



GMW Water Use Compliance Strategy



#A3696233

Acknowledgement

We acknowledge and respect Victorian Traditional Owners as the original custodians of Victoria's land and waters, their unique ability to care for Country and deep spiritual connection to it. We honour Elders past and present whose knowledge and wisdom has ensured the continuation of culture and traditional practices

We are committed to genuinely partner, and meaningfully engage, with Victoria's Traditional Owners and Aboriginal communities to support the protection of Country, the maintenance of spiritual and cultural practices and their broader aspirations in the 21st century and beyond.

Use of Material

This Strategy extensively uses wording and material from documents issued by the Department of Environment, Land, Water and Planning and the Murray-Darling Basin Authority. We acknowledge with gratitude the use of this wording and material.



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1. INTRODUCTION

1.1 Purpose

This Strategy sets Goulburn-Murray Water's (GMW's) priorities for water use compliance and enforcement.

1.2 What compliance and enforcement means

Compliance and enforcement are two separate concepts that work together to maintain the integrity of water markets and sustain public confidence in water management:

- compliance is a proactive regulatory activity: actions are taken to prevent breaches or offences from occurring in the first instance. There are a variety of compliance tools to support compliance with Victorian water laws including education, hydrographic monitoring programs, metering inspections, audits, reporting and accounting.
- enforcement is a reactive regulatory activity: activity is triggered when breaches of the law are detected. Enforcement actions under the Victorian Water Act include warning notices, direction notices, orders for reinstatement where appropriate, suspension or cancellation of an authorisation, or prosecution.

1.3 Importance of Water Use Compliance & Enforcement

Water is a precious and limited resource. It is critical to our economy, environment and communities. This is why water needs to be managed fairly for all water users. Water theft undermines the health of our environment, which threatens communities and our economy.

Effective and strong compliance helps to maintain fair access to water. It supports community confidence in the water entitlement framework and water market because the same rules apply to everyone. It also deters people from illegally taking and using water.

1.4 Regional Context

We are Australia's largest rural water corporation and manage Australia's largest irrigation delivery network. The irrigated agriculture sector in northern Victoria alone generates more than \$6 billion of production value annually and directly supports greater than 10,000 jobs in the Goulburn-Murray Irrigation District (GMID).

We manage 24 water storages that can hold approximately 11 million ML of water and also have responsibility for managing more than 100,000 hectares of public land surrounding our storages. GMW is a vital part of life in northern Victoria. Our role in delivering reliable, affordable water and providing other water-based services drives a regional economy underpinning our collective prosperity and enhancing the wellbeing of our communities.

These communities are in transition. Changes in climate, global trade, economics, government policy, land use and social values are driving major changes in how our region functions. This requires GMW to also change to meet the expectations of our customers and stakeholders in continuing to provide appropriate, affordable and reliable services.

1.5 Strategic Outcomes

GMW has set five strategic outcomes as our corporate goals. These strategic outcomes will ensure GMW is well placed, agile and adaptive in the face of challenges that face our

communities and our organisation. Water use compliance and enforcement is linked to these outcomes:

Strategic Outcome	Link to water use Compliance and Enforcement
Satisfied customers, trusting partners	Maintaining customer confidence in the legitimacy and fairness of Victoria’s water management
Innovation, data and technology driven services	Using innovation, data and technology for effective water use compliance and enforcement
Sustainable business, viable customers	Minimising: <ul style="list-style-type: none"> • loss of water otherwise available for customer use to maintain viability • loss of revenue to GMW
Water security and other water values recognised	Maintaining customer confidence in the security of water entitlements
Safe, skilled, engaged people	GMW staff need to be safe, skilled and engaged in undertaking water use compliance and enforcement activity

1.6 Our Values

GMW has committed to five organisational values that:

- are the essential and enduring principles of our organisation
- underpin our culture by providing a filter for employees to measure their actions and behaviours

These values also underpin our water use compliance and enforcement activities:



Excellence
We pursue quality, innovation and continuous improvement in everything we do.



Honesty
We are truthful and transparent in all our dealings and communications.



Accountability
We take responsibility and ensure we follow through on all our commitments.



Courage
We take considered risks and step forward with conviction into a new future.



Caring
We look out for each other and demonstrate genuine empathy for our customers.

2. BACKGROUND

2.1 Murray-Darling Basin Plan

The Murray-Darling Basin:

- is the largest and most complex river system in Australia
- covers one million square kilometres of south-eastern Australia, across New South Wales, Queensland, South Australia, Victoria and the Australian Capital Territory
- includes the Goulburn-Murray Irrigation District

