

# Managing trade between the Goulburn and the Lower Broken Creek

## Consultation paper

### Goulburn to Murray Trade Review



### Purpose

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 paper outlines the options proposed for managing trade between the Goulburn and the Lower Broken creek so that trade in the creek will not be unnecessarily restricted by the proposed Goulburn to Murray trade, tagged use and operating rules. The RIS consultation paper can be found on the Engage Victoria Website <https://engage.vic.gov.au/goulburn-murray-trade-rule-review>.

### Introduction

The Lower Broken Creek is between the Goulburn and the Murray Rivers, and flows into the Murray just below the Barmah Choke. It is considered part of the declared Murray water system downstream of the Barmah Choke, and although it receives some unregulated inflows from the upper catchment, its main source of water is from the Goulburn system through the East Goulburn Main Channel and some other smaller outfalls. However, it can also receive water from the Murray system via outfalls from the Murray Valley Irrigation Area and the Murray makes up any difference in allocations if the Goulburn seasonal determination is lower than the Murray seasonal determination. The Lower Broken Creek has its own trading zone (zone 6b).

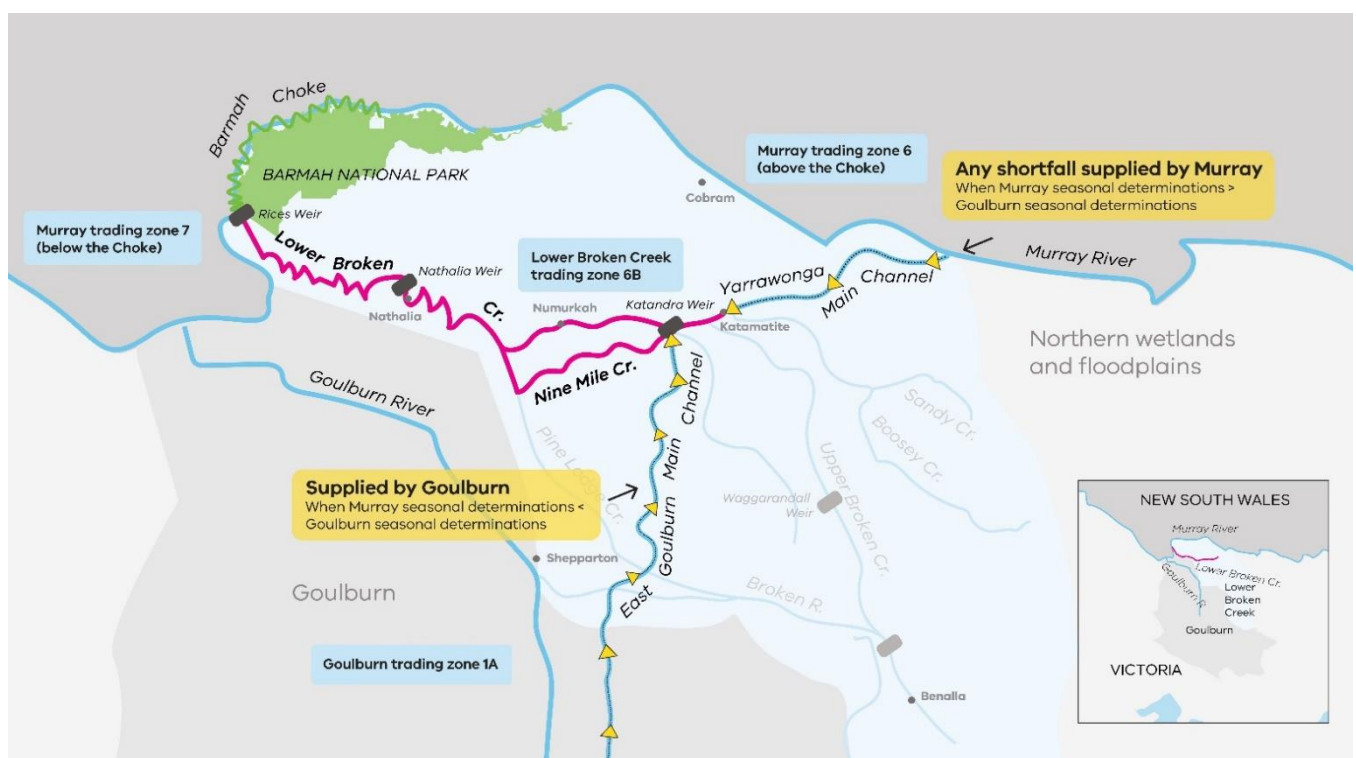


Figure 1: Lower Broken Creek system supply arrangements

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As water can be delivered through the Lower Broken Creek without passing through the lower Goulburn or the Barmah Choke, it can be used as a Barmah Choke bypass and to deliver small volumes of water from the Goulburn Inter-Valley Trade account (IVT) around the lower Goulburn River. Water delivered through the Lower Broken Creek mitigates some of the damage that can be caused from high summer flows down the lower Goulburn River and through the Barmah Choke.

