29 October 2018	D18/52746	SA Murray Region LTWP
Long-term Environmental Watering Plan for the South Australian River Murray Water Resource Plan Area November 2015	29 October 2018	D18/52745	SA River Murray LTWP
Natural Resources Management (Mallee Prescribed Well Area) Regulations 2005	29 October 2018	D18/52744	Mallee Prescription Notice
Natural Resources Management (Peake, Roby and Sherlock Prescribed Well Area) Regulations 2005	29 October 2018	D18/52763	Peake, Roby and Sherlock Prescription Notice
River Murray Act 2003 **15 December 2008**	29 October 2018	D18/52762	River Murray Act

Document title	Date provided to MDBA	HPE References	Abbreviation used in this assessment
River Murray Act Regulations 2017 **22 August 2017**	29 October 2018	D18/52761	River Murray Act Regulations
South Australia-Department of Environment, Water and Natural Resources Letter re: Baseline Diversion Limit recalculation **3 June 2016**	29 October 2018	D18/52760	SA DEWNR Letter –BDL recalculation
Attachment 1: Baseline Diversion Limit Recalculation Method	29 October 2018	D18/52759	BDL Method
A Comparative Analysis of GIS Dams Data in the SA Murray Region Water Resource Plan Area (SDL unit SS10), South Australia-Department of Environment, Water and Natural Resources Internal Technical Report December 2016	29 October 2018	D18/52758	GIS Dams Data – SA Murray
Farm Dam Volume Estimations from Simple Geometric Relationships DWLBC Report 2004/48	29 October 2018	D18/52757	Farm Dam Estimates Report
Estimation of stock, domestic and other exempt purpose water consumption in the Mallee Prescribed Wells Area DWLBC March 2005	29 October 2018	D18/52756	Mallee Stock and Domestic Estimates
The basis for the River Murray Catchment Plan Farm Dam Volume Limits, Sinclair Knight Merz **20 September 2004**	29 October 2018	D18/52755	SKM Farm Dam limit analysis
Banrock Reason for RAMSAR Listing, May 2014	29 October 2018	D18/52754	
A Long-Term Plan for the Coorong, Lower Lakes & Murray Mouth **June 2010**	29 October 2018	D18/52753	CLLMM Long Term Plan
An analysis of MDBA modelling outputs for the draft Basin Plan: Hydrodynamic modelling of the Coorong and Murray	29 October 2018	D18/52752	MDB Hydrodynamic

Document title	Date provided to MDBA	HPE References	Abbreviation used in this assessment
Mouth March 2012			Modelling CMM
Preliminary assessment of the impacts of water resource development on Burra Creek Catchment, DWLBC Report 2008/01	29 October 2018	D18/52741	Burra Creek assessment
The Water Allocation Plan for the Mallee Prescribed Wells Area, 2012	29 October 2018	D18/52742	Mallee WAP 2012
South Australian Murray-Darling Basin Natural Resources Management Board, Regional NRM Plan 2009	29 October 2018	D18/52736	SAMDB NRM Plan 2009
Water Allocation Plan for the Peake, Roby and Sherlock Prescribed Wells Area, 2011	29 October 2018	D18/52737	PRS WAP 2011
Water Allocation Plan for the Noora Prescribed Wells Area, 2001	29 October 2018	D18/52738	Noora WAP 2001
South Australian Public Health (Wastewater) Regulations 2013 1 July 2017	29 October 2018	D18/52739	Wastewater Regulations
Murray Futures Lower Lakes & Coorong Recovery: Securing the Future, A Long-Term Plan for the Coorong, Lower Lakes and Murray Mouth December 2009	29 October 2018	D18/52740	LTP CLLMM
Mallee PWA – Murrayville WSPA Groundwater Model, DWLBC Report	29 October 2018	D18/52733	Mallee GM
Water Requirements for Sheep and Cattle, Department of Primary Industries June 2014	29 October 2018	D18/52734	
Salinity Tolerance in Irrigated Crops, Department of Primary Industries June 2014	29 October 2018	D18/52735	
South Australian Licensed Water Use Metering Policy, DEWNR, July 2012	29 October 2018	D18/52731	

Document title	Date provided to MDBA	HPE References	Abbreviation used in this assessment
South Australian Licensed Water Use Meter Specification July 2015	29 October 2018	D18/52732	
Assessment of the groundwater resource capacity of the Peake-Roby-Sherlock Prescribed Wells Area, DWLBC Report, 2008 June 2008	29 October 2018	D18/52730	Groundwater Assessment for PRS
Safe Drinking Water Act 2011 1 March 2013	29 October 2018	D18/52729	Safe Drinking Water Act
Water Industry Act 2012 1 July 2016	29 October 2018	D18/52728	Water Industry Act
Water Retail Code – Minor and Intermediate Retailers March 2015	29 October 2018	D18/52727	Water Retail Code
Water Retail Code – Major Retailers January 2013	29 October 2018	D18/52726	Major Retailers Water Code
Aboriginal Heritage Act 1988 17 October 2017	29 October 2018	D18/52725	Aboriginal Heritage Act
Barrage and Water Level Management Policy 22 November 2017	29 October 2018	D18/52767	
Barrage Operating Strategy 22 November 2017	29 October 2018	D18/52768	

Table explaining the abbreviations used throughout this document

Term	Expansion/Explanation of the Term
'connectivity '	The physical features of management zones and the extent that water physically moves between two locations.
APT	Annual Permitted Take
BWS	Basin-wide Environmental Watering Strategy
EWP	Environmental Watering Plan
EWRs	Environmental Watering Requirements
GAB	Great Artesian Basin
GIS	Geographic Information Systems
HEW	Held Environmental Water
LTWP	Long-Term Watering Plan
MDBA	Murray-Darling Basin Authority
MOU	Memorandum of Understanding
NRM	Natural Resources Management
NRM Act	*Natural Resources Management Act 2004* (South Australia)
PEAs	Priority Ecosystem Assets
PEFs	Priority Ecosystem Functions
PEW	Planned Environmental Water
proposed WRP	The WRP drafted and submitted for assessment by States, as per date stipulated on cover page of assessment report.
PRS	Peake-Roby-Sherlock
PRS (confined)	Peake-Roby-Sherlock (confined) (GS5)
PRS (unconfined)	Peake-Roby-Sherlock (unconfined) (GS5)
SA	South Australia
SA Murray Region WRP Area	The geographical area defined by the Basin Plan.
SA Murray Region WRP	All submitted documents of the WRP Package that constitute the WRP for the SA Murray Region.
SAMR	South Australian Murray Region

Term	Expansion/Explanation of the Term
SDL	Sustainable Diversion Limit
SDL Resource Units	Sustainable Diversion Limit Resource Units
The Act	*Water Act 2007 (Cth)*
The Authority	Murray-Darling Basin Authority
WAA permits	Water Affecting Activity permits
WAP	Water Allocation Plan
WQMP	Water Quality Management Plan
WRP	Water Resource Plan

Contents

Overview

1. This Water Resource Plan assessment report summarises the reasons supporting the Murray Darling Basin Authority's recommendation to accredit the proposed South Australian Murray Region water resource plan provided by South Australia ('the proposed WRP').
2. This report includes:
    a. a short outline of the structure of the proposed WRP;
    b. a summary of key issues the proposed WRP presents;
    c. an assessment of the consistency of the proposed WRP with each Chapter of the *Basin Plan 2012* ('the Basin Plan'); and
    d. an assessment of the way in which the proposed WRP addresses each requirement in Chapter 10 of the Basin Plan.

Requirements of the *Water Act 2007* (Cth) ('the Act')

3. Section 54(1) of the Act provides that there is to be a WRP for each water resource plan area and section 55(1) of the Act requires that a WRP must provide for the management of the water resources of the WRP area.
4. The Act requires that a WRP must be consistent with the relevant Basin Plan, including:
    a. section 55(2)(a) of the Act requires that a WRP must be consistent with the requirements for WRPs - these are set out in Chapter 10 of the Basin Plan; and
    b. section 55(2)(b) of the Act requires that a WRP must be consistent with 'any long-term annual diversion limit for the water resources of the WRP area (or for a particular part of those water resources)' - these limits are set by Chapter 6 of the Basin Plan.
5. In considering whether a WRP is consistent with the relevant Basin Plan, the Authority must have regard to the legislative framework within which a proposed WRP operates (section 55(3) of the Act).

Relevant version of the Basin Plan

6. The term 'relevant Basin Plan' is defined as the version of the Basin Plan that the Minister applies in relation to a WRP under section 56(2) (section 55(2) of the Act).
7. The Act provides that the relevant version will be the version of the Basin Plan in effect 2 years before a proposed WRP is given to the Minister under section 63(3) (per Item 1 of the table in section 56(2A) of the Act) or, the version of the Basin Plan which is nominated by a Basin State in writing at the time a proposed WRP is provided (per Item 4 of the table in section 56(2A) of the Act). A version nominated by a Basin State must sit within certain bounds, meaning that the Basin Plan which is nominated must not be one in effect more than 2 years earlier than when the WRP is given.
8. In this case South Australia nominated a version of the Basin Plan for the purposes of section 56(2A).
9. The relevant Basin Plan is version F2017/C00078, registered on 23 January 2017 and ending on 13 November 2017 ('the Basin Plan').

Legislative framework within which the proposed WRP operates

10. Section 55(3) of the Act requires that in determining whether a proposed WRP is consistent with the Basin Plan, regard must be had to the legislative framework within which the WRP operates.

11. The *Natural Resources Management Act 2004* (SA) ('the NRM Act') provides the main legislative framework in South Australia within which the proposed WRP will operate. The NRM Act provides for the protection of South Australia's natural resources, and includes the legislative framework for the development of water management controls. These include:

    a. management of activities that can affect water, for example control of the location and construction of wells and dams or any other infrastructure that collects or diverts water;

    b. control of the taking and use of water through prescription of water resources and a water licensing regime; and

    c. authorisation or restriction of water use through a range of means available to the Minister.

12. The proposed WRP incorporates elements of the NRM Act, and subordinate legislation and regulations made under the NRM Act in order to address various WRP requirements. The relevant subordinate legislation and regulations that form part of the proposed WRP are:

    a. *Natural Resources Management (General) Regulations 2005* (SA)

    b. *Natural Resources Management (Financial Provisions) Regulations 2005* (SA)

    c. Regional Natural Resources Management Plan for the SA Arid Lands Natural Resources Management Region, Volume 2, Business and Operational Plan 2017/18 – 2019/20, Appendix 1: Water affecting activities policy

    d. South Australian Murray-Darling Basin Regional Natural Resources Management Plan, Volume B, Board Business and Operational Plan 2016/17 – 2018/19, version 4.0

    e. Amended South East Natural Resources Management Plan, Part 4: NRM Policy, February 2010 as revised 2017

    f. Water Allocation Plan for the Mallee Prescribed Wells Area (2017)

    g. Water Allocation Plan for the Peake, Roby and Sherlock Prescribed Wells Area (2017), and

    h. Water Allocation Plan for the River Murray Prescribed Watercourse (2017).

13. The *Environment Protection Act 1993* (SA), and the Environment Protection (Water Quality) Policy 2015 made under the Act, are the relevant aspects of South Australia's legislative framework that deal with matters of water quality, and elements of both of these instruments have been used to address WRP requirements relating to water quality.

14. The *Development Act 1993* (SA) and the Development Regulations 2008 made under the Act are relevant aspects of South Australia's legislative framework that deal with planning and regulation of development (including the construction of dams over a certain size), and have been used to address WRP requirements relating to rules for take by runoff dams.

15. The *Groundwater (Border Agreement) Act 1985* (SA), which gives effect to the Border Groundwaters Agreement between South Australia and Victoria, provides for the management

of groundwater adjacent to the border of South Australia and Victoria. Elements of this Act have been used to address WRP requirements relating to limiting take from groundwater.

16. The proposed WRP incorporates provisions of the Acts, regulations and legislative instruments listed in the preceding paragraphs for the purposes of satisfying particular requirements in Chapter 10 of the Basin Plan. The proposed WRP indicates that provisions identified in the proposed WRP should be interpreted consistently with the statutory context within which those provision sit. Accordingly, where such provisions have been put forward for accreditation, the Authority has assessed whether those provisions are consistent with Chapter 10 of the Basin Plan, and the Basin Plan more generally, having regard to the broader statutory context.
17. A number of other elements of South Australia's legislative framework (including Acts, regulations and industry codes) have been referred to in the proposed WRP as supporting information for various WRP requirements. Where references have been included to this material, these parts of the legislative framework have been considered to the extent that they provide supporting information about the way a WRP requirement has been met.

Structure of the proposed WRP

18. The proposed WRP consists of a number of documents.
19. For information, the main document is the South Australian Murray Region Water Resource Plan, which includes accredited text and supporting information. The parts of instruments and texts identified in Table 6 in s 5.2.3 of that document constitute the WRP.

Consultation

20. The proposed WRP contains a description of the consultation undertaken in relation to the proposed WRP. This has included community consultation as contemplated by Part 6 of Chapter 10, consultation with New South Wales and Victoria in satisfaction of the requirement in section 63(2) of the Act and consultation with relevant Indigenous organisations in relation to Part 14 of Chapter 10 of the Basin Plan.

Part 14 - consultation with relevant Indigenous organisations

21. There are several traditional owner and nation groups including representative Aboriginal corporations in the WRP area. The expectation is that a Basin State has undertaken effective and appropriate consultation with all relevant Aboriginal Nation groups in a WRP area during the development of a WRP and has consulted with relevant Indigenous organisations.
22. The Authority sought advice 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 (**Attachment C**). As a result of this process, MLDRIN has recommended that the proposed WRP is consistent with the requirements in that Part.

Consultation with adjacent states

23. Section 63(2) of the Act requires that if a WRP area is adjacent to a WRP area in another Basin state, the proposed WRP must be prepared in consultation with that State. The WRP area is

adjacent to water resource plan areas in New South Wales and Victoria. The MDBA is satisfied that the proposed WRP was prepared in consultation with New South Wales and Victoria. This is demonstrated in the material put forward to meet the requirements in s10.07 and s10.27 of the Basin Plan.

Key issues

Baseline Diversion Limit (BDL) estimate revision

24. The Basin Plan includes estimates of Baseline Diversion Limit (BDL) in each surface water SDL resource unit, which typically reflect a level of development based on water management rules that applied under state water management law in 2009. These estimates may be improved over time as new information on how the rules were implemented in practice becomes available. Changes to BDL estimates do not change demand on resources.
25. For the South Australian Non-Prescribed Areas SDL resource unit (SS10) in the SA Murray Region WRP area, the Basin Plan included an estimate of 3.5GL/year as the baseline diversion limit representing the 2009 level of development for take from run-off dams and watercourses in the area. A BDL re-estimate is about improved knowledge rather than a change to demand or risks to a particular water resource.
26. The revised estimate for the South Australian Non-Prescribed Areas SDL resource unit (SS10) is based on information provided by South Australia which has drawn attention to omissions in relation to the information used by the MDBA to develop the estimate at the time the Basin Plan was made. The MDBA agrees that the information provided supports an improved estimate of the BDL, and is in line with the requirements for changes to BDL estimates outlined in Position Statement 3D – Changes to BDL.
27. In this case, the revision is quite significant and results in a limit of 55.2 GL/year.
28. There is no water recovery planned for this area. The South East Flows Restoration Program has been identified as an SDL Adjustment measure but any adjustment arising from this program is to be attributed to the South Australian River Murray WRP.
29. The revised estimate is based on 2 components. One component is based on sub-catchment limits operating in state water management law as at 30 June 2009. When the Basin Plan was made, the Authority did not take account of dam development limits in place under state water management law at the time. The other component is based on the level of development as at 30 June 2009 for parts of the SDL resource unit where volumetric limits did not apply as at 30 June 2009. In relation to the level of development at 30 June 2009, the original Basin Plan estimate for the BDL did not consider all areas within the SDL resource unit.
30. The Authority has reviewed the comparative analysis of GIS datasets provided by South Australia to support the revised BDL estimate. While noting some limitations of the report, the Authority is satisfied that it provides enough detail in regards to the comparison to be confident South Australia has developed a better data set for estimating take by runoff dams.
31. The Authority has carefully examined the information provided by South Australia in support of the proposed revision and is satisfied that the information is scientifically robust and represents the best available information on which to base the BDL estimate. South Australia has amended state instruments to ensure limits are in place to implement the resulting SDL. The relevant state instruments will be incorporated from accreditation.
32. The proposed WRP sets out that the new data set, Topography Water Bodies dataset Number 902, has been archived by the South Australian Department of Environment and Water

to ensure the data is accessible in the future and will continue to be used to determine the annual permitted take until a better approach is determined.

33. The surface water resources relevant to the majority of the revised BDL estimate are mainly highly ephemeral streams that are located to the north of the River Murray, and in the Murray Mallee area to the east of the River Murray. The surface waters of these areas do not have any significant connections to the River Murray and Lower Lakes. A small portion of South Australia's South East NRM area is also relevant and this includes a narrow strip adjacent to the Coorong. A small amount (1.3GL/year) of the revised BDL estimate applies to this area. In addition, although the Coorong is included in this SDL resource unit, no take is permitted from the Coorong and the revised BDL estimate does not impact on the Coorong.

Managing environmental flows between connected resources and water quality in the Coorong

34. The Coorong and Murray Mouth are part of a site listed under the Ramsar Convention on Wetlands and a priority environmental asset. There is no held environmental water (HEW) in the Coorong and Murray Mouth but this sub-area is highly dependent on HEW received from upstream, via the South Australian River Murray WRP area, to ensure that the environmental watering requirements for this area can be met.

35. The proposed WRP describes the arrangements for coordinating environmental watering between the Coorong and Murray Mouth and the South Australian River Murray WRP area. It also indicates that flows to the Coorong South Lagoon from the South East Flows Restoration project will be appropriately co-ordinated when that project is complete, to take into account the requirements of the Coorong. The South East Flows Restoration project is designed to restore flows to the Coorong to improve water levels and salinity levels. It should be noted that the flows that will be provided through this project will come substantially from the South East NRM area that is outside of the Murray-Darling Basin.

36. In relation to water quality targets applying to the Coorong, the proposed WRP applies the targets specified in Schedule 11 of the Basin Plan. The proposed WRP notes that a recent CSIRO study, "Utilizing the Coorong, Lower Lakes and Murray Mouth Water Quality and Microalgae monitoring data to evaluate indicators for the Ecological Character Description", has found that the targets for fresh-water dependent eco-systems set out in the Basin Plan are inappropriate for the Coorong. However, there is not currently sufficient information to determine alternative targets. The Coorong is an estuarine environment and there are multiple factors impacting on the water quality. The Ecological Character Description relevant to the Coorong is being updated and is expected to provide the basis for more appropriate target values. In addition, water quality and salinity management aspects of the Basin Plan are scheduled for evaluation by the end of 2020. The proposed WRP indicates that if the Basin Plan is amended to improve water quality targets relevant to the Coorong, South Australia will consider the appropriateness of including these revised targets in the SA Murray Region WRP. If the WRP does need to be changed to reflect improved targets, there will be a formal process for consideration and accreditation of amendments to the WRP in accordance with Section 65 of the Act.

37. The Authority is satisfied the approach outlined by South Australia is appropriate for management of the Coorong and Murray Mouth, noting on-going work to improve arrangements as knowledge improves.

Identification of planned environmental water

38. The Authority notes there are two long-term environmental watering plans (LTWP) relevant to the South Australian Murray Region WRP area. The River Murray LTWP covers the Coorong and Murray Mouth sub-area to ensure a co-ordinated approach to the environmental management of the Coorong, Lower Lakes and Murray Mouth asset. The Murray Region LTWP covers the rest of the Murray Region WRP area.

39. For the Coorong and Murray Mouth sub-area, the proposed WRP identifies environmental water entering the region via the South Australian River Murray WRP and from the South East Flows Restoration Program as planned environmental water. This is additional to the PEW identified in the LTWP and is considered an important contribution to the management of this priority environmental asset. The accreditation of the South Australian Murray Region WRP and the South Australian River Murray WRP will trigger a review of the LTWP in accordance with Chapter 8 of the Basin Plan.

40. The proposed WRP identifies planned environmental water consistently with the LTWP for the Murray Region relevant to the management of priority environmental assets and ecosystem functions identified in the northern Mt Lofty Ranges sub-area, and the Peake, Roby, Sherlock groundwater area.

Identification of risks to Aboriginal values and uses

41. The MDBA received a proposed WRP from South Australia on 3 January 2018, which was provided to MLDRIN for review, before it was retracted and a further proposed WRP submitted by South Australia to the MDBA on 13 November 2018.

42. MLDRIN considered the 3 January 2018 proposed WRP did not include adequate consideration of the risks to Aboriginal values and uses; it provided information about future actions that South Australia would take to consider risks to Aboriginal values and uses in water management, but did not address how these risks were considered in the preparation of the WRP.

43. MLDRIN raised concerns about these matters in relation to that 3 January 2018 proposed WRP and South Australia then developed additional information that was included in the 13 November 2018 proposed WRP to address this issue. MLDRIN reviewed this additional information as it was being developed by South Australia and considered it addressed the issue adequately. MLDRIN subsequently provided its final advice to the MDBA to confirm this, before the 13 November 2018 proposed WRP was submitted to the MDBA. As such, MLDRIN was considered to have provided advice on the 13 November 2018 proposed WRP.

Consistency with the Basin Plan

44. If a proposed WRP is consistent with the requirements in Chapter 10 of the Basin Plan, it will generally be consistent with the remaining chapters of the Basin Plan. This position recognises the close connections between the requirements in Chapter 10 and the other parts of the Basin Plan. Despite this, to determine whether the proposed WRP is consistent with all parts of the Basin Plan, the proposed WRP has been assessed against each chapter of the Basin Plan.

Chapter 1 – Introduction

45. This Chapter sets out preliminary matters relating to the Basin Plan, the structure of the Basin Plan, interpretation provisions, including various definitions and construction provisions, and requirements relating to the entering into of implementation obligations.
46. The proposed WRP is consistent with these general provisions.

Chapter 2 – Basin water resources and the context of their use

47. This Chapter sets out a description of the Basin water resources and the context in which those resources are used.
48. The proposed WRP is consistent with this description.

Chapter 3 – Water resource plan areas and water accounting periods

49. This Chapter identifies the particular areas that are to be WRP areas and the periods that are to be the water accounting periods for each of those WRP areas. For s10.02, the proposed WRP identifies the WRP areas and the water resources consistently with this Chapter. The water accounting periods for the proposed WRP align with the water accounting periods in the Basin Plan (i.e. 1 July to 30 June).
50. The proposed WRP is consistent with this Chapter.

Chapter 4 – Identification and management of risks to Basin water resources

51. This Chapter sets out risks to the condition, or continued availability, of Basin water resources and strategies to manage, or address, those risks. For s10.41 of the Basin Plan, the risks identified in the proposed WRP have been identified having regard to the risks identified in s4.02 of the Basin Plan. For s10.43 of the Basin Plan, the proposed WRP has been prepared having regard to the strategies listed in s4.03(3) of the Basin Plan. No guidelines have been prepared for s4.04 of the Basin Plan.
52. The proposed WRP is consistent with this Chapter.

Chapter 5 – Management objectives and outcomes to be achieved by Basin Plan

53. This Chapter sets out the management objectives and outcomes to be achieved by the Basin Plan. The proposed WRP is consistent with these objectives and outcomes. In this respect, it is noted more generally that:

    a. The proposed WRP identifies water dependent ecosystems and ecosystem functions of those systems consistently with Chapter 8 of the Basin Plan. The WRP includes arrangements in relation to these water dependent ecosystems and ecosystem

functions that are consistent with the objectives in s5.03(1) and which contribute to the outcome in s5.03(2).

b. The water quality management plan ('WQM Plan') in the proposed WRP identifies measures and targets for water quality that are consistent with those set out in Chapter 9 of the Basin Plan. The measures and targets in the proposed WRP are therefore consistent with the objective in s5.04(1) and contribute to the outcome in s5.04(2).

c. The proposed WRP demonstrates that the long-term sustainable diversion limits on take will be given effect through the operation of the provisions addressing Part 3 of Chapter 10, which is consistent with Chapter 6 of the Basin Plan. Therefore, the operation of the proposed WRP is also consistent with the objective in s5.05(1) and contributes towards the outcomes in s5.05(2).

d. The objective and outcome for the operation of the SDL adjustment mechanism in s 5.06 is not relevant to this plan as the relevant Basin Plan does not include an adjustment to the SDLs for the SDL resource units that are covered by this plan.

e. The proposed WRP includes provisions relating to water trading which are not inconsistent with the requirements for restrictions on trade set out in Chapter 12 of the Basin Plan. These provisions are therefore consistent with the objectives in s5.07(1) and contribute towards the outcome in s5.07(2).

Chapter 6 – Water that can be taken

54. This Chapter sets out the long-term average sustainable diversion limits for each SDL resource unit, the method for determining compliance with those limits and how risks are allocated.

55. The proposed WRP is consistent with the long-term average sustainable diversion limit that applies to the SDL resource unit of the water resource plan area (section 55(2)(b) of the Act). This is principally because the proposed WRP has met the requirements in Part 3 of Chapter 10 of the Basin Plan, which set out how a WRP must incorporate and apply this limit.

56. In this respect, and as is noted in the context of assessing whether the proposed WRP is consistent with Chapter 10:

    a. the proposed WRP includes a method for s10.10 that has been demonstrated to enable the determination of an annual permitted take which, if applied over the historical climate conditions, meets the long-term average sustainable diversion limits, and

    b. the proposed WRP sets out how the quantity of water actually taken for consumptive use, by each form of take, will be determined at the end of a water accounting period, consistent with s10.15 of the Basin Plan. This generates the annual actual take that is used in the method for SDL compliance under Chapter 6; and

    c. the proposed WRP includes rules for s10.11 that ensure, as far as practicable, that actual take does not exceed permitted take.