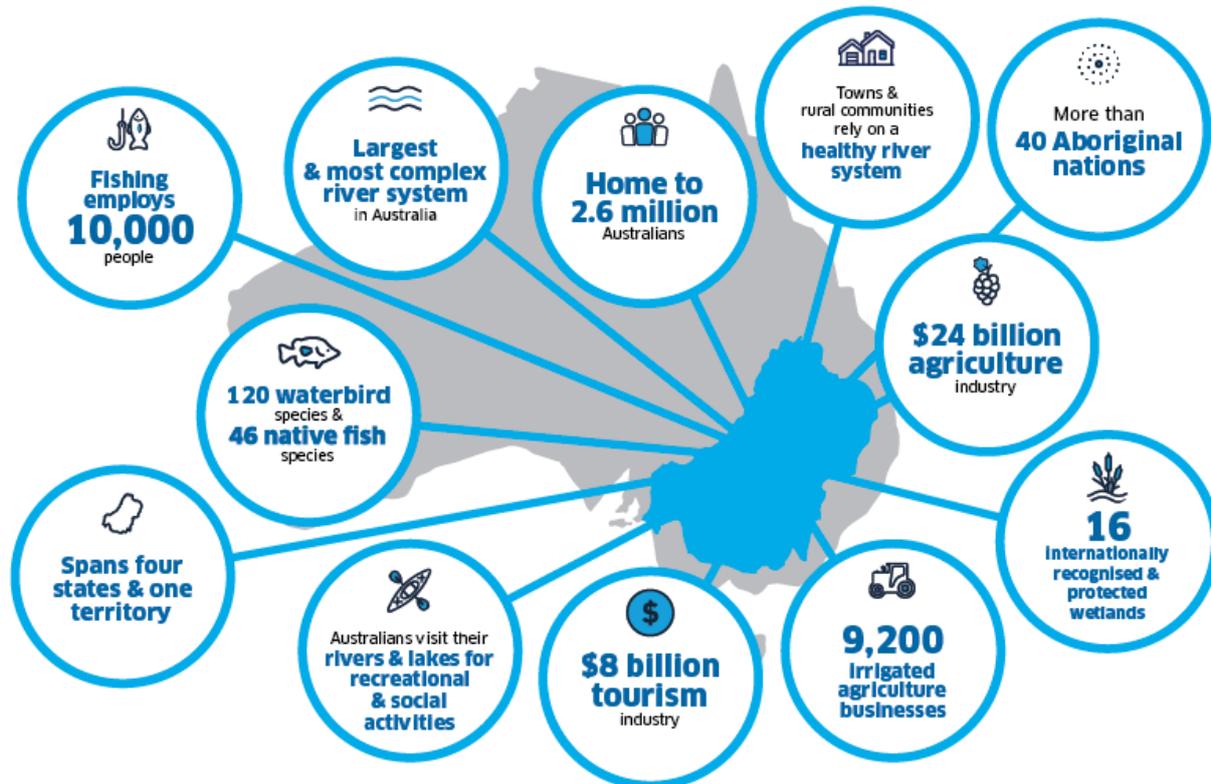


Diagram source: Murray-Darling Basin Authority

State and Commonwealth Governments agreed in 2012 that a plan was needed to manage our water carefully and protect the Basin for future generations. The Murray-Darling Basin Plan (the Basin Plan) was developed to manage the Basin as a whole connected system. The Basin Plan sets the maximum amount of water that can be taken from the Basin each year. This maximum leaves enough for our rivers, lakes and wetlands and the plants and animals that depend on them.

The Murray-Darling Basin Authority (MDBA):

- monitors compliance and enforcement with the Basin Plan
- regulates the state water agencies – like GMW – who have the front-line responsibility for water planning, river operations and water compliance

2.2 Victorian water use compliance and enforcement

In Victoria compliance and enforcement in the non-urban water sector is carried out by the Minister for Water and water corporations.

Victoria strives to maintain high standards in water compliance to be more effective in the face of changes in climate, reduced water availability and increased demand for water. This is done by continually updating policies, systems and legislation such as:

- the Government's water plan [Water for Victoria](#) (2016): which committed to modernising our compliance system
- Water corporations own compliance and enforcement policies: which were developed through the National Framework for Compliance and Enforcement Systems for Water Resources Management (2016)

[2017 MDBA Review](#)

The MDBA reviewed compliance systems across the Basin in 2017. The MDBA review revealed effective compliance in Victoria and noted Victoria has:

- an effective water market
- a collaborative approach to compliance: water corporations work directly with water users as the first step in supporting compliance for fair access to water
- layers of safeguards against large-scale or systemic water theft: these layers include extensive metering and measurement systems, comprehensive specification of entitlements, modernised irrigation systems, Victoria's sophisticated Water Register and comprehensive water accounting

[2018 Basin Compliance Compact](#)

The importance of having effective compliance and enforcement systems across Basin states and territories was highlighted in 2017 with allegations of significant water theft and poor regulation in the northern part of the Basin. All Basin states and the Australian Government responded by agreeing to a Basin Compliance Compact in June 2018.

The aim of the Compact is to:

- improve transparency and accountability of water management systems
- put more consistent compliance and enforcement practices in place
- create a clear system for compliance to reinforce public confidence in the Murray-Darling Basin Plan¹

[2018 Victorian Review](#)

The Victorian Government in 2018 reviewed the governance arrangements and framework for non-urban water compliance and enforcement in Victoria. The review concluded that:

- Victoria's approaches already had the elements for achieving effective compliance and enforcement
- there was scope for these approaches to be improved and applied more consistently

2.3 Roles and Responsibilities

The Minister for Water and water corporations have compliance and enforcement responsibilities under the Victorian Water Act. [Figure 1](#) shows these arrangements.

1. This is an interjurisdictional plan to share water sustainably between all users in the Basin as well as the environment. It was developed to put water aside for the environment and to set limits on how much water can be taken for irrigation, drinking water, industry and other future purposes across the Basin from July 2019.

Minister for Water

The Minister for Water is accountable to Parliament and responsible for the development of water policy and governance of the Victorian Water Act and *Catchment and Land Protection Act 1994*. Under the Victorian Water Act, the Minister for Water is responsible for issuing water entitlements and managing Victoria’s water resources for both urban and non-urban uses.