## What does the Goulburn to Murray trade review mean for the Lower Broken Creek?

The Lower Broken Creek trading zone (zone 6b) is on the Murray system side of the Goulburn to Murray trade rule. Without special arrangements, tagged use from the Goulburn system to the Lower Broken Creek would be subject to the Goulburn to Murray trade limit in the same way as other parts of the Murray system – even though water does not have to travel through the lower Goulburn River to be delivered to the Lower Broken Creek. This would mean that the customers in the Lower Broken Creek would be unnecessarily restricted in a way that does not reflect the risks to the system.

This would be at odds with the objectives of the Goulburn to Murray trade review, specifically the objective to prevent trade from being unnecessarily restricted and at odds with the allowable reasons to restrict trade under the Basin Plan trading rules (s. 12.16 and 12.18), as environmental and third-party impacts can be managed without full restriction in line with the Goulburn to Murray trade rule.

Because of its unique location and supply arrangements, when water entitlements were unbundled from land in 2007, entitlement holders on the Lower Broken Creek were given a choice of whether they wanted their entitlements converted into Murray (zone 6b) or Goulburn system water shares. The vast majority chose Murray water shares, but some chose Goulburn water shares which were then tagged for use in the Lower Broken Creek 6b trading zone. Since unbundling, a number of customers have decided to hold water in this arrangement; however, the total volume of Goulburn water shares tagged for use in the Lower Broken Creek 6b has slightly decreased over this time. Figure 2 shows that currently around 1,021 ML of Goulburn 1A high reliability and 984 ML of Goulburn 1A low reliability water shares are tagged for use in the Lower Broken Creek, a total of 2,005 ML compared to 2,289 ML at unbundling. Both the local Lower Broken Creek zone 6b water shares and the tagged Goulburn zone 1A water shares are supplied through bulk resource from the Goulburn system under most circumstances.