57. The Authority has undertaken an assessment of the proposed WRP and is satisfied that there are no reliability impacts of the kind specified in s6.14.

58. Therefore, the Authority considers that the proposed WRP is consistent with Chapter 6 of the Basin Plan.

Chapter 7 – Adjustment of SDLs

59. This Chapter details a process for adjusting the SDLs of certain surface water SDL resource units. The Authority considers that the proposed WRP is consistent with this Chapter.

Chapter 8 – Environmental watering plan

60. This Chapter sets out the environmental watering plan. For s10.26 of the Basin Plan the Authority considers that the proposed WRP is consistent with the environmental watering plan, the Basin-wide environmental watering strategy and contributes to the achievement of the objectives in Part 2 of this Chapter. The Authority is also of the view that for s10.27 of the Basin Plan the proposed WRP provides for the coordination of environmental watering between connected water resources and for s10.28 of the Basin Plan the proposed WRP does not result in a net reduction in the protection of planned environmental water from the protection provided for under State water management law immediately before the commencement of the Basin Plan on 22 November 2012. The Authority notes that the River Murray LTWP does not identify all instances of PEW that are identified in the WRP but that South Australia will update the LTWP in accordance with s 8.22 of the Basin Plan. The Authority considers that the proposed WRP is not inconsistent with Chapter 8 of the Basin Plan.

61. This Chapter sets out the environmental watering plan. The proposed WRP is consistent with the environmental watering plan for s10.26 of the Basin Plan, the Basin-wide environmental watering strategy and contributes to the achievement of the objectives in Part 2 of this Chapter.

62. For s10.27 of the Basin Plan, the proposed WRP provides for the coordination of environmental watering between connected water resources and for s10.28 of the Basin Plan the proposed WRP does not result in a net reduction in the protection of planned environmental water from the protection provided for under State water management law immediately before the commencement of the Basin Plan on 22 November 2012.

Chapter 9 – Water quality and salinity management plan

63. This Chapter sets out the water quality and salinity management plan. This Chapter sets out the key causes of water quality degradation in the Murray-Darling Basin, water quality objectives for Basin water resources and water quality targets.

64. The proposed WRP includes a water quality management plan ('WQM Plan') that is consistent with the requirements in Part 7 of Chapter 10 of the Basin Plan. The WQM Plan identifies:

    a. for s10.30 of the Basin Plan, causes of water quality degradation in the WRP area having regard to the key causes of water quality degradation identified in Part 2 of Chapter 9;

    b. for s10.32 of the Basin Plan, water quality target values that are consistent with the targets in Part 4 of Chapter 9; and

    c. for s10.33 of the Basin Plan, measures that contribute towards the achievement of the objectives in Part 3 of Chapter 9.

65. The proposed WRP is consistent with Chapter 9 of the Basin Plan.

Chapter 10 – Water resource plan requirements

66. The Authority's detailed assessment of how the proposed WRP satisfies the requirements for WRPs of Chapter 10 is contained in the attached South Australian Murray Region WRP assessment report. The Authority considers that the proposed WRP is consistent with Chapter 10 of the Basin Plan.
67. For the reasons which are elaborated on in the detailed assessment below, the proposed WRP is consistent with Chapter 10 of the Basin Plan.
68. Note that s 10.04(4) of the Basin Plan requires that a WRP includes a list that specifies and addresses each requirement as set out in Chapter 10 of the Basin Plan.

Chapter 11 – Critical human water needs

69. This Chapter is only relevant to water resource plans which cover part of the River Murray System, as defined in s86A(3) of the Act.
70. The water resources that are covered by the proposed WRP are not part of the River Murray System. Accordingly, the proposed WRP is not inconsistent with Chapter 11 of the Basin Plan.

Chapter 12 – Water trading rules

71. This Chapter sets out specific rules relating to water trading.
72. This Chapter sets out specific rules relating to water trading. The Authority takes the view that if a proposed WRP is inconsistent with these rules, it will not be possible for the Authority to recommend accreditation of the proposed WRP.
73. The proposed WRP sets out the circumstances in which groundwater trade is permitted consistent with the rules in ss 12.24-26 of Chapter 12 of the Basin Plan. The detailed assessment to support this conclusion is in Part 8 of the assessment report. When assessing the groundwater trade arrangements in the proposed WRP the Authority also considered the rules in ss 12.06-12.15 which ensure the right to trade free of certain restrictions. The Authority did not identify any matters of inconsistency with these rules. As such, the Authority is of the view that the proposed WRP is consistent with this Chapter.
74. The proposed WRP is consistent with this Chapter.

Chapter 13 – Program for monitoring and evaluating the effectiveness of the Basin Plan

75. This Chapter sets out the program for monitoring and evaluating effectiveness of the Basin Plan.
76. The proposed WRP specifies the monitoring of the water resources of the WRP area that will be done to enable South Australia to fulfil its reporting obligations under s13.14 of the Basin Plan.
77. The proposed WRP is consistent with this Chapter.

Part 2 - Identification of water resource plan area and other matters

Section 10.02 – Identification of water resource plan area and water resources

(1) A water resource plan must identify:
  (a) the water resource plan area; and
  (b) the water resources;
 to which it applies.
(2) The water resource plan area must be one of the water resource plan areas described in Part 2 of Chapter 3 and must be identified using the same description of that area as is set out in that Part, with any variations permitted by section 3.04.
(3) The water resources must be those described in Part 2 of Chapter 3 as the water resources of the water resource plan area and must be identified using the same description of those water resources as is set out in that Part.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Verify that (1) the WRP states a valid reference to the applicable geographic name and description (as listed in ss 3.05, 3.06 or 3.07) of the area and water resources.	WRP s 5.2.1	The proposed WRP identifies the water resource plan area and water resources within the area consistently with s 3.07 of the Basin Plan. This satisfies the requirements at s 10.02. The proposed WRP states that the version of the Basin Plan which it is has been developed consistently with is the version F2017C00078. The Authority has assessed the proposed WRP for consistency with the version of the Basin Plan referenced above.	**MET**

Section 10.03 – Identification of SDL resource units and water resources

(1) A water resource plan must identify:
  (a) each SDL resource unit in the water resource plan area; and
  (b) the water resources within each SDL resource unit.
(2) The SDL resource units must be those described in sections 6.02 and 6.03 and Schedules 2 and 4 as the SDL resource units within the water resource plan area, as applicable.
(3) The water resources within each SDL resource unit must be those described in sections 6.02 and 6.03, and Schedules 2 and 4.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Verify that the WRP has valid references to the applicable SDL unit name, geographic extent and description.	WRP s 5.2.2	The proposed WRP identifies each SDL resource unit within the WRP area. The proposed WRP identifies the water resources within each SDL resource unit. The water resources that are identified by the proposed WRP are the relevant water resources as described in s 6.03 and Schedule 4 of the Basin Plan. This satisfies the requirements of s 10.03.	**MET**

Section 10.04– Form of water resource plan

Water resource plan constituted by 2 or more instruments

(1) If a water resource plan is constituted by 2 or more instruments or texts, subsections (2) and (3) apply to it.

Note: Subsection 63(1) of the Act states that a water resource plan may be constituted by 2 or more instruments.

(2) The water resource plan must identify the instruments or texts that constitute the water resource plan.

Note: The same instrument or text may be used for more than one water resource plan.

(3) If an instrument or text applies only to some of the water resources of the water resource plan area, the water resource plan must:

(a) identify the water resources or the parts of the water resources to which the instrument or text applies; and

(b) include an indicative map of the water resources identified in paragraph (a).

Water resource plan to include list of requirements

(4) A water resource plan must include a list that specifies:

(a) each requirement set out in this Chapter; and

(b) the part of the plan that addresses each requirement; and

(c) the parts of the plan that will cease to have effect or are to be reviewed, and the times at which those parts will cease to have effect or are to be reviewed.

Material not forming part of the water resource plan

(5) If a water resource plan is constituted by an instrument or text which contains additional material that is not part of the water resource plan, the water resource plan must identify that material.

Note: See paragraph (d) of the definition of water resource plan in section 4 of the Act.

10.04 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	The WRP index refers to 2 or more instruments or texts	True	WRP s 5.2.3	The proposed WRP states that it is constituted of two or more instruments.	**MET**
	If 'yes' establish that the WRP addresses the requirements in subsection (2) and (3)	True	WRP s 5.2.3	The proposed WRP addresses subsections (2) and (3). See assessment below.	

10.04 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
2	The WRP identifies the instruments or texts that makes up the WRP package	True	WRP s 5.2.3, including Table 6	Table 6 in s 5.2.3 identifies all the instruments and texts that constitute the proposed WRP.	**MET**
3	The WRP includes an instrument or text that operates for or covers only some of the water resources in the WRP area	True	WRP s 5.2.3, including Table 6	Column 3 of Table 6 in s 5.2.3 identifies the water resources to which each instrument applies.	**MET**
	(a) The WRP identifies the water resources or the parts of water resources to which the instrument or text applies	True	WRP s 5.2.1 WRP s 5.2.2 WRP s 5.2.3, including Table 6	Table 6 in s 5.2.3 identifies the water resources or parts of water resources to which the instrument or text applies. In some cases this identification is by reference to all or part of the proposed WRP area, or specific SDL resource units. Together with the indicative maps and the text of ss 5.2.1 and 5.2.2, this is generally sufficient to identify the relevant water resources to which each instrument applies.	
	(b) The WRP includes an indicative map of the water resources identified in letter (a)	Present	WRP, Figures 2, 3, 4, 6 and 7 in ss 2 and 3	Figures 2, 3, 4, 6 and 7 in ss 2 and 3 of the proposed WRP are indicative maps which indicate the location of water resources and parts of water resources within the WRP area. The maps include the boundaries of the WRP area, the SDL resource units, relevant state instruments and regional boundaries.	

10.04 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
4	The WRP has an index that lists all the sections in Chapter 10	True	WRP Table 3, in s 4	Column 1 of Table 3 in s 4 lists all sections of Chapter 10.	**MET**
	The list references the part of the WRP that addresses each Chapter 10 requirement	True	WRP Table 3, in s 4 WRP Table 6 in s 5.2.3 WRP – all sections headed "Accredited text" and referenced in Table 3 in s 4.	Column 2 of Table 3 in s 4 identifies each part of the proposed WRP that addresses each Chapter 10 requirement. Table 6 in s 5.2.3 identifies the instruments and texts (and parts thereof) that are to be accredited. The sections headed "accredited text" under each requirement includes, where relevant, additional information about how each requirement is addressed and reference to the sections of instruments or texts that contribute to addressing the specific requirement. The proposed WRP includes a statement to provide clarity about the interpretation of the parts of state instruments incorporated for accreditation.	
	The list specifies date of cessation or review for each part of the WRP that is subject to a time limit for operation	True	WRP Table 6 in s 5.2.3	Column 4 of Table 6 in s 5.2.3 identifies the date of review or cessation of each instrument or text that constitutes the WRP.	

10.04 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
5	The WRP identifies which parts of instruments and other material that is 'additional material' and excluded from accreditation	True	WRP Table 6 in s 5.2.3	Table 6 in s 5.2.3 lists each instrument or text that constitute the WRP and identifies the parts of each instrument that are excluded from accreditation.	**MET**

Section 10.05 – Regard to other water resources

A water resource plan must:

(a) be prepared having regard to the management and use of any water resources which have a significant hydrological connection to the water resources of the water resource plan area; and

(b) describe the way in which paragraph (a) was complied with.

10.05 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	There are significant hydrological connections between water resources of the WRP area to water resources outside the WRP area	True	WRP s 5.2.4 WRP s 5.2.4.1	Section 5.2.4 describes the water resource connections within the WRP area and the connections to water resources of other WRP areas. The description classifies the nature of connectivity, thus identifying those connections which are significant. Section 5.2.4.1 provides additional detail relating to the nature of the connections as supporting information. Section 5.2.4 indicates that regard was shown to the management and use of connected resources through the risk assessment, through the development of state instruments that constitute the WRP, the limits on take in each aquifer and rules for the management of the trade of water access rights. The proposed WRP includes references to other relevant sections of the proposed WRP	**MET**

10.05 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				where management of connected resources is considered in more detail.	

Section 10.06 – Matters relating to requirements of Chapter

(1) For each matter that this Chapter requires to be dealt with in a water resource plan, the plan must specify the person responsible for the matter.

(2) Without limiting subsection (1), if a water resource plan requires a measure or action to be undertaken, the plan must specify the person responsible for undertaking that measure or action.

Streamlined assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
Verify that a responsible persons is listed for every matter in Chapter 10.	Verified	WRP s 5.2.5, including Table 12	Table 12 and the associated text in s 5.2.5 identifies the person responsible for each matter that is dealt with in the proposed WRP by reference to each section of Chapter 10. In addition, s 5.2.5 notes that the person identified in the table is the responsible person to the extent that another provision of the proposed WRP does not expressly identify another person or entity as responsible for a matter (including a measure or action).	**MET**

Section 10.07 – Consultation to be demonstrated

(1) A water resource plan prepared by a Basin State must contain a description of the consultation in relation to the plan (including in relation to any part of the plan), if any, that was undertaken before the State gave the plan to the Authority under subsection 63(1) of the Act.
Note: A water resource plan prepared by the Authority and adopted under section 69 of the Act is a legislative instrument. The Legislative Instruments Act 2003 requires that the explanatory statements for such plans describe the consultation undertaken in relation to the plans.

(2) If a water resource plan is amended in accordance with section 65 of the Act, the plan must contain a description of the consultation in relation to the amendment, if any, that was undertaken before the relevant Basin State gave the proposed amendment to the Authority under subsection 65(2) of the Act.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Verify that (1) a description of consultation is included in the WRP, and (2) a reference to supporting evidence is provided.	WRP s 5.2.6 WRP Attachment 1	The proposed WRP provides a general description of the consultation that occurred for the relevant documents, policies, legislation, plans and reports. Attachment 1 provides a list of consultation activities undertaken to amend the statutory plans for consistency with the Basin Plan. The description of the consultation is very general for some aspects of the consultation, such as consultation that occurred many years ago, however this assessment considers that this approach is adequate to meet this requirement.	**MET**

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
		Where the consultation relates to other more specific requirements in the Basin Plan further information has been included in the relevant sections of the proposed WRP.	

Part 3 Incorporation and application of long-term annual diversion limit

Section 10.08 – Water access rights must be identified

(1) A water resource plan must identify:

(a) each form of take from each SDL resource unit in the water resource plan area;

(b) any classes of water access rights that apply to the forms of take identified under paragraph (a);

(c) the characteristic of each class of right including, where appropriate, the number of rights and any conditions on the exercise of the rights.

(2) A water resource plan must require a holder of water access right to comply with the conditions of that right.

– Streamlined assessment is not applicable to this section –

10.08 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1(a)	All the forms of take mentioned in Schedule 3 (4 for groundwater resource units) for the SDL resource unit are listed.	True	WRP s 5.3.1, including Table 13 WRP s 5.3.3 WRP s 5.3.6 WRP s 5.5	The Basin Plan establishes the following SDL resource units within the SA Murray Region WRP area: South Australian Non-Prescribed Areas (SS10) Mallee (Pliocene Sands) (GS3) Mallee (Murray Group Limestone) (GS3) Mallee (Renmark Group) (GS3) Peake-Roby-Sherlock (unconfined) (GS5) Peake-Roby-Sherlock (confined) (GS5) SA Murray (GS6) SA Murray Salt Interception Schemes (GS7) Table 13 in s 5.3.1 identifies take by run off dams and take from watercourses as the forms	**MET**

10.08 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				of take applying to SS10, consistently with Schedule 3 of the Basin Plan. Table 13 in s 5.3.1 identifies take from groundwater as the form of take applying to each of the groundwater SDL resource units identified in Schedule 4 for the SA Murray Region WRP area. This approach is consistent with the Basin Plan. This requirement is linked to s 10.10, s 10.15 and Part 5 and the relevant WRP provisions addressing those requirements in ss 5.3.3, 5.3.8 and 5.5, respectively, are consistent with respect to the inclusion of the identified forms of take.	
	Additional forms of take apply to the SDL resource unit	False	WRP s 5.3.1	The proposed WRP has not identified any additional forms of take. Section 5.3.1 includes discussion of the forms of take that are not applicable to each SDL resource unit. This discussion is consistent with the Basin Plan and provides appropriate reasons for not including additional forms of take.	
	Additional forms of take in the SDL resource unit are identified	False	N/A	No additional forms of take have been identified relevant to any SDL resource units within the WRP area.	

10.08 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	Changes to the BDL estimate arising from any additional forms of take are stated	N/A	N/A	There are no changes in the BDL estimate arising from the identification of additional forms of take.	
1(b)	Applicable class(es) of water access rights are identified ('attributed') for each form of take (presence/absence *for each form of take*)	Present	WRP s 5.3.1, including Table 13 WRP Table 6 in s 5.2.3	Section 5.3.1 describes the classes of water access rights that apply under state water management law. The relevant sections of state water management law are incorporated and identified for accreditation in Table 6 in s 5.2.3. Table 13 in s 5.3.1 identifies each class of water access right that applies to each form of take and each SDL resource unit within the SA Murray Region WRP area.	
1(c)	The characteristics of each class of water access right are identified ('attributed') for each form of take (presence/absence *for each form of take*)	Present	WRP s 5.3.1, including Table 13 WRP s 5.3.1.1 WRP s 5.3.4 WRP Table 6 in s 5.2.3	Section 5.3.1 identifies the characteristics that apply to each class of water access right identified for the purposes of s 10.08(1)(b). The relevant sections of state water management law are incorporated and identified for accreditation in Table 6 in s 5.2.3. Table 13 in s 5.3.1 identifies the number of rights and volumes associated with each class of water access right for each form of take at the time the proposed WRP is submitted for accreditation. Section 5.3.4 identifies the rules for take in relation to each form of take and each class of	

10.08 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				water access right that have been identified for the purposes of s 10.08 of the Basin Plan. Additional information regarding the characteristics of water access rights is provided in s 5.3.1.1.	
	It is it appropriate for the WRP to include: (i) the number of rights for each class; (ii) the conditions on exercising rights that apply to each class	True	WRP s 5.3.1, including Table 13 WRP s 5.3.1.1 WRP 5.3.4	As above	
	The characteristics of each class of water access rights includes the number of rights and/or conditions on exercising those rights (presence/absence *for each form of take*)	Present	WRP s 5.3.1, including Table 13 WRP s 5.3.1.1 WRP s 5.3.4 WRP Table 6 in s 5.2.3	As above	
	The rationale for why it is not appropriate has merit	N/A	WRP s 5.3.1, including Table 13	The proposed WRP includes the relevant information, and as such the need to explain why the information is not included is not applicable.	

10.08 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
2	The WRP provision obliges water access right holders to comply with the conditions of a right	True	WRP s 5.3.1 WRP Table 6 in s 5.2.3	Section 5.3.1 provides that a person must comply with the conditions of water access rights and Table 6 in s 5.2.3 incorporates the relevant provisions of the NRM Act which require that a person must comply with the following water access rights: - Licences - General rights to take water - Basic rights - Authorisations.	

Section 10.09 – Identification of planned environmental water and register of held environmental water

(1) A water resource plan must identify the planned environmental water in the water resource plan area and associated rules and arrangements relating to that water.

(2) A water resource plan must provide for the establishment and maintenance of a register, to be published on a website specified by the plan, of held environmental water for the water resource plan area which records:

(a) the characteristics of held environmental water in the water resource plan area (for example, quantity, reliability, security class, licence type, limitations); and

(b) who holds that water.

(3) Subsection (2) is satisfied if the plan identifies a register of held environmental water which records the matters required by subsection (2) and is published on a website.

10.09 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
1	PEW is identified in the WRP area	True	WRP s 5.3.2 WRP s 5.3.2.1 WRP Table 6 in s 5.2.3	Section 5.3.2 of the proposed WRP identifies three instances of PEW for the proposed SA Murray Region WRP, and additional information is provided in s 5.3.2.1. The instances are: - Northern Mount Lofty Ranges – dam capacity limits put in place to protect certain environmental assets - Coorong – provisions in NRM plans which prohibit permits being issued in ecologically sensitive areas - Peake-Roby-Sherlock – buffer zones around saline wetlands.	**MET**

10.09 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				The relevant instruments which include arrangements and rules relating to PEW are the SAMDB NRM Plan and the Peake, Roby and Sherlock WAP. The relevant sections of these instruments are incorporated for accreditation in Table 6 in s 5.2.3.	
	There is no PEW in the WRP area, and the supporting evidence validates the claim	False	WRP s 5.3.2 WRP s 5.3.2.1	PEW is identified for the area as indicated above.	
	The identified PEW is PEW as defined in the Water Act (exhaustive - *all* PEW is identified)	True	WRP s 5.3.2 WRP s 5.3.2.1 WRP Table 6 in s 5.2.3 WRP s 5.2.4 WRP s 5.3.1	This assessment finds that the instances of PEW identified for the SA Murray Region are identified consistently with the definition in s 6 of the Water Act. Section 5.3.2 of the proposed WRP refers to Table 2 of the SA Murray Region LTWP that considers various rules in state instruments that apply within the region, setting out how these matters relate to the components of the definition of PEW. This consideration does not include the Coorong, which is addressed through the SA River Murray LTWP. Section 5.3.2.1 provides additional information about the process undertaken to identify PEW in	

10.09 subsection	Detailed assessment tests	Where this was observed in the WRP package	Justification	Assessment outcome
			the WRP area consistently with the definition in s 6 in the Water Act. ***Dam limits and policies*** Section 5.3.2 of the proposed WRP states that the dam limits that have been included in the regional NRM plans solely for the purpose of giving effect to the SDL are not considered PEW rules. Table 2 of the SA Murray Region LTWP provides further rationale for this conclusion indicating that these rules do not preserve the surface water resources of SS10 for the purpose of achieving environmental outcomes with respect to these resources or connected resources. The following rationale is provided in the context of the definition of PEW *(s 6, Water Act 2007 (Cth)).* • Prior to implementation of the SDL for this region, limits on dam development were not considered necessary throughout the SA Murray Region (other than in the Northern Mount Lofty Ranges) in the context of the NRM Act. This conclusion arises from consideration of the low level of risk posed by development, as identified in the risks set out in Appendix B of the SAMR Risk Assessment. In addition, current use is well	

10.09 subsection	Detailed assessment tests	Where this was observed in the WRP package	Justification	Assessment outcome
			below the limit as identified in Table 13 in s 5.3.1. • The SA Murray Region differs from other areas in the Basin, and the ecosystems that are in the region will not change or improve as a result of the SDL-related dam development limits. This analysis is supported by the SAMR LTWP, the SKM Farm Dam analysis and the SAMR Risk Assessment. • As identified in s 5.2.4 of the proposed WRP, the surface waters of the region do not contribute to the adjacent SA River Murray WRP area. As a result of these factors, this assessment concludes that PEW is not identified in this WRP area as a result of including dam development limits in every instance – as noted above dam development limits in the Northern Mount Lofty Ranges are included to protect environmental assets and these do result in PEW. Further explanation as to why these limits are not included for the purpose of achieving environmental outcomes is provided in the SA Murray Region LTWP. ***The Coorong***	

10.09 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				The surface waters of the Coorong are identified in s 5.3.2 as PEW. Section 5.3.2 of the proposed WRP describes rules in both the SAMDB NRM Plan and the South-East NRM Plan that result in PEW in the Coorong. These rules are included for accreditation in Table 6 in s 5.2.3. While the Authority notes that the LTWP for the SA River Murray does not identify PEW in the Coorong, the rationale provided in the proposed WRP is consistent with the definition of PEW. This assessment agrees that the surface waters of the Coorong are defined as PEW consistently with the Water Act.	
	PEW rules and arrangements to protect PEW operate in the WRP area	True	WRP s 5.3.2 WRP s 5.3.2.1 WRP Table 6 in s 5.2.3	Section 5.3.2 of the proposed WRP describes the rules set out in relevant state instruments that protect PEW. The relevant instruments which include arrangements and rules relating to PEW are the SAMDB NRM Plan, the SE NRM Plan and the Peake, Roby and Sherlock WAP. These rules are included for accreditation in Table 6 in s 5.2.3. Further contextual information regarding these arrangements is provided in s 5.3.2.1.	

10.09 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
2	A register of HEW for the WRP area is (and/or will be) established **OR**	True	WRP s 5.3.2	The proposed WRP states that there is no HEW within the SA Murray Region WRP area and that it is unlikely that HEW would be acquired in the WRP area. The proposed WRP includes a commitment to establish a register if HEW is ever acquired in the WRP area.	**MET**
3	An existing register is identified	N/A	N/A	As there is no HEW within the SA Murray Region WRP area, there is no existing register.	**Not applicable**
If it is verified that a register of HEW is / will be established OR that an identified register of HEW exists: consider the further matters required by subsection (2)					
2	Provides for the maintenance of a / the register	Present	WRP s 5.3.2	The proposed WRP includes an obligation for the Chief Executive of the relevant state agency to maintain the register of HEW if such a register is established.	**MET**
	A website for publication is specified	Present	WRP s 5.3.2	The proposed WRP includes an obligation for the Chief Executive of the relevant state agency to make the register, if established, publicly available on the Department's website.	
	Characteristics and holders of water are (or will be) included in the register	True	WRP s 5.3.2	The proposed WRP includes an obligation for the Chief Executive of the relevant state agency to ensure the required information is included in	

10.09 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				the register of HEW, if such a register is established.	