The Department of Environment, Land, Water and Planning (DELWP) supports the Minister in:

- establishing the policies and strategies necessary to fulfil the Minister’s responsibilities
- overseeing the performance and appointment of directors to the boards of water corporations

Water corporations

There are 19 statutory corporations established under the Victorian Water Act that provide water and wastewater services. Six water corporations – including GMW – provide non-urban water services. See [Figure 2](#) for a map of the water corporations and their geographical areas.

Under the Victorian Water Act, the Minister for Water has delegated powers and functions for licence administration to water corporations. This means that in addition to water corporations’ function of delivering water and draining irrigation services, water corporations are also responsible for the compliance and enforcement of rules and legislative requirements surrounding the take and use of water and construction of works. See

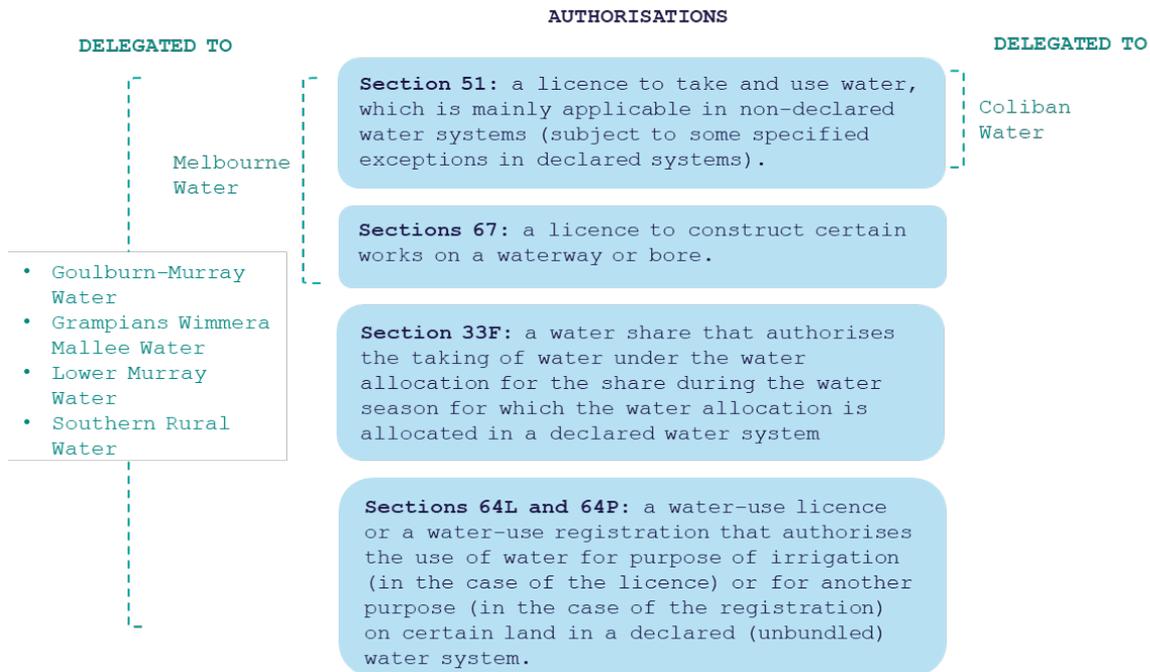


Figure 3 for more details on the authorisations and delegated functions under the Victorian Water Act.

Water corporations like GMW have a range of tools to ensure water use compliance. They are also empowered to investigate and prosecute breaches of the Victorian Water Act. See:

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- **Figure 4** for a list of offences under the Victorian Water Act relating to the take and use of water and construction of works on a waterway that have penalty units
- **Figure 5** for a list of compliance, detection and enforcement tools available to water corporations

The Minister for Water issued a Statement of Obligations (General)² on 20 December 2015 setting out expectations for water corporations to develop and implement policies, standards and systems to manage and prioritise water use compliance risks and enforce the Victorian Water Act (clause 7.3A).

This water use compliance strategy demonstrates how GMW will use the range of water use compliance, detection and enforcement tools and incorporate the key principles for effective compliance and enforcement to carry out its function effectively.

