



Goulburn-Murray Water

Senate Select Committee on the Murray-Darling Basin Plan

Submission

2 February 2016

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1. Introduction

Goulburn-Murray Water (GMW) supports the aim of the Basin Plan to strike a balance between access to water for Basin communities and provision of adequate water for the environment.

Notwithstanding the optimism for the future of agriculture, the Goulburn-Murray Irrigation District (GMID), our customers and GMW are facing a period of significant change and uncertainty. Over the last 10 years water held by irrigators in the GMID has reduced by more than 800GL, with high reliability water shares held in the GMID standing at around 1,000GL. In addition Northern Victorian climate forecasts are for less rainfall and more variable and extreme events over time.

The combination of these changes plus the market-based movement of water in the southern connected basin has significantly reduced the volume of water being delivered through GMW's infrastructure. The system, once delivering over 2,000GL per annum, is unlikely to deliver more than 1,400GL when water resources are plentiful and potentially under 1,000GL when water resources are scarcer.

The GMW Connections Project is critical in assisting to manage these changes – it increases the efficiency of the system to generate water savings for environmental benefit and does so without taking water from the consumptive pool. The project also has the benefits of reducing the GMID infrastructure footprint to assist in long term sustainability and most importantly enables customers to gain significant on-farm productivity benefits.

In November 2012, GMW made a submission on the then Proposed Basin Plan; we are pleased to note that many of the ideas expressed in that submission were taken into account to varying degrees in the making of the Basin Plan. Similar themes to those expressed in 2012 remain valid today as then:

- Taking productive water out of use adversely affects regional economies
- The pace for structural adjustment is too rapid
- Future water purchases should be avoided, but if they occur must be strategic

Our submission provides comments on three broad areas:

- Water recovery through infrastructure investment
- Implementing the plan
- Goulburn constraints management project

GMW's key submission points are summarised in bold throughout this paper.

2. About Goulburn-Murray Water

GMW is Australia's largest rural water business and provides a range of services and functions that is covered by multiple agencies in other jurisdictions in the Murray Darling Basin. GMW's fees and charges for water services compare favourably in benchmarking studies and we continue to focus on driving costs out of our business.

GMW Functions

Goulburn-Murray Rural Water Corporation, trading as Goulburn-Murray Water, is a statutory Corporation established under the provisions of the Victorian Water Act. Goulburn-Murray Water (GMW) manages water related services in a region of 68,000 square kilometers, bordered by the Great Dividing Range in the south and the River Murray in the north and stretching from Corryong in the east down river to Nyah. We manage around 70% of Victoria's stored water resources, around 50% of Victoria's underground water supplies and Australia's largest irrigation delivery network.

GMW manages both regulated and unregulated river systems that flow into the Murray and administers groundwater within this area.

GMW also operates a number of storages and weirs on behalf of the Murray-Darling Basin Authority (MDBA), operates salinity mitigation works on the Murray downstream of Nyah, and is the Victorian constructing authority for the MBDA.

GMW is the Victorian Resource Manager appointed by the Minister for Water and is responsible for making the seasonal determination for all northern Victorian declared water systems. GMW is a partner in the Victorian Water Register, using it to manage more than \$4 billion of water entitlements and trade.

Appendix one provides detailed information about our customer base and volumes per system.

GMW also manages recreational and boating activities at 14 of our 24 storages. This includes managing 720 houseboat licences and managing or leasing 11 caravan parks, 62 clubs and 100 public recreation areas.

With close to 38,000 customers to whom we provide water storage, delivery and drainage services (refer Appendix 1) and close to another 2,000 customers with agricultural leases, recreational and commercial leases, houseboat licences, and hydroelectricity agreements and plantation leases, we are Australia's largest water authority. We have more customers, larger service areas and more responsibilities than the New South Wales-based irrigation companies.

In other states, the range of services delivered by GMW is undertaken by a number of different agencies. For example, in southern NSW the full range of services GMW delivers is undertaken by five separate organisations - Water NSW manages the headworks, the private irrigation companies (Murray Irrigation Ltd, Murrumbidgee Irrigation Ltd and Coleambally Irrigation Co-operative Ltd) provide the irrigation delivery services, and the NSW Office of Water makes water allocations and licences diverters.

