

# Goulburn to Murray Trade Review

Regulatory impact statement – trade rule options

## Worked examples of trade rule options



### Purpose of this document

This document accompanies the **regulatory impact statement** (RIS) consultation paper, in which the Victorian Government is considering changing the rules governing the trade and delivery of water from the Goulburn River to the Murray River to avoid further environmental damage by sustained high flows during summer and autumn.

This document explains the different options presented in the RIS consultation paper, with examples of how each trade rule option would work over the water year. These examples highlight the key differences in terms of trade opportunities between the alternative options.

### Combining trade rules with operational rules for the lower Goulburn River

The Department of Environment, Land, Water and Planning (DELWP) is reviewing Goulburn to Murray trade, tagging and operating rules to help protect the health of the lower Goulburn River, without increasing water delivery risks in the Murray, and while enabling opportunities for water trading.

This means exploring options for:

- **Operational rules** which prescribe maximum average monthly rates of regulated flow down the lower Goulburn River. The rules should prescribe lower average monthly flows over summer and autumn to prevent environmental damage from unseasonal high flows.
- **Trade rules** which ensure that the volume of water that can be traded matches the volume that can be sustainably delivered within operational rules.

The RIS consultation paper assesses five options for complementary operational rules and trade rules.

### Operational and trade rule options

The five worked examples in this document include for the 'base case' option (if interim measures are allowed to lapse) and for each of the alternative options presented in the RIS consultation paper.

# Goulburn to Murray Trade Review

## Worked examples of trade rule options

Each trade rule option is combined with different operational rules. The table below outlines each option and the identified volumes of water that can be delivered from the inter-valley trade (IVT) account<sup>1</sup> under different flow regimes, comprising of average base flows and some shorter pulse flows<sup>2</sup> with a higher flow rate (3,000 ML/day<sup>3</sup>).

Option	Trade rule	Operating rule		
		Base flows	Annual pulses (number)	IVT volume enabled over summer and autumn
Base case	Rolling 200 GL limit	~2,700 ML/day <sup>1</sup>	n/a	80 GL/month
Option 1	Two-part trade rule	Avg. 940 ML/day	1 <sup>2</sup>	28 GL/month + 0 GL in pulses <sup>2</sup>
Option 2	Two-part trade rule	Avg. 1,100 ML/day	3	33 GL/month + 39 GL in pulses <sup>3</sup>
Option 3	Two-part trade rule	Avg. 1,300 ML/day	5-6	40 GL/month + 70 GL in pulses <sup>4</sup>
Option 4	Seasonal tagging rule	Avg. 1,100 ML/day	3	33 GL/month + 39 GL in pulses Jul-Nov: no restriction on tagging water for use in the Murray

<sup>1</sup> No baseflows or pulses are prescribed in the base case. Flows have averaged up to 2,700 ML/day.

<sup>2</sup> Option 1 pulse is timed to occur in May, which would not enable additional volumes of water over peak summer and autumn irrigation period.

<sup>3</sup> Option 2 pulses are timed to occur in December, late January-early February, and March. The third pulse provides additional operational flexibility to manage Murray delivery risks, but does not enable more trade as this could increase Murray delivery risks.

<sup>4</sup> Option 3 pulses would occur monthly over summer and would provide additional trade opportunity, though the frequency of these pulses has been identified as high risk of further environmental damage.

### Explaining how the trade rule options work

#### The current trade rule (base case)

The Goulburn to Murray trade rule governs how water allocation can be traded between the Goulburn and the Murray systems. The rule stops allocation trade from the Goulburn, Broken, Campaspe and Loddon systems to the Murray system (including interstate) when balance of the Goulburn IVT account is greater than 200 GL. The IVT account tracks what is owed between the Goulburn and Murray systems as a result of trade. The upper limit of 200 GL in this trade rule was put in place to restrict the volume of water that could be at risk of spilling from the IVT account if Lake Eildon spills.

The balance of the IVT account can grow above 200 GL during the season. This occurs when there is already a high IVT balance and allocations are made to legacy water commitments<sup>4</sup> held in the Goulburn system to support Murray entitlements. Unrestricted tagged water use<sup>5</sup> can also add to the IVT account balance<sup>6</sup>.