Section 10.10 – Annual determinations of water permitted to be taken

(1) For each SDL resource unit in a water resource plan area, and for each form of take, the water resource plan must set out the method for determining the maximum quantity of water that the plan permits to be taken for consumptive use during a water accounting period.

(2) The method for subsection (1) may include modelling, and must be designed to be applied after the end of the relevant water accounting period, having regard to the water resources available during the period.

(3) The method must:
  (a) account for the matters in subsection 10.12(1); and
  (b) be consistent with the other provisions of the water resource plan.

(4) The plan must also set out a demonstration that the method relates to the SDL of each resource unit in such a way that, if applied over a repeat of the historical climate conditions, it would result in meeting the SDL for the resource unit, including as amended under section 23B of the Act.
  Note 1: Under the Basin Plan, the SDL is the same as the long-term annual diversion limit because the temporary diversion provision for each SDL resource unit is zero. Section 6.04 and Schedules 2 and 4 set out the SDLs for each SDL resource unit.
  Note 2**:** Amendments under section 23B of the Act are made following proposals for adjustment under Chapter 7.

(5) If, as a result of an amendment under section 23B of the Act, the SDL for a surface water SDL resource unit is expressed as a formula that changes with time, the SDL for subsection (4) is taken to be:
  (a) for a water accounting period beginning on or after 1 July 2019 – the SDL as it stood on 30 June 2019; and
  (b) for a water accounting period beginning on or after 1 July 2022 – the SDL as it stood on 30 June 2022; and
  (c) for a water accounting period beginning on or after 1 July 2024 – the SDL as it stood on 30 June 2024.

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
1	A method is set out that determines maximum quantity of water permitted to be taken for consumptive use for each form of take during a water accounting period for each SDL resource unit in the WRP area	True	WRP s 5.3.3 WRP Table 13 in s 5.3.1	Section 5.3.3 of the proposed WRP identifies the methods for determining annual permitted take for each form of take for each SDL resource unit within the SA Murray Region WRP. The information provided in s 5.3.3 is consistent with the related information provided to address s 10.08 of the Basin Plan.	**MET**

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				The method for each SDL resource unit is that annual permitted take is equal to a fixed number to be applied annually. For each SDL resource unit, the fixed number is equal to, or less than, the SDL as specified in Schedule 2 (for surface water) or Schedule 4 (for groundwater) of the Basin Plan. For SS10, the relevant forms of take are 'take by run-off dams' and 'take from watercourses'. The combined APT for SS10 is 55.2 GL. The method for determining APT for run-off dams is that APT is 55.2GL minus APT from watercourses. The method for determining APT for watercourses is that APT equals the sum of volumes of water affecting activity permit approval for watercourse diversions (Table 13 in s 5.3.1 shows that the number of rights and current volume is zero). For all other SDL resource units in SAMR WRP area, the form of take is take from groundwater.	
	The BDL estimate has changed due to better methods	True	WRP s 5.3.3, including Table 14	The proposed WRP incorporates a revised estimate of the BDL for SS10. The revised BDL estimate is based on improved methods and data relating to the SDL resource unit.	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
	The changes to the BDL estimate due to better methods are identified, *and*	True	WRP s 5.3.3, including Table 14	The proposed WRP identifies the revised BDL estimate in Table 14 in s 5.3.3 and provides supporting information including correspondence to the MDBA and GIS data analysis.	
	The changes are agreed to by MDBA, *and either*	True	WRP s 5.3.3	The BDL for SS10 is described in Schedule 3 of the Basin Plan by reference to take by runoff dams and from water courses based on what would have been taken under the relevant state water management law as at 30 June 2009. At the time the Basin Plan was made, the Authority estimated this to be 3.5GL per year. The Authority based this estimate on a report of the National Water Commission regarding surface water and groundwater interception activities. However, as described in the GIS dams data – SA Murray, the estimate was based upon a narrow coverage of the plan area relevant to SS10. SA MDB Regional NRM Plan Vol. 3 – Regulatory and Policy Framework of April 2009 includes specified farm dam limits totalling 32.27GL for selected sub-areas of SS10. For the remaining parts of SS10, state water management law did not limit take by volume – rather take was managed by principles which set out the circumstances where water affecting	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				activity permits could be issued, but did not specify volumetric limits. The method for revising the BDL therefore draws on the limits that were in place within the SDL unit (in the instruments cited in the preceding paragraph) and spatial data relating to the level of development as at 30 June 2009 for the areas of SS10 not subject to the volumetric limits as set out in the GIS dams data – SA Murray. The Authority has reviewed this document. There are some limitations of the data comparison that are assessed in the GIS dams data – SA Murray provided as supporting evidence for the proposed WRP. The report identifies the resources that would be required to improve the accuracy of the data and concludes that the additional effort needed is not warranted for the relatively low-use areas involved. The Authority is satisfied that the analysis provides enough detail in regards to the comparison to be confident South Australia has developed a better data set for estimating take by runoff dams than was previously available. Section 5.3.3 of the proposed WRP sets out that the new data set, Topography Water Bodies dataset Number 902, will be archived by South	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				Australia to ensure the data is accessible in the future and will continue to be used to determine the annual permitted take until a better approach is determined. The Authority is satisfied that the BDL re-estimate for the SAMR WRP area is appropriate; being a re-estimate to the BDL for SS10.	
	The SDL volume is based on the better estimate of the BDL, *and*	True	WRP s 5.3.3 including Table 14	The SDL volume is based on fixed numbers for all SDL resource units in the SAMR WRP area. The method for determining APT for SS10 is that annual permitted take is equal to a fixed number to be applied annually. The fixed number is equal to, or less than, the SDL as specified in Schedule 2 of the Basin Plan, taking account of the revised estimate for the BDL as set out in Table 14 in s 5.3.3.	
	The SDL volume is based on the applicable local reduction amount, *and*	True	WRP s 5.3.3	Section 6.05 of the Basin Plan specifies that there is no local reduction amount for SS10. Therefore, the SDL volume set out in s 5.3.3 is based on the applicable local reduction amount.	
	The SDL volume is based on the SDL resource unit shared reduction amount, *or*	True	WRP s 5.3.3	Section 6.05 of the Basin Plan specifies that there is no shared reduction amount for SS10. Therefore, the SDL volume set out in s 5.3.3 is	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				based on the applicable shared reduction amount.	
	The SDL volume is based on the SDL adjustment amount written as a formula that changes over time to 2024	False	WRP s 5.3.3	The relevant Basin Plan has not been amended under s 23B of the Act and, as such, does not specify an SDL adjustment for SS10 or any groundwater SDL resource unit in the SA Murray Region WRP area. Section 5.3.3 of the proposed WRP provides this information.	
	The method represents and operates as 'best available information'	True	WRP s 5.3.3	The methods included in the proposed WRP accord with the MDBA's advice provided at various stages during the development of the proposed WRP. The methods include information and approaches developed in consultation with the MDBA where appropriate. The MDBA's advice to SA sent in May 2017, was developed through the examination of technical information provided by South Australia and through examination of South Australia's legislative framework for the management of water resources. Further discussion relating to the technical information relied on to determine a revised estimate of the BDL for SS10 is provided above.	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				Further information relating to the state instruments relied upon for informing relevant aspects of the method is provided in the justification relating to s 10.11(1).	
2	The method (which may be modelling) calculates max quantity of water available for consumptive take at the end of the water accounting period	True	WRP s 5.3.3	The methods for each form of take in each SDL resource unit are able to be applied at the end of the water accounting period. This is because, in each case, the method includes a fixed number to be applied annually.	**MET**
	The method (or modelling) has regard to availability of water resources during the accounting period	True	WRP s 5.3.3 WRP Table 6 in s 5.2.3	For SS10, s 5.3.3 of the proposed WRP indicates that regard to water resources available has been demonstrated through the application of dam development limits included in the regional NRM Plans identified for accreditation in Table 6 in s 5.2.3. The information provided in each of the NRM Plans and associated technical reports sets out how the dam development limits have been determined and how they are applied. This assessment concludes that this confirms the statement in the proposed WRP that the application of the limits has regard to the water resources available. For GS7, the proposed WRP states that the method for determining permitted take is based on requirements to meet saline water interception, rather than by specific reference to	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				water availability. The approach set out in the proposed WRP is explained in sufficient detail and reflects the approach taken by the Authority to determine the SDL for this unit in Schedule 4 of the Basin Plan. The SDL for this resource unit was set to account for the current interception volume and the projected growth of the salt interception schemes, in recognition that the take from a salt interception scheme provides a "beneficial use" to achieve lower water tables and reduced salt loads to rivers. For all other groundwater SDL resource units the proposed WRP states that the method has regard to water available because in each case, the method applies the SDL as determined by the Basin Plan and that the Basin Plan was prepared having regard to the long-term availability of water. In addition, the WAPS that apply to the groundwater resources that are prescribed under state water management law include consideration of the water available for meeting anticipated demands, including environmental requirements. This consideration informs the limits operating within the relevant SDL resource units.	
3	All matters listed under s10.12 are identified as either relevant or not	True	WRP s 5.3.3, including Table 14	All matters listed under s 10.12 of the Basin Plan are outlined in Table 14 in s 5.3.3 and the	**MET**

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
	relevant, and relevant matters are accounted for in the method (**exhaustive**)			relevance of each matter to the method for each SDL resource unit is summarised in that Table. Further information regarding each item, including how each matter is addressed in the proposed WRP, is set out below.	
	s10.12(1) letter (a) is relevant and accounted for	True	WRP s 5.3.3 WRP s 5.3.1	Section 5.3.3 of the proposed WRP identifies that this matter is relevant, all forms of take from the SDL resource units and all classes of water access rights, as identified in s 5.3.1, are accounted for in the method.	
	s10.12(1) letter (b) is relevant and accounted for	N/A	WRP s 5.3.3	Section 5.3.3 of the proposed WRP states that this matter is not relevant to the SA Murray Region WRP area as carry-over is not permitted for any of the forms of take and classes of water access right in this WRP area.	
	s10.12(1) letter (c) is relevant and accounted for	N/A	WRP s 5.3.3	Section 5.3.3 of the proposed WRP states that this matter is not relevant as the water access rights in SS10 are not licensed and there are no return flows.	
	s10.12(1) letter (d) is relevant and accounted for	True	WRP s 5.3.3, including Table 14 WRP s 5.8.2	Table 14 of s 5.3.3 of the proposed WRP identifies that this matter is relevant to certain groundwater SDL resource units where trade is permitted. In each case where trade is	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
			WRP s 5.8.3 PRS WAP 2017, Table 5 and Principle 14.	permitted, the method accounts for trade by providing that the fixed annual permitted take limit does not change as a result of the trade. Trade is permitted within and between the GS5 resource units. There is trade between the PRS (unconfined) SDL resource units and the PRS (confined) SDL resource unit. These trading arrangements are set out in ss 5.8.2 and 5.8.3. These two SDL resource units are managed under a single state instrument (PRS WAP 2017) covering a single prescribed wells area (PWA). There are management zones set out in Table 5 of PRS WAP 2017 and the volume that can be taken from each management zone is limited by principle 14 of PRS WAP 2017. Trade can only be permitted into a management zone if there is sufficient water available within the limit and the limit is not increased as a result of the trade. There are 2 management zones in one SDL resource unit, and 3 management zones in the other SDL resource unit. The same rules apply to trade between management zones whether they are within the same SDL resource unit or in another SDL resource unit.	
	s10.12(1) letter (e) is relevant and accounted for	True	WRP s 5.3.3, including Table 14	Table 14 in s 5.3.3 of the proposed WRP identifies significant hydrological connections	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
			WRP s 5.2.4.1	consistently with the supporting information provided in s 5.2.4.1. In each instance where a significant or medium hydrological connection is identified, s 5.3.3 describes how that connection has been considered in the method for determining annual permitted take. There is a significant hydrological connection between the Coorong and upstream SDL resource units. This connection is acknowledged but is not considered relevant to the method for determining annual permitted take for SS10, as there is no take permitted from the Coorong. There is significant hydrological connection between the Mallee (Murray Group Limestone) and the Wimmera Mallee (GS9). This connection is managed in accordance with the Border Groundwaters Agreement between South Australia and Victoria. The limits agreed through that Agreement are reflected in the SDL for the Mallee (Murray Group Limestone). As the method applies the SDL it appropriately accounts for this significant hydrological connection. There is significant hydrological connection between SA Murray Salt Interception Schemes (GS7) and the SA River Murray (SS11). This connection is managed for the purposes of	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				reducing salt loads in the SA River Murray (SS11) and the SDL is determined on this basis. As the method applies the SDL it appropriately accounts for this significant hydrological connection.	
	s10.12(1) letter (f) is relevant and accounted for	N/A	WRP s 5.3.3	The proposed WRP identifies that this matter is not relevant as for each SDL resource unit, the method is a fixed number equal to (or less than) the SDL. Therefore, changes in the way water is held or taken would not alter the permitted take.	
	s10.12(1) letter (g) is relevant and accounted for	N/A	WRP s 5.3.3	The proposed WRP identifies that this matter is not relevant as for each SDL resource unit, the method is a fixed number equal to (or less than) the SDL. Therefore, changes in the extent to which allocations are utilised will not impact on the permitted take.	
	s10.12(1) letter (h) is relevant and accounted for	N/A	WRP s 5.3.3	The proposed WRP identifies that this matter is not relevant as there are no water sources from the Great Artesian Basin in this WRP area.	
	s10.12(1) letter (i) is relevant and accounted for	N/A	WRP s 5.3.3	The proposed WRP identifies that this matter is not relevant as there is no managed aquifer recharge in this WRP area.	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
	Other matters are accounted for in the model	N/A	WRP s 5.3.3	No other matters are accounted for in the method as described in s 5.3.3. In addition, the method described in s 5.3.3 does not include a model.	
	Acquisition and disposal of HEW is accounted for separately in a way that does not affect the method used for s10.10	N/A	WRP s 5.3.3	The proposed WRP states that acquisition and disposal of HEW is not accounted for separately in the method. There is no HEW in the WRP area and the Authority is satisfied that this circumstance is unlikely to occur.	
	The method is consistent with other provisions of the water resource plan	True	WRP s 5.3.3	The proposed WRP states that the method is consistent with the other provisions of the water resource plan. Relevant provisions where this consistency is observed include: - identification of SDL resource units (s 5.2.2) - identification of forms of take (s 5.3.1) - rules included for s 10.11 (s 5.3.4) - limits included for s 10.13 (s 5.3.6) - the method for determining actual take (s 5.3.8) - rules included for Part 4 (s 5.4) - trade rules (s 5.8) - measuring and monitoring.	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				No inconsistencies have been observed in relation to other provisions of the proposed WRP.	
4	The method has been applied over the historical climate conditions in the demonstration	True	WRP s 5.3.3	The proposed WRP states that the method for each SDL resource unit is that the annual permitted take is equal to a fixed annual number. The discussion below sets out how the proposed WRP demonstrates that the method will result in meeting the SDL for each SDL resource unit. ***SA Non-prescribed surface water SDL resource unit*** The annual permitted take equals 55.2 GL. There are two forms of take relevant to this SDL resource unit and the method takes into account both forms of take. This limit is based on a revised estimate for the BDL for this SDL resource unit. The Authority has assessed information provided by South Australia and agrees that it supports an alternative estimate of the BDL, and is in line with the requirements for changes to BDL estimates outlined in Position Statement 3D – Changes to BDL. Analysis of the revised BDL estimate is considered in the assessment for s 10.10(1).	**MET**

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				Mallee (Pliocene Sands) SDL resource unit The annual permitted take equals 41.4 GL. This volume is equal to the SDL as stated in column 4, Schedule 4 of the Basin Plan with respect to this SDL resource unit. ***Mallee (Murray Group Limestone) SDL resource unit*** For GS3 Mallee (Murray Group Limestone) the method for determining annual permitted take is a fixed annual number – 63.6 GL. This is a lesser amount than the SDL in the relevant Basin Plan (65.7 GL). Setting the annual permitted take to a lower level than the SDL will result in meeting the SDL for the resource unit. The lower limit reflects the level of development at 30 June 2009 and operated in state water management law at the time the Basin Plan first came into effect. ***Mallee (Renmark Group) SDL resource unit*** The annual permitted take equals 2 GL. This volume is equal to the SDL as stated in column 4, Schedule 4 of the Basin Plan with respect to this SDL resource unit. ***Peake-Roby-Sherlock (confined) SDL resource unit***	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				The annual permitted take equals 2.58 GL. This volume is equal to the SDL as stated in column 4, Schedule 4 of the Basin Plan with respect to this SDL resource unit. ***Peake-Roby-Sherlock (unconfined) SDL resource unit*** The annual permitted take equals 3.41 GL. This volume is equal to the SDL as stated in column 4, Schedule 4 of the Basin Plan with respect to this SDL resource unit. ***SA Murray SDL resource unit*** The annual permitted take equals 64.8 GL. This volume is equal to the SDL as stated in column 4, Schedule 4 of the Basin Plan with respect to this SDL resource unit. ***SA Murray Salt Interception Schemes SDL resource unit*** The annual permitted take equals 28.6 GL. This volume is equal to the SDL as stated in column 4, Schedule 4 of the Basin Plan with respect to this SDL resource unit.	
	The results show that the method will result in the SDL for the unit,	True	WRP s 5.3.3 WRP s 5.3.1	The method for each SDL resource unit is described in s 5.3.3, consistently with the information provided in s 5.3.1 regarding each	

10.10 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
	(including as amended under s23B of the Act) is met			form of take. In each case, as the method applies a fixed annual number, applying the method over a repeat of the historical climate conditions will result in the SDL being met for each resource unit.	
5	An adjustment under WA s23B has resulted in the SDL being expressed as a formula that changes with time	False	WRP s 5.3.3	As indicated in s 5.3.3, the SDLs for the SA Murray Region WRP area will not change as a result of an amendment under s 23B of the Water Act.	**Not applicable**
	The WRP area comprises surface water SDL resource units that constitute an 'affected unit' under the SDLAM	False	WRP s 5.3.3	As above.	
	The formula that comprises the method applies the water accounting dates and SDLs in letters (a-c)	False	WRP s 5.3.3	As above.	

Section 10.11 – Rules for take, including water allocation rules

(1) A water resource plan must set out rules (including, if applicable, rules for water allocations) that ensure, as far as practicable, that the quantity of water actually taken from each SDL resource unit for consumptive use in a water accounting period that beginning on or after 1 July 2019 does not (after making any adjustments for the disposal or acquisition of held environmental water) exceed the unit's annual permitted take for the period.

Note 1: Water resource plans are not required to give effect to the long-term average sustainable diversion limits until 1 July 2019. Compliance with the long-term annual diversion limit will then be measured using the annual permitted take (see Part 4 of Chapter 6). The annual permitted take is defined in subsection 6.10(1).

Note 2: Water allocations can be made during or before a water accounting period. The annual permitted take is usually worked out after the end of a water accounting period.

A water resource plan may provide for less water to be taken

(2) To avoid doubt, the rules may be designed to ensure that the quantity of water that is actually taken for consumptive use from an SDL resource unit in a water accounting period is less than the annual permitted take.

10.11 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
1	Rules are included in the WRP	True	WRP s 5.3.4, including Table 15 WRP Table 6 in s 5.2.3	Section 5.3.4 of the proposed WRP includes a rule that imposes total limits on take for the non-prescribed water resources in GS6 and GS7. This rule is in the proposed WRP because there is currently no state instrument that includes such a rule. For the remaining SDL resource units, Table 15 in s 5.3.4 identifies instruments and sections of those instruments that apply rules for each SDL resource unit within the WRP area. The relevant	**MET**

10.11 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				parts of the state instruments identified are incorporated for accreditation in Table 6 in s 5.2.3. The rules relate to the forms of take identified for each SDL resource unit in accordance with s 10.08.	
	The rules ensure that the quantity of water actually taken does not exceed annual permitted take	True	WRP s 5.3.4, including Table 15 WRP s 5.3.4.1 WRP s 5.3.8 WRP Attachment 2	The rules listed in s 5.3.4 rely on a combination of state instruments and the WRP itself to ensure that the quantity of water actually taken does not exceed APT. The rules work in conjunction with the requirements for water access right holders to comply with the conditions on their right. The relevant rules contained in the instruments listed in Table 15 in s 5.3.4 are described further in s 5.3.4.1. This description provides additional context regarding the administration of the rules. ***For SS10***, the rules for limiting take by run-off dams are given effect through three NRM Plans across the region. These are the SAMDB NRM Plan, the SE NRM Plan and the SAAL NRM Plan. Each of these NRM Plans provides a limit on the total level of dam development that can occur in the relevant area covered by each Plan that falls within SS10. Each NRM Plan provides that permits (known as water affecting activity	

10.11 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				permits') may only be issued up to the stated limit for that area. Once a permit is issued, the permit holder must act in accordance with any conditions on the permit. Any changes to the limits for each region would be given effect through an amendment to the NRM Plans, triggering a formal amendment to the WRP. There is currently no take from watercourses in SS10. The method for determining annual permitted take provides that the volume for annual permitted take by run-off dams would be reduced by the sum of volumes of any permits issued for watercourse diversions. The rules in the regional NRM Plans provide an overall volumetric limit on take by run-off dams. There is no mechanism in the NRM Plans to reduce the overall limit on take by run-off dams when water affecting activity permits are issued for watercourse diversions, however, there is a requirement for SA to ensure that overall take remains within the SDL and this situation will be monitored and reported on annually. Current levels of take by run-off dams is well below the SDL for this unit as determined in accordance with the revised BDL estimate. In addition, there is currently no take from watercourses. The Authority does not anticipate that there will be	

10.11 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				any significant changes in demand by these forms of take. The method for determining annual permitted take requires that an increase in take from a watercourse (from the current level of 0GL) would need to be off-set by a corresponding reduction in annual permitted take by run-off dams. The rules are considered appropriate to manage take within the SDL in these circumstances. ***For the groundwater resources*** that are prescribed under state water management law, volumetric limits are imposed through the rules in water allocation plans for uses other than stock and domestic. The determination of the volumetric limits in the water allocations take into account an estimate of use for stock and domestic purposes, which is the best information available at the time. The relevant WAPs are the PRS WAP and the Mallee WAP. For GS6 and GS7, the limits are applied through a rule incorporated directly in the proposed WRP. This rule establishes an obligation on the responsible SA government agency to issue no further well construction permits for new take within GS6 or GS7, when the sum of actual take from wells within that SDL resource unit reaches the SDL. This obligation doesn't result in the	

10.11 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				creation of a water access entitlement or a water allocation. While the overall limit is to be imposed directly through the WRP, state water management law provides the basis through which the limit is administered and monitored. Section 127(2) of the NRM Act prevents a person taking from a non-prescribed resource in contravention of the regional NRM plan. Water affecting activity permits, which provide approval for water to taken from non-prescribed resources with appropriate conditions, are tracked in the State's water licensing database. Section 5.3.4 incorporates a commitment that the South Australian government will monitor the issue of permits and will not issue further permits once the SDL has been reached. The monitoring of actual take is discussed in s 5.3.8 and Attachment 2.	
	Rules for water allocation are included in the WRP	True	WRP s 5.3.4, including Table 15 WRP s 5.3.4.1 WRP Table 6 in s 5.2.3	Rules for water allocation are applicable for the water resources that are prescribed under state water management law. In these circumstances within the SA Murray Region WRP area, water licencing is 'bundled' and the water allocation rules are incorporated into the water access entitlement. These rules are included in the	

10.11 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				proposed WRP through the accreditation of provisions of state instruments identified in s 5.3.4 Table 15 in s 5.3.4. Further information relating to these matters is included in s 5.3.4.1. The relevant state instruments are the PRS WAP and the Mallee WAP. The relevant parts of these state instruments identified are incorporated for accreditation in Table 6 in s 5.2.3.	
	Rules for water allocation ensure that take does not exceed annual permitted take	True	WRP s 5.3.4, including Table 15 WRP s 5.3.4.1 WRP Table 6 in s 5.2.3	Rules for water allocation are applicable for the water resources that are prescribed under state water management law. In these circumstances within the SA Murray Region WRP area, water access entitlements and the associated water allocations must be issued consistently with the relevant WAP, including the provisions that limit take from the relevant water resource. For each of the prescribed water resources, the relevant WAP limits take to a volumetric level that is less than annual permitted take. The setting of a lower limit for take subject to a water allocation, ensures that there is capacity to allow for take based on other types of water access right (eg take for stock and domestic purposes). The relevant rules are identified in Table 15 in s 5.3.4 are incorporated for accreditation in Table	

10.11 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				6 in s 5.2.3. Further information relating to these matters is included in s 5.3.4.1.	
	The rationale for not applying rules for water allocation has merit	True	WRP s 5.3.4, including Table 15	Section 5.3.4, including Table 15, indicates that other types of water access right also apply to these resources and are managed by rules that are not defined as 'rules for water allocation'. The relevant water access rights are managed through water affecting activity permits which must be consistent with the relevant state instrument and the NRM Act.	
	The rationale for 'as far as practicable' has merit.	True	WRP s 5.3.4, including Table 15 WRP s 5.3.4.1 WRP s 5.3.8	Sections 5.3.4, including Table 15, and 5.3.4.1 indicate that some of the rules incorporated to limit take rely on estimation methods which represent the best information available for the relevant forms of take. Section 5.3.8 includes an assessment trigger to assist in ensuring that the SDL will not be exceeded as a result of growth in annual actual take. The trigger provides that when the estimated take from the water resources reaches 90 per cent of the SDL, an assessment process will be triggered to review the situation.	

