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GMW Compliance and Enforcement Strategy

November 2022



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Acknowledgement

Goulburn-Murray Water acknowledges the Aboriginal and Torres Strait Islander communities of Victoria and pays respect to their Elders past, present and emerging.

We acknowledge Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia and as the proud representatives of the world's oldest, living culture.

We recognise the Yorta Yorta Nation and the Dja Dja Wurrung, Taungurung and Gunaikurnai Clans, as the Registered Aboriginal Parties within the Goulburn-Murray Water Service Region and acknowledge their rights as the Traditional Owners of lands and waters, as outlined in their Agreements with the State of Victoria.

We also acknowledge the insight, contributions and value the Traditional Owner communities add to the management of those lands and waters.

We also recognise the rich cultural connections all First Peoples have across our region, as Traditional Custodians of lands and waters and the importance of those to all our communities.

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 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 Compliance and 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.

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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. Compliance and enforcement is linked to these outcomes:

Strategic Outcome	Link to 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 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	Strong compliance and enforcement culture with GMW

1.6 Key Performance Indicators

GMW has adopted the state-wide key performance indicators for unauthorised take set by the Minister for Water in 2020.

Where GMW aims for:

- no more than **1%** of volume of total water taken is above authorisation, and
- no more than **3%** of accounts are to be in negative at any time.

KPI results are calculated annually and published via the GMW Annual Report.

1.7 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 compliance and enforcement activities:



Excellence

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



Courage

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



Honesty

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



Caring

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



Accountability

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

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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

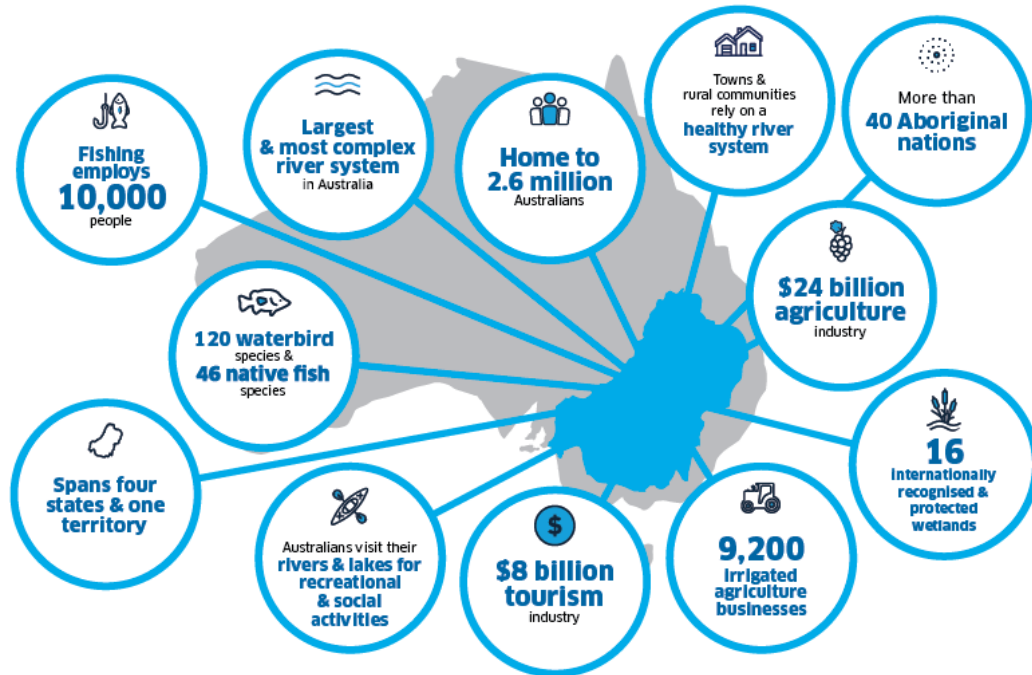


Diagram source: Murray-Darling Basin Authority

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 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:

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.