We are also delivering the \$2 billion GMW Connections Project, funded by the Victorian and Commonwealth governments. This is the most significant upgrade to the region's irrigation

infrastructure in its 100-year history and is the largest irrigation modernisation project in Australia.

The project will automate much of the water delivery network and replace ageing irrigation infrastructure, while reducing the GMID footprint and making water use sustainable by preparing us for future challenges and opportunities. It's creating hundreds of jobs for local contractors, designers, manufacturers and other water-related staff, and employs almost 20% of our 741 FTE staff.

Driving Operational & Cost Efficiencies

GMW continues to drive out costs and adjust to new technology. Our 2014/15 operating expenditure was \$5 million lower than forecast, reflecting savings from a variety of initiatives including reduced operating costs, improved processes and the transition to a simpler pricing structure reflecting the real cost of delivering our services. GMW's net debt position of \$52.6 million represents only about 1.2% of the \$4.4 billion in asset value.

Our commitment to creating efficiencies and reducing operating costs is showing results, with our financial performance during the 2013-14 to 2015-16 Regulatory Pricing period forecast to be \$24.2 million less than approved by the Essential Services Commission. This has allowed GMW to reduce the extent of price changes and reduce the debt level of the business.

The draft 2016-17 to 2019-20 Regulatory Pricing Submission operating expenditure is forecast to be \$398.3 million over the four years, at an average of \$6.5 million per year less than our 2013 Water Plan.

We continue to closely manage costs to ensure financial sustainability.

Benchmarking undertaken by Deloitte Australia for the current pricing submission compared GMW to its peers over a three-year period and used data from the ACCC Water Monitoring Report, the National Performance Report and annual reports for comparable organisations.

In general, GMW benchmarked well and was at the lower end of most ranges for gravity and pumped systems:

- GMW's operating costs for irrigation systems were at the low end of the dataset, indicating that we're relatively efficient.
- GMW has the fourth lowest total operating costs per customer across all rural services.
- Farm gate charges are typically \$60 - \$80 per ML for gravity irrigators using 250 ML.

Separate benchmarking indicates that GMW's corporate costs are in keeping with similar organisations.

Our corporate costs were benchmarked against three data sources:

- urban water utilities and one other rural utility
- a global database of energy utilities
- a database of global organisations with comparable annual revenue and turnover

GMW rated as the lowest or an average cost performer in six of eight benchmarked function areas.

GMW remains committed to improving its efficiency to minimise prices for our customers and retain financial sustainability.

3. Water recovery through infrastructure investment

GMW strongly supports water recovery through investment in modernised infrastructure. Infrastructure-based projects provide water recovery from improving system efficiencies without reducing water in the consumptive pool. These projects provide long term benefits for communities, the environment and agriculture.

GMW's Connections Project is the largest infrastructure project in the Murray Darling Basin Plan. It has delivered 225GL of annual water savings and connected more than 3,500 customers to an automated backbone of 3,000 km. The project enables significant productivity improvements for irrigated agriculture in Northern Victoria.

The operating environment has significantly shifted since the inception of the project due to changing water resource availability. These changes have presented challenges in delivering the project and GMW is working with the Victorian and Commonwealth Governments to address changes required. GMW believes any changes or reset of the project must promote productive agriculture and the long term sustainability of the GMID.

Much of the Goulburn Murray Irrigation District (GMID) was built almost 100 years ago. The gravity distribution systems are energy efficient. However, water losses were equivalent to about 30% of water diverted from the rivers.

Delivery inefficiencies are attributed to a range of factors, including evaporation, seepage, meter inaccuracy and theft. Some operating losses are fixed whilst some vary with the volume delivered. Where appropriate the irrigation delivery system utilises natural carriers and lakes.

The total GMID operating losses, pre-modernisation, is estimated at 834 GL, including losses from the Kerang Lakes, for long term average deliveries of 2100 GL. One objective of infrastructure modernisation is to improve the water delivery efficiency to a world class efficiency of 85%.

The GMW Connections project is a \$2 billion, 10 year modernisation of the irrigation network in the GMID, and is the largest infrastructure water recovery project in the Murray Darling Basin.

The project began in 2008 as the Northern Victorian Irrigation Renewal Project (NVIRP), with Stage 1 funded by the Victorian Government, and Stage 2 by the Commonwealth Government and State Government. Melbourne Water contributed funds to Stage 1, and the project was integrated into GMW as the Connections Project (**the Project**) on 1 July 2012 with stages 1 and 2 being completed concurrently.