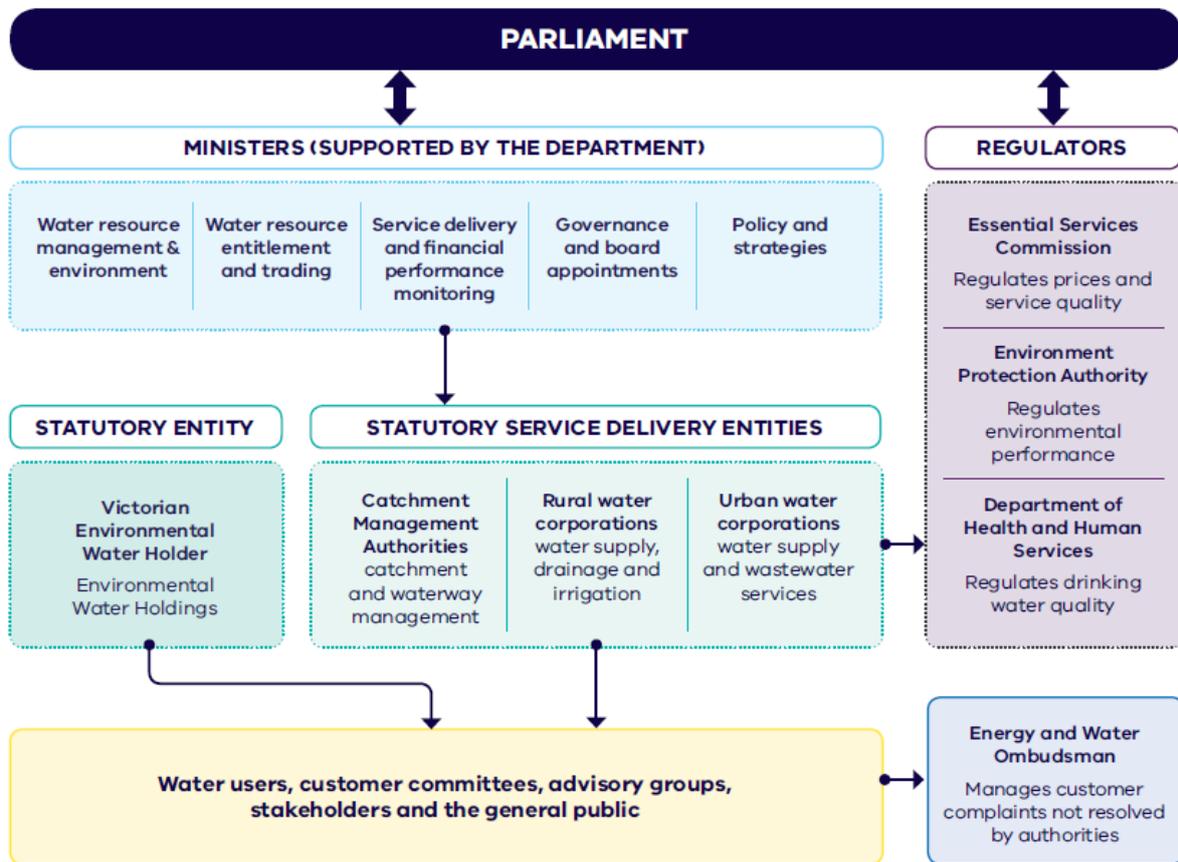


Figure 1: Illustration of the institutional arrangements in Victoria’s water sector

2. The Statement of Obligations (General) was issued under section 41(2) of the *Water Industry Act 1994 (Vic)*, which sets out the expectations the Minister has on water corporations to carry out its core functions and duties effectively, including compliance and enforcement. The Statement of Obligations (General) can be found in this link: https://www.water.vic.gov.au/_data/assets/pdf_file/0015/54330/Statement-of-Obligations-General.pdf

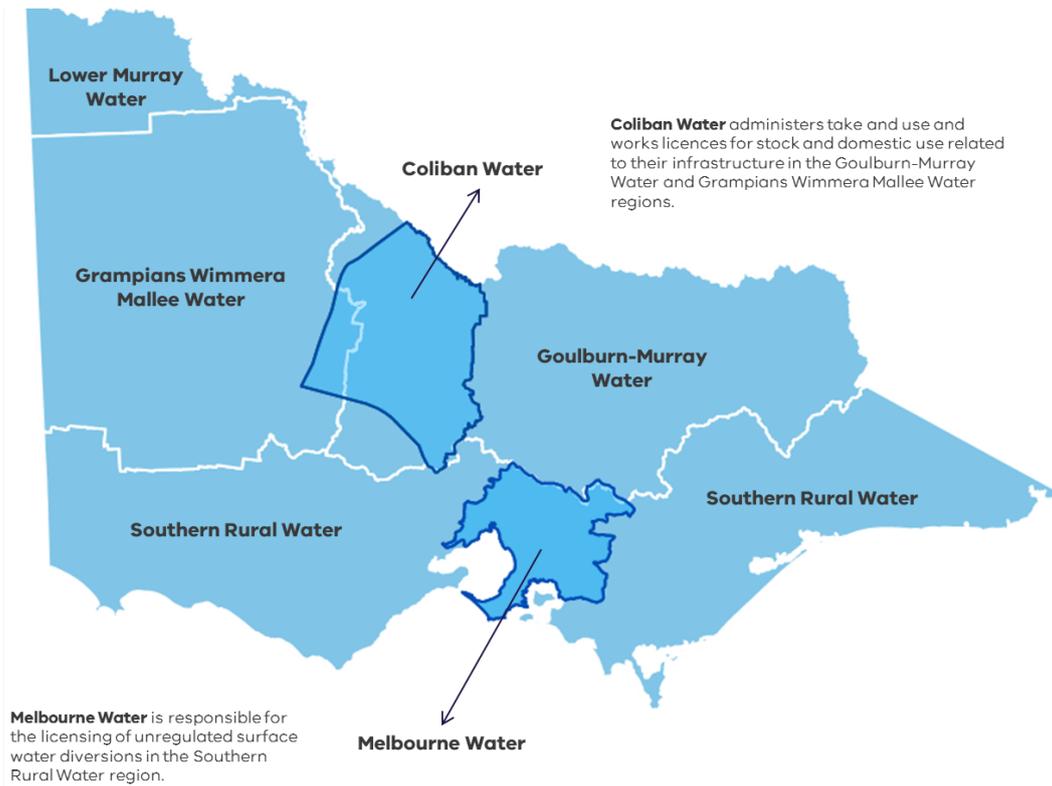


Figure 2: Map of the geographical jurisdictions of water corporations in Victoria

Under the Victorian Water Act, the Minister is empowered to issue authorisations relating to take and use of water and construction of works, including, but not limited to, works on waterways for the take and use of water under specific sections of the act.

The Minister then delegates these authorisations to water corporations under section 306 of the Victorian Water Act.