10.11 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
2	The rules for take will result in actual take being less than permitted take	True	WRP s 5.3.4 WRP s 5.3.8 WRP s 5.3.8.1	The rules in s 5.3.4 are designed to ensure that actual take is less than or equal to APT. The rules provide sufficient assurance that the operation of the WRP will ensure that actual take will not exceed APT. For GS3 Mallee (Murray Group Limestone) the method for determining annual permitted take is a fixed annual number that is a lesser amount than the SDL in the relevant Basin Plan. The rules in the proposed WRP are designed to ensure that actual take is less than or equal to the APT as stated for the purposes of s 10.10(1), which is less than the SDL in the relevant Basin Plan. In addition, as noted above s 5.3.8 provides a trigger to review the situation when estimated take reaches 90% of APT. Further information relating to this matter is provided in s 5.3.8.1.	**MET**
	Actual take will realistically be less than permitted take	True	WRP s 5.3.4 WRP Table 13 in s 5.3.1	Table 13 in s 5.3.1 of the proposed WRP identifies that the current level of use (in line with the rules in s 5.3.4) is below the Basin Plan SDL and Appendix B of the SAMR Risk Assessment identifies low likelihood of growth in use in this region.	

Section 10.12 – Matters relating to accounting for water

(1) For paragraph 10.10(3)(a), the following matters must be accounted for:

(a) all forms of take from the SDL resource unit and all classes of water access right;
(b) water allocations that are determined in one water accounting period and used in another, including water allocations that are carried over from one water accounting period to the next;
(c) for a surface water SDL resource unit—return flows, in a way that is consistent with arrangements under the Agreement immediately before the commencement of the Basin Plan;
(d) subject to subsection (3)—trade of water access rights;
(e) water resources which have a significant hydrological connection to the water resources of the SDL resource unit;
(f) circumstances in which there is a change in the way water is taken or held under a water access right;
(g) changes over time in the extent to which water allocations in the unit are utilised;
Note: Paragraph (g) includes what is commonly known as a growth-in-use strategy.
(h) water sourced from the Great Artesian Basin and released into a Basin water resource, by excluding that water;
(i) water resources which are used for the purpose of managed aquifer recharge.

(2) Subject to this section, the method may account for other matters.

(3) For paragraph (1)(d), the water resource plan must account for the disposal and acquisition of held environmental water separately and in a way that does not affect the method under section 10.10.

10.12 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
1 (a) – (i)	The WRP states which of the matters in letter (a) to (i) are and are not applicable	True	WRP s 5.3.3	The proposed WRP lists each of the matters in letter (a) to (i) for each SDL resource unit and states which are and are not applicable. See assessment justification for s 10.10(3)(a).	**MET**

10.12 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
	The WRP explains why the matters in letter (a) to (i) that are stated as 'not be applicable' do not apply	True	WRP s 5.3.3	The proposed WRP includes a fair and justified statement explaining the reasons why each of the matters that are not applicable do not apply.	
	Each of the relevant matters in letters (a) to (i) is accounted for in s10.10(3)(a)	True	WRP s 5.3.3	The proposed WRP indicates how each of the relevant matters in letters (a) to (i) is accounted for in s 10.10(3)(a).	
2	The method in 10.10 accounts for matters other than those under 10.12(1)	False	WRP s 5.3.3	Section 5.3.3 identifies the matters that are accounted for in the method. No matters other than those under s 10.12(1) are accounted for, so this provision is not applicable.	**Not applicable**
	The other matter(s) accounted for under the section is (are) permissible and the accounting treatment appropriate	N/A	WRP s 5.3.3	Section 5.3.3 identifies the matters that are accounted for in the method. No matters other than those under s 10.12(1) are accounted for, so this provision is not applicable.	
3	The method in s10.10 accounts for disposal and acquisition of HEW separately	False	WRP s 5.3.3	This matter is not relevant for this WRP area because there is no HEW as indicated in s 5.3.3.	**Not applicable**
	The disposal and acquisition of HEW does not affect the method under s.10.10	False	WRP s 5.3.3	This matter is not relevant for this WRP area because there is no HEW as indicated in s 5.3.3.	

Section 10.13 – Limits on certain forms of take

(1) Subject to this section, a water resource plan must require that the long-term annual average quantity of water that can be taken from a surface water SDL resource unit for consumptive use by:

(a) take under basic rights; or
(b) take by runoff dams; or
(c) net take by commercial plantations;

does not exceed the level specified in column 2 of Schedule 3 for that form of take.

(2) The quantity specified in subsection (1) for a form of take may be increased above the level specified in column 2 of Schedule 3 for that form of take if:

(a) the long-term annual average quantity of water that can be taken by another form of take from the same SDL resource unit is changed at the same time so that there is no overall change in the total long-term annual average quantity of water that can be taken; and
(b) take by the forms of take affected by the changes are capable of:
  (i) being accurately measured (for example, through the use of a meter); or
  (ii) in the case of a form of take that is not capable of being accurately measured at the time the water resource plan is submitted for accreditation or adoption—being reasonably estimated using the best available method immediately before the water resource plan is submitted; and
(c) the changes are not expected to result in the take from the SDL resource unit ceasing to be an environmentally sustainable level of take.

10.13 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
1	The LTAA quantity of take is stated as a volume for each form of take described in column 2 of Schedule 3 as follows:	True	WRP s 5.3.6	The proposed WRP identifies take by run-off dams in the SA non-prescribed surface water SDL resource unit (SS10) as the only form of take applicable to this requirement. This statement is consistent with the forms of take identified in Schedule 3 of the Basin Plan.	**MET**

10.13 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				The form of take identified and the limit specified is consistent with the provisions of the proposed WRP which address s 10.10 and s 10.11 of the Basin Plan.	
	take under basic rights	False	WRP s 5.3.6	Column 2 of Schedule 3 of the Basin Plan does not state levels applicable to basic rights for this WRP area.	
	take by runoff dams	True	WRP s 5.3.6	The proposed WRP limits take by run-off dams to the level specified in column 2 of Schedule 3 of the Basin Plan. The limit for take by run-off dams provides a volumetric limit of 55.2GL per annum. It is noted that the volumetric limit is a revised estimate. See the justification for the provisions addressing s 10.10(1) in this assessment.	
	net take by commercial plantations	False	WRP s 5.3.6	Column 2 of Schedule 3 of the Basin Plan does not state levels applicable to commercial plantations for this WRP area.	
	The limits (volume) for each form of take in subsection 1 letter (a) to (c) does not exceed the corresponding levels stated in column 2 of	True	WRP s 5.3.6 WRP s 5.3.3 WRP Table 6 in s 5.2.3	Section 5.3.6 states the limit (volume) and Table 6 in s 5.2.3 incorporates state instruments that give effect to the limit. The limit does not exceed the revised estimate of level stated in column 2 of Schedule 3 for take by run-off dams. Further discussion of the revised BDL estimate is	

10.13 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
	Schedule 3 for that form of take			provided in the justification in relation to s 10.10(1) of this report (s 5.3.3).	
	The provision states that the LTAA quantity (volume) does not (and will not) exceed the levels	True	WRP s 5.3.6 WRP s 5.3.3 WRP Table 6 in s 5.2.3	As above.	
	The provision states that one or more limits (volumes) exceeds the levels, and that s10.13(2) is applied	False	WRP s 5.3.6 WRP s 5.3.3 WRP Table 6 in s 5.2.3	As above.	
2	Section 10.13(1) identifies that the LTAA quantity (volume) (i.e. for basic rights, runoff dams and/or commercial plantations) has increased, and/or will increase over the life of the WRP	False	WRP s 5.3.6 WRP s 5.3.3 WRP Table 6 in s 5.2.3	Section 5.3.6 identifies the limits that apply to ensure that the LTAA quantity has not increased and will not increase over the life of the WRP. Table 6 in s 5.2.3 incorporates state instruments that give effect to the limit. The limit is applied consistently with the methods described in s 5.3.3. As a result of these limits being in place, s 5.3.6 concludes that s 10.13(2) is not required to be addressed for the SA Murray Region WRP. The Authority supports this conclusion.	**MET**

10.13 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
2(a)	The increase in take above the levels set out under s10.13(1) is offset in full by reduction in level for another form(s) of take in the same SDL resource unit	N/A	WRP s 5.3.6	As the proposed WRP does not provide for an increase of this type, this requirement is not applicable.	
2(b)	Accurate measurement (metering) is applied to affected forms of take The method of estimate is reasonable; and applies best available information	N/A N/A	WRP s 5.3.6	As the proposed WRP does not provide for an increase of this type, this requirement is not applicable.	
2(c)	The increase to levels of take under subsection 1 are not expected to result in take above the limit for environmentally sustainable level of take	N/A	WRP s 5.3.6	As the proposed WRP does not provide for an increase of this type, this requirement is not applicable.	
	A process to address future increases to the quantity of take under basic rights, by runoff dams, and/or net take by commercial plantations is provided over the term of the WRP	N/A	WRP s 5.3.6	As the proposed WRP does not provide for an increase of this type, this requirement is not applicable.	

10.13 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
	The process to increase quantity is based on a risk assessment, and comprises a trigger for advice to the MDBA that the process will be triggered and that it is necessary	N/A	WRP s 5.3.6	As the proposed WRP does not provide for an increase of this type, this requirement is not applicable.	

Section 10.14 – Effects, and potential effects, on water resources of the water resource plan area

(1) A water resource plan must identify the effect, or potential effect, if any, of the following on the use and management of the water resources of the water resource plan area:

(a) the taking of groundwater that is not a Basin water resource resulting in water being removed from a groundwater SDL resource unit in the water resource plan area because of a pre-existing hydrological connection or a hydrological connection created by the process of taking that groundwater;

(b) the taking of groundwater that is not a Basin water resource resulting in water that would otherwise flow directly or indirectly into an SDL resource unit in the water resource plan area no longer flowing into that unit.

(2) If a water resource plan identifies an effect, or potential effect, of the kind referred to in subsection (1), the water resource plan must set out:

(a) a process for monitoring that effect or potential effect; and

(b) actions that will be taken to respond to that effect or potential effect.

(3) Without limiting paragraph (2)(b), the water resource plan may require a person to hold a water access right in the water resource plan area in relation to the effect, or potential effect, identified.

10.14 subsection	Streamlined assessment tests	Where this was observed in the WRP package	Justification	Assessment outcome
1	**Establish** if (1) MDBA agrees with a WRP statement to the effect that take from non-Basin water resources affects (or potentially affects) the water resources in the plan area.	WRP s 5.3.7 WRP s 5.2.4 WRP s 5.2.4.1	Section 5.3.7 of the proposed WRP states there are no effects or potential effects, of the type identified in s 10.14. Section 5.3.7 of the proposed WRP indicates that connection to non-Basin water resources for groundwater in the SA Murray Region are considered medium or insignificant. This statement is consistent with s 5.2.4 and s 5.2.4.1 which identifies and assesses management of all	**MET**

10.14 subsection	Streamlined assessment tests	Where this was observed in the WRP package	Justification	Assessment outcome
			connected resources, including relevant risks. This assessment concludes that this analysis adequately considers the matters relevant to this section.	

Section 10.15 – Determination of actual take must be specified

(1) A water resource plan must set out how the quantity of water actually taken for consumptive use by each form of take from each SDL resource unit will be determined after the end of a water accounting period using the best information available at the time.

Note: The annual actual take for the SDL resource unit is the sum of the quantity of water actually taken by each form of take for consumptive use: see subsection 6.10(2). Paragraph 71(1)(c) of the Act requires the annual actual take to be set out in a report to the Authority within 4 months after the end of the water accounting period.

(2) For a particular form of take, and subject to the requirement that a determination use the best information available at the time, a determination may be made by:

(a) measuring the quantity of water actually taken; or
(b) estimating the quantity of water actually taken; or
(c) a combination of the above.

(3) Where a determination for a form of take is made by estimating the quantity of water actually taken, the water resource plan must provide for the estimate to be done consistently with the method under subsection 10.10(1) that relates to that form of take.

(4) The quantity of water actually taken must:

(a) include water that was held environmental water which was disposed of and then used in the SDL resource unit for consumptive use; and
(b) exclude water sourced from the Great Artesian Basin and released into and taken from a Basin water resource.

10.15 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
1	A method for determining annual actual take is set out for each form of take from each SDL resource unit	Present	WRP s 5.3.8, including Table 16 WRP s 5.3.1 WRP Attachment 2	Section 5.3.8, including Table 16, identifies a method for each form of take within the WRP area. The forms of take are identified consistently with s 5.3.1 which identifies the forms of take and classes of water access right that apply in the WRP area.	**MET**

10.15 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				The methods identified for determining annual actual take from each of the groundwater SDL resource units are consistent with the methods used by South Australia in their annual reporting under s 71(1)(c) of the Act. Attachment 2 sets out the method for estimating take in the non-prescribed groundwater resources of GS6. The methods identified in s 5.3.8 for determining annual actual take in SS10 have been developed to account for the revised BDL estimate and to incorporate future approvals of water affecting activity permits or development approvals.	
	The method applies best available information	True	WRP s 5.3.8, including Table 16 WRP Attachment 2	Each of the methods for determining annual actual take, set out in Table 16 in s 5.3.8, applies the best information expected to be available at the time of determining annual actual take. For SS10, the method for determining annual actual take incorporates the methods used to determine the revised BDL together with any new WAA permits or approvals issued since July 2009. For take from each of the groundwater SDL resource units, the method for determining annual actual take is a combination of	

10.15 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				measurement (through metering) and estimation. The estimate for annual actual take from groundwater for stock and domestic purposes within the prescribed areas relies on the upper estimate for stock and domestic use set out in the relevant water allocation plans. The Authority is satisfied that this approach represents the use of best information available at the time that annual actual take is determined. For GS6, a method for estimating take from these resources is included in Attachment 2 of the proposed WRP and referenced in s 5.3.8 for the purposes of determining annual actual take. For GS7, take is for the purposes of intercepting highly saline regional groundwater prior to it entering the River Murray. This take is metered.	
2	For each form of take, the method for determining annual actual take is nominated as either 'measuring', 'estimating' or a combination	True	WRP Table 16 in s 5.3.8	Table 16 in s 5.3.8 sets out the method (or methods) that apply to each form of take and indicates whether the method involves measurement or estimation or both. The forms of take are identified consistently with the provisions of the proposed WRP addressing	**MET**

10.15 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
				other related sections of Chapter 10, Part 3 of the Basin Plan.	
3	All forms of take that use estimation (including in combination) to determine the quantity of annual actual take are identified (**exhaustive**)	True	WRP Table 16 in s 5.3.8	Table 16 in s 5.3.8 identifies each instance where estimation is used to determine the quantity of annual actual take. The forms of take are identified consistently with the provisions of the proposed WRP addressing other related sections of Chapter 10, Part 3 of the Basin Plan.	**MET**
	Where estimation is used (includes 'combined'), the estimation is consistent with the method in s10.10(1) for that form of take	True	WRP Table 16 in s 5.3.8 WRP Table 14 in s 5.3.3	Where estimation methods are used, these methods are consistent with the methods for determining annual permitted take set out in Table 14 in s 5.3.3.	
4	The WRP describes whether the circumstances in letters (a) and/or (b) are relevant in the WRP area	False	WRP s 5.3.8	The proposed WRP states that there is no HEW in the WRP area and that there is no water sourced from the GAB.	**MET**
	The WRP provides a method that is capable of accounting for the quantity of actual annual take in a way that:	False	N/A	The circumstances relevant to this section do not apply to this WRP and are not expected to apply in the future.	

10.15 subsection	Detailed assessment tests		Where this was observed in the WRP package	Justification	Assessment outcome
	(a) includes HEW that was disposed of and used for consumptive use	False	N/A	As above.	
	(b) excludes water sourced from the GAB and released into and taken from a Basin water resource	False	N/A	As above.	

Part 4 The sustainable use and management of water resources

Section 10.16 – Sustainable use and management

This part sets out the requirements in relation to the sustainable use and management of water resources of the water resource plan area within the long-term annual diversion limit for an SDL resource unit.

Section 10.16 is a simplified outline of Part 4 only and therefore there is no requirement to assess

Section 10.17 – Priority environmental assets and priority ecosystem functions

(1) A water resource plan must be prepared having regard to whether it is necessary for it to include rules which ensure that the operation of the plan does not compromise the meeting of environmental watering requirements of priority environmental assets and priority ecosystem functions.

Note: The environmental watering requirements of priority environmental assets and priority ecosystem functions will be set out in long-term watering plans and may also be set out in the Basin-wide environmental watering strategy. Long-term watering plans are required to use the methods in Part 5 of Chapter 8 to identify those requirements.

(2) Without limiting subsection (1), regard must be had to whether it is necessary for the rules to prescribe:

(a) the times, places and rates at which water is permitted to be taken from a surface water SDL resource unit; and
(b) how water resources in the water resource plan area must be managed and used.

(3) If the outcome of the requirement in subsection (1) is that such rules are necessary, the water resource plan must include those rules.

10.17 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	Regard was had to the need for rules to ensure that the operation of the WRP does not compromise the desired flow regimes (as expressed by the environmental watering requirements) that are needed to protect PEAs/PEFs	True	WRP s 5.4.2	Section 5.4.2 of the proposed WRP identifies the following PEAs with associated PEFs: - The Coorong and Murray Mouth - Northern Mount Lofty Ranges watercourses The EWRs for these assets are identified in the SA River Murray LTWP and SA Murray Region LTWP respectively. The proposed WRP states that the rules in state water management law to protect these assets and functions were considered during the development of the LTWPs and the SAMR Risk	**MET**

10.17 subsection	Detailed assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
			Assessment. This statement is supported by s 2.4.2 of the SAMR Risk Assessment which describes the risk assessment methodology. In addition, both LTWPs describe existing arrangements relevant to the management of environmental water. Where the SAMR Risk Assessment identified the level of risk as low as a result of existing management controls, those controls are included in the proposed WRP for accreditation. ***PEAs and PEFs*** The proposed WRP identifies that there are two LTWPs relevant to this area. The SA Murray Region LTWP identifies Northern Mount Lofty Ranges watercourses (including waterholes) as PEAs with associated PEFs. The LTWP analyses environmental assets, in addition to those identified as PEAs, in accordance with the requirements of Chapter 8 of the Basin Plan. The analysis concludes that the other assets cannot be categorised as PEAs as they do not meet all of the relevant criteria. Notably the Noora Evaporation Basin is identified as an environmental asset in the BWS. The Noora Basin is used to divert saline groundwater from salt-interception schemes. It	

10.17 subsection	Detailed assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
			has been identified as a habitat for certain bird species that make opportunistic use of this artificial wetland. While the environmental benefits of the Noora Basin are recognised, this asset is not able to be watered by environmental water and as such is not included in the proposed WRP as a PEA. The watercourses (including waterholes) of the Olary Ranges are not identified as PEAs or PEFs as they are not able to be watered by environmental water. The SA River Murray LTWP identifies the Coorong and Murray Mouth as part of the Coorong, Lower Lakes and Murray Mouth PEA. There are PEFs aligned with this PEA and the relevant environmental watering requirements are similarly aligned. ***Environmental watering requirements*** The proposed WRP states that the environmental watering requirements for the Coorong and Murray Mouth are set out in the SA River Murray LTWP. The flow regimes needed to achieve the environmental watering requirements for the relevant part of the SA Murray Region WRP area are managed	

10.17 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				upstream of the area and are not incorporated into the proposed WRP. However, the controls in place for the Coorong and Murray Mouth result in PEW being identified for this asset. The environmental watering requirements for the Northern Mount Lofty Ranges are set out in the SA Murray Region LTWP and are informed by a 2008 report regarding the impacts of water resource development in the area. Given the nature of the area, PEW is not actively managed but the controls incorporated in the WRP provide for the PEAs and PEFs to be protected.	
2	Regard was had to the need for rules to prescribe: (a) times, places and rates for permitted take from a surface water SDL resource unit	True	WRP s 5.4.2 WRP s 5.4.2.1 WRP Table 6 in s 5.2.3 WRP s 5.9.11	Section 5.4.2 of the proposed WRP sets out certain controls of the type relevant to this sub-section. The state instruments that give effect to these controls are included for accreditation in Table 6 in s 5.2.3. The need for additional rules was considered through the development of the LTWPs, the SAMR Risk Assessment and the proposed WRP. The proposed WRP concludes that no further rules are needed in	**MET**

10.17 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				the SA Murray Region WRP to protect the EWRs of PEAs and PEFs. Section 5.4.2.1 states that the SAMR Risk Assessment identifies two risks that are rated medium or higher that are relevant to this section. However, these risks cannot be managed through additional rules in the SA Murray Region WRP. Section 5.9.11 of the proposed WRP details that the treatment of these risks relies on management of connected water resources to ensure sufficient delivery of environmental water.	
	(b) how water resources in the WRP area must be managed and used	True	WRP s 5.4.2 WRP s 5.4.2.1 WRP Table 6 in s 5.2.3 WRP s 5.9.11	Section 5.4.2 of the proposed WRP sets out certain controls of the type relevant to this sub-section. The state instruments that give effect to these controls are included for accreditation in Table 6 in s 5.2.3. The need for additional rules was considered through the development of the LTWPs, the SAMR Risk Assessment and the proposed WRP. The proposed WRP concludes that no further rules are needed in the SA Murray Region WRP to protect the EWRs of PEAs and PEFs. Section 5.4.2.1 states that the SAMR Risk Assessment identifies two risks that are rated medium or higher that are relevant to this	

10.17 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				section. However, these risks relate to the management of connected resources and cannot be managed through additional rules in the SA Murray Region WRP. Section 5.9.11 of the proposed WRP details that the treatment of these risks relies on management of connected water resources to ensure sufficient delivery of environmental water.	
3	Rules are included	True	WRP s 5.4.2 WRP Table 6 in s 5.2.3	Section 5.4.2 of the proposed WRP describes rules in state water planning instruments which limit the level of dam development that can occur in the Northern Mount Lofty Ranges. In addition, there are controls to protect environmental water requirements, water dependent eco-systems and incorporate conditions on dam construction including by providing for low-flow by-passes. For the Northern Mount Lofty Ranges there are additional protections which limit dam development. The state instruments that give effect to these controls are included for accreditation in Table 6 in s 5.2.3. Section 5.4.2 of the proposed WRP describes existing controls within state water planning instruments for the Coorong and Murray Mouth. The state instruments that give effect to	**MET**

10.17 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				these controls are included for accreditation in Table 6 in s 5.2.3. These controls are intended to protect environmental water requirements and water dependent eco-systems and specifically limit activities in ecologically sensitive areas.	
	A rationale is provided for the application of section 10.17(2)	True	WRP s 5.4.2 WRP s 5.4.2.1	Section 5.4.2 and 5.4.2.1 of the proposed WRP describe the consideration given to determine which rules need to be included in the WRP, including by reference to the specific matters in s 10.17.	
	A rationale is provided for why rules are not necessary	True	WRP s 5.4.2 WRP s 5.4.2.1 WRP Table 6 in s 5.2.3	Section 5.4.2 and 5.4.2.1 of the proposed WRP describes rules relating to the management of these assets, as described in the preceding section of this assessment report. The state instruments that give effect to these controls are included for accreditation in Table 6 in s 5.2.3.	
	A rationale is provided for why rules are not included	True	WRP s 5.4.2.1	Rules relating the management of these assets are included in the proposed WRP, as described in the preceding section of this assessment report. Section 5.4.2.1 of the proposed WRP explains why additional rules are not included.	

Section 10.18 – Priority environmental assets dependent on groundwater

(1) A water resource plan must be prepared having regard to whether it is necessary for it to include rules which ensure that, for priority environmental assets and priority ecosystem functions that depend on groundwater, the operation of the plan does not compromise the meeting of environmental watering requirements.

Note: The environmental watering requirements of priority environmental assets and priority ecosystem functions will be set out in long-term watering plans and may also be set out in the Basin-wide environmental watering strategy. Long-term watering plans are required to use the methods in Part 5 of Chapter 8 to identify those requirements.

(2) Without limiting subsection (1), regard must be had to whether it is necessary for the water resource plan to include rules that specify:

(a) the times, places and rates at which water is permitted to be taken from a groundwater SDL resource unit; and
(b) resource condition limits, being limits beyond which the taking of groundwater will, for a priority environmental asset that depends on groundwater, compromise an environmental watering requirement; and
(c) restrictions on the water permitted to be taken (including the times, places and rates at which water may be taken) in order to prevent a resource condition limit from being exceeded.

(3) If the outcome of the requirement in subsection (1) is that such rules are necessary, the water resource plan must include those rules.

10.18 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	Regard was had to the need for rules to ensure that the operation of the WRP does not compromise the surface water flow regimes, and/or groundwater PEW or groundwater HEW (as expressed by the environmental watering requirements) that are needed to protect groundwater dependent PEAs/PEFs	True	WRP s 5.4.3 WRP s 5.4.3.1 WRP 5.4.4	Section 5.4.3 of the proposed WRP identifies that some watercourses in the Northern Mount Lofty Ranges have dependence on groundwater through baseflow, but the environmental watering requirements of these watercourses are considered in s 5.4.4 to address the requirements in s 10.19. Similarly, s 5.4.3.1 notes that the SA River Murray LTWP identifies the EWRs of the Coorong and that no groundwater metrics are expressed in the	**MET**

10.18 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				EWRs. Further consideration of this matter is provided in s 5.4.4. This assessment concurs that this is an appropriate way to consider the need for rules relating to the EWRs of groundwater dependent PEAs and PEFs in this WRP area.	
2	Regard was had to the need for rules to specify:		WRP s 5.4.3 WRP s 5.4.3.1	Section 5.4.3 of the proposed WRP identifies that no rules are needed for this requirement because rules relevant to NMLR PEAs and PEFs are considered in the provisions addressing s 10.19. In addition, as stated in s 5.4.3.1, the SA River Murray LTWP identifies that groundwater does not contribute to the EWRs for the Coorong.	**Not applicable**
	(a) times, places and rates for permitted take from a groundwater SDL resource unit	N/A	WRP s 5.4.3 WRP s 5.4.3.1	As above.	
	b) limits for groundwater take beyond which the condition of the groundwater resource would compromise the desired flow regimes, groundwater HEW and PEW (environmental watering requirements) needed to protect	N/A	WRP s 5.4.3 WRP s 5.4.3.1	As above.	