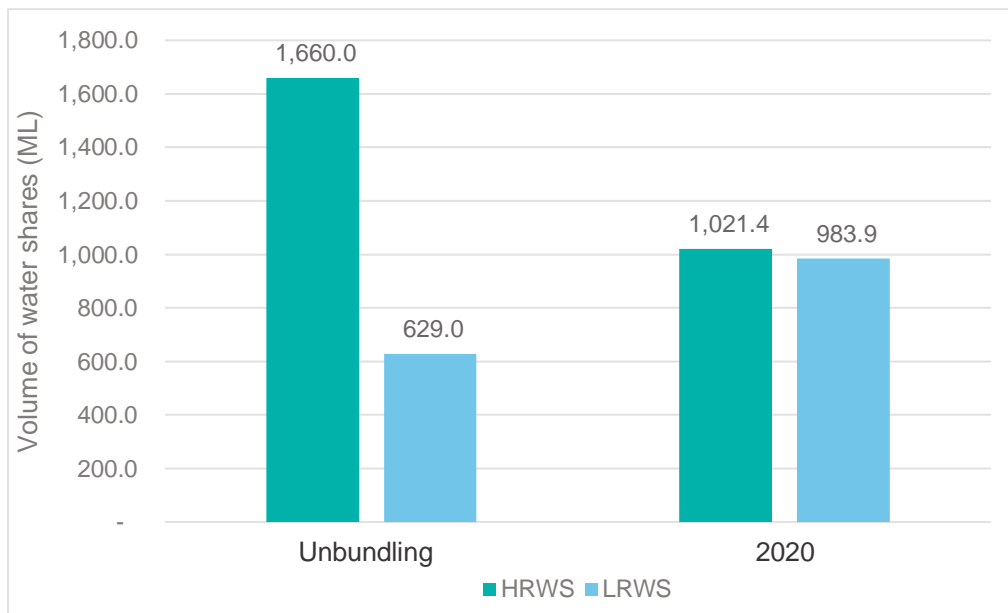


Figure 2: Goulburn 1A water shares tagged for use in the Lower Broken Creek at Unbundling (2007) and current (2020).

Since the Minister for Water introduced new measures to bring tagged water use into line with allocation trade rules in December 2019, customers in the Lower Broken Creek have been given a temporary opportunity to continue to

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use water from Goulburn tagged accounts in the Lower Broken Creek without restriction, until long-term trade arrangements are established. This exemption recognises the unique setting of the Lower Broken Creek, in which water delivered to Lower Broken Creek customers does not rely on the lower Goulburn River and that without exemption the entitlement holders in the Lower Broken Creek would be unnecessarily restricted from using their entitlements. The temporary arrangements for tagged water use in the Lower Broken Creek have meant that customers have been able to continue to use water from the Goulburn system via their tagged accounts, even when Goulburn to Murray trade is closed.

## Allocation trade and tagged use in the Lower Broken Creek

### Allocation trade rules for the Lower Broken Creek

- Trade between the Goulburn (trading zones 1a, 1b, 3) and the Lower Broken Creek (trading zone 6b)

**Allocation trade from the Goulburn to the Lower Broken Creek** is subject to the Goulburn to Murray trade rule, which means under the current trade rule water allocations can be traded to the Lower Broken Creek when the Goulburn inter-valley trade account is less than 200 GL. From 1 July 2021 trade between the Goulburn and the Lower Broken Creek will be subject to the preferred trade rule identified through the Goulburn to Murray trade review. **Lower Broken Creek allocations can be traded to the Goulburn** whenever there are back trade opportunities.

- Trade between the Lower Broken Creek (trading zone 6b) and the Murray below the Barmah Choke (trading zone 7)

**Allocation trade from the Lower Broken Creek downstream to the Murray below the Barmah Choke** is not subject to any trade rules, which means it can always occur. **Allocation trade from the Murray below the Barmah Choke to the Lower Broken Creek** can occur when there are back trade opportunities.

- Trade between the Murray above the Barmah Choke (trading zone 6) and the Lower Broken Creek (trading zone 6b)

**Allocation trade from the Murray above the Barmah Choke to the Lower Broken Creek** (which is below the Barmah Choke) is subject to the Barmah Choke trade rule, which means it is allowed only when there is trade opportunity available. **Allocation trade from the Lower Broken Creek to the Murray above the Barmah Choke** is always allowed.

