

Diversion Strategy

Date



Excellence



Honesty



Accountability



Courage



Caring

Diversions Strategy

1. Purpose

The Diversions Strategy has been developed to set out priority actions to ensure outcomes are considered, relevant, contemporary, and visible. These actions will be the cornerstone of our strategy and will provide a clear set of expectations to be measured against.

2. Pillars

The integrity and security of existing entitlements are preserved

At all times, GMW will represent the diversions customer bases interests with an aim of preserving or enhancing

Goals are scaled to the right timeframe

The Diversion Business Unit will be focused on current and immerging issues that have the potential to impact customers; and will ensure that they take proactive steps to advocate on their behalf.

Resources will be managed sustainably

GMW has the responsibility of ensuring that available resources are managed efficiently and sustainably to ensure access rights are preserved.

Easily accessible and relevant information

Stakeholders require timely, targeted and relevant information that meets contemporary expectations in terms of the way in which it is shared. The information needs to be relevant to the viewer and easily accessible.

Efficient and streamlined processes

GMW will continue to look at ways to streamline processes to avoid complication, reduce unnecessary delays, and ensure affordability. We will be adaptable to the changing environment, and innovative and flexible in the way we do business to minimise financial impact to customers.

Deliver exceptional customer service

The Diversions Business Unit will deliver high standard services that cater for legislative and statutory requirements while being adaptable to customer and stakeholder needs.

3. Priority Objectives

Project Status	Description
● Red	Risks or issues: There is a significant risk/issue or risks/issues with the project. The project requires corrective action to meet project objectives
● Amber	On watch: A problem has a negative effect on project performance and action is being taken to resolve the problem or a decision made to watch the situation.
● Green	On track: The project is performing to plan. All aspects of project viability are within tolerance.



Priority Objectives	Objective overview	Project status	Risks	Action Progress	Dependencies	Outcome	Start	End
PO1. Engagement	Continue to review engagement activities to ensure they remain contemporary and meet customer and stakeholder expectations	●	- Communication methods don't meet customer/regulators expectations/requirements. - Communication requirements result in increased costs that impact fees/charges. Reduced take-up of information by customers	GMW embraces new technologies and communication methods to meet changing environments. GMW continues to seek feedback on the preferred method of communication from our customers	- Statutory obligations - Annual reporting requirement - DEECA and ESC expectations Customers' needs and preferences	- Targeted information that is contemporary and relevant - Options for customers to access information via different sources. - Formatted information that is shaped for the audience. - Information meets the requirements of statutory/stakeholder/corporate requirements. - Engagement methods are considerate of cost/benefit impacts.	Started	Ongoing
PO2. Licencing/ water trading	Continue to look for opportunities to improve processes to increase efficiencies, decrease time and cost of the application process	●	- If efficiencies are not introduced the cost of applications will increase. - Increased costs will lead to reduced uptake. - Lack of efficiencies leads to protracted processing times and customer dissatisfaction. Inability to meet KPI's and service levels.	- System improvements implemented. - Annual review of processes to consider enhancements. - Represent customer interests at stakeholder meetings. Feedback sought from customers/stakeholders.	- Licensing obligations. - Ministers Policies for Managing T&U and Works Licences. - Current and future legislation. Risk to benefit.	- GMW reviews its processes to ensure opportunities for efficiencies are considered and implemented where potential exists. - Application fees and annual charges are minimised. Customers' needs and suggestions are considered in the decision-making process.	Started	Ongoing
PO3. Sustainability	To support the uses of alternative energy sources. To review operating expenditure ensuring services are appropriate and pricing justifiable. Preservation of access rights through management plans and licence conditions to safeguard resources	●	- Alternative energy sources do not deliver effective cost to benefit savings. - Service levels decline to an unacceptable level. - Pricing is not justified for the service provided; or the service delivered unnecessarily exceeds the requirement resulting in additional costs. - Access rights are diminished. Unplanned or targeted buy-backs – Swiss cheese effect	- GMW considers alternative energy sources to offset costs. - Service levels are reviewed and modified to achieve the best outcome for the customer with costs in mind. - Impacts to access rights are considered in all decision-making processes. Victorian prospectus as a response	- State and federal commitments and funding streams. - ESC approval of service levels and fees & Charges. - Climate and season variability. Development of management plans to identify risks and take appropriate remedial action.	- Where appropriate alternative energy sources used. - Service levels are in line with customer expectations – and are justifiable. - Access rights are maintained in accordance with state policy. GMW lobbies for customers rights and interests in stakeholder forums to preserve as best as possible pre-existing access rights to safeguard resources.		