The Project Objectives are to:

- deliver a total of 429 GL of water savings to the project's investors and irrigators through a reduction in water losses from the channel system. Contribute 279 GL of the water savings (75 GL from Stage 1 and 204 GL from Stage 2) to Victoria's water recovery target of 1075 GL to reduce diversions to the Basin Plan's sustainable diversion limit

- improve water delivery service standards for GMID irrigators to support on-farm irrigation efficiency and the productivity of the irrigated agriculture sector in Northern Victoria
- ensure a sustainable future for irrigation communities in Northern Victoria
- increase the economic activity in the Northern Victoria through the implementation of the project.

The first stage of the Project has largely been completed through automating 3,000 km of backbone gravity channels and the upgrade of more than 5,000 backbone meters. As a result of modernisation, the network is transitioning from a traditional manually operated system to a centrally controlled system operated remotely via a SCADA (supervisory control and data acquisition) communication network. The backbone modernisation component of the project is close to completion and has been delivered within budget and on schedule.

At the project's half way point, just under half the \$2 billion funding remains to deliver the project by June 2018 and GMW has delivered 225 GL of water savings required to date on behalf of Victoria to the Commonwealth.

Included in the contractual obligations governing Stage 2, an independent review (**the Mid-Term Review**) of the project's status was completed in late 2015.

The Mid-Term Review commenced in May 2015 with the appointment of an independent reviewer, GHD, to undertake the review on behalf of the Commonwealth and Victorian governments.

The aims of the review were to:

- evaluate the appropriateness of the key assumptions outlined in the 2010 business case and reflected in the Project Schedule to the Water Management Partnership Agreement between the Commonwealth and Victoria, and subsequent updates included in the Connections Implementation Plan Update (CIP2) finalised by GMW in October 2013 in achieving the agreed outcomes;
- evaluate the performance and determine whether it is likely to achieve the specified outputs, outcomes and aim specified in the Project Schedule within the allocated financial and human resources and timeframe; and
- recommend corrective actions and improvements to the delivery of the Project (if required).

The outcomes of the review were announced in November 2015.

The Review found that the Connections Project is critically important for our region, our customers and GMW. It determined that the Project must continue, however because many of the assumptions which framed the Business case had shifted it needed to be reshaped to achieve its outcomes.

GMW acknowledges that further improvement is also required in the delivery of the Project and is working with the State and Commonwealth Governments, our customers and other stakeholders to implement the recommendations of the Review and reshape the project.

The GMW Connections Project provides water recovery from improved system efficiencies without reducing water in the consumptive pool available for irrigators. Improvement in service levels for customers has enabled significant productivity benefits for irrigated agriculture in Northern Victoria and provides long-term benefits for communities, the environment and agriculture.

GMW's Connections Project is the largest infrastructure project in the Murray Darling Basin Plan. It has delivered 225GL of annual water savings and connected more than 3,500 customers to an automated backbone of 3,000 km. It is critical this project is completed successfully with a strong focus on productive agriculture to support local communities.

4. Implementing the Plan

On-farm efficiency programs

On-farm efficiency programs are effective and require strategic alignment with the modernisation of the delivery system to mitigate risks arising from the loss of water from the supply systems.

GMW considers investment in on-farm efficiency programs an effective approach to contribute to Basin Plan water recovery targets. The program generates the most cost-effective water recovery at present. Water recovery to date across all Victorian programs is in the order of 90 GL. We support the ongoing investment in these programs to contribute to Victoria's committed water recovery target.

We are keen to ensure that the on-farm efficiency initiatives are coordinated and integrated with the GMW Connections Program to ensure that irrigators maximise the benefits available from the modernised irrigation delivery system by having a modernised on-farm irrigation system. Currently this integration is happening at an operational level. We believe more could be achieved if there was better coordination and integration at a strategic level to ensure on-farm efficiency programs do not inadvertently negatively affect the viability of supply systems..

Any review of the delivery of the Victorian Farm Water Program (the large on-farm irrigation efficiency program run by a regional consortium of partners lead by the Goulburn Broken Catchment Management Authority) should be considered in the context of the current review of the GMW Connections Program.