- 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

2020 and 2021 Independent Review of Compliance and Enforcement in Victoria

In May 2020 the Minister for Water appointed Mr Des Pearson, Victoria's former Auditor-General to review the compliance and enforcement frameworks of DELWP and water corporations with non-urban customers, to ensure they are aligned to the Government's zero tolerance approach to unauthorised take. GMW has addressed all recommendations. The report is available [here](#).

2022 Inspector-General of Water Compliance - Compliance and Enforcement across the Murray-Darling Basin Report

The Murray-Darling Inspector General on compliance published a report on compliance and enforcement across the Murray-Darling Basin. The report shows Victoria in a positive light. The IG's report reinforces the strong performance of Victoria's compliance framework and confirms that water theft in Victoria is extremely low.

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.

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

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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 compliance. They are also empowered to investigate and prosecute breaches of the Victorian Water Act. See:

- [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

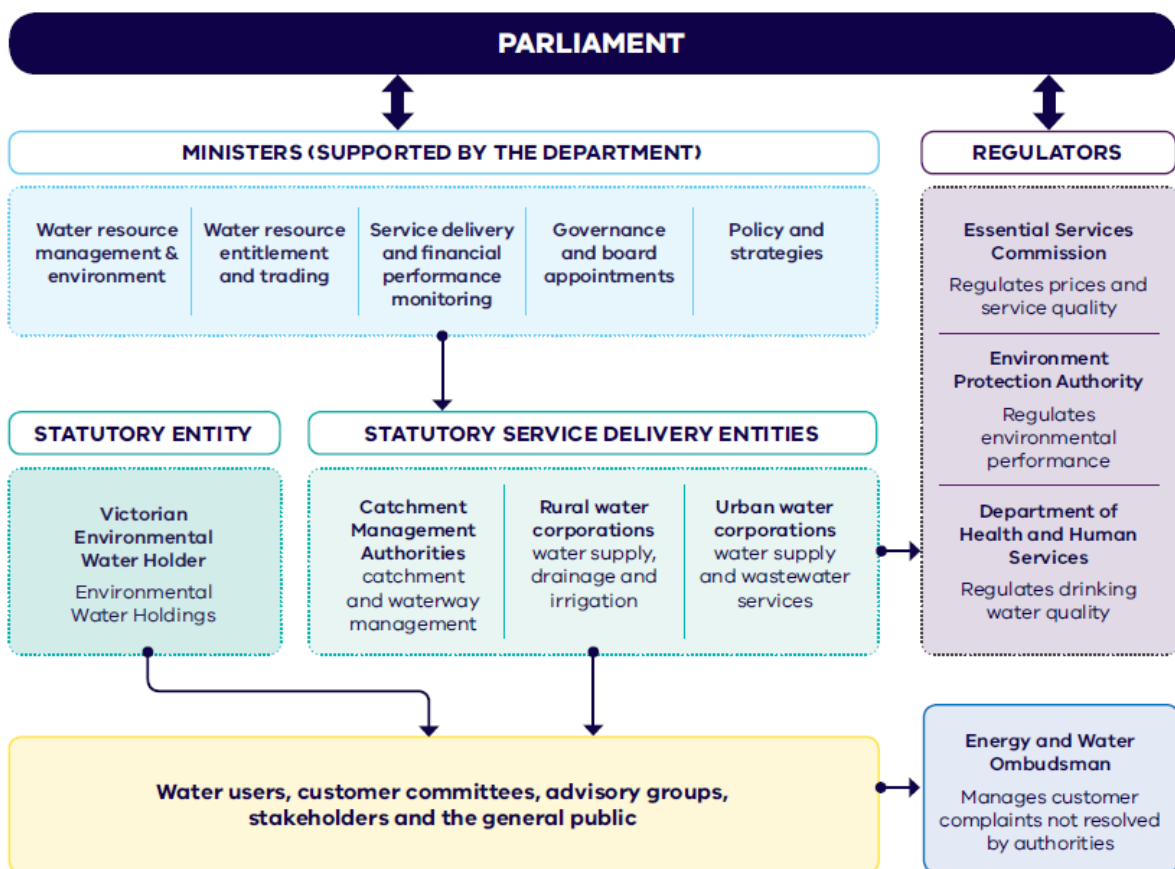


Figure 1: Illustration of the institutional arrangements in Victoria’s water sector