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	GMW services needed for our region and our future, while we continue to embed climate change considerations into all our activities.							
PO6. Management	Maintain appropriate levels of labour across Diversions Services - What does the customer of the future look like - What does the Diversions workforce of the future look like Embracing technology	●	- Appropriate levels of labour resources are not maintained. - Service levels decline or significantly exceed requirements. - Impacts to customer fees & charges. KPI's and service levels not met.	GMW continually monitors service levels and demands and adjusts according to requirements.	- Customer and stakeholder expectations. - GMW KPI's and service levels. - Customer Charter. Climatic influences.	GMW monitors demands and adjusts labour levels accordingly where flexibility exists. Labour changes are considerate of customer cost implications.	Started	Ongoing

4. Priority Areas Engagement



Priority Areas PA1. Engage	Action	Project Status	Risk	Action Progress	Dependencies	Outcome	Start	End
PA1a	WSC/Advisory committee future structure	●	- Revised structure does not maintain/enhance existing benefits. - Customers' needs are not clearly communicated. - Disconnect with stakeholder engagement.	GMW routinely reviews the structure of its reference committees to ensure they meet intended objectives.	- Representation of customer groups is maintained. - Committees align with corporate obligations.	Customers interests are effectively communicated through WSC's and advisory committees.	2024	2024
PA1b	Unregulated customer – tariff components explained	●	- Unregulated tariff components are not understood resulting in confusion and customers dissatisfaction. - Increased number of submissions to the pricing regulator (ESC). - The pricing regulator (ESC) makes changes to unregulated tariffs that impact other customer groups.	- GMW continues to develop improved information that explains tariff components. - Improved information is shared with unregulated customers in formats that support their education. - GMW is improving data to support justification of the tariff elements.	- Having data that support the tariff elements. - Having appropriate, targeted communication platforms to deliver information to customers.	GMW have initiated targeted education material to support unregulated customers understanding of the tariff components.	Started	2025
PA1d	Groundwater customer – tariff components explained	●	- Groundwater tariff components are not understood resulting in confusion and customers dissatisfaction. - Increased number of submissions to the pricing regulator (ESC). - The pricing regulator (ESC) makes changes to groundwater tariffs that impact other customer groups.	- GMW continues to develop improved information that explains tariff components. - Improved information is shared with groundwater customers in formats that support their education. - GMW is improving data to support justification of the tariff elements.	- Having data that support the tariff elements. - Having appropriate, targeted communication platforms to deliver information to customers.	GMW have initiated targeted education material to support regulated customers understanding of the tariff components.	Started	2025

Priority Areas PA1. Engageme nt	Action	Project Status	Risk	Action Progress	Dependencies	Outcome	Start	End
PA1e	Review of rosters and restrictions notification process- more contemporary	●	- Changes result in reduced management of unregulated streams. - Customers access to available resources diminishes. - Customer confusion. - Increased breaches of licence conditions. - Non-compliance with rosters and restrictions.	- GMW have sought legal advice to inform changes. - Customers have been surveyed to seek their feedback on proposed changes.	- Changes need to align with licence conditions. - Changes cannot diminish powers to enforce rosters & restrictions. - Customers need to understand the changes through effective communication and education initiatives.	- GMW will seek to implement processes to accelerate notifications of roster & restriction changes. - Customers will receive notification in a more responsive timeframe to changes in unregulated stream flows. - GMW maintains its obligations under the Water Act 1989, Ministers policies and licence conditions.	Started	2025
PA1F	Use of alternative engagement methods – community pages, newsletters etc	●	- Alternative communication methods are not getting to the targeted audience. - Alternative communication options are more expensive. - Reduced audience. - Customer dissatisfaction.	GMW have explored alternative engagement methods.	- Legislative requirement. - Customers preferences. - Urgency of messages/information to be delivered. - Geographic spread of impacted groups (is it isolated to a small area or is it across the whole footprint of GMW's area).	GMW will continue to look for opportunities to improve the delivery of information through effective communication using appropriate methods tailored to the audience.	Started	Ongoing
PA1G	Improve/arm Diversions Inspectors with targeted customer information	●	- Diversions Inspectors are not equipped with the information requested by customers. - Reduced knowledge of issues relating to their customer groups. - Delays in getting information to customers resulting in dissatisfaction or business decision impacts.	GMW endeavours to keep relevant Diversions Inspectors informed of relevant information to support the exchange with their respective customer groups.	- Information is available and understandable. - Information is shared in a timely manner that allows Diversions Inspectors to understand it and be able to communicate it accurately with customers.	GMW actively provide information to Diversions Inspectors to ensure they are equipped with relevant, timely, and accurate information.	Ongoing	Ongoing