Efficient irrigation systems improve farm productivity as well as optimise water use. Individual farms can maintain productivity with less water. Alternatively, additional water, either through the allocation market or through purchase of water shares, may be sought to replace water handed over in the on-farm program and increase farm output. This is a positive outcome to the extent that these actions contribute to the overall individual and regional productivity.

The impacts on the operation, management and cost recovery in the GMID will depend on the aggregate response to the on-farm efficiency programs. An overall reduction in water delivery will add to the incentive to terminate delivery shares by landowners with reduced water shares. This would increase the drivers for GMW to find matching operating cost efficiencies to neutralize the tariff price pressures and yet maintain the same extent of supply system. Movement of water to modernised, efficient farms from other properties in the GMID will contribute to the trend of excess supply capacity in the parts of the network where the sellers are located, further contributing to the “patchwork quilt” effect of land retired from irrigation. In the absence of adjustment mechanisms, there will be a continuing trend to higher unit costs for maintaining the delivery system.

With a \$2 billion dollar investment in the GMID through the Connections Project, the best outcome for the GMID is to ensure sufficient water is available to support modernised, efficient farms. The modernised GMID is capable of providing efficient delivery services for these increased volumes. Maintenance of delivery shares within the system and increased delivery volumes are the key to GMW providing cost-effective services in support of a productive regional economy.

Further implementation – efficiency measures program

The Efficiency Measures Program (EMP) has the potential to take large volumes of additional water from the GMID, adversely affecting regional productivity. The EMP should not proceed until there is a clear demonstration that there will be no adverse economic and social impacts.

The Water for Environment Special Account provides the funding for the Efficiency Measures Program (EMP). As at 22 December 2015 the Commonwealth Government have not provided details of the EMP design or how the EMP will be delivered. It is understood that that the EMP will look like on-farm water savings projects with 100% of the savings being returned to the Commonwealth. This will take water out of production; it will increase the potential for the program participants to recover water from the market to utilise on their improved farms. This will further compromise the regional productivity. The Commonwealth have not demonstrated how this program will achieve its objectives for additional water recovery without adverse economic and social impacts.

Any program of this nature will reduce water deliveries, which reduces GMW’s variable revenue, which will lead to tariff increases to recover the operating revenue requirement thus putting customers under further pressure. There will be increased incentive for termination of delivery shares, thereby ultimately affecting GMW’s fixed revenue, leading to tariff increases to recover the revenue requirement for operating the distribution system and thereby further affecting those irrigators not participating in the EMP who require ongoing delivery services.

The Commonwealth should look for opportunities to utilise budget from the Water for Environment Special Account for better outcomes. Consideration of further support for water recovery programs now in progress should be made. Opportunities should be sought for additional water savings to contribute to the Water Recovery Target, rather than set up a

water recovery competition between programs. The GMW Connections Program could deliver better water savings outcomes by aligning new on-farm water savings and adjustment initiatives with reconfiguration plans in a manner that better manages adverse socio-economic impacts.

The Basin Plan allows for the downward adjustment of the SDL through the recovery of additional water through the EMP, provided that the additional water recovery does not have adverse economic and social impacts. This qualification is important and it is important that the test is applied at the local scale, where the impacts will be most evident. This test must also be considered in the context of the generally positive outlook for agribusiness. Water availability has declined through the implementation of the Plan and is further threatened by climate change, and is a constraining factor for the otherwise positive outlook. GMW is of the view that the further reduction of the SDL through this mechanism is not warranted, cannot be justified and will not meet the safeguard that is built into the Plan.

5. Goulburn Constraints Project

Current analysis considering the removal of Goulburn constraints to the beneficial usage of held environmental entitlements does not mitigate the impacts on GMW and our customers.

Proposals for addressing constraints which limit the effectiveness of the Environmental Water Holders achieving environmental watering objectives through the use of their substantial water holdings need to be assessed as providing a significant contribution to the SDL adjustment. Impact on landowners and rivers operators such as GMW should be completely mitigated.

GMW has been consulted in the process to develop and assess the proposals for the removal of the supply constraints in the Goulburn River as part of the Victorian Government's commitments to addressing constraints in the Murray Darling Basin. A business case is being prepared which will identify the investigations and mitigation measures required for environmental watering events in the Goulburn. GMW has identified concerns about operational risks, asset ownership and consequential impact on landowners.

