

Re: BDL definition

From: Andrew Brown
To: Linda Holz
Cc: Richard Beecham Daniel Connor
Date: Mon, 12 Mar 2018 03:15:38 +0000

Put simply, I'm right.

Put complicatedly, we are all right.

Schedule 3, part 9(a)(i) says:

summing the quantity of water that would have been taken by those forms of take for each year of the historical climate conditions under State water management law as at 1 July 2009

One way to interpret this is to say that the diversion is what development and behaviour was in 2009 independent of climate and some in MDBA advocate for this. However, the NSW planning assumptions include a phrase that says that we take this to mean the plan limit even if a true 2009 conditions model shows a lower level of take because under our law we would not have taken any actions to limit take until the valley had reached the plan limit again.

The plan limit was defined using rules from the WSP and development and behaviour circa 2000. In an ideal world, we would have a BDL scenario that has circa 2009 development and behaviour, that also produces take levels that are at plan limit.

However, applying the best available information test from Basin Plan, we can substitute 2009 development and behaviour with a plan limit model that produces plan limit levels of diversion if that is the best we have available because we don't have sufficient information to change the planting decision for example.

We could also use an updated model with 2009 development and behaviour that is tweaked to produce plan limit diversions. I think Marina will be in this zone with Gwydir because her BDL shows growth against plan limit, so it will have to be cut down to size at some point.

I guess, for Border Rivers the BDL model won't be actual 2009 conditions but I do think the statement that it has better information is still broadly correct. Remember, it just has to be an improvement to qualify as a new BDL model, it doesn't have to be perfect.

You might have a list of 10 things you know are wrong with the model, then fix one of them and it is still an improved model even with 9 other things you know are wrong still. A model doesn't even have to be fit for purpose to qualify as best available information.

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On Tue, Mar 6, 2018 at 1:22 PM, Linda Holz wrote:

Hi Richard,

As discussed, I am making a note of potential confusion around the BDL, particularly for the Border, but also more generally.

Dan has mentioned that Border Rivers Food and Fibre have questioned the level of growth that we have reported between BDL and PBP. They said something like they did not think there was that much growth from 2009.

We define the BDL for Border based on the Plan Limit definition which refers to level of development at 2001/2002. (We use 2003 as best estimate) The only difference between the BDL and PBP model is level of development and entitlements. There is no change in planting decision as there is not sufficient information to define a change in planting decision.

I am concerned that there may be a perception that the BDL is based on level of development as at 2009. Andrew's presentation to the all SAP I think gives this impression (see below).

Modelling components

Baseline Diversion Limit (BDL)

- As part of the WRP process, the BDL models for each SDL resource unit are being updated.
- The new models include better information on the levels of development and management in the 2009 baseline year.
- MDBA must be satisfied that the updated BDL models are an improvement over the existing model scenario to satisfy the requirement for "best available information".

cheers,
Linda

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