

## Delivery Share Response

The Torrumbarry WSC represents irrigation customers from Swan Hill, Kerang and Cohuna and surrounding areas. Customers from this region use water for horticulture, dairy, sheep and irrigated cropping.

The WSC is very concerned that Delivery Share no longer reflects the water usage of the area and the burden of this imbalance will increasingly threaten the viability of irrigation in Torrumbarry unless ownership of Delivery Share is incentivized.

Of the options presented in the Delivery Share Review Discussion Paper, the WSC believes that the following are acceptable: 8,9, 10, 11, 13, 16 (for further investigation), 19, 20 & 21.

### Potential option to create a market for Delivery Share

#### Changes to be implemented

1. Change the ADA to an ADL (annual diversion limit), this removes the casual use trigger and enforces a set limit
2. Reduction of the current 270 times delivery share to 148 times Delivery Share as the ADL
3. GMW stops issuing new Delivery Share on a free basis but still has the ability to on a case by case basis dependant on development prospects and revenue opportunity to the area
4. ADL becomes a tradable commodity with GMW facilitating the transaction on a temporary basis, at the start of each season the ADL reverts to the property where the delivery share is held
5. The market creates the price for ADL

#### Points for consideration

1. The actual delivery share is not transferred on the temporary basis, this prevents the need for mortgagee to release and potential complications on mid-season property transfers etc
2. Further consideration needs to be given to channel capacity, as the actual delivery share is not being transferred the need for channel capacity assessment at each transaction is reduced but still needs to be considered
3. Some landowners that have lower then the standard Delivery Share may seek to obtain permanent Delivery Share transfer that will still be subject to the existing criteria, as GMW will no longer be issuing Delivery Share this may also create a value for the shares (or a lesser negative value)