10.18 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	priority groundwater dependent PEAs				
	(c) restrictions on water permitted to be taken (including times, places and rates of take) that prevents take from exceeding the resource condition limits	N/A	WRP s 5.4.3 WRP s 5.4.3.1	As above.	
3	Rules are included	False	WRP s 5.4.3	The proposed WRP identifies that rules are not included for the purposes of s 10.18. The groundwater contribution to EWRs is considered further in response to s 10.19.	**Not applicable**
	A rationale is provided for the application of section 10.18(2)	N/A	WRP s 5.4.3	As above.	
	A rationale is provided for why rules are not necessary	N/A	WRP s 5.4.3	As above.	
	A rationale is provided for why rules are not included	True	WRP s 5.4.3 WRP s 5.4.3.1	Section 5.4.3 and 5.4.3.1 of the proposed WRP indicate that rules are not included because there are no PEAs or PEFs solely dependent on groundwater.	

Section 10.19 – Groundwater and surface water connections

(1) A water resource plan must be prepared having regard to whether it is necessary for it to include rules which ensure that, for groundwater that has a significant hydrological connection to surface water, the operation of the plan does not compromise the meeting of environmental watering requirements (for example, base flows).

(2) Without limiting subsection (1), regard must be had to whether it is necessary for the water resource plan to include rules that specify:

(a) the times, places and rates at which water is permitted to be taken from a groundwater SDL resource unit; and

(b) resource condition limits, being limits beyond which the taking of groundwater will compromise the discharge of water into any surface water resource; and

(c) restrictions on the water permitted to be taken (including the times, places and rates at which water may be taken) in order to prevent a resource condition limit from being exceeded.

(3) If the outcome of the requirement in subsection (1) is that such rules are necessary, the water resource plan must include those rules.

10.19 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	Regard was had to the need for rules to ensure that the operation of the WRP does not compromise flows and recharge (environmental watering requirements) between groundwater and surface water including for groundwater HEW and PEW	True	WRP s 5.4.4 WRP s 5.2.4 WRP s 5.2.4.1	Section 5.2.4 and 5.2.4.1 of the proposed WRP identify the following circumstances where groundwater has a significant hydrological connection to surface water: - The resources of the SA Murray Salt Interception Schemes (GS7) have a significant hydrological connection to the SA River Murray (SS11) - Certain resources of the SA Murray groundwater SDL resource unit (GS6) have locally significant hydrological connection to the SA Non-prescribed surface water SDL resource unit (SS10)	**MET**

10.19 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				in the Northern Mount Lofty Ranges and the Olary Ranges. The proposed WRP identifies a medium connection between the surface water of the Coorong and the SA Murray groundwater SDL resource unit (GS6). Section 5.4.4 of the proposed WRP together with supporting information and associated documents outline consideration of the need for rules relevant to these connections.	
2	Regard was had to the need for rules to specify:		WRP s 5.4.4 WRP s 5.4.4.1	Section 5.4.4 and 5.4.4.1 of the proposed WRP indicate that the risks associated with the connection between the permanent pools of the Northern Mount Lofty Ranges are rated low on the basis of the effectiveness of existing controls. As existing controls relevant to this subsection are considered effective, additional rules are not considered necessary. The existing rules that result in the low level of risk have been included in the proposed WRP. The proposed WRP indicates that there is a significant hydrological connection between GS7 and SS11, noting that SS11, in turn, has a significant connection to the SA Murray Region. The SA River Murray LTWP identifies the environmental watering requirements for the	**MET**

10.19 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				SA River Murray and confirms that groundwater-derived baseflows do not contribute to meeting the environmental watering requirements of the Channel and Floodplain PEAs (LTWP s 3.2.1). Therefore, the proposed WRP indicates that rules of the type relevant to this sub-section are not required to manage this connection. The proposed WRP identifies a medium connection between the Coorong and the groundwater resources of GS6.	
	(a) times, places and rates for permitted take from a groundwater SDL resource unit	True	WRP s 5.4.4 WRP s 5.4.4.1	Section 5.4.4 and 5.4.4.1 of the proposed WRP confirms that rules of this type have been considered. The rules included provide broad protections that are considered sufficient to maintain groundwater derived EWRs at a low level of risk. Therefore, additional rules of this type are not included.	
	(b) limits for groundwater take beyond which the condition of the groundwater resource would compromise the discharge of water into any surface water resource	True	WRP s 5.4.4 WRP s 5.4.4.1	Section 5.4.4 and 5.4.4.1 of the proposed WRP confirms that rules of this type have been considered. The rules included provide broad protections that are considered sufficient to maintain groundwater derived EWRs at a low level of risk. Therefore, additional rules of this type are not included.	

10.19 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	(c) restrictions on permitted take (including times, places and rates of take) that prevents take from exceeding the resource condition limits	True	WRP s 5.4.4 WRP s 5.4.4.1	Section 5.4.4 and 5.4.4.1 of the proposed WRP confirms that rules of this type have been considered. The rules included provide broad protections that are considered sufficient to maintain groundwater derived EWRs at a low level of risk. Therefore, additional rules of this type are not included.	
3	Rules are included	True	WRP s 5.4.4 WRP Table 6 in s 5.2.3	Section 5.4.4 of the proposed WRP describes rules in state water planning instruments for managing impacts relating to the resources of the SA Murray groundwater SDL resource unit (GS6) which have locally significant hydrological connection to the SA Non-prescribed surface water SDL resource unit (SS10) in the Northern Mount Lofty Ranges and the Olary Ranges. The state instruments that give effect to these controls are included for accreditation in Table 6 in s 5.2.3. Section 5.4.4 of the proposed WRP references the rules included for the purpose of s 10.17 with respect to the Coorong as contributing an appropriate level of protection to the EWRs of the Coorong that may depend on groundwater. Rules are not included in relation to the connection between GS7 and SS11.	**MET**

10.19 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	A rationale is provided for the application of section 10.19(2)	True	WRP s 5.4.4 WRP s 5.4.4.1	Section 5.4.4 and 5.4.4.1 of the proposed WRP describes rules in state water planning instruments for managing impacts relating to the resources of the SA Murray groundwater SDL resource unit (GS6) which have a locally significant hydrological connection to the SA Non-prescribed surface water SDL resource unit (SS10) in the Northern Mount Lofty Ranges and the Olary Ranges. The state instruments that give effect to these rules are included for accreditation in Table 6 in s 5.2.3. The rules provide high level protections relating to environmental watering requirements, water dependent eco-systems, ecologically sensitive areas, water quality, aquifer integrity, hydrological and hydraulic processes. Section 5.4.4 and 5.4.4.1 of the proposed WRP describes rules relevant to the management of the surface water of the Coorong and explains that these rules also contribute to the protection of the EWRs of the Coorong that may be dependent on groundwater. The state instruments that give effect to these rules are included for accreditation in Table 6 in s 5.2.3.	
	A rationale is provided for why rules are not necessary	True	WRP s 5.4.4 WRP s 5.4.4.1	Section 5.4.4 and 5.4.4.1 of the proposed WRP provides reasons for not including additional rules for managing impacts relating to the	

10.19 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				resources of the SA Murray groundwater SDL resource unit (GS6) which have locally significant hydrological connection to the SA Non-prescribed surface water SDL resource unit (SS10) in the Northern Mount Lofty Ranges and the Olary Ranges. The proposed WRP provides reasons for not including rules in relation to the connection between GS7 and SS11. Rules are not considered necessary as the resources of GS7 do not contribute to the EWRs identified for SS11.	
	A rationale is provided for why rules are not included	N/A	WRP s 5.4.4 WRP s 5.4.4.1	As above.	

Section 10.20 – Productive base of groundwater

(1) A water resource plan must be prepared having regard to whether it is necessary for it to include rules which ensure that:

(a) there is no structural damage to an aquifer (whether within or outside the water resource plan area) arising from take within the long-term annual diversion limit for an SDL resource unit; and

(b) hydraulic relationships and properties between groundwater and surface water systems, between groundwater systems, and within groundwater systems are maintained.

(2) Without limiting subsection (1), regard must be had to whether it is necessary for the water resource plan to include rules that specify:

(a) the times, places and rates at which water is permitted to be taken from a groundwater SDL resource unit; and

(b) any zones in the water resource plan area where continued groundwater extraction will result in a long-term decline in groundwater levels; and

(c) measures to prevent any long-term decline in groundwater levels in that zone, except where the groundwater is a non-renewable groundwater resource; and

(d) for a non-renewable groundwater resource—the planned rate of decline in groundwater levels and the anticipated groundwater levels after 50 years from the commencement of the water resource plan; and

(e) resource condition limits, being limits beyond which the taking of groundwater from the SDL resource unit will compromise the objectives in paragraphs (1)(a) and (b); and

(f) restrictions on the water permitted to be taken (including the times, places and rates at which water may be taken) in order to prevent a resource condition limit from being exceeded.

(3) If the outcome of the requirement in subsection (1) is that such rules are necessary, the water resource plan must include those rules.

10.20 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	Regard was had to the need for rules to ensure that:			Section 5.4.5 and 5.4.5.1 of the proposed WRP consider the need for rules relevant to this	**MET**

10.20 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	(a) there is no structural damage to aquifers (e.g. within or outside the WRP area) arising from take within the long-term annual diversion limit for the SDL resource unit	True	WRP s 5.4.5 WRP s 5.4.5.1	section for each of the groundwater SDL resource units within the WRP area. The consideration is informed by the SAMR Risk Assessment and includes reference to impacts on adjacent WRP areas where appropriate.	
	(b) hydraulic relationships and properties are maintained within and between groundwater systems, and between surface water and groundwater systems	True	WRP s 5.4.5 WRP s 5.4.5.1		
2	Regard was had to the need for rules to specify:		WRP s 5.4.5 WRP s 5.4.5.1	Section 5.4.5 and 5.4.5.1 of the proposed WRP include consideration of rules of the type relevant to this sub-section. The consideration is informed by the SAMR Risk Assessment.	**MET**
	(a) times, places and rates for permitted take from a groundwater SDL resource unit	True	WRP s 5.4.5 WRP s 5.4.5.1	As above.	
	(b) zones where extraction will result in long-term decline in groundwater levels	True	WRP s 5.4.5 WRP s 5.4.5.1	As above.	

10.20 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	(c) measures to prevent long-term decline in groundwater levels in the zone, but with the exception provided in letter (d)	True	WRP s 5.4.5 WRP s 5.4.5.1	As above.	
	(d) non-renewable groundwater resources that has a planned rate of decline in groundwater levels after 50 years (of the commencement of the WRP)	True	WRP s 5.4.5 WRP s 5.4.5.1	As above.	
	(e) limits for groundwater take beyond which the condition of the groundwater resource (resource condition limits) would compromise the objectives in subsection (1)	True	WRP s 5.4.5 WRP s 5.4.5.1	As above.	
	(f) restrictions on permitted take in order to prevent exceedance of resource condition limit	True	WRP s 5.4.5 WRP s 5.4.5.1	As above.	
3	Rules are included	True	WRP s 5.4.5 WRP Table 6 in s 5.2.3	Section 5.4.5 of the proposed WRP describes rules relevant to this section for each of the groundwater SDL resource units in the WRP area.	**MET**

10.20 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				The state instruments that give effect to these rules are included for accreditation in Table 6 in s 5.2.3. Rules are more comprehensive for the resources that are prescribed under state water management law, reflecting the higher level of demand and management of these resources. For these resources the rules provide volumetric limits within management zones. In some cases there are also limits on the locations where take is permitted. A range of rules covering prescribed and non-prescribed resources provide further conditions relating to the protection of aquifer integrity, as well as maintenance of hydrological and hydrogeological processes.	
	A rationale is provided for the application of section 10.20(2)	True	WRP s 5.4.5 WRP s 5.4.5.1	The rules described in s 5.4.5 of the proposed WRP were considered during the development of the SAMR Risk Assessment. Section 5.4.5.1 explains that additional rules of the kind listed in this sub-section were not considered necessary in these SDL resource units either due to the inherent nature of the groundwater resource, or because the risks are adequately managed through the existing management arrangements. Where the risks are	

10.20 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				considered to be adequately managed by existing arrangements, the relevant rules have been incorporated into the proposed WRP, and these include the kinds of rules set out in s 10.20(2).	
	A rationale is provided for why rules are not necessary	True	WRP s 5.4.5 WRP s 5.4.5.1	The matters relevant to this sub-section were not considered significant contributors to risk in these SDL resource units either due to the inherent nature of the groundwater resource, or because the risks are adequately managed through the existing management arrangements. Where the risks are considered to be adequately managed by existing arrangements, the relevant rules have been incorporated into the proposed WRP. Sections 5.4.5 and 5.4.5.1 of the proposed WRP describe the consideration given to these matters and conclude that additional rules are not needed.	
	A rationale is provided for why rules are not included	N/A	WRP s 5.4.5	The matters relevant to this sub-section were not considered significant contributors to risk in these SDL resource units either due to the inherent nature of the groundwater resource, or because the risks are adequately managed through the existing management arrangements. Where the risks are considered to be adequately	

10.20 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				managed by existing arrangements, the relevant rules have been incorporated into the proposed WRP. Therefore, s 5.4.5 of the proposed WRP concludes that additional rules are not needed. Therefore, no additional rules are included.	

Section 10.21 – Environmental outcomes relating to groundwater

(1) A water resource plan must be prepared having regard to whether it is necessary for it to include rules to prevent elevated levels of salinity and other types of water quality degradation within a groundwater SDL resource unit.

(2) Without limiting subsection (1), regard must be had to whether it is necessary for the water resource plan to include rules that specify:

  (a) the times, places and rates at which water is permitted to be taken from a groundwater SDL resource unit; and
  (b) resource condition limits, being limits beyond which the taking of groundwater from the groundwater SDL resource unit will result in an elevated level of salinity or another type of water quality degradation; and
  (c) restrictions on the water permitted to be taken (including the times, places and rates at which water may be taken) in order to prevent a resource condition limit from being exceeded; and
  (d) a requirement to establish and maintain a register which identifies the sites of bores used to monitor salinity or other water quality characteristics in the groundwater SDL resource unit.

(3) If the outcome of the requirement in subsection (1) is that such rules are necessary, the water resource plan must include those rules.

10.21 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	Regard was had to the need for rules to prevent water quality degradation (including salinity) of groundwater resources within the SDL resource unit	True	WRP s 5.4.6 WRP s 5.4.6.1	Section 5.4.6 and 5.4.6.1 of the proposed WRP consider the need for rules relevant to this section for each of the groundwater SDL resource units within the WRP area. The consideration is informed by the SAMR Risk Assessment.	**MET**
2	Regard was had to the need for rules to specify:		WRP s 5.4.6 WRP s 5.4.6.1	Section 5.4.6 and 5.4.6.1 of the proposed WRP include consideration of rules of the type relevant to this sub-section.	**MET**

10.21 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				The consideration is informed by the SAMR Risk Assessment.	
	(a) times, places and rates for permitted take from a groundwater SDL resource unit	True	WRP s 5.4.6 WRP s 5.4.6.1	As above.	
	(b) resource condition limits for salinity levels and other water quality degradation	True	WRP s 5.4.6 WRP s 5.4.6.1	As above.	
	(c) restrictions on take to prevent exceedance of resource condition limit	True	WRP s 5.4.6 WRP s 5.4.6.1	As above.	
	(d) establishment and maintenance of a register of bores to monitor water quality	True	WRP s 5.4.6 WRP s 5.4.6.1	As above.	
3	Rules are included	True	WRP s 5.4.6 WRP Table 6 in s 5.2.3	Section 5.4.6 of the proposed WRP describes rules relevant to this section for each of the groundwater SDL resource units in the WRP area. The state instruments that give effect to these	**MET**

10.21 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				rules are included for accreditation in Table 6 in s 5.2.3. The rules incorporated from state instruments include extraction limits, management zones, well buffers, well construction rules, and trade rules. The trade rules must be applied consistently with resource condition and extraction limits relevant to this sub-section.	
	A rationale is provided for the application of section 10.21(2)	True	WRP s 5.4.6	As indicated in s 5.4.6 of the proposed WRP, the SAMR Risk Assessment found risks relevant to the water quality degradation and increases in groundwater salinity are considered low for this area. The low rating arises either because of the inherent characteristics of the resources or as a result of existing management arrangements. For the latter circumstances, the existing rules from state instruments are incorporated in the proposed WRP, and these include the kinds of rules set out in s 10.21(2). These rules relate to the prescribed water resources and no rules are included for the non-prescribed water resources for the purpose of this section.	
	A rationale is provided for why rules are not necessary	True	WRP s 5.4.6	As indicated in s 5.4.6 of the proposed WRP, the SAMR Risk Assessment found risks relevant to	

10.21 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				the water quality degradation and increases in groundwater salinity are considered low for this area. The low rating arises either because of the inherent characteristics of the resources with respect to the non-prescribed resources of GS6 and GS7, or as a result of existing management arrangements included in the proposed WRP for GS3 and GS5. Therefore additional rules are not considered necessary.	
	A rationale is provided for why rules are not included	N/A	WRP s 5.4.6	As indicated in s 5.4.6 of the proposed WRP, the SAMR Risk Assessment found risks relevant to the water quality degradation and increases in groundwater salinity are considered low for this area. The low rating arises either because of the inherent characteristics of the resources with respect to the non-prescribed resources of GS6 and GS7, or as a result of existing management arrangements included in the proposed WRP for GS3 and GS5. Therefore additional rules are not considered necessary. Therefore no additional rules are included.	

Section 10.22 – Description of how requirements have been met

A water resource plan must:

(a) describe what was done to comply with the requirements in this Part; and
(b) if a risk of a kind referred to in subsection 10.41(1) has been identified in relation to the water resources of the water resource plan area—explain why rules addressing the risk have or have not been included in the plan.

10.22 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
(a)	The WRP describes what was done to comply with the requirements in sections 10.17 to 10.21	True	WRP s 5.4.2 WRP s 5.4.3 WRP s 5.4.4 WRP s 5.4.5 WRP s 5.4.6 WRP s 5.4.7 WRP s 5.9.2 WRP s 5.9.2.1, including Table 20	Section 5.4.7 indicates that the proposed WRP sets out what was done to comply with each requirement of sections 10.17 to 10.21 in the 'text for accreditation' in ss 5.4.2, 5.4.3, 5.4.4, and s 5.4.6 respectively; in conjunction with the outcomes of the SAMR Risk Assessment as described in ss 5.9.2 and s 5.9.2.1 including Table 20. This assessment concludes this is appropriate and satisfies this requirement.	**MET**
(b)	The WRP explains why rules have (or have not) been included in the WRP to address risks identified in s 10.41(1)	True	WRP s 5.4.2 WRP s 5.4.2 WRP s 5.4.3 WRP s 5.4.4	Section 5.4.7 indicates that the proposed WRP sets out what was done to comply with each requirement of sections 10.17 to 10.21 in the 'text for accreditation' in ss 5.4.2, 5.4.3, 5.4.4, and s 5.4.6 respectively. These explanations discuss the low, medium and higher level risks relevant to the requirements of each section, consistently with s 5.9.2.	

10.22 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
			WRP s 5.4.5 WRP s 5.4.6 WRP s 5.4.7 WRP s 5.9.2 WRP s 5.9.2.1, including Table 20	Further explanation of the treatment of risks is provided in s 5.9.2.1, including Table 20 and in the SAMR Risk Assessment.	

Part 5 Interception activities

Section 10.23 – Listing types of interception activity

(1) A water resource plan must, having regard to the risk identification and assessment conducted for section 10.41, specify whether there are any types of interception activity in the water resource plan area which have the potential to have a significant impact on:

(a) the water resources of the water resource plan area; or
(b) water resources which are hydrologically connected to the water resources of the water resource plan area;

whether on an activity-by-activity basis, or cumulatively.

(2) If there are any such types of interception activity, the water resource plan must list those types.

(3) For the purpose of determining whether a type of interception activity is of the kind referred to in subsection (1), regard must be had to the following factors:

(a) the location of particular activities of that type in the water resource plan area;
(b) the impact of the type of activity on the availability of:
  (i) the water resources of the water resource plan area; and
  (ii) any water resources which are hydrologically connected to the water resources of the water resource plan area;
(c) the projected growth of the type of activity over the period for which the water resource plan will have effect.

Note: The following are types of interception activity which may have the potential to have a significant impact on the water resources of a water resource plan area:

(a) interception by runoff dams;
(b) interception by commercial plantations;
(c) interception by mining activities, including coal seam gas mining;
(d) interception by floodplain harvesting.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish if (1) a statement about 'no significant impacts' is provided, and verify that (2) the conclusion demonstrates how regard was had to the risk assessment and specified factors.	WRP s 5.3.1 WRP s 5.5.1 WRP s 5.2.4 WRP s 5.2.4.1	Section 5.5.1 of the proposed WRP identifies runoff dams, commercial plantations and mining as interception activities that occur in the WRP area. Section 5.3.1 states that floodplain harvesting does not occur in the WRP area. This statement is confirmed in the SAMR Risk Assessment and supporting evidence to this effect is cited in the proposed WRP. Section 5.5.1 of the proposed WRP states that there are no interception activities in the WRP area with the potential to have a significant impact on the water resources of the WRP area or on water resources which are significantly hydrologically connected to the WRP area (see s 5.2.4 and s 5.2.4.1), given the current controls in place to manage the risks. This conclusion is supported by the SAMR Risk Assessment.	**MET**

Section 10.24 – Monitoring impact of interception activities

If a water resource plan includes a list of the kind referred to in subsection 10.23(2), the plan must set out, in respect of each type of interception activity listed, a process for monitoring the impact of that type of activity on:

(a) the water resources of the water resource plan area; and
(b) water resources which are hydrologically connected to the water resources of the water resource plan area.

Streamlined assessment tests	Where this was observed in the WRP package	Justification	Assessment outcome
Establish if (1) there are significant impacts. If 'no' the assessment concludes. If 'yes', establish that (2) a process is set out for monitoring impacts on (i) water resources in the plan area, and (ii) hydrologically connected water resources outside the plan area.	WRP s 5.5.2	The proposed WRP states that there are no types of interception activity that would need to be listed in accordance with section 10.23.	**MET**

Section 10.25 – Actions to be taken

(1) A water resource plan must identify actions that will be taken in the event that monitoring under section 10.24 shows that:

(a) an impact of a type of interception activity compromises the meeting of an environmental watering requirement; or
(b) an impact of several types of activity together compromises the meeting of an environmental watering requirement; or
(c) there is an increase in the quantity of water being intercepted by a type of activity;

after the commencement of the water resource plan.

(2) Subsection (1) does not apply if the relevant outcome in paragraph (1)(a), (b) or (c) is accounted for by the method under subsection 10.10(1).

Note 1: This section provides a mechanism to address unanticipated effects of, or changes in, interception activity.

Note 2: Section 10.13 sets out the circumstances in which a water resource plan may allow for an increase in anticipated take by an interception activity.

Streamlined assessment tests	Where this was observed in the WRP package	Justification	Assessment outcome
Establish if (1) a statement is provided about 'no significant impacts'. If 'yes', the streamlined assessment concludes. **If 'significant impacts' are identified, establish if (2) a statement is provided to the effect that impacts are accounted for under 10.10(1). If it is the case, verify that (3) information is provided that set out how impacts are accounted for.**	WRP s 5.5.3	The proposed WRP states that there are no types of interception activity in this WRP area that would require actions to be identified for this section. The Authority is satisfied that the proposed WRP supports this conclusion and that s 10.25 does not apply to this WRP area.	**MET**

Part 6 Planning for environmental watering

Section 10.26 – Planning for environmental watering

(1) A water resource plan must provide for environmental watering to occur in a way that:

(a) is consistent with:

(i) the environmental watering plan; and

(ii) the Basin-wide environmental watering strategy; and

(b) contributes to the achievement of the objectives in Part 2 of Chapter 8.

(2) For the purposes of subsection (1), the water resource plan must be prepared having regard to:

(a) the most recent version of the long-term watering plan prepared in accordance with the requirements of Division 3 of Part 4 of Chapter 8; and

(b) the views of local communities, including bodies established by a Basin State that express community views in relation to environmental watering.

– Streamlined assessment is not applicable to this section –

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	The WRP has provision for environmental watering that:				**MET**
	is consistent with the EWP and BWS	True	WRP s 5.3.2 WRP s 5.4.2 WRP s 5.4.4	There is no HEW in the SAMR WRP area and there are limited instances of PEW identified in s 5.3.2. However, there is a significant environmental asset of the Coorong and Murray Mouth which is an important element of the Coorong, Lower Lakes and Murray Mouth PEA.	

