



15 April 2020

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Acting Director, Purchase and Northern Infrastructure  
Department of Agriculture, Water and Environment  
GPO Box 858  
CANBERRA ACT 2601

By Email: [fodder.review@agriculture.gov.au](mailto:fodder.review@agriculture.gov.au)

Dear ██████████,

### **Submission – Water for Fodder Program Round 1 Review**

Goulburn-Murray Water (GMW) is pleased to have the opportunity to make a submission to this review and provides the following comments on the program:

#### **Application Process**

- *Applicants need more information on eligible Allocation Bank Accounts (ABA) to determine their eligibility.*

Many customers contacted GMW for help to complete the application form. Customers were uncertain if their (ABA) was eligible for the program as the criteria were unclear. The only information GMW had was that given to the customer – that the ABA had to have a Water Use Licence (WUL) associated with it.

- *The meaning of Trading Zone needs to be made clear in Round 2.*

Applicants were asked for a trading zone however in GMW's region, it was not clear if this meant the source or use trading zone. This term should be clarified by including Trading Zone in the Key Terms and Definitions section of the Guidelines for Round 2 of the program.

- *The Department of Agriculture, Water and Environment needs to understand the potential impact of tagged ABA restrictions and advise customers accordingly in Round 2.*

GMW's customers are likely to encounter restrictions on tagged accounts and so may not be able to access water for use from that ABA.

#### **Online Form**

- *The on-line form must use the correct terminology for each state.*

For example, the term 'Right to Use' was used when asking for a GMW WUL number. This was confusing for both our customers and for GMW without reference to Section 8 of the Guidelines.

- *The on-line form must allow space to list more than one WUL.*

This caused confusion for applications as some GMW ABAs have multiple WULs associated with them.

## Guidelines

- *Clarify what is meant by Section 2.3 “...we may request to be provided with the documentation that has been listed in the Application Form which will provide evidence in support of any authority to submit the Application.”*

Many customers assumed this meant they must have the authorisation in place before they could lodge their application and so GMW received several hundred Agents Authorised to Trade Allocation forms in a matter of days.

- *Better communication and engagement on how compliance with the rules will be enforced.*

Many customers are calling GMW to ask if they can move the water or how compliance checks are being completed.

- *Better communication and engagement around timeframes to determine eligibility and for applications to be processed.*

As customers had only a short timeframe to determine their eligibility they rushed to create new ABAs and have them linked to their WULs. GMW also received numerous enquires about the status of applications we had not yet received. It can take GMW up to 10 working days to process transactions for interstate trades. Notifying customers when the Water Authority has received the application would assist.

- *Consider giving priority to unsuccessful Round 1 applications in Round 2*

Many customers were disappointed that they had missed out on Round 1 and would like to see their Round 2 applications given priority over those who were successful in Round 1.

Yours sincerely



Ann Telford  
GENERAL MANAGER CUSTOMERS & STAKEHOLDERS