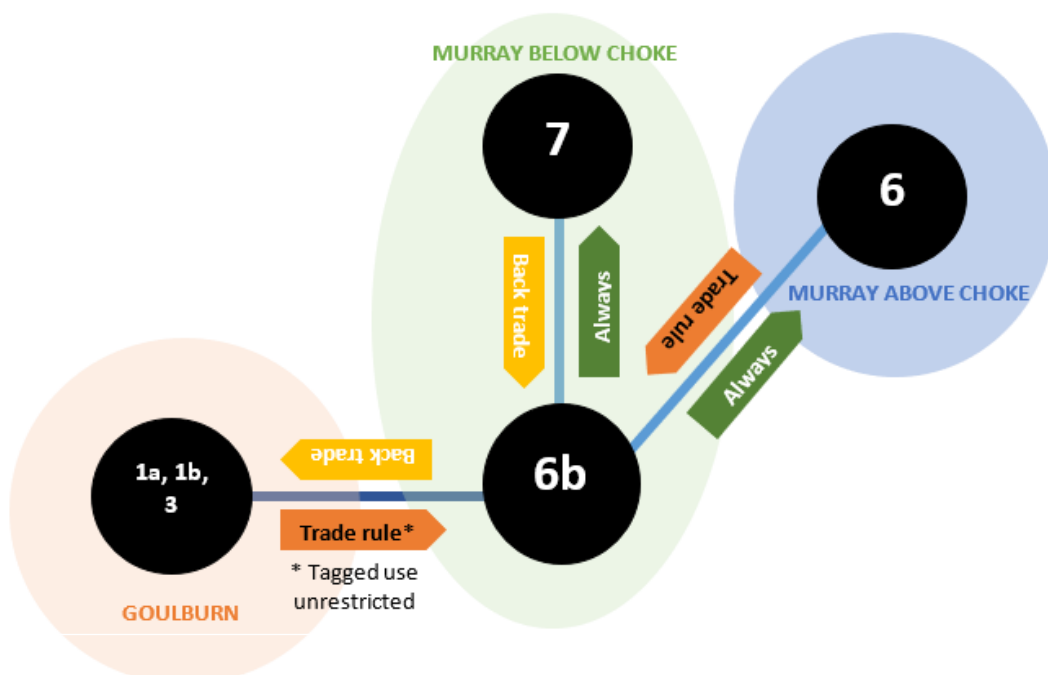


Figure 3: current allocation trade rules for the Lower Broken Creek trading zone 6b

For more information about trading rules and real-time available trade opportunity visit the '*Where can I trade?*' web application on the Victorian Water Register webpage <https://waterregister.vic.gov.au/about/news/296-how-to-use-where-can-i-trade-tool>.

### Tagged use and the Lower Broken Creek

Tagged trade is a way for customers to use water allocation that they own in one valley, in a different valley. A tagged account is an allocation account which is located in one trading zone but marked for use in another. For example, an allocation account in the Goulburn (e.g. zone 1A) can be marked for use in the Murray, either upstream or downstream of the Barmah Choke (e.g. zones 6, 6b and 7). This arrangement gives the holder of a tagged account the ability to use their Goulburn water in the Murray without trading allocation.

The Lower Broken Creek customers that chose to hold Goulburn entitlements at unbundling have tagged entitlements that have a Goulburn source zone and a Lower Broken Creek 6b use zone. These are often referred to as 1A/6b entitlements, but water can also be tagged from other Goulburn zones (1B and 3) for use in the Lower Broken Creek. This is compared to local Lower Broken Creek entitlements that have a source and use zone of 6b, or 6b/6b entitlements.

Because of the interim exemption from tagged use restrictions in place since 2019, there is currently no restriction on when water in a Goulburn account tagged for use in the Lower Broken Creek can be used in the Lower Broken Creek. However, the allocations in the tagged allocation accounts have the same trading rules as other Goulburn entitlements. This means that the Goulburn allocations can only trade to a Lower Broken Creek 6b/6b allocation account or out to other Murray trading zones when the Goulburn to Murray trade rule allows, even though they are tagged for use in the Lower Broken Creek.

The interim exemption on tagged use restrictions in the Lower Broken Creek has been allowed without risk to the wider system because, whilst the allocations in the Goulburn tagged accounts can be used in the Lower Broken Creek when Goulburn to Murray trade is closed, they cannot be traded through the Lower Broken Creek to other Murray trading zones.

Unlike tagged use, allocation trade does not need to be used in the Creek. If allocation trade from the Goulburn to the Lower Broken Creek was also exempt when the Goulburn to Murray trade rule was closed, a loophole around the Goulburn to Murray trade rule would be created. This is because when allocation trades from the Goulburn to the Lower Broken Creek it can then trade out to other Murray trading zones without restriction. This type of allocation trade could be accessed by anyone, not just water users in the Lower Broken Creek.