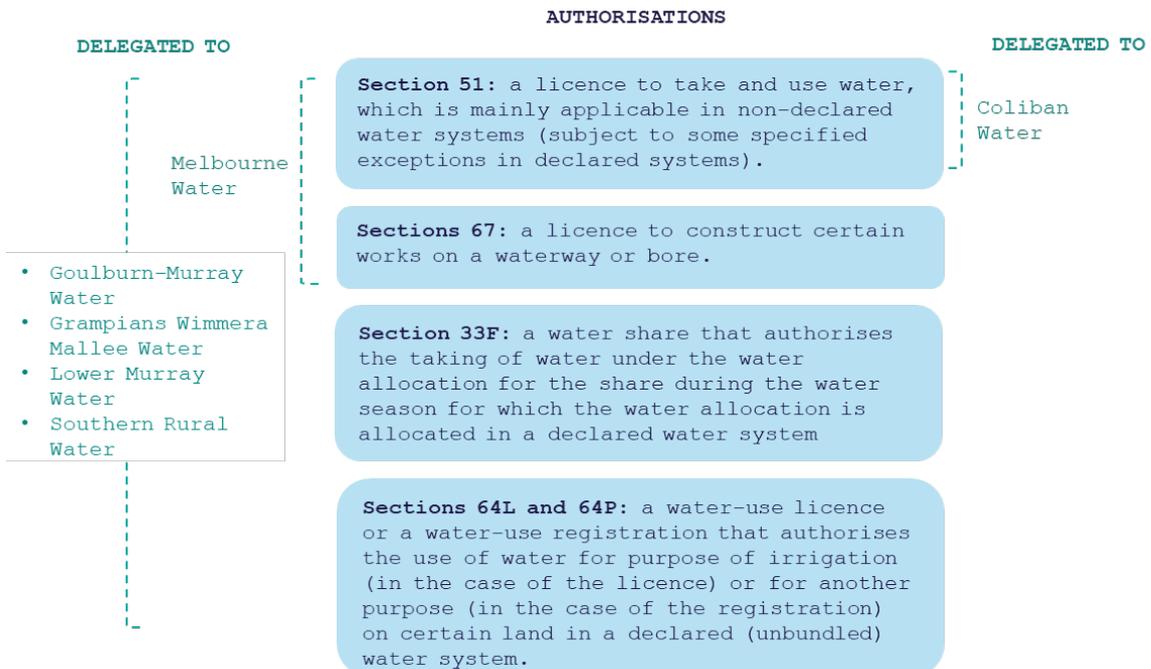


Figure 3: Authorisations under the Victorian Water Act



2.4 Prohibited Activity

Figure 4 shows a general description of the applicable prohibited activity.



Figure 4: Offences under the Victorian Water Act



Penalties for prohibited activity range from:

- 60 – 120 penalty units (each penalty unit \$161.19 as at 1 July 2018)
- imprisonment for 6-12 months

A detailed listing of prohibited activities and applicable fines and penalties is provided under the “Water” tab at the following link to the Department of Environment, Land, Water and Planning website: https://www2.delwp.vic.gov.au/doing-business-with-us/fees-and-charges?_ga=2.164427839.163067636.1575330112-236004443.1572329229

2.5 Compliance Tools

GMW has the tools available in [Figure 5](#) to ensure compliance.