The IVT account balance is drawn down when river operators deliver water from the account to supply downstream users. Typically, river operators call on the release of water from the Goulburn IVT account in spring, summer and early autumn when irrigation use is high.

<sup>1</sup> The IVT account tracks how much water is owed between the Goulburn and Murray systems as a result of trade.

<sup>2</sup> Pulse flows would occur over a period of 14 days with prescribed rates of rise and fall according to operating rules

<sup>3</sup> This is the current operational limit in place to prevent impacts to in-channel privately owned pumps in use over summer and autumn. If these pumps were moved to the top of the bank, pulse flows of up 6,000 ML/day could be enabled.

<sup>4</sup> 'Legacy' Goulburn water consists of 100 GL of water shares issued to the Murray, including some to South Australia, and 40 GL of water for environmental flows in the Snowy and Murray rivers. This water needs to be delivered each year to support the reliability of existing Victorian Murray entitlements.

<sup>5</sup> A tagged account is a water allocation account which is located in one trading zone but marked for use in another. This arrangement gives the holder of a tagged account the ability to use their Goulburn water in the Murray.

<sup>6</sup> The base case assumes that current rules apply and interim measures including restrictions on tagging water lapse.

# Goulburn to Murray Trade Review

## Worked examples of trade rule options

Prior to December 2019 when interim operating measures were introduced by the Victorian Minister for Water, there was no formal restriction on how much water could be delivered from the Goulburn IVT account per month<sup>7</sup>. This meant that in some years, it was possible to deliver large volumes of water from the IVT account throughout the water year, and large opportunities for allocation trade were available as the balance was drawn down.

### The two-part trade rule (options 1 to 3)

The two-part trade rule has been refined in light of public consultation on trade rules held in early 2020 (known as the 'dynamic rule' previously). This trade rule applies to options 1, 2 and 3 in the RIS consultation paper. Both parts of the rule govern trade for a specific period of the year to match seasonal opportunities to trade with the ability to deliver water to users. This better reflects the different opportunities to deliver water from the Goulburn IVT account without damaging the environment compared to a single limit year-round.

Under the two-part trade rule:

- From July until mid-December a **rolling winter-spring limit** applies – this allows opportunities to trade when water from the IVT account is delivered in winter and spring. Seasonal conditions with naturally higher flows allow river operators to deliver more water early in the irrigation season without damaging the environment.

This part of the rule operates like the current trade rule with trade stopped when the IVT balance exceeds a designated limit. In this case a rolling limit only applies in winter-spring rather than across the entire water year.

- From mid-December until June, a **fixed summer-autumn limit** applies – this ensures all traded water can be delivered according to operating rules for the lower Goulburn, which provide for lower flows over summer and autumn.

The fixed limit results in the Goulburn IVT account balance being gradually drawn down over this time.

The volume of water that can be delivered under the operating regime during summer and autumn is the basis for determining both the rolling winter-spring limit and whether any additional trade opportunity can be made available under the fixed summer-autumn limit. This avoids increasing delivery risks to downstream users, as only the volume of that can be delivered under the operating rules can be traded.

The two-part trade rule will prevent making trade opportunity available for water that cannot be delivered.

#### Part 1 – 'rolling winter-spring limit' – applies from 1 July to 14 December:

- The volume of potential legacy commitments (typically up to 140 GL) would be **quarantined** on 1 July.
- Additional trade opportunity would be available on 1 July up to the rolling winter-spring limit.
- The rolling-winter spring limit will be set to make sure the balance of the IVT account does not exceed the amount that can be delivered during summer and autumn within the lower Goulburn operating rules.
- During this period when delivery of water from the Goulburn IVT draws the Goulburn IVT account balance down below **the rolling winter-spring limit**, new trade opportunity will occur. This means that the greater the delivery of water from the IVT account between July and mid-December, the greater the opportunity for trade.
- Options 1, 2 and 3 are similar to the base case during this period, in that delivery of water to users from the IVT account creates trade opportunity.