Sub-section	Detailed assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
		WRP s 5.6.1 WRP s 5.6.2	The instances of PEW, including the water of the Coorong, are managed in accordance with rules identified in ss 5.3.2, 5.4.2 and 5.4.4 and referenced in s 5.6.1. There are limited opportunities for environmental watering in the SA Murray Region, given the limited water-dependent PEAs and PEFs and the unregulated nature of the system. In this context, the Authority concludes that the arrangements included in the proposed WRP are consistent with the EWP and the BWS. PEAs and PEFs are identified for the Northern Mount Lofty Ranges and the Coorong and Murray Mouth in the respective LTWP. The environmental watering requirements for the Northern Mount Lofty Ranges PEAs and PEFs are identified in the SA Murray Region LTWP and rules to protect these assets and functions are included in s 5.4.2 and s 5.4.4 of the proposed WRP. The environmental watering requirements for the Coorong and Murray Mouth are identified in the SA River Murray LTWP. The proposed WRP indicates that these requirements are primarily reliant on connected resources and cannot be managed within the proposed WRP. Coordination arrangements are set out in s 5.6.2. Subsequent to the finalisation of the SA River Murray LTWP, SA has identified that the resources of the Coorong are PEW and the proposed WRP incorporates the rules protecting PEW in the Coorong. This provides a sound basis to ensure that the benefits of environmental flows received from connected resources are realised. In considering consistency with the BWS the Authority notes that the Noora Evaporation Basin is identified as an environmental asset in the BWS. This asset attracts an abundance and diversity of waterbirds. However, the asset is not categorised as a priority environmental asset as it is not able to be	

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				managed with environmental water. It is primarily used for the disposal of highly saline water through salt interception schemes. The Authority concludes that this approach is consistent with the EWP and BWS.	
	contributes to the overall environmental objectives for water dependent ecosystems	True	WRP s 5.6.1 WRP s 5.4.2 WRP s 5.4.4 WRP s 5.6.2	Section 5.6.1 indicates that the proposed WRP contributes to the overall environmental objectives, in a manner appropriate for the area, through the management arrangements identified for inclusion in ss 5.4.2, 5.4.4 and 5.6.2. Given the unregulated nature of the system and low levels of water use, these arrangements relate to maintaining protections for PEW and providing for co-ordination of environmental watering to the limited extent possible. The Authority concludes that by identifying and maintaining PEW for the Coorong and Murray Mouth and the Northern Mount Lofty Ranges and providing for co-ordination of environmental watering the proposed WRP contributes to the objectives of Part 2, Chapter 8 of the Basin Plan.	
2	The provisions for environmental watering had regard to the matters in letters (a) and (b)	Present	Refer to 10.26(2)(a) and (b) below	Refer to 10.26(2)(a) and (b) below.	**MET**

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	(a) the most recent version of the LTWP	True	WRP s 5.6.1 WRP s 5.6.1.1 WRP s 5.6.2 WRP s 5.10.3	There are two LTWPs that relate to the SAMR WRP area. The SA River Murray LTWP incorporates the Coorong and Murray Mouth as the management of these resources are closely linked to the management of the Lower Lakes and the southern-connected system. The SA Murray Region LTWP covers the rest of the SAMR WRP area. Sections 5.6.1 and 5.6.1.1 provide some specific information about matters in both LTWPs that have informed the development of the environmental watering provisions in the proposed WRP. It is noted that the environmental watering requirements for the Coorong are highly dependent on environmental flows from connected resources, primarily the River Murray and Lower Lakes. Consistently with the SA River Murray LTWP, the supporting information in s 5.6.1.1 highlights the importance of effective decision making, as well as monitoring and evaluation to ensure the EWRs for the Coorong can be achieved. These matters are discussed in related provisions addressing s 10.27 (s 5.6.2) and s 10.46 (s 5.10.3).	
	(b) the views of local communities in relation to environmental watering	True	WRP s 5.6.1 WRP s 5.6.1.1	Sections 5.6.1 and 5.6.1.1 and the SA River Murray and SA Murray Region LTWPs provide information regarding consultation with local communities regarding environmental watering.	

Section 10.27 – Enabling environmental water between connected water resources

(1) This section applies if:

(a) there are 2 water resource plan areas that contain surface water; and

(b) there is a surface water connection between the 2 areas.

(2) The water resource plan for each of the areas must provide for the co-ordination of environmental watering between the 2 areas.

10.27 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	In the WRP area, there is a surface water connection to surface water resources in other WRP areas	True	WRP s 5.6.2 WRP s 5.2.4 WRP s 5.2.4.1	Sections 5.2.4 and 5.2.4.1 describe the connections between water resources relevant to the SA Murray Region WRP area and connected resources. Section 5.6.2 of the proposed WRP identifies two connections relevant to s 10.27, these are: - The connection between the Coorong and Murray Mouth (SS10) with the Lower Lakes (SS11) - The connection between Burra Creek (SS10) and the River Murray Channel (SS11). The first listed connection is significant and the second is ephemeral.	**MET**

10.27 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
2	Arrangements for coordinating environmental watering are included in the WRP	Present	WRP s 5.6.2	The proposed WRP describes the arrangements for coordinating environmental watering across the southern-connected Murray-Darling Basin through SCBEWC. In addition, the proposed WRP sets out the arrangements for coordinating environmental watering between the Coorong and Murray Mouth and the Lower Lakes, including the role of the Barrage Operating Strategy and the Variable Lakes policy. The proposed WRP also indicates that flows to the Coorong South Lagoon through the South East Drainage Network will be coordinated, once the SE Flows Restoration project is complete. These flows will be coordinated and adjusted annually taking account of the requirements of the Coorong.	**MET**
	The provision makes the case for why arrangements to coordinate environmental watering is not included in the WRP	True	WRP s 5.6.2	The proposed WRP indicates that the connection between Burra Creek and the River Murray channel is extremely rare and that coordinating the flows is not necessary.	

Section 10.28 – No net reduction in the protection of planned environmental water

A water resource plan must ensure that there is no net reduction in the protection of planned environmental water from the protection provided for under State water management law immediately before the commencement of the Basin Plan.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish if (1) a statement is provided that PEW protection levels are unchanged from that which operated on 23/11/2012. ***Streamlining assumptions*: Level of PEW protection is not in dispute.**	WRP s 5.3.2 WRP s 5.6.3 WRP s 5.6.3.1	Section 5.6.3 of the proposed WRP indicates that the rules relating to the management of PEW have not changed since 23/11/2012 for the following matters: - Sub-catchment dam development limits in the northern Mt Lofty Ranges - Principles relevant to the protection of the Coorong and Murray Mouth PEW contained in the SAMDB NRM Plan & the SE NRM Plan - Principles in the PRS WAP that apply buffer zones around saline wetlands in PRS. The incidents of PEW included above are consistent with the incidents of PEW identified in s 5.3.2. This assessment has verified that these rules have not changed by reference to the earlier versions of the relevant statutory plans, and concludes that this requirement has been met. Additional	**MET**

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
		information provided in s 5.6.3.1 has informed this assessment.	

Part 7 Water quality objectives

Section 10.29 – Water resource plan to include WQM Plan

A water resource plan must include a water quality management plan (WQM Plan). The WQM Plan must be made in accordance with this Part.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish if (1) a WQMP is incorporated in the WRP.	WRP s 5.7	The WQMP is constituted by s 5.7 of the proposed WRP together with the state instruments incorporated as described in the accredited text within s 5.7.	**MET**

Section 10.30 – WQM Plan to identify key causes of water quality degradation

The WQM Plan must identify the causes, or likely causes, of water quality degradation in the water resource plan area having regard to the key causes of water quality degradation identified in Part 2 of Chapter 9 and set out in Schedule 10.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish if (1) a statement is present. Verify that (2) that s 10.30 and 10.31 are addressed separately.	WRP s 5.7.2	The proposed WRP identifies the causes (or likely causes) of water quality degradation that apply to groundwater and surface water resources of the SA Murray Region WRP area. In general the causes or likely causes are consistent with the key causes documented in Schedule 10 of the Basin Plan. The proposed WRP identifies the exceptions and explains why these matters are not relevant to the SA Murray Region WRP area, further demonstrating how regard was had to the matters in Schedule 10.	**MET**

Section 10.31 – Measures addressing risks arising from water quality degradation

If a risk of a kind mentioned in paragraph 10.41(2)(d) has been identified in relation to the water resources of the water resource plan area, the WQM Plan must explain why measures addressing the risk have or have not been included in the water resource plan.

Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
For each risk listed under s10.41(2)(d):				**MET**
an explanation for why a measure is:				
- **not included in the WQMP**	True	WRP s 5.7.3 WRP s 5.9.2 WRP s 5.9.11	The proposed WRP states that the risk assessment in accordance with Basin Plan s 10.41 (see s 5.9.2) has identified two medium or high risks arising from elevated levels of salinity or other types of water quality degradation. A statement is included in s 5.7.3 with reference to s 5.9.11 outlining why the proposed WRP does not include additional measures that would fully mitigate these two risks. The Authority is satisfied that additional measures do not need to be included in the WQMP. Low level risks arising from elevated levels of salinity or other types of water quality degradation have been considered in relation to the requirements of s 10.31.	

Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
- **included in the WQMP**	True	WRP s 5.7.3 WRP s 5.7.7 WRP s 5.9.2 WRP s 5.9.11 WRP Table 6 in s 5.2.3	Section 5.7.3 of the proposed WRP notes that the SAMR Risk Assessment identified a number of current measures and strategies that are in place to mitigate or address risks (see s 5.9.2). The proposed WRP incorporates current measures and strategies that contribute to the mitigation of water quality risks (see s 5.7.7, s 5.9.11 and Table 6 in s 5.2.3).	
For risks that are identified as having measures, the measure are included	N/A	WRP s 5.7.3	The proposed WRP does not identify measures addressing the relevant risks for inclusion in the WQMP.	

Section 10.32 – WQM Plan to identify water quality target values

(1) The WQM Plan must identify the water quality target values for the water resource plan area.

(2) The water quality target values are the following:

(a) for fresh water-dependent ecosystems—the applicable target values referred to in section 9.16;
(b) for irrigation water—the target values for water quality characteristics set out in section 9.17;
(c) for water used for recreational purposes—the values set out in section 9.18.

Note: The ADWG sets out standards for the quality of raw water for treatment for human consumption.

(3) However, if the objectively determined actual value of a water quality characteristic at a site is better than the target value identified in subsection (2), then the target value is that better value.

Note: See the objective in section 9.08.

(4) The WQM Plan may specify an alternative water quality target value if:

(a) it is consistent with the water quality objectives in Part 3 of Chapter 9; and
(b) it is determined in accordance with the procedures set out in the ANZECC Guidelines; and
(c) either:
(i) the alternative target value provides a better level of protection than the value that would apply under subsection (2) or (3), as applicable; or
(ii) the WQM Plan sets out reasons why the alternative target value will be as effective in achieving the objectives in Part 3 of Chapter 9; or
(iii) the WQM Plan sets out reasons why the target value in subsection (2) or (3), as applicable, is inappropriate for the water resource plan area; and
(d) for a water resource that is also covered by a water resource plan area of another Basin State—it is developed in consultation with that State.

10.32 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	The WRP identifies water	True	WRP s 5.7.4		**MET**

10.32 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	quality targets for the plan area		WRP s 5.7.5 WRP s 5.7.6	The proposed WRP identifies that water quality target values that have been determined consistently with the requirements of s 10.32(2) apply in the SA Murray Region WRP area (see also s 5.7.5 and s 5.7.6).	
	The WRP identifies which subsection approach is applied: s10.32(2), (3) or (4)	True			
2	*Either*, the identified water quality targets are targets that apply:				
2(a)	(a) values for freshwater-dependent ecosystems as those values are described in s9.16/Schedule 11	True	WRP s 5.7.4	The proposed WRP identifies that the water quality target values for fresh-water dependent eco-systems are the values identified in Schedule 11 for the Lower Murray. These target values apply to the South Australian Non-Prescribed Areas (SS10) surface water SDL resource unit, which includes the Coorong, as well as to groundwater resources where there are known to be groundwater dependent eco-systems. The relevant groundwater SDL resource units where these water quality target values apply are the Peake, Roby and Sherlock (unconfined) (GS5); SA Murray (GS6); and SA Murray Salt Interception Schemes (GS7).	**MET**
2(b)	(b) values for irrigation water as	True	WRP s 5.7.4	The proposed WRP identifies that the targets values for irrigation water are described in s 9.17. Section 9.17 indicates that the target values apply at sites in	**MET**

10.32 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	those values are described in s9.17			the Murray-Darling Basin where water is extracted by an irrigation infrastructure operator. The proposed WRP states that there are no sites within the SA Murray Region WRP area where water is extracted by an irrigation infrastructure operator. Therefore, the proposed WRP concludes that the target values for irrigation water do not apply in the SA Murray Region WRP area. The Authority is satisfied that this is the case and that the target values do not apply. However, the Authority notes that water extracted by irrigation infrastructure operators from sites in the adjacent SA River Murray WRP area is applied to soils within the SA Murray Region WRP area. This situation will be relevant when determining the water quality target values for irrigation water in the SA River Murray WRP area.	
2(c)	(c) values for recreational purposes as those values are described in s9.18	True	WRP s 5.7.4	The proposed WRP identifies that the water quality target values for recreation water are the values described in section 9.18 of the Basin Plan. The water quality target values for recreation water apply only to the surface water resources. This assessment supports this approach and agrees that these targets do not apply to groundwater resources.	**MET**
3	*Or*, the values are objectively determined actual values of WQ characteristics at the site	False	WRP s 5.7.5	The proposed WRP states that no sites have been identified where an objectively determined actual value of a water quality characteristic is better than the target values to the SA Murray Region WRP.	**MET**

10.32 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	The water quality targets are values that are better than the values under subsection 2	N/A	WRP s 5.7.5	The proposed WRP states that no sites have been identified where an objectively determined actual value of a water quality characteristic is better than the target values to the SA Murray Region WRP.	
4	*Or,* the alternative water quality target values apply:	N/A	WRP s 5.7.6 WRP s 5.7.6.1	Section 5.7.6 of the proposed WRP does not include any alternative water quality target values. Section 5.7.6.1 notes a CSIRO study which indicates the targets for fresh-water dependent eco-systems set out in the Basin Plan are inappropriate for the Coorong. However, there is not currently sufficient information to determine alternative water quality targets for the Coorong. The Ecological Character Description relevant to the Coorong is currently being updated and, when finalised, is expected to provide a basis for determining more appropriate target values. Therefore, the proposed WRP indicates that if there is an amendment to the Basin Plan to include improved water quality target values, South Australia will review the appropriateness of the new target values for the SA Murray Region WRP area.	**Not applicable**
4(a)	Values that are consistent with the water quality objectives in Part 3 of Chapter 9	N/A	WRP s 5.7.6	The proposed WRP does not include any alternative water quality target values.	

10.32 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
4(b)	The values are determined in accordance with the procedure in the ANZECC Guidelines	N/A	WRP s 5.7.6	The proposed WRP does not include any alternative water quality target values.	
4(c)	Item (i), (ii) or (iii) is applied	N/A	WRP s 5.7.6	The proposed WRP does not include any alternative water quality target values.	
4(c)(i)	*either*, the alternative target provides a better level of protection than the value that would apply under subsection (2) or (3), as applicable	N/A	WRP s 5.7.6	The proposed WRP does not include any alternative water quality target values.	
4(c)(ii)	*or*, the WQMP sets out reasons why the alternative target value will be as effective in achieving the	N/A	WRP s 5.7.6	The proposed WRP does not include any alternative water quality target values.	

10.32 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	objectives in Part 3 of Chapter 9				
4(c)(iii)	*or*, the WQMP sets out reasons why the target value in subsection (2) or (3), as applicable, is inappropriate for the water resource plan area	N/A	WRP s 5.7.6	The proposed WRP does not include any alternative water quality target values.	
4(d)	The water resource is connected to water resources in another Basin state's WRP area	N/A	WRP s 5.7.6	The proposed WRP does not include any alternative water quality target values.	
	The applicable alternative was developed in consultation with	N/A	WRP s 5.7.6	The proposed WRP does not include any alternative water quality target values.	

10.32 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	the other Basin state(s)				
	The WRP states that the water resources are not connected to another Basin state's WRP area	N/A	WRP s 5.7.6	The proposed WRP does not include any alternative water quality target values.	

Section 10.33 – WQM Plan to identify measures

(1) The WQM Plan must specify measures to be undertaken in or in relation to the water resources of the water resource plan area that contribute to the achievement of the objectives set out in:

(a) section 9.04 (Objectives of water-dependent ecosystems); and
(b) section 9.05 (Objectives for raw water for treatment for human consumption); and
(c) section 9.06 (Objective for irrigation water); and
(d) section 9.07 (Objective for recreational water quality); and
(e) section 9.08 (Objective to maintain good levels of water quality);

unless there are no such measures that can be undertaken cost-effectively.

(2) The measures must be prepared having regard to:

(a) the causes, or likely causes, of water quality degradation identified in accordance with section 10.30; and
(b) target values identified in accordance with section 10.32; and
(c) the targets in Division 4 of Part 4 of Chapter 9.

(3) The measures may include land management measures.

Note 1: Chapter 9 contains both water quality objectives and water quality targets. A WQM Plan must specify measures that contribute to the achievement of the objectives. The targets are relevant only to the extent that subsection (2) requires that the measures be prepared having regard to the targets. This section does not require a WQM Plan to set out measures designed to achieve the targets.

Note 2: See also subsections 22(9) to (12) of the Act.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish if (1) management strategies, plans, codes of practice, standards or legislative instruments are stated as (or referenced as) measures in the WQMP. Verify that (2) a statement is provided about how regard was	WRP s 5.7.2 WRP s 5.7.4 WRP s 5.7.7	Section 5.7.7 of the proposed WRP identifies the key management controls that operate in the SA Murray Region WRP area. These measures include relevant water management instruments as well as	**MET**

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
had to matters under s 10.33(2), and establish if (3) each measure identifies Chapter 9 objectives as applicable or not applicable. If costs are stated as prohibitive, then detailed assessment is required.	WRP Table 6 in s 5.2.3 WRP s 5.7.7.1 WRP s 5.9.2.1	environmental protection provisions relevant to water quality. The relevant sections of the water management and environmental protection provisions are included in Table 6 in s 5.2.3 for accreditation. The proposed WRP states that the measures have been identified having regard to the causes or likely causes of water quality degradation identified in accordance with the Basin Plan s 10.30 (see s 5.7.2), target values identified in accordance with the Basin Plan s 10.32 (see 5.7.4) and the targets in the Basin Plan Division 4 of Part 4 of Chapter 9. This is substantiated by the risk assessment for the SA Murray Region, as outlined in s 5.9.2.1, considering a two-part risk event, one part of which was water quality. Section 5.7.7.1 sets out how each of the instruments included for accreditation, and additional measures referenced in supporting information, contribute to the achievement of the objectives listed in ss 9.04-9.08 (inclusive).	

Section 10.34 – WQM Plan to identify locations of targets for irrigation water

The WQM Plan must identify the sites in the water resource plan area at which the target values for irrigation water apply.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish if (1) a site map of locations where target values for irrigation water applies is included. If no map included, establish if (2) a statement and rational to the effect that there is no irrigation activity.	WRP s 5.7.8	The proposed WRP states that there are no sites within the SA Murray Region WRP where target values for irrigation apply.	**MET**

Section 10.35 – Impact of WQM Plan on another Basin State

The measures specified in the WQM Plan must be developed having regard to:

(a) the impact those measures (including the absence of adequate measures) may have on the ability of another Basin State to meet water quality targets; and

(b) any adverse impacts those measures may have on Basin water resources in the other Basin State.

Note: See also the consultation requirement in subsection 63(2) of the Act.

10.35 subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	The measures under s10.33 take account of the matters in letters (a) and (b)	True	WRP s 5.2.4 WRP s 5.2.4.1 WRP s 5.7.3 WRP s 5.7.7 WRP s 5.7.7.1 WRP s 5.7.9 WRP s 5.7.9.1 WRP s 5.9.3	The SAMR Risk Assessment included consideration of water quality matters and the risk consequences included consideration of 'connected resources impacted'. Section 5.7.3 of the proposed WRP indicates that one medium level risk and one high level risk are relevant to water quality matters. This is consistent with the description of risks provided in s 5.9.3. Sections 5.2.4 and 5.2.4.1 of the proposed WRP state that the groundwater resources of GS3 are shared with Victoria. The WRP also states that the relevant measures outlined in WRP ss 5.7.7 and 5.7.7.1 are agreed measures with Victoria to manage the resource sustainably and that it is not likely that the measures would have an impact on another Basin State.	**MET**
(a)	The impact(s) of the measures (or absence of measures) upon another Basin state's ability to meet WQ targets	True			
(b)	Adverse impacts on water resources in other the Basin state	True			

				The supporting information (s 5.7.9.1) identifies the Border Groundwaters Agreement between SA and Victoria as the management tool for the shared groundwater resources. The Agreement, together with State-based statutory instruments such as the Mallee WAP, are considered adequate safeguards to ensure that the inclusion of measures in the SA Murray Region WQM Plan will not pose any risk to the ability of Victoria to meet Basin Plan water quality targets or have any adverse impacts on water resources in that state. In terms of surface water, s 5.7.9 of the proposed WRP states that the Coorong and Murray Mouth are hydrologically connected to the Lower Lakes and River Murray (specifically resource units SS2, SS6, SS11, SS14, SS15). This statement is consistent with the information provided in ss 5.2.4, 5.2.4.1 and 5.7.3. The supporting information in s 5.7.9.1 notes that water quality targets along the River Murray channel are similar. In addition, the supporting information in s 5.7.7.1 indicates that participation in Basin-wide arrangements contributes to the achievement of relevant salinity targets throughout the Basin.	

Part 8 Trade of water access rights

Section 10.36 – Application of Part

This Part does not apply to water access rights of a kind that are not able to be traded under State water management law.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish if (1) if the WRP has a statement about whether Part 8 applies in the plan area.	WRP s 5.8.1 WRP s 5.3.1	Section 5.8.1 of the proposed WRP identifies the water access rights operating within the WRP area and identifies which are tradeable or not tradeable. This section of the proposed WRP provides a broad indication of the SDL resource units where trade is permitted under state water management law. The information provided about the circumstances where trade may occur is clarified further in the provisions addressing the remaining requirements of Part 8. The information provided in this section relating to water access rights is consistent with the information provided for the purposes of s 10.08 (see s 5.3.1).	**MET**

Section 10.37 – Circumstances in which conditions in section 12.24 are met

(1) A water resource plan must set out the circumstances in which trade between 2 locations within a groundwater SDL resource unit is permitted. In setting out the circumstances, a water resource plan must ensure that each condition set out in section 12.24 will be met in relation to the proposed trade.

(2) If the water resource plan applies a conversion rate to meet the condition in paragraph 12.24(d), the water resource plan must either:

(a) specify the conversion rate; or
(b) set out the way in which the conversion rate will be determined from time to time and made generally available.

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	The WRP sets out the circumstances in which trade between 2 locations within a groundwater SDL resource unit is permitted	True	WRP s 5.8.2 WRP s 5.8.2.1 WRP Table 6 in s 5.2.3 WRP s 5.2.4.1 WRP s 5.3.3	Section 5.8.2 and 5.8.2.1 of the proposed WRP set out the circumstances in which trade is permitted between 2 locations *within* the same SDL resource unit. Trade is permitted between 2 locations in each of the following SDL resource units: Mallee (Murray Group Limestone) (GS3) Peake-Roby-Sherlock (confined) (GS5) Peake-Roby-Sherlock (unconfined) (GS5) The proposed WRP identifies the sections of the NRM Act which provide for trades to occur, provide the legal authority for the trades to be approved or refused, and which also include the circumstances and conditions which must be met for approval to be given. These sections of the NRM Act are included in Table 6 in s 5.2.3 for accreditation.	**MET**

Subsection	Detailed assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
			Table 6 in s 5.2.3 also incorporates relevant sections of water allocation plans which set out further conditions which must be met in order for a trade to be approved. Two key aspects of the conditions which must be met for trade to be approved are: - Under the NRM Act, a transfer is a change in ownership of a water access entitlement or allocation. A change in location is achieved through varying the licence or allocation. These activities are considered trade for Basin Plan purposes. - For a trade to be approved it must comply with all aspects of the WAP, including transfer rules, management zone limits, and other rules that manage the effects of water use. ***Linked provisions*** The level of consistency of the arrangements in the proposed WRP with the requirements of s 12.24 is discussed below. Section 5.2.4.1 provides supporting information regarding the management of connected resources as required by s 10.05 of the Basin Plan. Section 5.2.4.1 indicates that the Mallee (Murray Group Limestone) SDL resource unit comprises one aquifer and it is therefore considered appropriate to allow trade, within defined limits	

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				and subject to certain conditions intended to manage any adverse effects within the SDL resource unit or on connected resources. Relevant rules and conditions are incorporated into the proposed WRP through the instruments included for accreditation in Table 6 in s 5.2.3. Section 5.3.3 of the proposed WRP sets out the methods for determining annual permitted take as required for s 10.10 and s 10.12 of the Basin Plan. The methods for determining annual permitted take account for trade consistently with the provisions addressing trade in the proposed WRP. In each case where trade may permitted, s 5.3.3 states that taking limits do not change as a result of trade. This statement is consistent with the provisions addressing trade within SDL resource units in the proposed WRP.	
	When a trade as described in this section occurs, each of the following conditions will be met in relation to that trade:				**MET**
	sufficient hydraulic connectivity between the 2 locations	True	WRP s 5.8.2 WRP s 5.8.2.1, including Table 17 and Table 18 WRP Table 6 in s 5.2.3	Section 5.8.2 indicates that, in accordance with the sections of the NRM Act incorporated for accreditation in Table 6 in s 5.2.3, a trade may only be approved if it is consistent with all rules regarding trade and allocation in the relevant water allocation plan.	