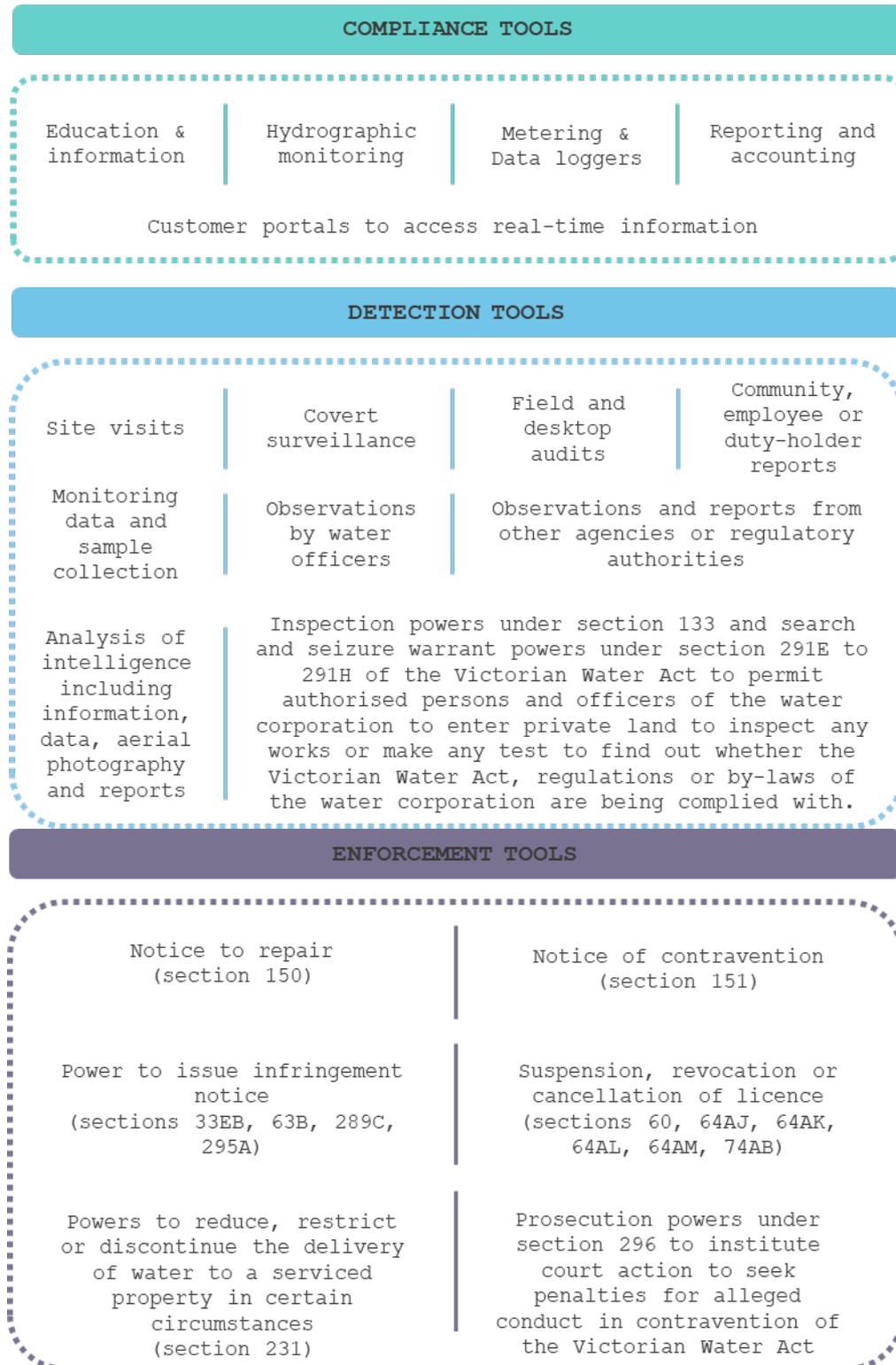


Figure 5: Compliance, detection and enforcement tools

3. TAKING ACTION

3.1 Policy

GMW's water use compliance strategies will be risk-based to make sure that resources are used efficiently, focussing more on areas where there are the greatest compliance risks

GMW has a range of available compliance and enforcement tools. Use of these tools will be responsive and appropriate to the level of non-compliance and the risk associated with the non-compliance. GMW is committed to:

- a clear and logical escalation pathway in response to detected breaches, from warnings through to when prosecutions will be pursued
- an emphasis on engagement, education and awareness raising
- work in good faith with all parties and use our enforcement powers only when needed

GMW will be transparent about its water use compliance strategies, protocols and compliance and enforcement activities.

3.2 Compliance Pyramid

GMW has a range of compliance and enforcement tools available (see [Figure 5](#)). These allow for flexible responses to different levels of risks established through a risk-based approach. Having flexible responses is a characteristic of a responsive regulatory approach.

GMW has a compliance pyramid (see [Figure 6](#)) to signal to water users that while GMW's resources will be focused on encouraging compliance, there is capacity for enforcement actions to be escalated to the highest power. This acts as a deterrent to breaches of the law and encourages cooperative problem solving at the base of the pyramid.

The compliance pyramid also guides GMW in establishing how and when the available compliance and enforcement tools can be used depending on the risk profile of the offence, water user and scale of impacts. This will inform GMW's decision-making processes for handling detected breaches and escalation pathways for enforcement actions in response to breaches of Victorian water legislation.

3.3 Encouraging and assisting compliance

Compliance tools at the bottom of the pyramid are GMW's strategies of first choice and often used. Education, community engagement and monitoring programs allow for high levels of self-regulation in the community. These tools are less coercive and interventionist and more cost effective. They also align more closely with the customer-service roles of water corporations.

Most water users are responsible and want to comply with the laws. To do this they need to be empowered with the necessary information and tools for compliance. GMW will help educate water users on their rights and obligations through a continuing program of awareness-raising campaigns and interactive education including:

- regular publication of newsletters and media releases about compliance issues
- newspaper notices about prosecutions
- committee meetings with customers and other stakeholders to discuss key issues and solutions

GMW can issue advisory letters or oral advices to water users who may have unintentionally breached the Victorian Water Act because they were not familiar with the rules and their obligations. Oral advices will be documented and recorded.

Advisory letters or oral advices will be sent to water users only in scenarios where the act of non-compliance was:

- not deliberate
- had minimal or no impact on the environment and other water users
- was a first-time offence

Advisory letters or oral advices will inform water users of their obligations, provide them with reasonable time to correct the breach, and remind them that a subsequent act of non-compliance could result in further enforcement action being taken.

3.4 Directing compliance

GMW can use stronger warnings to bring an offender back into compliance.

GMW can issue warning letters or oral warnings to water users who have allegedly breached the Victorian Water Act, intentionally or unintentionally. Warning letters or oral warnings should:

- inform these water users of requirements under the Victorian Water Act and conditions under their licences and/or water shares
- caution that if the breach is not corrected within a specified time, further enforcement actions will be taken

Oral warnings will be documented and recorded.