#### Part 2 – 'fixed summer-autumn limit' – applies from 15 December to 30 June:

- On 15 December, any part of the volume quarantined for legacy commitments that is not likely to be required – based on the seasonal determination outlook for Goulburn high-reliability water shares – is now made available, creating new trade opportunity
- From this time onwards, delivery of water to users from the IVT account will not create new trade opportunity. Instead the IVT account balance will gradually be drawn down. This will allow all water in the IVT account to be

<sup>7</sup> Typically river operators have kept flows below 3,000 ML/day over peak irrigation periods (summer and autumn) to prevent impacts to privately owned irrigation pumps in use at those times.

delivered to users during the same water year it was traded, and the IVT account will be drawn down to zero by the end of the water year.

### Back-trade and net trade limits

- Throughout the year, if there is any back-trade from the Murray to the Goulburn, this will create the equivalent volume of trade opportunity from the Goulburn to the Murray.

### Benefits

- Trade opportunity will occur earlier in the water year as IVT water is delivered to match traded demands, making it easier for water users to plan for the season ahead.
- When seasonal conditions allow additional water from the Goulburn IVT account to be delivered in spring without causing environmental damage or creating additional risks to water users downstream, more trade opportunity will occur.
- In most years, the balance of the Goulburn IVT account at the end of the water year will be low or at zero, reducing the risk of resource availability for Murray entitlement holders being affected if Lake Eildon spills.
- The fixed summer-autumn limit prevents the Goulburn IVT account balance from continuing to grow beyond what can be delivered for the rest of the water year, reducing the risk of a large IVT balance and reducing the risk of delivery shortfalls in the Murray System as a result of additional demands that cannot be met from the delivery of IVT water.

### Risks

- The rule has two parts that work differently and are affected by a range of seasonal conditions. This will take adjusting to, and water users will need good information about how the rule works.

### Seasonal tagging trade rule (Option 4)

The seasonal tagging rule in Option 4 also involves two-parts, but the key difference is that under this rule, instead of a rolling trade limit applying over winter and spring, there is unrestricted tagging for that period (July to October). From November onwards, tagged use is restricted in line with allocation trade according to an annual trade limit, which is set to reflect the operating rules for the lower Goulburn during summer and autumn (November to June).

Under the seasonal rule:

- From July through to October **tagged use is unlimited and allocation trade would be subject to an annual limit**, based on what can be delivered from November to April under the same operating rule as option 2. It is assumed that over this time, deliveries would be meeting tagged water use demand, so that the IVT account balance is increasing with trade over this period.
- From November until June **tagged water use and allocation trade are treated equally and both would be subject to the annual trade limit**. This means that the IVT account balance will be drawn down as water is delivered.

### Benefits

- Water users will have certainty on when they can use water from tagged accounts.
- Market participants know how much trade opportunity is available at the start of each year.
- Would increase trade opportunity compared to other options (although the majority of opportunity will be from tagged accounts).

### Risks

- This option provides Murray water users the chance to use unlimited volumes of Goulburn water from tagged accounts during winter and spring and reserve the use of their local Murray allocations for the peak summer and

autumn period. Using significantly more Murray allocation in summer and autumn would create an unacceptable shortfall risk in the Murray system, because the delivery of local allocation through the Barmah Choke would be concentrated during this peak demand period. Analysis indicates that this option could result in more than 100 GL of additional use of Murray allocation in the peak demand period.

- This option would be inconsistent with Basin Plan trading rules which state that restrictions on tagged use should be in line with restrictions on allocation trade (rule 12.23). Victoria is advocating that in some cases allocation trade and tagged use could be managed differently based on the different risks presented, especially in cases treating them the same would unnecessarily restrict trade. However, in this case the shortfall risk presented to the Murray system from unlimited tagged use would have an unacceptable impact on entitlement holders.

### Quarantine of legacy commitments

The potential new options proposed for future Goulburn to Murray trade contain a 'quarantine' component for legacy water commitments that contribute to the Goulburn IVT account each year. These legacy water commitments are described in more detail in *Water Trade Rules and Inter Valley Trade Accounts* – available on the [Victorian Water Register](#).