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
			WRP s 5.2.4.1 WRP s 5.3.3	***Mallee*** Trade is permitted within Mallee (Murray Group Limestone). The Murray Group Limestone aquifer is one continuous basin. Table 6 of the Mallee WAP sets out the zones within the confined aquifer where trade is permitted. There are annual limits on take from each of the management zones and a trade is only permitted into any zone if doing so does not cause the annual limit for that zone to be exceeded. Trade is limited by groundwater management zone limits within the water allocation plan such that the limit for a management zone cannot increase as a result of trade. These limits and associated rules have been put in place to avoid adverse impacts on third parties and the aquifer. In addition, s 5.8.2.1 references the water budget within the Mallee Groundwater model (2006) as evidence of sufficient hydraulic connectivity to allow trade throughout the Mallee Prescribed Wells area. This report and the Mallee WAP 2017 provide information regarding the hydrological and cadastral features that the management zones within the Prescribed Wells area are based upon. The proposed WRP, in particular s 5.3.3 and s 5.8.2 make clear that the tradeable water access	

Subsection	Detailed assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
			rights within the Mallee (Murray Group Limestone) SDL resource unit are administered under the NRM Act and the Mallee WAP. Relevant provisions of the WAP are incorporated for accreditation in Table 6 in s 5.2.3. ***Peake-Roby-Sherlock*** Trade is permitted between and within certain management zones within the PRS (confined) SDL resource unit. The supporting information indicates that the confined aquifer consists of the Buccleuch Group and Renmark Group which are highly interconnected. Table 5 of the PRS WAP 2017 sets out the zones within the confined aquifer where trade is permitted. There are annual limits on take from each of the management zones and a trade is only permitted into any zone if doing so does not cause the annual limit for that zone to be exceeded. Trade is permitted between and within certain management zones within the PRS (unconfined) SDL resource unit. The supporting information indicates that the unconfined aquifer is connected but can be subdivided into the Mallee Highland in the east and the Coastal Plain region in the west. Two technical reports are referenced which support this statement.	

Subsection	Detailed assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
			Table 5 of the PRS WAP 2017 sets out the management zones within the confined aquifer where trade is permitted. There are annual limits on take from each of the management zones and a trade is only permitted into any zone if doing so does not cause the annual limit for that zone to be exceeded. The proposed WRP, in particular s 5.3.3 and s 5.8.2 make clear that the tradeable water access rights are administered under the NRM Act and the PRS WAP 2017 which includes the two PRS SDL resource units. Relevant sections of the WAP are incorporated into the proposed WRP. Two technical reports are referenced which discuss connectivity in the PRS SDL resource units. These reports and the PRS WAP 2017 provide information regarding the hydrological and cadastral features that the management zones within the Prescribed Wells area are based upon. ***Overall conclusion*** The proposed WRP provides information about the level of hydraulic connectivity within each of the SDL resource units. The level of connectivity varies depending on the hydrogeological features of each SDL resource unit, and the WRP has addressed these varying levels of connectivity by taking a conservative approach to allowing trade	

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				within an SDL resource unit. This includes setting out management zones to limit trade within an SDL resource unit, and only allowing trades where this will not cause the annual limit for a management zone to be exceeded. This assessment concludes that the level of hydraulic connectivity in each of the SDL resource units is sufficient for trade to occur, taking into account the precautionary approach of the rules that have been put in place to manage trade within each of the SDL resource units.	
	resource condition limits in the SDL resource unit specified in a water resource plan will not be exceeded as a result of the trade	True	WRP s 5.8.2 WRP s 5.8.2.1, including Table 17 and Table 18 WRP Table 6 WRP s 5.4.5 WRP s 5.4.6	Section 5.8.2 of the proposed WRP indicates that in accordance with the sections of the NRM Act incorporated for accreditation in Table 6 in s 5.2.3, a trade may only be approved if it is consistent with the principles in the relevant water allocation plan. Certain of these principles, which may be considered Resource Condition Limits, are incorporated in the proposed WRP (see s 5.4.5, s 5.4.6 and Table 6 in s 5.2.3). There are annual limits on take from each of the management zones within the WAPs (see s 5.8.2.1). These limits are intended to avoid adverse impacts arising from take (including as a result of trade). A trade is only permitted into any	

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				zone if doing so does not cause the annual limit for that zone to be exceeded.	
	and either:				
	water access rights in the 2 locations have substantially similar characteristics of timing, reliability and volume or	True	WRP s 5.8.2 WRP s 5.8.2.1	Section 5.8.2 and 5.8.2.1 of the proposed WRP explain how matters relating to timing, reliability and volume are dealt with in each relevant SDL resource unit. For each of the SDL resource units where trade is permitted within that unit, the water access rights are managed under the same state legislation and water planning instruments. This assessment is satisfied that water access rights in the locations where trade is permitted have substantially similar characteristics.	
	measures are in place to ensure that the water access right to be traded will maintain its characteristics of timing, reliability and volume	N/A	N/A	The first option for this section is relevant as noted above, therefore this option is not applicable.	

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	measures in place to address the impact, as a result of trade, on water availability in relation to a water access right held by a third party	True	WRP s 5.8.2 WRP s 5.8.2.1 WRP s 5.2.3, including Table 6	Section 5.8.2 of the proposed WRP indicates that in accordance with the sections of the NRM Act incorporated for accreditation in Table 6 in s 5.2.3, a trade may only be approved if it is consistent with the principles in the relevant water allocation plan. Certain of these principles, which aim to avoid adverse impacts on third parties, are incorporated for accreditation in Table 6 in s 5.2.3. Relevant principles give effect to: - management zone limits - buffer zones - accounting provisions Section 5.8.2.1 refers to a number of relevant principles including one (Principle 44 in the Mallee WAP) which is not also included in Table 6 in s 5.2.3 for accreditation. Therefore, in accordance with the note relating to Table 6 in s 5.2.3, Principle 44 of the Mallee WAP is not included for accreditation. Principle 44 relates to additional information that may be considered by the decision-maker in certain limited circumstances. As such it is not considered that this matter needs to be included for accreditation in order for this requirement to be met.	

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
2	The WRP applies a conversion rate to meet the condition in s12.24(d)	False	WRP s 5.8.2.1	Section 5.8.2.1 describes how the requirements of s 12.24(d) are addressed. No conversion rate is applied to meet the condition in s 12.24(d) therefore this requirement is not applicable.	**MET**
	If 'yes' either of the following:				**Not applicable**
(a)	The conversion rate is specified	N/A	WRP s 5.8.2.1	Section 5.8.2.1 describes how the requirements of s 12.24(d) are addressed. No conversion rate is applied to meet the condition in s 12.24(d) therefore this requirement is not applicable.	
(b)	The way in which the conversion rate will be determined from time to time and made generally available is set out	N/A	WRP s 5.8.2.1	Section 5.8.2.1 describes how the requirements of s 12.24(d) are addressed. No conversion rate is applied to meet the condition in s 12.24(d) therefore this requirement is not applicable.	
	The 'no' case in not necessary to re-state				

Section 10.38 – Circumstances in which conditions in section 12.25 are met

(1) A water resource plan must set out the circumstances in which trade between 2 groundwater SDL resource units is permitted. In setting out the circumstances, a water resource plan must ensure that each condition set out in section 12.25 will be met in relation to proposed trade.

(2) If the water resource plan applies a conversion rate to meet the condition in paragraph 12.25(e), the water resource plan must either:

(a) specify the conversion rate; or

(b) set out the way in which the conversion rate will be determined from time to time and made generally available.

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	The WRP sets out the circumstances in which trade between 2 groundwater SDL resource unit is permitted	True	WRP s 5.2.4 WRP s 5.2.4.1 WRP s 5.8.3 WRP s 5.8.3.1, including Table 19 WRP s 5.4.3 – 5.4.6 WRP s 5.3.3 WRP Table 6 in s 5.2.3	Section 5.8.3 of the proposed WRP identifies that trade is permitted between GS5 PRS (confined) SDL resource unit and GS5 PRS (unconfined) SDL resource unit. The proposed WRP indicates that trade is not permitted between any other groundwater SDL resource units in the WRP area. Section 5.8.3 and 5.8.3.1 of the proposed WRP identifies the sections of the NRM Act which provide for trades to occur, provide the legal authority for the trades to be approved or refused, and which also include the circumstances and conditions which must be met for approval to be given. These sections of the NRM Act are	**MET**

Subsection	Detailed assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
			included in Table 6 in s 5.2.3 for accreditation. The PRS WAP 2017 is the water planning instrument that covers both of the relevant groundwater SDL resource units. Section 5.8.3 of the proposed WRP identifies rules (referred to in the state instrument as 'principles') in the PRS WAP 2017 which must be applied by the decision maker in determining whether a proposed trade is to be approved or refused. The relevant sections of the PRS WAP 2017 are included in Table 6 in s 5.2.3 for accreditation. Two key aspects of the conditions given effect by these arrangements are: - Under the NRM Act, a transfer is a change in ownership of a water access entitlement or allocation. A change in location is achieved through varying the licence or allocation. These activities are considered trade for Basin Plan purposes. - For a trade to be approved it must comply with all aspects of the WAP, including transfer rules, management zone limits, and other rules that manage the effects of water use. ***Linked provisions***	

Subsection	Detailed assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
			The level of consistency of the arrangements in the proposed WRP with the requirements of s 12.25 is discussed in the sections below which specifically address this requirement. Sections 5.2.4 and 5.2.4.1 provide information regarding the management of resources with a significant hydrological connection within the WRP area in response to s 10.05 of the Basin Plan. Section 5.2.4.1 identifies two reports which indicate there are small volumes of inter-aquifer leakage in the east of the area and that the confining layer is progressively absent towards the west. Overall, the connection is considered to be present, but not significant. Section 5.3.3 of the proposed WRP sets out the methods for determining annual permitted take as required for s 10.10 and s 10.12 of the Basin Plan. The methods for determining annual permitted take account for trade consistently with the provisions addressing trade within SDL resource units in the proposed WRP. In each case where trade may be permitted, s 5.3.3 states that take limits do not change as a result of trade. This statement is consistent with the	

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				provisions addressing trade within SDL resource units in the proposed WRP. Sections 5.4.3 – 5.4.6 of the proposed WRP address the requirements of ss 10.18 – 10.21 of the Basin Plan. These sections of the proposed WRP describe rules from the PRS WAP which must be applied for a trade between the SDL resource units to be approved.	
	When a trade as described in this section occurs, each of the following conditions will be met in relation to that trade:				**MET**
	sufficient hydraulic connectivity between the 2 units	True	WRP s 5.8.3.1 WRP s 5.2.4.1 WRP s 5.8.2.1	The supporting information in s 5.8.3.1 of the proposed WRP identifies s 1.5 of the PRS WAP as evidence that there is sufficient hydraulic connectivity to allow for trade between the confined and unconfined aquifer. This section of the PRS WAP references a 2008 modelling report. In particular, the section of the report that identifies that there could be some leakage between the confined and unconfined layers is quoted. The supporting information in s 5.2.4.1 of the proposed WRP references a more	

Subsection	Detailed assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
			recent report (2015) which indicates that the confining layer is progressively absent towards the west of the area. The proposed WRP and the supporting reports indicate that there is not significant connectivity between the two aquifers. However, the proposed WRP concludes that there is sufficient connectivity for the purposes of trade in this area, within the bounds of the management arrangements in place through the PRS WAP. Supporting information in s 5.8.2.1 describes how the transfer principles apply in the PRS WAP. Considered together, these descriptions provide further information about how trading between the PRS confined and unconfined SDL resource units is managed to protect aquifers from salinity impacts, excessive drawdowns and associated impacts to third parties and the aquifers. Principle 14 & Table 5 of the PRS WAP set out the specific management zones where trade is permitted, further limiting the circumstances in which trade is permitted. In addition, as noted previously in this advice, there are annual limits on take from	

Subsection	Detailed assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
			each of the management zones and a trade is only permitted into any zone if doing so does not cause the annual limit for that zone to be exceeded. The supporting information in s 5.8.3.1 of the proposed WRP indicates that the likelihood of trade between these two SDL resource units is very low. This assessment supports this analysis on the basis of: - the limited number of tradeable rights in the area - the history of trade to date - the high salinity levels and relatively high proportion of unallocated water available from the unconfined aquifer - limited circumstances in which trade is permitted by the WAP. In conclusion, the proposed WRP identifies that there is a limited and variable level of connectivity between the GS5 PRS confined and unconfined SDL resource units. The proposed WRP has addressed the varying levels of connectivity by taking a conservative approach to allowing trade between the SDL resource units by setting out management zones to limit trade and	

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				only allowing trades where this will not cause the annual limit for a management zone to be exceeded. This assessment concludes that the level of hydraulic connectivity between the PRS confined and unconfined SDL resource units is sufficient for trade to occur, taking into account the precautionary approach of the rules that have been put in place to manage trade between these SDL resource units.	
	resource condition limits in the SDL resource units specified in a water resource plan will not be exceeded as a result of the trade	True	WRP s 5.8.3 WRP s 5.8.3.1 WRP s 5.4 WRP Table 6 in s 5.2.3	Section 5.8.3 of the proposed WRP indicates that in accordance with the sections of the NRM Act incorporated for accreditation in Table 6 in s 5.2.3, a trade may only be approved if it is consistent with the principles in the relevant WAP. Certain of these principles, which may be considered Resource Condition Limits, are incorporated for accreditation in Table 6 in s 5.2.3 (s 5.4 includes further explanation of these principles). There are annual limits on take from each of the management zones within the WAPs. These limits are intended to avoid adverse impacts arising from take (including as a result of trade). A trade is only permitted into any zone if doing so does not cause the	

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				annual limit for that zone to be exceeded (see 5.8.3.1).	
	the measures in place to address s10.10 take account of trade	True	WRP s 5.8.3 WRP s 5.8.3.1 WRP s 5.3.3	Section 5.8.3 and 5.8.3.1 of the proposed WRP indicate that trade is accounted for consistently with the requirements of the PRS WAP. These requirements state that trade into a management zone must not result in the management zone limit being exceeded. This accounting arrangement is not required to address s 10.10 in this case. For the two relevant SDL resource units, the method used for s 10.10 (s 5.3.3) is that annual permitted take equals a fixed number equal to the SDL. As such, the trading arrangements do not impact on permitted take.	
	and either:				
	water access rights in the 2 units have substantially similar characteristics of timing, reliability and volume *or*	True	WRP s 5.3.8.1	The supporting information in s 5.3.8.1 of the proposed WRP explains how matters relating to timing, reliability and volume are dealt with in each relevant SDL resource unit.	

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				For each of the SDL resource units where trade is permitted within that unit, the water access rights are managed under the same state legislation and water planning instruments. This assessment is satisfied that water access rights in the locations where trade is permitted have substantially similar characteristics.	
	measures are in place to ensure that the water access right to be traded will maintain its characteristics of timing, reliability and volume	N/A	WRP s 5.3.8.1	The first option for this section is relevant as noted above, therefore this option is not applicable.	
	measures in place to address the impact, as a result of trade, on water availability in relation to a water access right held by a third party	True	WRP s 5.8.3 WRP s 5.8.3.1 WRP Table 6 in s 5.2.3	Section 5.8.3 of the proposed WRP indicates that in accordance with the sections of the NRM Act incorporated for accreditation in Table 6 in s 5.2.3, a trade may only be approved if it is consistent with the principles in the relevant water allocation plan. Certain of these principles, which aim to avoid adverse impacts on third parties, are incorporated for accreditation in Table 6 in s 5.2.3 (s 5.8.3.1 includes further information about these	

Subsection	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				principles). Relevant principles give effect to: - management zone limits - buffer zones - accounting provisions	
2	The WRP applies a conversion rate to meet the condition in s12.25(e)	False	WRP s 5.8.3.1	Section 5.8.3.1 describes how the requirements of s 12.25(e) of the Basin Plan are addressed. No conversion rate is applied to meet the condition in s 12.25(e) therefore this requirement is not applicable.	**MET**
	If 'yes' either of the following:				**Not applicable**
(a)	The conversion rate is specified	N/A	WRP s 5.8.3.1	Section 5.8.3.1 describes how the requirements of s 12.25(e) of the Basin Plan are addressed. No conversion rate is applied to meet the condition in s 12.25(e) therefore this requirement is not applicable.	
(b)	The way in which the conversion rate will be determined from time to time and made generally available is set out	N/A	WRP s 5.8.3.1	Section 5.8.3.1 describes how the requirements of s 12.25(e) of the Basin Plan are addressed. No conversion rate is applied to meet the condition in s 12.25(e) therefore this requirement is not applicable.	

Subsection	Detailed assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
	The 'no case in not necessary to re-state			

Section 10.39 – Circumstances in which conditions in section 12.26 are met

(1) A water resource plan must set out the circumstances in which trade between a groundwater SDL resource unit and a surface water SDL resource unit is permitted. In setting out the circumstances, a water resource plan must ensure that each condition set out in section 12.26 will be met in relation to proposed trade.

(2) If the water resource plan applies a conversion rate to meet the condition in paragraph 12.26(e), the water resource plan must either:

(a) specify the conversion rate; or

(b) set out the way in which the conversion rate will be determined from time to time and made generally available.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish if (1) a statement about the applicability of the section is provided. If 'not applicable', verify that (2) the circumstance is correctly stated, and (3) reflects the relevant state law.	WRP s 5.8.4 WRP s 5.8.1	Consistently with s 5.8.1, s 5.8.4 of the proposed WRP indicates that trade cannot occur between a groundwater SDL resource unit and the surface water SDL resource unit either within the WRP area or with a surface water SDL resource unit in another WRP area.	**MET**

Part 9 Risk assessment

Section 10.40 - Definitions

In this Part:

risk means a risk listed in a water resource plan in accordance with subsection 10.41(4).

level of risk has the meaning given in AS/NZS ISO 31000:2009 Risk Management—Principles and Guidelines.

Section 10.40 lists definitions for Part 9 only and therefore there is no requirement to assess

Section 10.41 – Risk identification and assessment methodology

(1) A water resource plan must be prepared having regard to current and future risks to the condition and continued availability of the water resources of the water resource plan area.

(2) Without limiting subsection (1), the risks include (where applicable):

  (a) risks to the capacity to meet environmental watering requirements; and
  (b) risks arising from the matters referred to in subsection 10.20(1); and
  (c) risks arising from potential interception activities; and
  (d) risks arising from elevated levels of salinity or other types of water quality degradation.

(3) In identifying risks for the purposes of subsection (1), regard must be had to:

  (a) risks identified in section 4.02; and
  (b) any guidelines published by the Authority in relation to risk identification and risk assessment.

(4) The water resource plan must list the risks identified for the purposes of subsection (1).

(5) The water resource plan must assess each risk.

(6) The water resource plan must define the level of risk of each risk, using the following categories:

  (a) low;
  (b) medium;
  (c) high;
  (d) if it is considered appropriate, any additional category.

(7) The water resource plan must describe the data and methods used to identify and assess the risks.

(8) The water resource plan must describe any quantified uncertainties in the level of risk attributed to each risk, including the results of any sensitivity analysis.

– Streamlined assessment is not applicable to subsection 10.41 (1) – must be assessed using the detailed critieria –

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	The development of the WRP had regard to current and future risks to the water resources in the WRP area	True	WRP s 5.9.2 WRP s 5.9.2.1, including Table 20	Section 5.9.2 and 5.9.2.1 of the proposed WRP provide detailed information regarding the method for identification of current and future risks to the condition and continued availability of water resources in the WRP area. Table 20 in s 5.9.2.1 provides an outline of the various sections of the proposed WRP where relevant risks were considered.	**MET**
2	The development of the WRP had regard to the risks in letters (a)-(d) that are relevant to the WRP area	True	WRP s 5.9.2.1, including Table 20	Section 5.9.2.1, including Table 20, describes how the proposed WRP was developed having regard to each of the items relevant to this section. The approach to each item is discussed in the following sections.	**MET**
	The list of risks in s10.41(4) includes each of the risks specified as follows: Risks to the capacity to meet environmental watering requirements is listed in s10.41(4)	True	WRP s 5.9.2.1, including Table 20 WRP s 5.9.3 WRP s 5.9.5 WRP s 5.4.2 WRP s 5.4.4 WRP s 5.13.1 WRP Table 6 in s 5.2.3	Section 5.9.2.1, including Table 20, indicates that risks to the capacity to meet environmental watering requirements were considered in the risk assessment through the assessment of risks with a consequence of 'water-dependent ecosystems impacted'. These risks are listed in Appendix B of the Risk Assessment which is incorporated for accreditation in Table 6 in s 5.2.3 for the purposes of s 10.41(4). Table 20 in s 5.9.2.1 indicates these risks have informed the development of the WRP, with more	

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				detailed discussion included in the relevant sections of the proposed WRP.	
	Risks arising from the matters referred to in subsection 10.20(1) are listed in s10.41(4), as follows: Risks that may cause structural damage to an aquifer (within or outside the water resource plan area) arising from take within the long-term annual diversion limit for an SDL resource unit	True	WRP s 5.9.2.1, including Table 20 WRP s 5.9.3 WRP s 5.9.5 WRP s 5.4.5 WRP Table 6 in s 5.2.3	Section 5.9.2.1, including Table 20, indicates how risks arising from the matters listed in s 10.20(1) were considered during the development of the risk assessment. These risks are listed in Appendix B of the risk assessment report which is incorporated for accreditation in Table 6 in s 5.2.3 for the purposes of s 10.41(4). Further explanation of the consideration of these risks during the development of the WRP, as well as during the development of the state instruments that form part of the proposed WRP, is included in Section 5.4.5. Table 20 in s 5.9.2.1 indicates where these risks have informed the development of the WRP, with more detailed discussion included in the relevant sections of the proposed WRP.	
	Risks that may cause damage to hydraulic relationships and properties between groundwater and surface water systems, between groundwater systems, and within groundwater systems	True	WRP s 5.9.2.1, including Table 20 WRP s 5.9.3 WRP s 5.9.5 WRP s 5.4.5	Section 5.9.2.1, including Table 20, indicates how risks arising from the matters listed in s 10.20(1) were considered during the development of the risk assessment. These risks are listed in Appendix B of the risk assessment report which is incorporated for accreditation in Table 6 in s 5.2.3 for the purposes of s 10.41(4).	

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
			WRP Table 6 in s 5.2.3	Further explanation of the consideration of these risks during the development of the WRP, as well as during the development of the state instruments that form part of the proposed WRP, is included in s 5.4.5. Table 20 in s 5.9.2.1 indicates where these risks have informed the development of the WRP, with more detailed discussion included in the relevant sections of the proposed WRP.	
	Risks arising from potential interception activities	True	WRP s 5.9.2.1, including Table 20 WRP s 5.9.3 WRP s 5.9.5 WRP s 5.5.1 WRP Table 6 in s 5.2.3	Section 5.9.2.1, including Table 20, indicates how risks arising from potential interception activities were considered during the development of the risk assessment. These risks are listed in Appendix B of the risk assessment report which is incorporated for accreditation in Table 6 in s 5.2.3 for the purposes of s 10.41(4). Further explanation of the consideration of these risks during the development of the WRP, as well as during the development of the state instruments that form part of the proposed WRP, is included in s 5.5.1. Table 20 in s 5.9.2.1 indicates where these risks have informed the development of the WRP, with more detailed discussion included in the relevant sections of the proposed WRP.	

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	Risks arising from elevated levels of salinity or other types of water quality degradation	True	WRP s 5.9.2.1 WRP s 5.9.3 WRP s 5.9.5 WRP s 5.5.1 WRP 5.7.3 WRP 5.7.7 WRP Table 6 in s 5.2.3	The proposed WRP indicates how risks arising from elevated levels of salinity or other types of water quality degradation were considered during the development of the risk assessment. These risks are listed in Appendix B of the risk assessment report which is incorporated for accreditation in Table 6 in s 5.2.3 for the purposes of s 10.41(4). Further explanation of the consideration of these risks during the development of the WRP, as well as during the development of the state instruments that form part of the proposed WRP, is included in sections 5.7.3 and 5.7.7. Table 20 in s 5.9.2.1 indicates where these risks have informed the development of the WRP, with more detailed discussion included in the relevant sections of the proposed WRP.	
3	Risk identification had regard to risks in letters (a) and (b) as follows: Risks identified in s4.02: Insufficient water available for the environment	True	WRP s 5.9.4 WRP s 5.9.4.1	Section 5.9.4 and 5.9.4.1 of the proposed WRP indicate how the identification of risks to the condition or continued availability of Basin water resources had regard to insufficient water being available for the environment.	**MET**
	Water being of a quality unsuitable for use	True	WRP s 5.9.4	Section 5.9.4 and 5.9.4.1 indicate how the identification of risks to the condition or continued	

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
			WRP s 5.9.4.1	availability of Basin water resources had regard to water being of a quality unsuitable for use.	
	Poor health of water-dependent ecosystems	True	WRP s 5.9.4 WRP s 5.9.4.1	Section 5.9.4 and 5.9.4.1 indicate how the identification of risks to the condition or continued availability of Basin water resources water had regard the health of water-dependent ecosystems.	
	Insufficient water is available, or water is not suitable for consumptive and other economic uses of Basin water resources	True	WRP s 5.9.4 WRP s 5.9.4.1	As indicated in s 5.9.4 of the proposed WRP, the risk identification had regard to the risks identified in s 4.02 of the Basin Plan. The SAMR Risk Assessment describes how the consideration of the consequences, for consumptive and other economic uses, of the materialisation of the risks mentioned above has informed the risk assessment.	
	Insufficient water is available, or water is not suitable to maintain social, cultural, Indigenous and other public benefit values	True	WRP s 5.9.4 WRP s 5.9.4.1	As indicated in s 5.9.4 of the proposed WRP, the risk identification had regard to the risks identified in s 4.02 of the Basin Plan. The SAMR Risk Assessment describes how the consideration of the consequences, for consumptive and other economic uses, of the materialisation of the risks mentioned above has	

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				informed the risk assessment. This consideration includes other social and public benefit factors. However, the SAMR Risk Assessment indicates that risks to cultural values were considered in the development of the risk assessment. The proposed WRP consequently includes consideration of risks to Aboriginal values and uses. The proposed WRP also clarifies the statement in the SAMR Risk Assessment to note that non-indigenous cultural values have been considered in the consideration of other social factors.	
	Guidelines published by the Authority in relation to risk identification and risk assessment	False	N/A	No relevant guidelines have been published by the Authority for the purposes of this section.	
4	The list of risks includes all current and future risks as described in subsection (1)-(3)	True	WRP s 5.9.5	The proposed WRP identifies the current and future risks throughout various sections. Appendix B of the SAMR Risk Assessment provides a comprehensive list of risks identified for the WRP area.	**MET**
5	Each of the risks listed in subsection (4) has been assessed according to the State's chosen risk assessment method	True	WRP 5.9.6	As indicated in s 5.9.6 of the proposed WRP, the SAMR Risk Assessment includes consideration of each of the risks listed.	**MET**

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
6	Each of the risks listed in subsection (4) is rated as 'low', 'medium' or 'high'	True	WRP 5.9.7	As indicated in s 5.9.7 of the proposed WRP, the SAMR Risk Assessment rates each risk as low, medium or high.	**MET**
	If used, additional categories of risk rating are appropriate to the State's chosen risk assessment method	N/A	N/A	The proposed WRP does not include any additional categories of risk rating.	
7	The data and method used to identify and assess risks is described	True	WRP 5.9.8	As indicated in s 5.9.8 of the proposed WRP, the SAMR Risk Assessment sets out the data and methods used to identify and assess the risks.	**MET**
8	Where uncertainties about risks are quantified, a description of the quantification methods is provided	True	WRP 5.9.9	As indicated in s 5.9.9 of the proposed WRP, the SAMR Risk Assessment sets out the uncertainties associated with the risk assessment. This includes the quantification of uncertainties where applicable.	**MET**
	Where sensitivity analysis is used, the results are provided	N/A	N/A	The risk assessment methodology does not include a sensitivity analysis.	