3.5 Enforcement

GMW has the powers to reduce or restrict water delivery, issue penalty infringement notices, prosecute, suspend or revoke licences. These actions are taken for reasons including:

- offenders who are uncooperative
- offences that have unacceptable impacts on the environment and/or other stakeholders or have the potential to cause significant negative impacts on the environment and/or other stakeholders if the offence continued

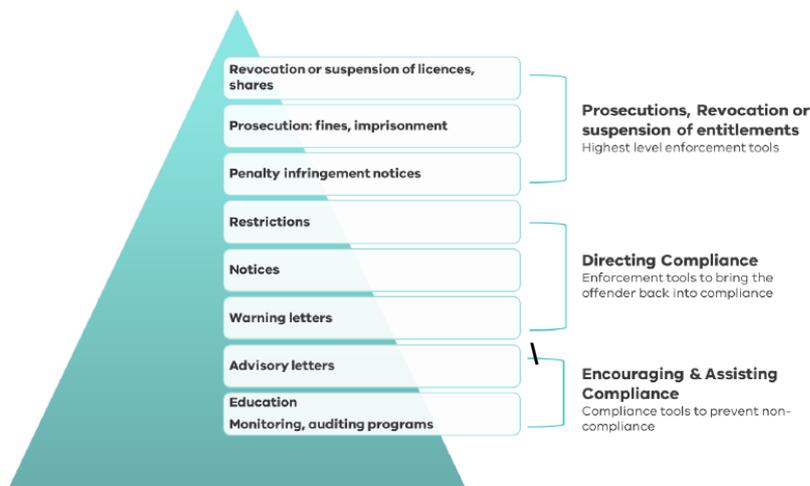


Figure 6: GMW’s Compliance Pyramid

3.6 Information gathering, risk assessment

GMW will discern instances of water use non-compliance by:

- receiving and acting on information received from the public
- using the water use compliance and detection tools shown in [Figure 5](#)

GMW will undertake a water use compliance risk assessment as shown in Section 4.

GMW's risk-based approach to compliance includes consideration of issues such as:

- the potential impact of non-compliance
- the timing and spatial nature of the issues
- the likelihood of non-compliance continuing or being repeated
- the availability of alternative solutions
- whether good faith is present
- how long the issue has been occurring
- any aggravating or mitigating circumstances

3.7 Investigations

GMW may identify potential breaches of the Victorian Water Act as part of our ongoing monitoring activities. We may also receive allegations from a number of sources including the public.

An investigation is where GMW undertakes a systematic process of gathering information. We will gather information to establish whether an offence has occurred, identify the person(s) involved and determine what the extent or consequences of the breach were.

GMW aims to conduct an investigation within a reasonable time and at a reasonable cost, considering legislative requirements and the nature of the investigation.

3.8 GMW Staff Accountability

GMW's investigators are accountable for their actions and the decisions they make during the course of investigations. We require investigators to:

- make ethical and informed decisions
- demonstrate a culture of accountability and professionalism

Persons can make a complaint if they believe GMW staff actions have not been:

- consistent with these requirements
- fair or reasonable

Persons can make a complaint to:

- GMW's Corporate Secretary
- the Energy and Water Ombudsman Victoria (EWOV) which is an independent dispute resolution service



3.9 How we decide which enforcement power to use

GMW’s enforcement tools are shown in Figure 5. Persons who are subject to the use of these tools will at first instance be provided with the opportunity to:

- explain their circumstances
- if they believe a proposed enforcement decision is unfair, explain why that is so

GMW’s decision whether to use these enforcement tools has been discussed in Sections 3.1- 3.6. Some other factors we may use to determine which enforcement powers to use include:

- timeliness: GMW will promptly respond to issues of non-compliance to minimise adverse impacts
- the nature and seriousness of the alleged contravention:
 - whether the non-compliance may impact materially e.g. volume or cost of water taken
 - whether the contravention involved dishonesty or intent
 - the value of any benefit or detriment caused as a result of the contravention
 - the impact of the non-compliance on the water market, including potential loss of public confidence
 - the value of any financial loss caused to water market participants
 - the extent of actual or potential environmental damage
 - whether the non-compliance has ceased or is continuing
 - whether the non-compliance is one-off or part of a systemic compliance failure
 - the impact on fairness and equity if the matter is not pursued
 - whether the non-compliant person has a poor compliance record
- conduct of the person following the alleged contravention:
 - when and how the breach came to our attention (i.e. was it self-reported or detected via other means)
 - the level of cooperation with our reviews, audits or investigations
 - whether remedial steps have been taken
- how robust our case is:
 - the availability of evidence to support the relevant enforcement option
 - the likelihood of success
- the expected public benefit of enforcement action:
 - whether the case is likely to clarify the law and help people to better understand their obligations
 - the length and expense of a contested hearing and the remedies available compared with other remedies that may be available more quickly

3.10 GMW Compliance and Enforcement Roles

The following GMW staff have a role in compliance and enforcement:

GMW staff	Role
General Manager Water Delivery Services	<ul style="list-style-type: none"> • Water system operations • Oversees detection and reporting of compliance matters
General Manager Customers & Stakeholders	<ul style="list-style-type: none"> • Land and Licencing
General Manager Water Storage Services	<ul style="list-style-type: none"> • Land & On-Water recreation services



GMW staff (continued)	Role (continued)
General Manager Strategy & Services Planning	<ul style="list-style-type: none"> • Recreation and Land • Metering
Corporate Secretary	<ul style="list-style-type: none"> • Oversees legal services including investigations and prosecutions • Receives external person complaints about investigations and prosecutions
Managers Storage Operations	<ul style="list-style-type: none"> • Recreation operations • Land and waterway management • Oversees detection and reporting of compliance matters
Manager Distribution Services	<ul style="list-style-type: none"> • Manage distribution services • Responsibility for compliance inspections, detection and reporting
Manager Diversions	<ul style="list-style-type: none"> • Manage the delivery of quality groundwater, regulated and unregulated stream services • Responsibility for compliance inspections, detection and reporting
Manager Customer Experience	<ul style="list-style-type: none"> • Oversees licencing under the <i>Water Act</i> 1989 • Oversees monitoring of customer water usage and ABA balances
Manager Water Systems Operations	<ul style="list-style-type: none"> • Oversees the Water Management System • Detection and reporting of breaches under the <i>Water Act</i> 1989
Customer Service Managers	<ul style="list-style-type: none"> • Compliance inspections, detection and reporting • Sending advisory letters
Authorised Water Officers	<ul style="list-style-type: none"> • Compliance inspections, detection and reporting • Assistance with compliance investigations
Manager Legal Services	<ul style="list-style-type: none"> • Oversees compliance and enforcement function • Oversee matters referred for prosecution