5. Priority Areas Licencing/water trading

Priority Areas PA2. Licencing /Water trading	Action	Project Status	Risk	Action Progress	Dependencies	Outcome	Start	End
PA2a	Review of Sec67 Works Licence	●	- The absence of a review leads to missed opportunities for enhancements or customer benefits. - Non-compliance with Ministers Policies and Water Act 1989. - Customer confusion.	- GMW reviews s.67 works licence processes and identifies areas of improvement through efficiency savings. - Important changes that impact customers will be communicated.	Compliance with Ministers policies and the Water Act 1989.	- Regular reviews of s.67 licencing requirements and processes performed to ensure any opportunities for efficiency savings and cost reductions are implemented. - Important changes communicated.	Started	Ongoing
PA2b	Review of Sec51 T&U Licence	●	- The absence of a review leads to missed opportunities for enhancements or customer benefits. - Non-compliance with Ministers Policies and Water Act 1989. - Customer confusion.	- GMW reviews s.51 T&U licence processes and identifies areas of improvement through efficiency savings. - Important changes that impact customers will be communicated.	Compliance with Ministers policies and the Water Act 1989.	- Regular reviews of s.51 licencing requirements and processes performed to ensure any opportunities for efficiency savings and cost reductions are implemented. - Important changes communicated.	Started	Ongoing
PA2c	Review of Farm Dam Registration	●	- Registration licence holder's dissatisfaction. - Additional work demand exceeds GMW's ability to service. - Absence of funding to deliver any on-ground works (i.e. metering).	- Impacts and issues communicated with DEECA. - Guidance sought as to the ability to introduce the recovery of expenses through the commencement of fees.	- Support from DEECA. - Support from the Minister. - Support from the pricing regulator (ESC).	Service requirements and costs have been communicated to DEECA.	2024	2025
PA2d	Private Right review	●	Non-compliance with the Water Act 1989.	DEECA are investigating the current	Support from DEECA and the Minister.	GMW actively communicate the need for LGA's to consider	2024	2025

Priority Areas PA2. Licencing /Water trading	Action	Project Status	Risk	Action Progress	Dependencies	Outcome	Start	End
			Private Right customers dissatisfied.	- impacts of s.8 rights on water resources. - LGA's are aware of the impacts that s.8 rights have on the environment and are considerate of these issues in their planning processes.	Support from the pricing regulator (ESC).	- impacts of s.8 use in their planning schemes. - GMW have participated in workshops with DEECA where impacts of s.8 rights have been communicated. - GMW actively undertake compliance monitoring to identify and address unauthorised T&U.		
PA2e	Review of trading practices – Cost /Time	●	- The impact of not implementing efficiency savings leads to unaffordable applications fees. - Increased fees lead to increased non-compliance. - Adverse impacts to third parties through not adequately addressing risks.	GMW regularly performs reviews of trading processes with a view of implementing efficiencies that lead to improved outcomes for customers.	- Compliance with Water Act 1989. - Compliance with the Minister's policies. - Compliance with the Victorian Water Register. - Risks of adverse outcomes mitigated.	Water trading practices and processes are reviewed and opportunities for enhancements, efficiency savings and cost reductions introduced.	Started	Ongoing
PA2f	Options to promote trade in smaller systems	●	Promotion of trade could be seen as outside GMW's remit; with Water Brokers being the more appropriate avenue.	GMW can improve its information available to customers explaining the benefits of trading entitlement.	Alignment of GMW with its responsibilities.	GMW reviews its education material on water trading.	2024	Ongoing
PA2g	Section 51 conversion (Unbundling)	●	- Changes lead to increased complexity. - Entitlements held by speculators without any connection to land. - Customer confusion. - Increased management complexities. - Increased annual fees.	- GMW commissioned a report which identified the pro's and con's of unbundling groundwater and unregulated entitlements. - The above report has been shared with Regional WSC's and DEECA. - Unbundling of groundwater and unregulated entitlements is not currently supported.	- Support from DEECA and the Minister. - Defining benefits that outweigh increased complexity, risks and potential cost increases.	GMW will monitor community and stakeholder interests in unbundling groundwater and unregulated entitlements and recommence work in this area if deemed required.	Started	Completed
PA2h	Trading rules in the Upper Ovens WSPA Water Management Plan to bring them into	●	- Changes don't align with management plan rules. - Negative impacts to resources.	Potential for change/improvement will be considered when the plan is reviewed.	- Reliability of resources maintained or enhanced. - Negative impacts to entitlement holders is avoided.	GMW have committed to assess rules within the Upper Ovens WSPA when the respective plan is reviewed.	2025	2025