### Monitoring flows in the Lower Broken Creek

We heard from a number of people along the Lower Broken Creek who have concerns about how much water from the Goulburn inter-valley trade account is being delivered through the Creek, because of observed issues with erosion on the waterway.

For over a decade, Goulburn Murray Water (GMW) has been transferring Murray and Goulburn system water through the Lower Broken Creek at the request of the Goulburn-Broken Catchment Management Authority (GBCMA) to meet environmental flow objectives. Historically, the use of the Lower Broken Creek to deliver water from the Goulburn IVT account was primarily for meeting ecological targets for water quality and habitat provision, with the environment covering any losses. In recent years, higher IVT demand has led to the volume of transfers increasing in lower Broken Creek, which helps reduce ecological damage from water transfers in the lower Goulburn River and Barmah Choke. This is proposed to continue, although the volume of spare capacity and volumes delivered will depend on how people use and trade water in the Lower Broken Creek area and the environmental tolerances of the Lower Broken Creek.

To determine the long-term sustainability of continued delivery of the higher volumes of water-in-transit along this system and to ensure IVT water is not delivered in a pattern which puts the local environment at risk from increased erosion, a bank condition assessment is being conducted to inform future flow management and weir pool operations. The aims of this project being undertaken by the Goulburn-Broken Catchment Management Authority are to:

- Investigate the impact of consistently high flows from water-in-transit on the bank condition of the lower Broken Creek over the 2020-21 irrigation season.
- Identify what, if any, operational changes may be needed to mitigate any impacts from delivery of consistently high flows.

Before and after the 2020-21 water deliveries, drone surveys and bank profile measurements will collect data on erosion, deposition, tree fall and changes in vegetation associated with the high flows. A temporary weir pool drawdown (within operational limits) will also be trialled during the summer and autumn high flow period to identify whether such operational adjustments would provide any benefits for maintaining or improving the bank condition of Lower Broken Creek. The findings of this study will be available mid-2021.

DELWP and the GBCMA will continue to work closely with GMW to monitor the impact of IVT deliveries and flow management in the Lower Broken Creek over the 2020/21 season and use this information to inform future monitoring programs and operations.

### Options for the Lower Broken Creek

These proposed options for the Lower Broken Creek are designed assuming the presence of the preferred Goulburn to Murray trade, tagged use and operational review. Details of these rules can be found in the *Regulatory Impact Statement, Goulburn to Murray Trade Review – assessing changes to trade, tagging and operating arrangements* on the Engage Victoria website <https://engage.vic.gov.au/goulburn-murray-trade-rule-review>.

The proposed options address managing trade and tagged use between the Goulburn system and the Lower Broken Creek. The options do not propose changes for trade between the Lower Broken Creek and Murray above the Barmah Choke. Any changes to the trade rules between the Murray above the Barmah Choke and the Lower Broken Creek require agreement between all southern basin states and the Murray-Darling Basin Authority, which is outside the scope of the Goulburn to Murray trade review.

### Option A: Do nothing option - interim measures lapse

Under this option, when the interim tagged use exemption for the Lower Broken Creek expires on 30 June 2021 the Lower Broken Creek would be treated the same as the wider Murray. This means that all allocation trade and use of Goulburn water shares tagged for use in the Lower Broken Creek would be restricted under the Goulburn to Murray trade rule.

The Lower Broken Creek customers that hold Goulburn water shares tagged for use in the Lower Broken Creek due to the 2007 historical supply arrangements would not be able to use these tagged water shares when the Goulburn to Murray trade rule is closed.

This option is not preferred as it unnecessarily restricts the customers in the Lower Broken Creek and does not reflect that water can be delivered to the Lower Broken Creek without damage to the lower Goulburn River. Restrictions in line with the wider Murray system do not reflect the low risks posed to the environment or shortfall delivery risks to the Murray system by delivering water to and through the Lower Broken Creek. The flow on impacts of trade between the Goulburn and the Lower Broken Creek can be managed with some exemption from these restrictions, which would mean more efficient use of the system and be more aligned with the objectives of the Goulburn to Murray trade review of allowing as much trade as can be sustainably delivered and not unnecessarily restricting trade and in line with the allowable reasons to restrict trade under the Basin Plan sections 12.16 and 12.18.