GMW has the following decision making process to ensure it maintains strong and effective water use compliance:

Decision Maker	Use of Compliance Tools	Internal reporting
Managers in Water Delivery Services	<ul style="list-style-type: none"> • Warning letters • Advisory Letters • Notices 	<ul style="list-style-type: none"> • Team reporting
General Manager Water Delivery Services	<ul style="list-style-type: none"> • Restrictions • Revocation or suspension of licences, shares • Prosecution: fines, imprisonment • Penalty infringement notices 	<ul style="list-style-type: none"> • Executive Team Reporting • Board Reporting

3.11 Privacy

We will undertake compliance, assurance and enforcement activities consistent with the requirements of our Privacy Policy

4. RISK ASSESSMENT

4.1 Risk Assessment

GMW water use compliance and enforcement activities use a risk management approach based on *AS/NZS ISO 31000: 2018 Risk Management Principles and Guidelines*. Key elements of this approach are:

- identifying the compliance risk associated with GMW water resources: GMW will annually undertake a risk assessment that considers the compliance risk to GMW's water resources
- assessing the likelihood and consequences of harm
- making sure that monitoring, detection and enforcements actions build as the risk increases
- using resources efficiently by focusing more on areas and persons/entities where there are the greatest compliance risks
- using different responses based on the overall risk associated with actual or possible offences

4.2 2020/21 Risk Assessment

GMW will annually consider the compliance risk of each of its water sources. This assessment will be conducted before the commencement of the irrigation season for the GMID in August.

GMW has conducted a compliance risk assessment for 2020/21 for each water source as shown in Appendix A

4.3 Treating Risks

GMW will undertake at a minimum the following risk treatments in response to the assessed compliance risk level.

Risk Treatment	Risk Level	Low	Medium	Significant	Extreme
General Education and Engagement e.g. newsletter, media releases, meeting with customers and stakeholder groups		X	X	X	X
Targeted Education and Engagement e.g. engaging with large water users or users with a history of non-compliance					X
Non-Automated Meters: annual reading and responding to ABA's with a negative balance over-use		X	X	X	X
Automated Meters: responding to system notifications of outlets operating without orders and ABA's with a negative balance		X	X	X	X
Responding to complaints received		X	X	X	X
Targeted in-person surveillance visits e.g. users with a history of non-compliance				X	X
Detailed analysis of data from GMW's water management system to identify areas where non-compliance may be occurring					X

5. TRANSPARENCY

5.1 Commitment

GMW is committed to transparency about its compliance strategies, protocols and compliance and enforcement activities.

5.2 Letting us Know About Misconduct

Please let GMW know about any non-compliance by contacting us on 1800 013 357

5.3 GMW's Public Reporting

GMW will demonstrate this transparency by:

- publishing on its website GMW's compliance strategy and general protocols impacting on water users
- publishing on its website a report on GMW's compliance and enforcement activities
- developing public communication materials to raise awareness of:
 - how GMW manages compliance risks
 - the main aspect of compliance and enforcement affecting water users

APPENDIX A

GMW has conducted a compliance risk assessment for 2020/21 for each water source as shown in Tables 1-3

Table 1: Groundwater

Water resource - Groundwater		
Area	Groundwater Management Unit	Risk level
West	Loddon Highland WSPA	Medium
	Mid Loddon GMA	Low
	Lower Campaspe WSPA	Medium
	Central Victorian Mineral Springs GMA	Medium
	Unincorporated	Low
Central	West Goulburn GMA	Low
	Upper Goulburn GMA	Low
	Eildon GMA	Low
	Mid Goulburn GMA	Low
	Shepparton Irrigation Region GMA	Medium
	Katunga WSPA	Medium
	Strathbogie GMA	Low
	Broken GMA	Low
East	Upper Ovens WSPA	Low
	Lower Ovens GMA	Medium
	Kiewa GMA	Low
	Upper Murray GMA	Low
	Barnawartha GMA	Low
	Unincorporated	Low



Table 2: Unregulated

Water resource – Unregulated		
Area	Catchment	Risk level
West	Loddon Basin South Cairn Curran Reservoir	Medium
	Loddon Basin North Cairn Curran Reservoir	Low
	Campaspe Basin upstream Lake Eppalock	Medium
	Campaspe Basin downstream Lake Eppalock	Low
Central	Goulburn Basin upstream Seymour	Medium
	Goulburn Basin downstream Seymour	Low
	Broken Basin	Medium
East	Ovens Basin upstream Myrtleford	Medium
	Ovens Basin downstream Myrtleford	Low
	Kiewa River main stem	Medium
	Kiewa River tributaries	Low
	Upper Murray Basin	Medium

Table 3: Regulated

Water resource – Regulated	
System	Risk level
Murray	Medium
Ovens	Medium
Broken	Medium
Goulburn	Medium
Campaspe	Medium
Loddon	Medium
Bullarook	Medium