Priority Areas PA2. Licencing /Water trading	Action	Project Status	Risk	Action Progress	Dependencies	Outcome	Start	End
	line with the rules that apply to all other unregulated licence holders			Feedback sought from Upper Ovens WSPA customers and DEECA.				
PA2i	Investigate and understand water trading out of systems and the possible impacts to GMW and remaining customers	●	- Trade out of entitlement has a negative impact on remaining customers or the environment. - Lack of intervention results in avoidable issues. - Making changes to trade rules results in negative impacts.	- GMW has committed to monitor the movement of water and identify any unacceptable impacts resulting. - Trade rules to be continuously assessed for opportunities for improvement and for the benefit of its customers.	- Current trade rules. - DEECA. - GMW customers. - Communities.	- Impacts of trade out of systems are identified and communicated to DEECA. - Socioeconomic impacts identified and shared with regulating bodies.	2025	2025
PA2j	Improve trade opportunities in small systems	●	- Changes result in negative outcomes. - Customer dissatisfaction.	- GMW has committed to monitor the movement of water and identify any unacceptable impacts resulting. - Trade rules to be continuously assessed for opportunities for improvement and for the benefit of its customers.	- Current trade rules. - DEECA. - GMW customers. - Communities.	- Potential improvement to trade rules within small systems are identified and communicated to DEECA.	2025	2025

5. Priority Areas Sustainability

Priority Areas PA3. Sustainability	Action	Project Status	Risk	Action Progress	Dependencies	Outcome	Start	End
PA3a	Investigate and promote alternative power options	●	Alternative energy sources do not deliver effective cost to benefit savings.	GMW considers alternative energy sources to offset costs.	State and federal commitments and funding streams.	Where appropriate alternative energy sources used.	2025	Ongoing
PA3b	Review of sleeper licence	●	- Changed operating arrangements leads to surrendering of entitlements. - Changed operating arrangement leads to reduced access for existing users. - Increased frequency of rosters & restrictions - Socioeconomic impacts.	- Information available to sleeper licence holders on how to trade entitlement (PTWE and TTWE). - Investigation into unbundling unregulated and groundwater entitlement completed.	Appetite of existing sleeper licences to start using or trade entitlement.	Information is available on options available to sleeper licence holders.	2023	Completed
PA3c	Investigate new revenue streams	●	- New revenue streams management costs outweigh revenue raised. - No new revenue streams identified. - Impacts to existing customer base.	- GMW are investigating the ability to recover part/all of costs from registration licence holders. - The ability to generate new income from alternative power sources (solar/hydro) will be considered. - Ongoing annual review of fee-for-service activities.	- Pricing regulator approval may be required. - Cost to benefit analysis.	Opportunities for alternative revenue streams will be considered on a case-by-case basis.	Started	Ongoing
PA3d	Section 51 conversion (Unbundling)	●	- Unbundling results in increased costs. - Confusion and complexity. - Inability to manage entitlements effectively. - Removal of entitlement from communities leading to undesirable socioeconomic impacts.	Investigation into unbundling unregulated and groundwater entitlement completed.	- DEECA support. - Minister support. - Alignment with state objectives.	No further investigation suggested unless the Minister provides further direction.	Started	Completed
PA3e	future competing demands for water, with urban expansion, lifestyle blocks and the demand for domestic and stock water	●	- Demand for water negatively impacts existing users from a resource availability or quality point of view. - Demand exceeds supply.	GMW to continue to proactively identify areas of competition and take the necessary actions to protect existing customer access.	- Impacts from climate variability/change. - State planning policies and legislation. - Federal targets and objectives (i.e. Basin Plan).	GMW will continue to represent customers interests to preserve their current entitlement and their access to them.	Started	Ongoing