GMW is a stakeholder due to our operational role, delivery of entitlements to customers including environmental water holders, licencing of customers' infrastructure such as diversion pumps, owner of Loch Garry flood protection assets and for our role as the potential constructing authority for lower Goulburn levee works and related assets.

Potential liabilities for operational decisions reside with the storage operator, GMW. The business case needs to set out the investments and processes required from now until 2024 to address the residual risks to private property arising from storage releases. Real time operational decisions based on forecast information across a large catchment will be required. When dealing with natural systems, particularly with the trend towards more extreme weather events, operational risks can never be eliminated.

A large number of complex issues have been considered and future work programs identified. GMW supports additional rain and flow monitoring in the Goulburn catchment and the development of operational models to assist operational decisions.

The assignment of these operational risks has not been resolved. Whilst we acknowledge that assignment of risks is subject to further work, GMW cannot accept a transfer of risk from project's beneficiaries to GMW and its customers.

Resolution of issues relating to the ownership and maintenance of assets on this and other related projects is on-going. The extensive levees of the lower Goulburn floodplain present particular challenges. The project relies on some 150km of levees to contain environmental watering to the forests on public land. Resolution of the arrangements for the ownership and maintenance of existing, new or refurbished assets is required. GMW maintains that the ownership and associated costs of levees must be the responsibility of the project's beneficiaries and should not be transferred to GMW and its customers.

6. Payments for Environmental Water

Environmental Water Holders (EWH) own large volumes of entitlement and require levels of service from GMW which is now material in the overall scope of our operations, and these services must continue to be paid for on a commercial basis.

Environmental Water Holders (EWH) are now the largest holders of Victorian water entitlements and therefore GMW's largest customers for storage services and for river operation services. Most of the environmental water portfolio has been acquired through purchasing programs and complemented with entitlements converted from GMW Bulk Entitlements based on water savings achieved through investment in modernising the gravity irrigation distribution systems.

Although the majority of environmental water deliveries are to supplement flows in the rivers, there are significant deliveries made to environmental assets which utilise the GMW irrigation delivery network. In order for GMW to remain financially sustainable we need to recover operating costs through a tariff system which is equitable for all customers. The EWH must pay their way for services received.

Payment for like service is an equity issue. Environmental entitlements are no longer minor compared to all other entitlements and environmental deliveries can no longer be accommodated at little or no marginal cost by adapting the environmental watering delivery schedules to suit the operation of the system. The scale of environmental entitlements and deliveries now demands that they be treated equally for access to the irrigation infrastructure. Moreover, many of the sustainability challenges in the GMID have been influenced by the nature of the water purchasing conducted by the Commonwealth acquiring water from any willing seller. Purchases were uncoordinated with respect to location thus leaving a "patchwork quilt" legacy in the GMID leading to under utilised capacity in randomly distributed parts of the delivery system and cost recovery pressures on remaining users.

Because the EWH water holdings are so large, there is the potential to distort water markets, system operational decisions, capacity sharing considerations, recreation interests and other features of the water supply system that communities have become accustomed to. The operating patterns, predominantly based on irrigation, have been relatively stable over long periods. . The EWHs must continue to have regard for these factors when making decisions about the timing and scale of operational orders and water market activities. As the system operator GMW will work with the EWHs in developing the relevant operational plans and execution of decisions.

7. Concluding remarks

GMW provides water storage and delivery services in Victoria. We operate the largest irrigation delivery network in the Murray Darling Basin and provide a complex range of water services to a large number of customers and stakeholders.

The Murray Darling Basin Plan has a significant impact on our customers, our business and our regional communities and economy.

The implementation of the Basin Plan has provided many opportunities, none greater than the funding of the modernisation of the irrigation delivery infrastructure to achieve water savings to support the water recovery targets.

GMW will continue to support implementation measures such as our Connections Project and the environmental works and measures to support effective utilisation of the water already recovered to support sustainable environmental outcomes for the rivers and wetlands.

The risks posed to communities through the constraints projects must be properly addressed and managed. We consider that further water recovery by purchase of entitlements or proposed EMP measures to recover 100% of water savings are detrimental to the communities and economy of Northern Victoria and should not proceed. Funding from the Special Account should be directed to assist in meeting existing water recovery targets.