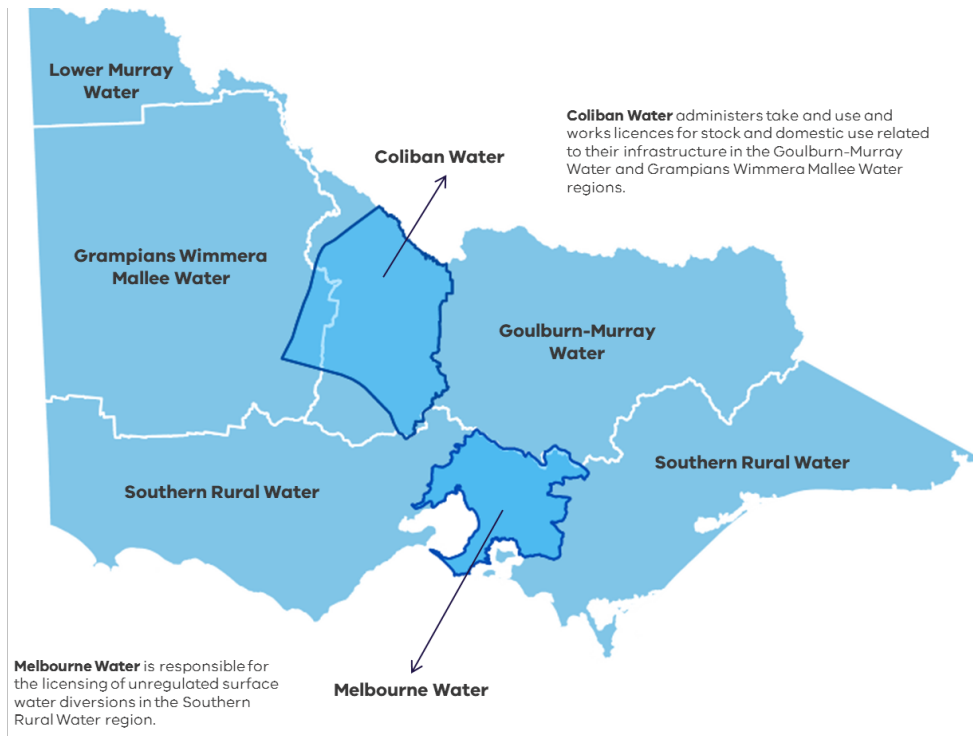


Figure 2: Map of the geographical jurisdictions of water corporations in Victoria

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.

