

# Department of Energy, Environment and Climate Action and Goulburn-Murray Water

Management Response to Audit Recommendations

## Inspector General of Water Compliance Audit Management of Groundwater – Goulburn-Murray (Groundwater) Water Resource Plan Area

### Purpose

This document is the response of the Department of Energy, Environment and Climate Action (DEECA) and Goulburn-Murray Water (GMW) to the recommendations made by the Inspector General of Water Compliance through the Audit of Management of Groundwater – Goulburn-Murray (Groundwater) Water Resource Plan Area. This response meets the requirements of section 73M of the *Water Act 2007* (Commonwealth).

### Recommendation 1

**1a.** *The Katunga Groundwater Management Plan should be amended to demonstrate that there is sufficient hydraulic connectivity between the location of the seller and location of the buyer before the trade of a water access right is approved. This could include reference to, and publication of, the technical assessment currently being relied on by GMW for all groundwater resources managed under the plan.*

**1b.** *Victoria should identify changes made to the Katunga Groundwater Management Plan when they report to the MDBA on matters listed in Schedule 12 under section 13.14 of the Basin Plan. Matter 19 of this Schedule requires Basin States to report on whether there have been any amendments to state instruments that affect the operation of a water resource plan or are referenced in accredited text of a water resource plan.*

### Response

**This recommendation is accepted in part.**

This recommendation is not accepted in whole by DEECA and GMW.

DEECA and GMW accept the intent of this recommendation to improve transparency regarding water trade arrangements. However, the associated finding misrepresents the effect of the accredited approach to meeting the requirements of section 12.24(a) of the Basin Plan regarding groundwater trade.

No amendment to the Katunga Groundwater Management Plan is required to demonstrate compliance with the Basin Plan and the Goulburn-Murray (Groundwater) Water Resource Plan (WRP).

DEECA and GMW are required to act consistently with the Basin Plan and accredited Water Resource Plans. Section 10.37 of the Basin Plan requires a Water Resource Plan to set out the circumstance in which groundwater trade is permitted to ensure the conditions set out in section 12.24 of the Basin Plan are met.

Victoria's accredited Groundwater WRP has set out the circumstances in which trade is permitted between 2 locations in a groundwater Sustainable Diversion Limit (SDL) resource unit. Under Victoria's Groundwater WRP, trade between two locations in a single SDL resource unit is permitted if sufficient hydraulic connectivity is demonstrated by a statutory management plan approved under section 32A of the *Water Act 1989* (Vic).

The Katunga Groundwater Management Plan is a statutory management plan covering the connected groundwater aquifer within the boundaries of the Katunga Water Supply Protection Area. This meets the requirement for

sufficient hydraulic connectivity for the purposes of section 12.24(a) is met for trades of water access rights within the Katunga Water Supply Protection Area.

***Proposed action to give effect to the recommendation***

GMW will publish a summary of the data, monitoring and technical assessments that have informed groundwater management for the Katunga area on their website to show in a clear way the basis for confirming hydraulic connectivity of groundwater resources within the management area.

## Recommendation 2

***2. DEECA should ensure that data collected from the state observation bore network is entered into the groundwater database, within 30 days after it has been collected.***

### Response

**This recommendation is accepted.**

DEECA accepts the finding of the audit report that manual water level measurements were not being entered into the groundwater database within 30 days of collection. DEECA accepts the general intent of this recommendation to improve local water data collection and recording processes.

Relevant water monitoring sites are either telemetered or manual readings provided by DEECA's service provider. It has been identified that there has been a historic misinterpretation of the requirements for this data to be entered in-line with the 30-day timeframe.

While the timing of data inputs has not consistently met the requirements set out in the Katunga GMP, DEECA and GMW have confidence in the accuracy and completeness of the long-term data record for State Observation Bore Network sites relevant to the Katunga GMP.

***Proposed action to give effect to the recommendation***

Since 1 August 2023, when this issue was first highlighted by the Office of the IGWC, DEECA have put new parameters in place to ensure improved data collection, input, and validation practices for the SOBN sites relevant to the Katunga Groundwater Management Plan.

These parameters will ensure Prescription 5.2(c) requirements are met in the future.

## Recommendation 3

***3. Groundwater level monitoring processes should be reviewed to ensure that allocation announcements are based on readings that have been validated.***

### Response

**This recommendation is not accepted.**

The recommendation and associated finding in the audit report misrepresent the approach set out in the Katunga Groundwater Management Plan (GMP) for data collection and recording, annual reporting requirements and the process for allocation announcements.

All allocation announcements and annual reports are completed according to processes set out in the Katunga GMP, using the best data available at the time. In some cases, unvalidated data is used as part of a longer-term data set to provide an indication of the most recent conditions. The Katunga GMP does not require GMW to use identical data sets for different processes. In some cases, data verification and validation processes result in minor discrepancies when a retrospective comparison is done between point-in-time data sources.

GMW's monitoring of resource information is more comprehensive than what is required by the Katunga GMP's prescriptions and is supporting positive and effective water management outcomes in the Katunga Water Supply Protection Area. GMW will continue to use the best available data for the purposes of allocation announcements and annual reporting at the time it is required, in-line with the requirements of the Katunga GMP.