Section 10.42 – Description of risks

A water resource plan must describe:

(a) each risk which is defined in accordance with subsection 10.41(6) as having a medium or higher level of risk; and

(b) factors that contribute to those risks.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Verify that (1) the list provided under s 10.41 is a consolidated description of each medium and high risk	WRP s 5.9.10	The proposed WRP and the Risk Assessment Report describe the risks identified as medium or high and the factors that contribute to those risks. There are two risks of this type relevant to the WRP area: **Risk rated high** Coorong Surface Water: There is the potential for management of connected water resources to cause changes to inflows of water in turn leading to water quality changes impacting on water dependent ecosystems (r844). **Risk rated medium** Coorong, Lower Lakes and River Murray unconfined groundwater: There is the potential for climate extremes to cause increased evaporative discharge (and/or reduced recharge) leading to an impact on groundwater level such that groundwater-dependent ecosystems are impacted (r700).	**MET**

Section 10.43 – Strategies for addressing risks

(1) If a water resource plan defines a risk in accordance with subsection 10.41(6) as having a medium or higher level of risk, the water resource plan must either:

(a) describe a strategy for the management of the water resources of the water resource plan area to address the risk in a manner commensurate with the level of risk; or

(b) explain why the risk cannot be addressed by the water resource plan in a manner commensurate with the level of risk.

(2) If the water resource plan identifies a risk which relates to a matter dealt with by a requirement in another Part of this Chapter, the strategy must take account of that requirement.

(3) A water resource plan must be prepared having regard to:

(a) the strategies listed in subsection 4.03(3); and

(b) any guidelines published by the Authority in accordance with section 4.04.

Note: The Authority may publish guidelines in accordance with section 4.04 in relation to the implementation of strategies to manage or address risks identified in section 4.02.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish that (1) the list of risks is consistent with s 10.42. Verify that (2) the list has a description of a strategy to manage each risk to water resources in the plan area. Establish that (3) the description of strategies is commensurate with risk level. If strategies are not provided, establish that (4) an explanation of why a risk cannot be addressed in a commensurate manner is provided. Verify that (5) risk assessment outcomes have links to other WRP requirements. Establish that (6) a description	WRP s 5.9.11	The proposed WRP and the SAMR Risk Assessment identify two risks that are rated medium or higher. One of the risks is identified as a matter that can only be fully mitigated by actions upstream of the WRP area, while the other risk identified has no cost-effective strategy available to fully mitigate the risk. In each case there are some local management strategies included that contribute somewhat to mitigation of the risks.	**MET**

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
of how that requirement was taken account of is provided. **Verify that (7) an explanation of how regard was had to s 4.03(3) and relevant guidelines is provided.**			

Part 10 Measuring and monitoring

Section 10.44 – Information relating to measuring take – water access entitlements

A water resource plan must include the following information in relation to each class of water access right relating to the water resources of the water resource plan area:

(a) the best estimate of the total long-term annual average quantity of water taken that is measured;
(b) the best estimate of the total long-term annual average quantity of water taken that is not measured;
(c) how the quantities under paragraphs (a) and (b) were calculated;
(d) the proportion of the quantity referred to in paragraph (a) that is measured in accordance with standards for measuring agreed by the Basin States and the Commonwealth.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish that (1) current best estimate of LTAA 'take' per class is stated. Establish that (2) a description of the calculations is provided. **Verify that (3) the proportion of 'take' measured according to agreed standard is stated for each of the quantities (where it is applicable).**	WRP s 5.10.1 WRP s 5.3	For each SDL resource unit and each class of water access right, s 5.10.1 of the proposed WRP includes the best estimate of the long-term annual average quantity of water taken that is measured or not-measured. The proposed WRP includes information about how each of these amounts was calculated. The information provided to address this requirement is consistent with the provisions addressing Chapter 10, Part 3 (see s 5.3) of the Basin Plan.	**MET**

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
		At the time the proposed WRP was submitted, the Authority and Basin States were working through the implementation arrangements for standards relating to measuring. The proposed WRP includes a commitment that, once these arrangements have been settled, SA will consider whether this section of the SA Murray Region WRP needs amendment to reflect the agreed arrangements.	

Section 10.45 – Supporting measuring

(1) A water resource plan must specify measures for maintaining and, if practicable, improving:

(a) the proportion of take that is measured in the water resource plan area; and

(b) the standard to which take is measured.

(2) The water resource plan must specify the timeframe for implementing the measures.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish that (1) measures for maintaining measured proportion of 'take' is specified. **Establish that (2) the standard to which to which 'take' is measured is stated.** **Establish that (3) measures to improve measures is stated.** **Establish that (4) measures to improve the standard is stated.** **Verify that (5) timeframe for implementation is within 5 years.**	WRP s 5.10.2 WRP Table 6 in s 5.2.3	Section 5.10.2 of the proposed WRP sets out the relevant sections of state regulations that set out the obligations for licence holders to undertake metering and the standards for meters. These obligations relate to licenced take in resources that are prescribed under state water management law. The relevant obligations are included for accreditation in Table 6 in s 5.2.3 of the proposed WRP. The proposed WRP states that no improvements are needed as the proportion of take that is measured, and the current metering standards are already of a high standard, which will be maintained. However, the proposed WRP indicates that improvements would be made in the future if deemed necessary through the agreed approach to the implementation of standards for measuring between the Commonwealth and Basin States,	**MET**

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
		through the Compliance Compact agreed by the Authority and Basin States.	

Section 10.46 – Monitoring water resources

(1) A water resource plan must specify the monitoring of the water resources of the water resource plan area that will be done to enable the Basin State to fulfil its reporting obligations under section 13.14.

(2) Nothing in this section limits the capacity of the Basin State to conduct other monitoring of the water resources of a water resource plan area.

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	The WRP specifies monitoring of water resources	True	WRP s 5.10.3, including Table 24	Table 24 in s 5.10.3 sets out a number of monitoring activities against matters 8, 9, 12 and 19 of Schedule 12 of the Basin Plan. The proposed WRP also identifies that the monitoring undertaken for those matters may also be used to fulfil reporting obligations in relation to other matters.	**MET**
	The monitoring is specified in terms of the State's reporting obligation under s13.14/Schedule 12 (**exhaustive**)	True	WRP s 5.10.3, including Table 24	Table 24 in s 5.10.3 identifies that the monitoring undertaken for the matters that need monitoring of water resources may also be used to fulfil reporting obligations in relation to other matters. The table also specifically refers to its purpose being to outline the monitoring to meet obligations imposed by s 13.14.	
	The monitoring specified will enable the State to fulfil its	True	WRP s 5.10.3, including Table 24	Table 24 in s 5.10.3 provides a high-level description of the monitoring in place, including	

Sub-section	Detailed assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
	reporting obligations under s13.14/Schedule 12	WRP s 5.3.2	the nature, extent and indicative frequencies of monitoring. It is noted that South Australia does not report volumes of PEW in the SA Murray Region WRP area. This is because the instances of PEW in this area arise from rules which limit water affecting activities and the relevant systems are not regulated. Therefore, monitoring relating to the volumes of PEW is not undertaken. With respect to the Coorong, HEW agreed for delivery to the Coorong will be accounted as HEW over the barrages through the SA River Murray WRP. This water is considered PEW once it enters the SA Murray Region WRP area as it the resources are not managed through a licencing system. The water that enters the Coorong is protected as PEW through the arrangements described in s 5.3.2 of the proposed WRP.	

Part 11 Review of water resource plans

Section 10.47 – Review of water resource plans

A water resource plan must require that if a review of the plan (or a part of the plan) is undertaken, the report of the review must be given to the Authority within 30 days after the report is completed.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Verify that (1) the WRP includes model text: ***'For section 10.47, if a review of this plan is undertaken, the report of that review must be given to the Murray-Darling Basin Authority within 30 days after the report is completed.'***	WRP s 5.11.1	The proposed WRP provides that if a review of the proposed WRP (or part thereof) is undertaken, a report of that review will be given to the Authority within 30 days of the report being completed.	**MET**

Section 10.48 – Amendment of water resource plan

A water resource plan must require a Basin State that proposes an amendment to the plan arising from a review to give the reasons for the amendment to the Authority.

Note: See also section 65 of the Act.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Verify that (1) the WRP includes model text: ***'For section 10.48, if review of this plan results in a proposed amendment to this plan, the reasons for the amendment must be provided to the Murray-Darling Basin Authority.'***	WRP s 5.11.2	The proposed WRP provides that if the South Australian Government proposes an amendment to the proposed WRP, the South Australian Government must provide reasons for the amendment to the Authority.	**MET**

Part 12 Information used to prepare water resource plan

Section 10.49 – Best available information

(1) A water resource plan must be based on the best available information.

(2) The water resource plan must identify and describe the significant sources of information on which the water resource plan is based.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Verify that (1) all significant sources of information are identified. **Establish that (2) in each instance an explanation establishes the information as 'best available'.**	WRP s 5.12.1 WRP s 5.14.2 WRP s 6	Section 5.12.1 of the proposed WRP lists significant sources of information and refers to the bibliography (WRP s 6) for complete references and additional sources of supporting information. The list of documents includes scientific and technical reports and the proposed WRP describes that various Acts, regulations, policies and internal procedures also materially influenced the proposed WRP. The proposed WRP states that the information to fulfil requirements of Chapter 10, Part 14 of the Basin Plan was obtained from various sources including literature review, workshops, meetings and on-country visits with Nations. This is evident in s 5.14.2 of the proposed SA Murray Region WRP.	**MET**

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
		Section 5.12.1 states that it was developed using best available information to develop appropriate management for the water resources within the region. The supporting information explains why the sources of information are considered the best available. The Authority concurs with this conclusion.	

Section 10.50 – Methods used to develop water resource plan

A water resource plan must identify any significant method, model or tool that has been used to develop the water resource plan.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Verify that (1) a list is included that identifies all significant methods, models and tools used to develop the plan.	WRP s 5.12.2 WRP s 5.3.3 WRP s 5.3.8	Section 5.12.2 of the proposed WRP includes a list that identifies all significant methods, models and tools used to develop the plan. It also refers to s 5.3.3 and s 5.3.8 for methods used to determine annual permitted take and actual take. Section 5.12.2 identifies the significant methods, models and tools used to develop the proposed WRP and therefore meets the requirements of Basin Plan s 10.50.	**MET**

Part 13 Extreme events

Section 10.51 – Measures in response to extreme events

(1) A water resource plan must describe how the water resources of the water resource plan area will be managed during the following types of events:

(a) an extreme dry period;

(b) a water quality event of an intensity, magnitude and duration that is sufficient to render water acutely toxic or unusable for established local uses and values;

(c) any type of event that has resulted in the suspension of a statutory regional water plan in the past 50 years (including a transitional water resource plan or interim water resource plan).

(2) If an event of a type listed in subsection (1) would compromise a Basin State's ability to meet critical human water needs in the water resource plan area, the water resource plan must set out measures to meet critical human water needs during such an event.

(3) The water resource plan must provide that, if new scientific information suggests a change in the likelihood of an event of a type listed in subsection (1) occurring (for example, due to climate change), consideration must be given to whether, as a result of this new information, the water resources should be managed differently.

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	The WRP describes how water resources will be managed during:	True	WRP s 5.3.4, including Table 15 WRP s 5.13.1 WRP Table 6 in s 5.2.3	Section 5.13.1 of the proposed WRP describes how each type of extreme event is managed and specifically refers to section 5.3.4, Table 15 of the WRP for rules that apply to the various types of water access rights in extreme dry periods. The proposed WRP describes relevant provisions of state legislation to provide for management of water resources in the SA Murray Region during	**MET**
1(a)	an extreme dry period	True			
1(b)	a water quality event that is sufficient to render water acutely toxic or unusable for established local uses and values	True			

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1(c)	The WRP identifies that there has been an event in the past 50 years that resulted in the suspension of a statutory regional plan	False		extreme dry periods or a water quality event that is sufficient to render water acutely toxic or unusable for established local uses and values. The relevant sections of state legislation are incorporated for accreditation in Table 6 in s 5.2.3. The proposed WRP also states that decisions about the management of the Coorong and Murray Mouth during an extreme dry period will be dependent on the connection with the Lower Lakes and River Murray. The proposed WRP states that there have been no suspensions of statutory water plans in South Australia. The Authority concludes that the proposed WRP describes the arrangements in place in South Australia to manage water resources during the range of extreme events relevant to this requirement.	
	If yes, the WRP describes how water resources will be managed during such events	N/A	N/A	There have been no suspensions of statutory water plans in South Australia, so this requirement is not applicable.	
	If no, the WRP states that such an event has not occurred.	True	WRP s 5.13.1	The proposed WRP states that there have been no suspensions of statutory water plans in South Australia. State legislation does not provide for the suspension of a statutory water plan in its entirety,	

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
				therefore there are no events that would result in the suspension of a statutory water management plan.	
2	One or more events listed under s10.51(1) have potential to compromise the State's ability to meet critical human water needs in the plan area	True	WRP s 5.13.1 WRP s 5.13.1.1	Section 5.13.1 of the WRP states that during an extreme event when there is not sufficient water available to provide for critical human water needs, the water retailers such as SA Water would consider options for providing supply to customers. Section 5.13.1.1 supports this conclusion.	**MET**
	If yes, the WRP sets out measures that operate to meet critical human water needs during a type of event listed under subsection (1)	True	WRP s 5.13.1 WRP s 5.13.1.1	As above. Section 5.13.1 and 5.13.1.1 of the proposed WRP identify measures that operate to meet critical human water needs during extreme events as listed under subsection 10.51(1).	
	If no, the WRP sets out the logic and rationale for why events listed under subsection (1) do not compromise the State's ability to meet critical human water needs in the plan area	N/A	N/A	Such events are noted in the proposed WRP, so this provision is not applicable.	

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
3	The WRP provides for a trigger to consider changes to management in the event that new scientific information suggest a change in frequency of events under subsection (1)	Present	WRP s 5.13.1	The proposed WRP states that South Australia will consider whether water resources should be managed in a different way to the current arrangements under the SA Murray Region WRP if new reputable and robust scientific information suggests a change in the likelihood of extreme events (as listed under subsection 10.51(1)) occurring (for example, due to climate change).	**MET**

Part 14 Indigenous values and uses

Section 10.52 – Objectives and outcomes based on Indigenous values and uses

(1) A water resource plan must identify:

(a) the objectives of Indigenous people in relation to managing the water resources of the water resource plan area; and

(b) the outcomes for the management of the water resources of the water resource plan area that are desired by Indigenous people.

(2) In identifying the matters set out in subsection (1), regard must be had to:

(a) the social, spiritual and cultural values of Indigenous people that relate to the water resources of the water resource plan area (***Indigenous values***); and

(b) the social, spiritual and cultural uses of the water resources of the water resource plan area by Indigenous people (***Indigenous uses***);

as determined through consultation with relevant Indigenous organisations, including (where appropriate) the Murray Lower Darling Rivers Indigenous Nations and the Northern Murray-Darling Basin Aboriginal Nations.

(3) A person or body preparing a water resource plan may identify opportunities to strengthen the protection of Indigenous values and Indigenous uses in accordance with the objectives and outcomes identified under subsection (1), in which case the opportunities must be specified in the water resource plan.

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1(a)	The objectives of Aboriginal people in relation to managing water resources in the	True	WRP s 5.14.1	The proposed WRP lists objectives for the management of water. The proposed WRP states that these objectives have been identified by SA Murray Region Aboriginal Nations.	**MET**

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	WRP area are listed				
1(b)	The outcomes of water resource management as desired by Aboriginal people are listed	True	WRP s 5.14.1	The proposed WRP lists desired outcomes from the management of water. The proposed WRP states that these desired outcomes have been identified by SA Murray Region Aboriginal Nations.	
2 (a)	Supporting evidence demonstrates that the objectives and outcomes listed under subsection (1) had regard to the social, spiritual and cultural values of Aboriginal people	True	WRP s 5.14.1 WRP s 5.14.1.1 WRP s 5.14.2.1	Section 5.14.1 of the proposed WRP includes statements relating to the current and future arrangements whereby the South Australian government has regard to Aboriginal values for water resources. Section 5.14.1.1 includes more detailed information and case studies relevant to this requirement. The proposed WRP does not specifically set out how regard was had to specific Aboriginal values when identifying the objectives and outcomes identified for s 10.52(1). The Authority acknowledges that Aboriginal Nations restrict the sharing of cultural knowledge. In this context, the Authority notes that s 5.14.2.1 outlines the approach taken to engaging with Aboriginal Nations and taking account of their views prior to and during the development of the proposed WRP. In addition, the proposed WRP incorporates an obligation for on-going engagement in relation to future water planning processes.	**MET**
	The social, spiritual and cultural values of Aboriginal people were determined through	True			

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
	consultation with relevant indigenous organisations				
2(b)	Supporting evidence demonstrates that the objectives and outcomes listed under subsection (1) had regard to Aboriginal people's social, spiritual and cultural uses	True	WRP s 5.14.1 WRP s 5.14.1.1 WRP s 5.14.2.1	Section 5.14.1 of the proposed WRP includes statements relating to the current and future arrangements whereby the South Australian government has regard to Aboriginal uses of water resources. Section 5.14.1.1 includes more detailed information and case studies relevant to this requirement. The supporting information does not specifically set out how regard was had to specific Aboriginal uses when identifying the objectives and outcomes identified for s 10.52(1). The Authority acknowledges that Aboriginal Nations restrict the sharing of cultural knowledge. In this context, the Authority notes that s 5.14.2.1 outlines the approach taken to engaging with Aboriginal Nations and taking account of their views prior to and during the development of the proposed WRP. In addition, the proposed WRP incorporates an obligation for on-going engagement in relation to future water planning processes.	
	Aboriginal people's social, spiritual and cultural uses were determined through consultation with relevant indigenous organisations	True			

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
3	Opportunities to strengthen the protection of Aboriginal values and Aboriginal uses are identified in the WRP	Present	WRP s 5.14	The proposed WRP does not specifically address this requirement. However, throughout s 5.14 there are several incidental comments about activities and commitments intended to improve the protection of Aboriginal values and Aboriginal uses.	**MET**
	The opportunities included under this subsection (3) operate to strengthen protections for Aboriginal values and uses	N/A	N/A		

Section 10.53 – Consultation and preparation of water resource plan

(1) A water resource plan must be prepared having regard to the views of relevant Indigenous organisations with respect to the matters identified under section 10.52 and the following matters:

(a) native title rights, native title claims and Indigenous Land Use Agreements provided for by the Native Title Act 1993 in relation to the water resources of the water resource plan area;
(b) registered Aboriginal heritage relating to the water resources of the water resource plan area;
(c) inclusion of Indigenous representation in the preparation and implementation of the plan;
(d) Indigenous social, cultural, spiritual and customary objectives, and strategies for achieving these objectives;
(e) encouragement of active and informed participation of Indigenous people;
(f) risks to Indigenous values and Indigenous uses arising from the use and management of the water resources of the water resource plan area.

Note: For examples of the principles that may be applied in relation to the participation of Indigenous people, see the document titled 'MLDRIN and NBAN Principles of Indigenous Engagement in the Murray-Darling Basin'.

(2) In this section, ***registered Aboriginal heritage*** means Aboriginal heritage registered or listed under a law of a Basin State or the Commonwealth that deals with the registration or listing of Aboriginal heritage (regardless of whether the law deals with the listing of other heritage).

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1	Regard was had to the views of relevant Aboriginal organisation with respect to matters identified in section 10.52	True	WRP s 5.14.1 WRP s 5.14.1.1 WRP s 5.14.2 WRP s 5.14.2.1	Section 5.14.2 and 5.14.2.1 of the proposed WRP provide detailed information regarding consultation with Traditional Owners and the efforts made to tailor engagement to the specific needs of each group.	**MET**
	Regard was had to each of the matters in letters (a) to (f):	True			

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
1(a)	native title rights, native title claims and Aboriginal Land Use Agreements	True		Where relevant, s 5.14.2 and s 5.14.2.1 explain where the consultation has informed the development of the proposed WRP, including the strengthened commitment to on-going engagement on water planning processes. Opportunities and strategies for capacity building have also been identified. The Authority concludes that the supporting information provides sufficient information about how each of the elements of this requirement have been considered in the development of the objectives and outcomes included for the purposes of s 10.52(1) as well as the engagement principles and obligations incorporated into the proposed WRP (see s 5.14.1 and s 5.14.1.1). The Authority has consulted with MLDRIN to seek their advice as to whether the requirements of Part 14, Chapter 10 have been met in the SA Murray Region WRP. MLDRIN has confirmed that South Australia consulted with Traditional Owners in the SAMR WRP area in a culturally appropriate way to inform the proposed WRP, and is satisfied that the proposed WRP addresses the requirements of Part 14, Chapter 10. The Authority considers that the information provided in the proposed WRP and by MLDRIN satisfies this requirement.	
1(b)	registered Aboriginal heritage relating to the water resources of the WRP area	True			
1(c)	inclusion of Aboriginal representation in the preparation and implementation of the plan	True			
1(d)	Aboriginal social, cultural, spiritual and customary objectives and strategies for achieving these objectives	True			
1(e)	encouragement of active and informed participation of Aboriginal people	True			
1(f)	risks to Aboriginal values and Aboriginal uses arising from the use and management of the water resources of the WRP area	True			

Sub-section	Detailed assessment test		Where this was observed in the WRP package	Justification	Assessment outcome
2	The application of 10.53(1)(b) identifies all formally registered Aboriginal heritage at Basin State and Commonwealth levels	False	WRP s 5.14.2 WRP s 5.14.2.1 WRP s 5.14.1.1	Section 5.14.2.1 and 5.14.1.1 of the proposed WRP identify a significant registered Aboriginal Heritage site known as "The Meeting of the Waters" and reference the arrangements in place to ensure this site is managed appropriately. The Authority is unable to determine whether all Aboriginal heritage sites are identified. South Australia's registers of Aboriginal Heritage Agreements and Aboriginal Heritage Sites are not public registers. This is because information about Aboriginal heritage can be extremely sensitive and there are cultural restrictions related to whether and how this information is shared. Section 5.14.2 and 5.14.2.1 of the proposed WRP recognises that Aboriginal Heritage sites may be identified through Commonwealth and/or State legislation. Further, the proposed WRP indicates that these matters have been considered during consultation with relevant Aboriginal organisations during the development of the proposed WRP.	**MET**

Section 10.54 – Cultural flows

A water resource plan must be prepared having regard to the views of Indigenous people with respect to cultural flows.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish that (1) consultation was genuine and comprehensive. **Verify that (2) a statement about cultural flows is included.**	WRP s 5.14.3 WRP s 5.14.2	Section 5.14.3 of the proposed WRP states that cultural flows were discussed during the consultation outlined in section 5.14.2. This includes noting that the concept of cultural flows may have differing meaning for different people and Nations. The proposed WRP includes an obligation for the SA government to pursue opportunities for water entitlements that are legally and beneficially owned by Nations in the future.	**MET**

Section 10.55 – Retention of current protection

A water resource plan must provide at least the same level of protection of Indigenous values and Indigenous uses as provided in:

(a) a transitional water resource plan for the water resource plan area; or

(b) an interim water resource plan for the water resource plan area.

Streamlined assessment test	Where this was observed in the WRP package	Justification	Assessment outcome
Establish (1) the level of protection in a TWRP/IWRP. Establish (2) the level of protection in the WRP.	WRP s 5.14.4	Section 5.14.4 of the proposed WRP identifies the transitional WRPs for the SA Murray Region WRP area and states that these plans included no specific protections for Indigenous values and Indigenous uses. The Authority supports this view. State instruments that currently apply to this WRP area have been amended to include Indigenous values and Indigenous uses.	**MET**

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