### Option B: exchange Goulburn water shares tagged to the Lower Broken Creek

As an alternative to simply letting interim tagging exemptions lapse and restricting the use of some Lower Broken Creek customers' entitlements, Option B for managing trade between the Goulburn and the Lower Broken Creek is for the Lower Broken Creek to:

- a. Have the same rules for allocation trade and tagged use from the Goulburn as the rest of the Murray, and
- b. Give all eligible entitlement holders with Goulburn entitlements the option to exchange them for local Murray entitlements (recognising the unique arrangements since 2007) so that these users can always use their entitlements in the local 6b zone.

Under Option B, the use of Goulburn water shares tagged for use in the Lower Broken Creek would be restricted in line with the Goulburn to Murray trade rule, meaning that no tagged use would be allowed when allocation trade is closed.

Having the same rules for allocation trade as the rest of the Murray means that there are no proposed changes to the allocation trade rules for the Lower Broken Creek, with the exception of any changes made to the Goulburn to Murray trade rule as part of the wider Goulburn to Murray trade review. This means trade rules for the trade of Lower Broken Creek (zone 6b) allocation to other Murray trading zones and trade of allocation from other Murray trading zones to the Lower Broken Creek would be unchanged. Trade of Lower Broken Creek zone 6b allocation to the Goulburn is unchanged and remains subject to back trade opportunity. Trade of Goulburn allocation to the Lower Broken Creek remains subject to the Goulburn to Murray trade rule; however, this rule would change in line with the outcomes of the Goulburn to Murray trade review.

### Exchanging tagged Goulburn water shares for local Murray (Lower Broken Creek 6b) water shares

This option would include offering customers holding Goulburn water shares tagged for use in the Lower Broken Creek prior to the Minister for Water's announcement 20 August 2019 the opportunity to exchange these with local Murray (Lower Broken Creek zone 6b) water shares. There is around 1,000 ML of Goulburn high-reliability water share and 1,000 ML of Goulburn low-reliability water share tagged for use in the Lower Broken Creek that would be eligible for the exchange.

This option proposes that that all Lower Broken Creek customers holding tagged Goulburn water shares prior to 20 August 2019 be given the opportunity to hold local Murray system water shares, which means their use would not be restricted when Goulburn to Murray trade is closed. Under this option Lower Broken Creek customers would be treated the same as each other unless they choose to continue to hold Goulburn water in a tagged account where use would be subject to Goulburn to Murray trade restrictions.

Offering eligible Lower Broken Creek customers the opportunity to exchange these entitlements recognises the historical arrangement that has existed since unbundling and aligns with the choices offered when entitlements were converted in 2007.

A set of principles has been followed while developing this option so that exchanging the water shares:

- Would not change the consumptive volume of water in either system
- Would not increase the commitment from the Goulburn to the Murray systems
- Would not increase the commitment from above to below the Barmah Choke
- Would not impact on the reliability of entitlements for other entitlement holders
- Would align with bulk water supply to the Lower Broken Creek

The process to exchange these entitlements would occur during the 2021/2022 water year, which is to be considered a transitional year for implementing the Goulburn to Murray trade rule. Under option B tagged use in the Lower Broken Creek would be exempt while the exchange is underway so that customers holding Goulburn water shares tagged for use in the Lower Broken Creek would not be temporarily impacted when Goulburn to Murray trade is closed. Customers holding eligible Goulburn water shares tagged for use in the Lower Broken Creek will be contacted directly with details of the exchange and how it may impact them prior to making a decision about exchanging their water shares.

Whilst this option allows customers holding Goulburn entitlements tagged for use in the Lower Broken Creek the opportunity to manage their water in a way that will not be subject to restriction and reflects that Lower Broken Creek entitlements are Murray entitlements despite the supply arrangements of the Creek, this option does not address that trade between the Goulburn and Lower Broken Creek can be exempt from some of the restrictions placed on the wider Murray, whilst still managing environmental and delivery risks in the Goulburn and Murray systems. Similar to Option A, this option is therefore still considered at odds with the Goulburn to Murray trade review objectives and the allowable reasons to restrict trade under Basin Plan sections 12.16 and 12.18.