Priority Areas PA3. Sustainability	Action	Project Status	Risk	Action Progress	Dependencies	Outcome	Start	End
PA3f	Promote development in the region through water use	●	Lack of water use promotion leads to declining viability and cost increases.	GMW is represented on regionally focused reference committees to ensure customer interests are promoted.	- Availability of appropriate forums. - Willingness of industry groups to invest in the GMW operational area. - Market trends. - Appointment of role within GMW to actively liaise with industry representative.	GMW actively promote development opportunities and assist where appropriate.	Started	Ongoing

6. Priority Areas Traditional Owner

Priority Areas PA1. Engagement	Action	Project Status	Risk	Action Progress	Dependencies	Outcome	Start	End
PA4a	Action Water is Life	●	Action sits with DEECA to provide guidance to access of Unallocated Water		DEECA / Traditional Owner Groups	Actions in Water is Life are realised with a frameworks established for the return of water to traditional owners	Started	Ongoing
PA4b	Land Use Activity Agreements	●	TLWC and DJAARA have different expectation to LUAA requirements		DEECA/ DJAARA/ TLWC	GMW have processes in place for LUAA procedure	Started	Ongoing
PA4c	GM2030 Traditional Owner Actions	●						
PA4d	Access to unallocated water	●	Guidance from DEECA around process	Documentation including mapping provided to RAPs. Discussion held with DJAARA around application process.	Water is Life GM2030	TO's have access to unallocated water.	Started	Ongoing
PA4e	Identify suitable land parcels for Traditional Owners to make applications for licences	●	Guidance from DEECA around process		Water is Life	TO's have parcels of lands for attach water to	Started	Ongoing
PA4f	Investigate more appropriate ways that Traditional Owners can access water within entitlement framework	●	Guidance from DEECA around process		Water is Life GM2030		Started	Ongoing

7. Priority Areas Climate Impacts

Priority Areas PA5. Climate Impacts	Action	Project Status	Risk	Action Progress	Dependencies	Outcome	Start	End
PA5a	Water Resource Strategy that was being developed within GMW to address future climate scenarios. <i>This work will be incorporated into the Diversions Strategy</i>	●			Water Resources and SSP to lead			
PA5b	Investigate rural government incentives for water supply (eg water tanks offered on the urban setting not rural)	●	Inequity between customer/community groups	GMW lobbies on behalf of customer interests to secure incentives.	State incentive program availability.	GMW will actively represent customers interests and promote incentive programs when available.	Ongoing	Ongoing

8. Priority Areas Management

Priority Areas PA6. Management	Action	Project Status	Risk	Action Progress	Dependencies	Outcome	Start	End
PA6a	the right resources and flexibility to meet our obligations.	●			Water Resources and SSP to lead			
PA6b	sufficient staffing numbers on the ground, particularly when dealing with climatic extremes (drought) and in recognition of future climate predictions.	●	- Under resourced staffing leads to negative impacts to customer. - Inability to effectively manage compliance. - Under resourced to provide services to customer.	- GMW will monitor staffing levels and take the necessary steps if changes required. - Consideration will be given to the ongoing impacts to pricing.	- Seasonal conditions. - Availability of temporary staff numbers from other internal groups.	GMW will take timely and responsive action to address staffing needs when conditions require it.	Ongoing	Ongoing
PA6c	Future development of groundwater – should be well serviced and structured so that it is managed in the right way.	●	Lack of management impacts existing entitlement holders	GMW actively manages groundwater and associated development to preserve existing customers access rights.	- Groundwater management plans. - Early intervention.	GMW effectively manages groundwater through the use of management plans, policies and Water Act.	Ongoing	Ongoing