Appendix 1 - Customer and entitlement data

GMW Customers

<i>Water Customers</i>	<i>No</i>
Goulburn Murray Irrigation District (gravity irrigation areas)	14,350
Pumped Irrigation	670
Regulated Surface Water Diversions	3,639
Unregulated Surface Water Diversions (irrigation, domestic & stock and farm dams)	7,388
Groundwater (irrigation, domestic & stock and commercial)	8,819
Water Districts (domestic and stock)	1,257
Flood Protection	121
Non-water users	1,603
Bulk water supply to urban and rural water corporations	6

Current at 29 October, 2015.

High Reliability Water Share Entitlements

		<i>Volume of High Reliability Water Shares in 2015 GL</i>
Goulburn Murray Irrigation District	Shepparton Irrigation Area	119
	Central Goulburn Irrigation Area	238
	Rochester Irrigation Area	123
	Loddon Valley Irrigation Area	123
	Murray Valley Irrigation Area	167
	Torrumbarry Irrigation Area	208
	Total	978
Pumped Irrigation	Nyah Irrigation District	8
	Tresco Irrigation District	7
	Woorinen Irrigation Area	11
	Total	26
Regulated Streams	Ovens	26
	Broken	16
	Goulburn	37
	Campaspe	14
	Loddon	17
	Bullarook	1
	Murray	55
	Total	166
Non Water User	Ovens	1
	Broken	1
	Goulburn	366
	Campaspe	9

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	Loddon	4
	Bullarook	0
	Murray	444
	Total	825
Grand Total		1,995

The July 2015 High Reliability Water Shares (HRWS) volumes are based on current information from the Victorian Water Register.

Goulburn Murray Irrigation District (GMID) – Customers predominately draw water by gravity from a GMW supply channel. The GMID incorporates the Shepparton, Central Goulburn, Rochester, Loddon Valley, Murray Valley and Torrumbarry Irrigation Areas. The GMID irrigation delivery network, much of which is 60-80 years old, presently consists of some 6,300 km of channels, 900 km of pipes and 3,000 km of drains. GMW is delivering the Connections Project on behalf of the State and Federal Governments. The Connections Project is a \$2 billion investment in the modernisation of the irrigation infrastructure in the GMID delivering water efficiency and water saving outcomes.

Pumped Irrigation – Water is supplied to customers from a GMW fully piped and pressured supply system at Nyah, Tresco and Woorinen.

Regulated Streams – Customers who source their water directly from rivers in declared water systems. Water is stored and flows are controlled or ‘regulated’ by a GMW water storage. These customers provide the irrigation infrastructure including the pump and supply to the property.

Unregulated Streams – Customers holding Section 51 Take and Use licences who source their water directly from rivers, streams or lakes where supply is not controlled by a GMW water storage but instead rely on access to natural run-of-river flows. These customers provide the irrigation infrastructure including the pump and supply to the property.

Groundwater – Customers hold a licence to divert water from an aquifer by means of a bore. The customer owns and operates the irrigation supply including pump, bore and supply infrastructure.

Non-Water User – Water shares not associated with a water use licence or registration.

Environmental Water Holdings

Victorian Environmental Water Holdings

System	High Reliability Entitlement (ML)	Low Reliability Entitlement (ML)	Unregulated Entitlement (ML)
Murray	155,802	137,167	74,300
Goulburn	126,218	186,128	0
Ovens	0	0	0
Broken	0	0	0
Campaspe	20,778	8,014	0
Loddon	4,050	2,024	0
Total	306,848	333,333	74,300

Effective July 2015; High reliability includes provisional reliability and 50% minimum reliability entitlements, Low reliability includes season reliability entitlements.

Commonwealth Environmental Water Holdings

System	High Reliability Entitlement (ML)	Low Reliability Entitlement (ML)
Murray	297,936	20,117
Goulburn	255,209	22,379
Ovens	70	0
Broken	275	7
Campaspe	6,517	395
Loddon	3,356	527
Total	563,363	43,425

Effective July 2015.

Total Environmental Water Holdings Commonwealth and Victoria

System	High Reliability Entitlement (ML)	Low Reliability Entitlement (ML)
Murray	453,738	157,284
Goulburn	381,427	208,507
Ovens	70	0
Broken	275	7
Campaspe	27,295	8,409
Loddon	7,406	2,551
Total	870,211	376,758