### Option C: exchange tagged water shares and special tagged use rules for the Lower Broken Creek (preferred option)

The preferred option for managing trade between the Goulburn and the Lower Broken Creek is for the Lower Broken Creek to:

- c. Have the same rules for allocation trade from the Goulburn as the rest of the Murray, **and**
- d. Give all eligible entitlement holders with Goulburn entitlements the option to exchange them for local Murray entitlements (recognising the unique arrangements since 2007) so that these users can always use their entitlements in the local 6b zone, **and**
- e. Have system-specific tagged use restrictions that are different to those for the wider Murray, in recognition of the unique attributes of this system.

Like option B, this option proposes no change to the allocation trade rules for the Lower Broken Creek and trade from the Goulburn to the Lower Broken Creek would remain subject to the Goulburn to Murray trade rule. However, the Goulburn to Murray trade rule would change in line with the outcomes of the wider Goulburn to Murray trade review.

This builds on Option B by offering the same exchange of tagged water shares in addition to adding a zone-specific rule to enable some further tagged use in the Lower Broken Creek. This means that while allocation trade and tagged water use from the Goulburn system to the Murray is restricted under the Goulburn to Murray trade rule, there would be some tagged use allowed in the Lower Broken Creek at certain times<sup>1</sup>. This option reflects the Lower Broken Creek's position in the Murray system, as well as the different risks posed by delivering water to the Lower Broken Creek and the different risks tagged water use has to allocation trade. The proposed exemptions from tagging restrictions recognise that restricting tagged use in the Lower Broken Creek in line with the wider Murray is not commensurate with the risks posed, whilst also managing the risk of flow on impacts if no tagged use restrictions were placed on the Lower Broken Creek.

This preferred option includes both the opportunity to exchange current tagged water shares as describes in option one in the presence of specific tagging rules for the Lower Broken Creek, as the Goulburn water shares tagged for use in the Lower Broken Creek will no longer have unrestricted use and the tagging rules may change over time.

This option allows for the customers in the Lower Broken Creek to hold local water shares and access additional tagged use in line with the proposed tagging rules for the Lower Broken Creek.

Under the proposed tagging rules, all Lower Broken Creek customers will be eligible to hold Goulburn water tagged for use in the Lower Broken Creek irrespective of whether they have previously held water shares in a tagged arrangement. This option would not include special rules for the water held in the Murray above the Choke zone 6 tagged accounts, as the Barmah Choke trading rule is out of scope of the Goulburn to Murray trade review.

Like option B, the Goulburn tagged water shares would be exchanged during the first half of the 2021/2022 water year and tagged use in the Lower Broken Creek would be exempt while the exchange is underway so that customers holding Goulburn water shares tagged for use in the Lower Broken Creek would not be temporarily impacted when Goulburn to Murray trade is closed.

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<sup>1</sup> This rule allowing tagged use in certain circumstances would be enacted through an exemption for the trading zone in the Victorian tagged use regulations.

## Proposed tagging rule for the Lower Broken Creek

It is proposed that the zone-specific tagged use rule for the Lower Broken Creek be a seasonal tagged use rule. The proposal is to allow uncapped tagged use through winter and spring when demands are low and tagged use would have lesser impact on delivery during the peak summer and autumn period. During the period of peak demand tagged use will be restricted in line with the Goulburn to Murray trade rule. Table 1 summarises the proposed rule.