The legacy commitments from the Goulburn to the Murray can equal up to about 140 GL each water year. This includes about 30-40 GL of allocations recovered under the Snowy Water Initiative (actual volume is known at 1 July each year) and about 100 GL of entitlement (issued pre-2007 to the Murray and South Australia) that receives allocations throughout the water year as Goulburn high-reliability seasonal determinations increase. In years where Goulburn high-reliability seasonal determinations reach 100%, 100 GL needs to be delivered during the water year. However in years with less than 100% high-reliability seasonal determinations the delivery volume would be less than 100 GL (i.e. if 70%, only 70 GL needs to be delivered) and so the portion of water set aside and no longer required would be made available as trade opportunity.

#### Delivering legacy commitments to Murray entitlements

Quarantining water delivery opportunity for the legacy water commitments at the beginning of the water year is proposed to ensure that these historical commitments can be delivered to support entitlements in the Murray system each year within the operational rules.

In Victoria, seasonal determinations against entitlements are announced via seasonal determinations that are updated throughout the season as water becomes available<sup>8</sup>.

The proposed quarantine component in these worked examples sets aside space for up to the full 140 GL to be delivered from the Goulburn IVT account each year from July at the start of the water year:

- On 1 July**, the volume from the Snowy contribution is added to the Goulburn IVT account
  - The Snowy contribution is allocations recovered under the Snowy Water Initiative in the previous year, typically around 30-40 GL.
- On 1 July**, a quarantine is reserved for an additional **100 GL** which may be required if Goulburn allocations for high-reliability water shares reach 100%.
- On 15 December** the Northern Victorian Resource Manager updates the Seasonal Determination Outlook. If Goulburn allocations for high-reliability water shares are not predicted to reach 100%, the full quarantine will not be required, and an additional trade opportunity will be made available.

### Example of quarantining legacy commitments

Below is an example of how legacy commitments are quarantined and released to create additional trade opportunity in dry years (when allocations don't reach 100%).

Timing

Accounting for quarantined water

<sup>8</sup> The Northern Victoria Resource Manager updates on seasonal determinations are available at <https://nvrn.net.au/seasonal-determinations>

# Goulburn to Murray Trade Review

## Worked examples of trade rule options

At 1 July

The balance of the IVT account opens at **140 GL** based on:

- **0 GL** of water not delivered in the previous year; and
- **40 GL** for the Snowy contribution
- **100 GL** set aside to ensure the legacy water commitments can be delivered if seasonal determinations reach 100%.

At 15 December

If the seasonal outlook indicates that Goulburn high-reliability seasonal determinations are only expected to reach 70%, then 30 GL of additional trade opportunity is released to reflect the reduced legacy water commitments that need to be delivered.

## Worked examples of options

### Key concepts for worked examples

The following key concepts are used in the examples:

- **Summer-autumn delivery limit:** The maximum volume that can be delivered within the operational rules from 15 December to 30 April.
- **Average winter-spring IVT delivery volume:** The volume that is expected to be able to be delivered between 1 July and 14 December to meet demands in the Murray.
- **Average annual IVT delivery volume:** The expected average volume of IVT that can be delivered in a water year within the operational rules and without impacting Murray entitlements.

### Assumptions for worked examples

Seasonal conditions, river operations and water market behaviour all have an impact on the southern connected Murray-Darling Basin water market each year. Recent history shows that each year is different in terms of climatic conditions, water availability and water user behaviour.

In the worked examples below, a set of prescribed assumptions are used so that different rules can be described under a specific set of conditions to show how they work, and to be able to compare the differences between the options. In reality, each year is different, and this can impact how the trade rule options work, and the net trade opportunity from year to year.

#### Assumptions:

- For each of the four proposed new options, the IVT balance at 1 July carried over from the previous year is assumed to be **0 GL**, as this is the desired long-term start for each water year.
- For the base case, the assumed IVT balance at 1 July carried over from the previous year is **200 GL**. This is because current rules do not limit summer and autumn trade, which means the IVT balance is often not drawn down towards zero by the end of the year.
- The Snowy River contribution to the Goulburn IVT is assumed to be 40 GL.
- IVT delivery volume from 1 July to 14 December ('winter-spring limit') is assumed to be the volume that river operators plan to deliver to meet demands in the Murray generated by trade from the Goulburn.
- All available trade opportunity from the Goulburn to the Murray is assumed to be taken up by buyers and sellers as it becomes available.
- On 15 December, the seasonal determination outlook for the Goulburn high-reliability water shares indicates allocations are expected to reach 100% by February with average inflows. So, all of the 100 GL quarantined for legacy commitments is required, and no additional trade opportunity is made available during the summer-autumn 'fixed limit' period.