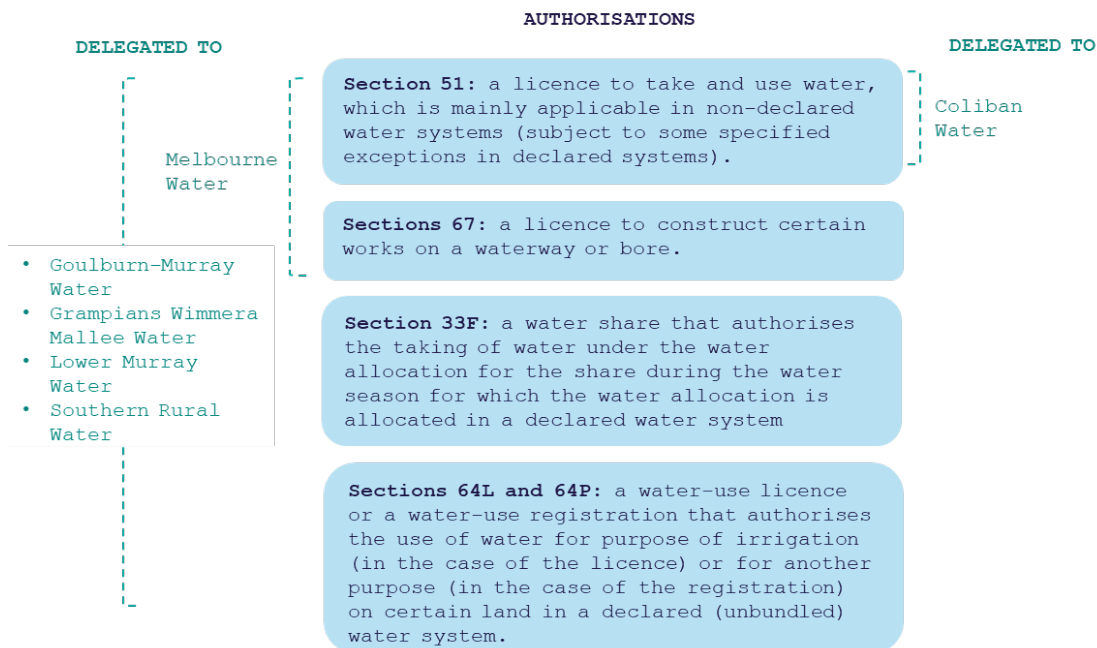


Figure 3: Authorisations under the Victorian Water Act

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2.4 Prohibited Activity

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



Figure 4: Offences under the Victorian Water Act

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Penalty units

Penalty units determine the amount a person is fined when they commit an infringement offence. The value of a penalty unit is set annually by the Victorian Treasurer, and is updated on 1 July each year. For more information see website [Penalties and values | Department of Justice and Community Safety Victoria](#)

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: [DELWP Fees and Charges](#).

2.5 Compliance Tools

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

Compliance Tools			
Education & Information	Hydrographic monitoring	Metering & Data loggers	Reporting and accounting
Customer portals to access real-time information			
Detection Tools			
Site visits	Covert surveillance	Field and desktop audits	Community, employee or duty-holder reports
Monitoring data and sample collection	Observations by water officers	Observations and reports from other agencies or regulatory authorities	
Analysis of intelligence including information, data, aerial photography and reports	Inspection powers under section 133 and search and seizure warrant powers under section 291E to 291H of the Victorian Water Act to permit authorised persons and officers of the water corporation to enter private land to inspect any works or make any test to find out whether the Victorian Water Act, regulations or by-laws of the water corporation are being complied with.		
Enforcement Tools			
Notice to repair (section 15)		Notice of contravention (section 151)	
Power to issue infringement notice (sections 33EB, 63B, 289C, 295A)		Suspension, revocation or cancellation of licence (sections 60, 64AJ, 64AK, 64AL, 64AM, 75AB)	
Powers to reduce, restrict or discontinue the delivery of water to a serviced property in certain circumstances (section 231)		Prosecution powers under section 296 to institute court action to seek penalties for alleged conduct in contravention of the Victorian Water Act	

Figure 5: Compliance, detection and enforcement tools

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3. Taking Action

3.1 Policy

GMW has:

1. a zero-tolerance approach to unauthorised take
2. a risk-based compliance strategy to ensure that resources are used efficiently, focusing more on areas where there are the greatest compliance risks
3. 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) a clear and logical escalation pathway in response to detected breaches, from warnings through to when prosecutions will be pursued
 - b) an emphasis on engagement, education and awareness raising
 - c) ensuring customers are compliant with their obligations, and where found to be non-compliant, undertake the necessary steps to enforce compliance and mitigate the risk that non-compliance creates.

GMW will be transparent about its compliance and enforcement strategy 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.

3.2.1 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.

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GMW will help educate water users on their rights and obligations through a continuing program of awareness-raising campaigns and interactive education including:

- Customer Charter
- 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

3.2.2 Directing compliance

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

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

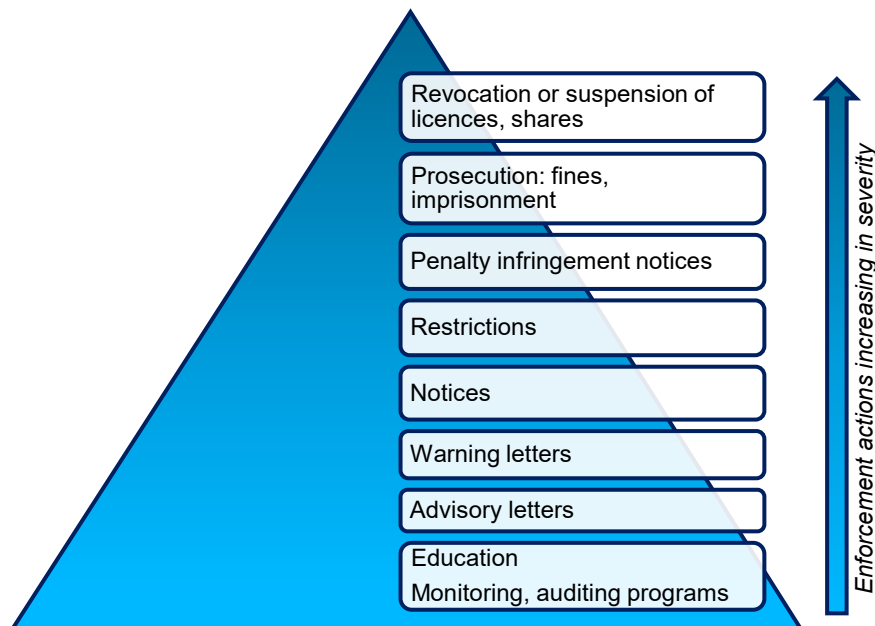
- inform these water users of requirements under the Victorian Water Act and conditions under their licences and/or water shares
- caution that if the breach is not corrected within a specified time, further enforcement actions will be taken

Oral warnings will be documented and recorded.

3.2.3 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



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Figure 6: GMW's Compliance Pyramid

3.3 Information gathering, risk assessment

GMW will discern instances of non-compliance by:

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

GMW will undertake a 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

3.4 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.

3.5 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 Manager Governance
- the Energy and Water Ombudsman Victoria (EWOV) which is an independent dispute resolution service

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GMW’s Compliance and Enforcement Advisor and prosecutors will hold a minimum qualification of Certificate IV in Government Investigations or equivalent.

Ongoing training will be provided for updated legislation and implementing new legislation when required.

3.6 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:

Decision Factors	
<i>Timeliness</i>	GMW will promptly respond to issues of non-compliance to minimise adverse impacts
<i>The nature and seriousness of the alleged contravention</i>	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
<i>Conduct of the person following the alleged contravention</i>	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
<i>How robust our case is</i>	the availability of evidence to support the relevant enforcement option the likelihood of success
<i>The expected public benefit of enforcement action</i>	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

3.8 Privacy

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

3.7 GMW Compliance and Enforcement Roles

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

GMW Team	Role
Business and Finance	<ul style="list-style-type: none"> Oversee the implementation plan Receives external person complaints about investigations and prosecutions Oversees compliance and enforcement function Oversee matters referred for prosecution
Water Delivery Services	<ul style="list-style-type: none"> Water system operations Manage distribution services Manage the delivery of quality groundwater, regulated and unregulated stream services Detection and reporting of breaches under the Water Act 1989 Compliance inspections Oversees the Water Management System
Customers and Stakeholders	<ul style="list-style-type: none"> Oversees licencing under the Water Act 1989 Oversees monitoring of customer water usage and ABA balances Land and Licencing
Strategy and Services Planning	<ul style="list-style-type: none"> Recreation and Land Metering
Water Storage Services	<ul style="list-style-type: none"> Land & On-Water recreation services Recreation operations Land and waterway management Oversees detection and reporting of compliance matters
Authorised Water Officers	<ul style="list-style-type: none"> Compliance inspections, detection and reporting Undertake or assist with compliance investigations

4. Risk Assessment

4.1 Risk Assessment

GMW 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 2022/23 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 2022/23 for each water source as shown in Appendix.

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 and performance against state-wide key performance indicators for unauthorised take
- developing public communication materials to raise awareness of:
 - how GMW manages compliance risks
 - the main aspect of compliance and enforcement affecting water users

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6. Appendix

GMW has conducted a compliance risk assessment for 2022/23 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

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Table 3: Regulated

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