**Table 1: proposed seasonal tagged use rule for the Lower Broken Creek**

Season	Allocation trade	Tagged water use rule
Winter and spring	Restricted in line with the Goulburn to Murray trade rule	Unlimited
Summer and autumn	Restricted in line with the Goulburn to Murray trade rule	Restricted in line with allocation trade rule

This option is similar to the seasonally-based rule proposed for the wider Goulburn to Murray trade rule (Option 4). The main reason a seasonally-based rule is not the preferred option for the Goulburn to Murray trade rule is that it can create increased delivery shortfall risks in the Murray during peak summer and autumn demand. This would happen if people meet their winter and spring irrigation demands with use from Goulburn tagged accounts and would therefore be able to use much more water from their Murray accounts during summer and autumn.

Under this proposed seasonal rule for the Lower Broken Creek there is considered to be no material delivery risk to the Lower Broken Creek or the Murray downstream of the Barmah Choke. The tagged water would be delivered in spring when there is capacity in the system and would be limited to the demand in the Lower Broken Creek over that period. During the peak summer period, this places an upper boundary on the substitution risks, both within the Creek and arising from the potential trade of allocation water from local (Lower Broken Creek) entitlements out to the wider Murray. Delivery of that additional volume through the Creek during the peak period is considered manageable, without material impact on shortfall delivery risk to the wider Murray and while allowing some spare capacity to be used to mitigate some of the damage to the lower Goulburn River.

The proposed rule better reflects the characteristics of the Lower Broken Creek and the different risks posed by tagged use versus allocation trade in some circumstances. Allowing some additional tagged use in the Lower Broken Creek in the presence of the Goulburn to Murray trade rule is considered to have a low risk of increasing the risk of a shortfall in the Murray downstream of the Barmah Choke. The proposed rule is considered conservative management of any flow on impact that might be felt by allowing exemptions on tagged use in the Lower Broken Creek. The proposed zone-specific tagging rule for the Lower Broken Creek will be monitored to ensure the rule is operating in line with expectations.

This option meets the objectives of the Goulburn to Murray trade rule and the allowable reasons to restrict trade under Basin Plan sections 12.16 and 12.18. However, the intent of Basin Plan section 12.23 is that all tagged use should be restricted the same way as allocation trade, which is at odds with the preferred option for the Lower Broken Creek. This could be subject to change depending on the Australian Competition and Consumer Commission's review of section 12.23 as part of its Murray-Darling Basin water markets inquiry. Victoria will advocate for an amendment to section 12.23 as part of the review of the Murray-Darling Basin Plan in 2026, and look to work with the MDBA and partner states to acknowledge that tagged use and allocation trade rules should be allowed to differ to the extent States can show there are different risks in certain circumstances.



As the Lower Broken Creek is on the Murray side of the Goulburn to Murray trade rule, allowing allocation trade to be unlimited in line with tagged use in spring would meet the requirements of rule 12.23, but would have unacceptable risks. Once allocation is traded to a Lower Broken Creek allocation account, it is not restricted to use in the creek or from trading out to the wider Murray. This would create a loophole around that Goulburn to Murray trade rule which could be accessed by any market participant and have unacceptable third-party impacts. Setting separate rules for tagged use manages this risk.

## Making a submission

Stakeholders are invited to make formal submissions or comments on the RIS and the proposed operating rules, trade rule and tagged use regulations, including the rules proposed for the Lower Broken Creek. Submissions may present analysis of alternative options and recommend changes to the proposed rules and regulations.

Submissions are required to be made in writing and submitted no later than **5pm on 30 April 2021** via the **Engage Victoria website**:

**<https://engage.vic.gov.au/goulburn-murray-trade-rule-review>**

All submissions will be treated as public documents and published on the Engage Victoria website unless they are marked as confidential.

After the consultation period, the Department will consider all feedback received from stakeholders and the community and consider whether any changes to the proposed operating rules, trade rule and tagged use regulations are required. The Department will make recommendations to the Minister for Water about the final form and content of these rules and regulations for the Minister to make the final decision.

A public notice on the Victorian Government's decision will be made, with the new trade rule and tagged use regulations proposed to start to come into effect from 1 July 2021.

Once the trade rule and tagged use regulations are made, copies of all submissions will be provided to the Parliament's Scrutiny of Acts and Regulations Committee. This committee examines these submissions to ensure that the Department has considered the views of all stakeholders.

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