# Goulburn to Murray Trade Review

## Worked examples of trade rule options

- The MDBA river operators call out all possible Goulburn IVT over the summer and autumn period under the given operating regime.
- Trade opportunity represents **net trade** – i.e. more trade from the Goulburn to the Murray could occur if water is traded in the opposite direction from the Murray to the Goulburn (i.e. back-trade).

In reality, whenever back-trade occurs, regardless of the time of year, new opportunity to trade out of the Goulburn will be created for the same volume.

# Goulburn to Murray Trade Review

## Worked examples of trade rule options

### Worked examples: options assessed in the RIS

Option	1 July – 14 December	15 December – 30 June	Estimated annual volumes
<b>Current trade rule (rolling 200 GL IVT limit)</b>			
Base case: 80 GL/month	Opening trade opportunity: <b>0 GL</b> (based on recent years, though this can be negative)  Winter-spring IVT delivery volume: <b>50 GL</b> (based on historic average)	New trade opportunity due to IVT delivery: <b>150 GL</b> (based on historic average)  Additional trade opportunity from unneeded quarantine water (at 15 Dec): <b>0 GL</b> (no quarantining)	Total annual trade opportunity (including tagging): <b>~200 GL*</b> [50 GL + 150 GL] *greater volumes if more IVT is delivered throughout the year
<b>Two-Part Trade Rule</b>			
Option 1: <b>28 GL/month + 0 GL pulse*</b> *5 GL pulse occurs in May and does not allow delivery over peak period  Summer-autumn delivery limit: <b>126 GL</b>	Opening trade opportunity: <b>-14 GL</b> Opening IVT balance exceeds rolling limit by <b>14 GL</b> (summer-autumn delivery limit is exceeded as a result of legacy commitments). <sup>9</sup>  Winter-spring IVT delivery volume: <b>80 GL</b> most years, (slightly less in very wet years, more in years with higher spring demands)	Additional trade opportunity from unneeded quarantine water (at 15 Dec): <b>0 GL</b>	Total annual trade opportunity (including tagging): <b>66 GL</b> [-14 GL + 80 GL]  Average annual IVT delivery volume: <b>206 GL</b> [126 GL + 80 GL]
Option 2 33 GL/month + 39 GL in pulses  Summer-autumn delivery limit: <b>190 GL</b>	Opening trade opportunity: <b>50 GL</b> <sup>10</sup>  Winter-spring IVT delivery volume: <b>80 GL</b> most years, (slightly less in very wet years, more in years with higher spring demands)	Additional trade opportunity from unneeded quarantine water (at 15 Dec): <b>0 GL</b>	Total annual trade opportunity (including tagging): <b>130 GL</b> [50 GL + 80 GL]  Average annual IVT delivery volume: <b>270 GL</b> [190 GL + 80 GL]
Option 3 40 GL/month + 70 GL in pulses  Summer-autumn delivery limit: <b>250 GL</b>	Opening trade opportunity: <b>110 GL</b> <sup>11</sup>  Winter-spring IVT delivery volume: <b>80 GL</b> most years, (slightly less in wet years, more in years with less peaky demands)	Additional trade opportunity from unneeded quarantine water (at 15 Dec): <b>0 GL</b>	Total annual trade opportunity (including tagging): <b>190 GL</b> [110 GL + 80 GL]  Average annual IVT delivery volume: <b>330 GL</b> [250 GL + 80 GL]
<b>Seasonal Tagging Rule</b>			
Option 4 33 GL/month + 39 GL in pulses (Nov-Jun) with unrestricted delivery for tagging Jul-Oct  Summer-autumn delivery limit: <b>240 GL</b>	Opening trade opportunity: <b>100 GL</b> <sup>12</sup>  Winter-spring tagged use and IVT delivery volume: unlimited but likely <b>0 - 150 GL</b> most years <sup>13</sup>	Additional trade opportunity from unneeded quarantine water (at 15 Dec): <b>0 GL</b>	Total annual trade opportunity <sup>14</sup> (including tagging): <b>~ 250 GL</b> [100 GL opening trade] + [~150 GL tagged use]  Average annual IVT delivery volume: <b>390 GL (240 GL + 150 GL tagged use)</b>

<sup>9</sup> Summer-autumn delivery limit = 28 GL/month x 4.5 months (15 Dec – 30 April) = 126 GL. Opening IVT balance = 140 GL (as a result of legacy commitments). As IVT balance exceeds rolling limit by 14 GL, there is no opening trade opportunity, and 14 GL of winter-spring IVT delivery is required before trade opens.

<sup>10</sup> Summer-autumn delivery limit = 33 GL x 4.5 months (15 – 31 Dec) + 39 GL (pulses) = 190 GL. Opening trade opportunity = 190 GL - 140 GL (legacy commitments) = 50 GL.

<sup>11</sup> Summer-autumn delivery limit = 40 GL/month x 4.5 months (15 Dec – 30 April) + 70 GL (pulses) = 250 GL. Opening trade opportunity = 250 GL - 140 GL (legacy commitments) = 110 GL.

<sup>12</sup> Fixed annual limit = 33 GL x 6 months (1 Nov – 30 April) + 39 GL pulses = 240 GL. Opening trade opportunity = 240 GL - 140 GL (legacy commitment) = 100 GL

<sup>13</sup> 150 GL based on potential downstream demand in Victoria only. As there is unlimited tagging over this time, this upper limit is an estimation and tagged use could be higher, especially if interstate demands are considered.

## Historic trade opportunity volumes

**Table 1** shows the historic volume of net Goulburn to Murray trade each year, including allocation trade and use from tagged accounts, from 2012-13 to the current season and the months in which trade opportunities have been available in those years.

**Table 1: Historic net annual Goulburn to Murray trade**

Water year	Net annual trade from Goulburn to Murray	Month of trade opportunity
2012-13	-1 GL (net back trade)	All months
2013-14	-15 GL (net back trade)	All months except Oct
2014-15	79 GL	Jul, Nov – Jun
2015-16	-10 GL (net back trade)	All months
2016-17	72 GL	Jul – Sep, Jan – Jun
2017-18	250 GL	Jul, Mar – Jun
2018-19	228 GL	Oct – Jun
2019-20	152 GL	Jul, Jan – Mar, Jun

## Key seasonal factors likely to affect trade opportunity

Changes in seasonal conditions, river operations and water market behaviour may also change trade opportunities beyond the examples provided above. This section outlines what the other key factors are that will influence trade opportunities in the future.

### Seasonal determinations for Goulburn high-reliability water shares

- The seasonal determinations for the example irrigation seasons were 100% for HRWS.
  - If seasonal determinations were lower, there would be more trade opportunity than the examples as less of the 'quarantine' would need to be used
    - e.g. if the 15 December outlook only projected seasonal determinations to reach 70%, there would be 30 GL more net trade opportunity than in the examples.

### Contribution of Snowy legacy component to opening IVT balance

- In the examples, the Snowy legacy contribution to the Goulburn IVT balance is assumed to be 40 GL.
  - This is calculated by adding up all allocations made to high and low-reliability Snowy entitlements in the previous 12 months between 1 February and 31 January.
  - The Snowy legacy contribution will be 43 GL next year (2021-22 water year), based on allocations made to high and low-reliability Snowy entitlements between 1 February 2020 and 31 January 2021.

# Goulburn to Murray Trade Review

## Worked examples of trade rule options

- If the Snowy contribution were lower (e.g. following a dry year like 2019-20), there would be more trade opportunity.

### Opening IVT balance due to water undelivered in previous years

- In the examples, the opening IVT balance due to water undelivered from the IVT account in previous years is assumed to be 0 GL.
  - If the opening IVT balance is higher than 0 GL, trade under those rules that include a rolling IVT limit (i.e. the current rule and dynamic rule) would be more restricted early in the season.

## Have your say

DELWP are seeking your feedback on the proposed options identified in the Regulatory Impact Statement. We will consider all feedback in making our final recommendations to the Minister on long-term changes to these rules.

Any feedback should be submitted to DELWP by **XXX** at the latest.

Submissions can be made at <https://engage.vic.gov.au/goulburn-murray-trade-rule-review>.

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