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Water and Rivers Commission

policies

Statewide Policy No. 6

Transferable (Tradeable) Water Entitlements for Western Australia

2001

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Acknowledgments

This document has been prepared by the Resource Allocation Branch within the Resource Management Division of the Water and Rivers Commission.

The Commission gratefully acknowledges the advice of the State Water Reform Council, Commission staff and members of the public who have provided input into the development of this policy.

Andy Lawson Allocation Officer

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Foreword

The Water and Rivers Commission is Western Australia's primary water resource management agency. The Commission is responsible for managing and allocating the State's water resources to support sustainable development and conserve the environment.

The Rights in Water and Irrigation (RIWI) Act 1914 as amended is the principal legislation for managing the State's water resources. In areas proclaimed under the RIWI Act a licence is required to take groundwater or surface water. A water entitlement is the volume of water, allocation, that may be abstracted under the terms of a licence.

An important component in the Commission's role is to develop policies to ensure the effective management and allocation of the water resource. They are intended to provide guidance to staff and external stakeholders on the sharing of water between the different uses and users.

Recent amendment to the *RIWI Act* made the provision for the transferring (trading) of water entitlements. This policy describes the principles to be applied by the Commission when assessing trading of water entitlements.

The benefits of being able to trade water entitlements are:

- ability for water to migrate to higher economic uses;
- introduction of new water users and industries; and

encourage more efficient use of water.

The Commission will ensure that trading of entitlements is established in appropriate areas that will benefit the resource and the community at large.

A draft of this policy was released in June 2001 for public comment and submissions. Due to the level of interest generated, the Commission extended the closing date of submissions to provide additional opportunity for interested parties to have their say about how the policy is implemented.

A total of 31 submissions were received from a range of stakeholders. Most were supportive of the objectives of the policy although a number of issues were raised that required further clarification. These, together with issues raised through the water law reform process, have been considered in the finalisation of this policy.

The Commission will continue to consult and work with stakeholders and the community to raise the level of awareness on the management and allocation of water resources.

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1. Intent

The intent of this policy is to provide a consistent and comprehensive policy foundation for the implementation of Transferable (or Tradeable) Water Entitlements (TWE) in Western Australia. It has been prepared to foresee many of the policy issues that may arise with implementation and explain how the Commission will address them. This policy will provide guidance to Commission staff, water users and other interested parties.

This policy is subject to change and refinement as it is gradually implemented across the State. The latest copy of the policy can be obtained by contacting the Commission at 3 Plain St East Perth telephone (08) 9278 0300 or from the Commission's website http://www.wrc.wa.gov.au.

2. Definition and applicability

The Rights in Water and Irrigation (RIWI) Act 1914 as amended vests terrestrial water resources of Western Australia in the Crown. Licences to take this water are issued and managed by the Water & Rivers Commission and usually specify conditions, length of tenure and the volume of water that may be taken. This volume is referred to as the "licensed entitlement".

Tradeable Water Entitlements (TWE) is the term used to describe the ability of a licence holder to trade all or part of the licensed entitlement, to another water user. These can also be referred to as transfers, however, it is expected that most transfers will happen as "trades" where the entitlement is leased or sold, although in some instances transfers may occur without recompense (eg a deceased estate). Because the terms "trading" and trades have more currency within the water industry they will be used in this policy rather than the terms "transferring" or transfers.

A person wishing to trade away an entitlement will be referred to as the "vendor" and the person receiving the trade will be referred to as the "purchaser".

It is important to note that it is the licensed entitlement to take water that is tradeable. Where part of the entitlement is permanently traded to a new water user, the vendor's original licence will be amended to reflect the trade or cancelled altogether if the full entitlement has been traded. A new licence will be issued to the purchaser or their existing licence amended to reflect the trade. The ability to trade entitlements was provided by amendments made in 2001 to the *Rights in Water and Irrigation (RIWI) Act* following water law reforms promoted by the Council of Australian Governments.

This policy applies to all terrestrial water resources of Western Australia unless specifically altered by a plan for managing the water resources that has been approved by the Minister or by the Board of the Commission with delegated authority.

Trading markets are usually effective only where allocation limits have been reached. However, in some circumstances, trading may offer lower cost outcomes than obtaining a new entitlement in areas where the allocation limit has not yet been reached.

TWEs must also operate within the water resource management planning framework, including community and industry consultation and liaison. This issue is described further in section 5, Implementation.

Special provisions in the *RIWI Act* deal with trades to and from the Water and Rivers Commission. These matters are not dealt with under this policy.

This policy uses the term Water Resource Management Unit (WRMU) which refers to a defined area containing an aquifer or stream basin. This is the base unit of allocation planning and will usually define the area within which a trade may occur.

3. Objective

The objective of this policy is to see the benefits of trading realised in a sustainable and well-managed fashion whilst protecting important ecological and social values and the legitimate interests of third parties.

TWEs are a market-based tool intended to:

- encourage the efficient use of water resources (within allocation limits) by providing the opportunity to capitalise
 on water savings through sale or lease;
- enable migration of water to uses of higher economic value;
- allow the water users to respond to changing conditions; and
- enable re-allocation of water resources in fully allocated systems, including new water users moving in.

4. Policy principles

The following principles will guide the Commission's decision making with regard to trading in water entitlements.

4.1 Eligibility

- i. TWEs should be able to operate in all surface and groundwater systems where sustainable allocation limits have been established and where current and committed usage, licensed allocation, is considered to be within these limits. Market forces will dictate where trades would occur.
- Both permanent and temporary (annual) trades are available. Consideration could be given, in extenuating circumstances, to allow a temporary trade of less than 1 year. Temporary trades are a form of lease and occur via the temporary (agreement) "assignment" of a licensed entitlement, or part thereof, to another party. This second party is then able to operate under the licence for the period of the agreement. Permanent trades are where the licensed entitlement is permanently traded to a second party.
- iii. Any person permitted by the *RIWI Act* to hold a water licence is potentially able to trade. A licence must be held within the WRMU where the trade is to occur. Special provisions relate to people who are not eligible to hold a

licence but are buying property and want to make arrangements to purchase an entitlement for the property after they have bought it. In this situation the Commission can undertake to make the trade once the property is purchased.

- iv. A purchaser who does not already have a licence must undergo the normal licence assessment process and receive a new licence as part of the trade. Where the purchaser already has a licence, the assessment will be on the outcomes of the trade, usually an increase in abstraction, and whether these are acceptable.
- v. Only water entitlements that are clearly defined in terms of volume may be traded.
- vi. All, or part, of a licensed entitlement may be traded (subject to clauses vii and viii below).
 Prior to the trade, the Commission will determine a volumetric allocation if one does not already exist for the licence in question. This will be used to determine the maximum tradeable volume.

- vii. Riparian right allocations, normal (low volume) stock & domestic supplies and environmental water provisions are nontradeable and must stay with the property. In areas where allocation limits have been reached, and a town water supply is not available, domestic allocations for newly created lots will have to be purchased or provided from the existing water entitlement of the original property. These allocations will not be tradeable once they are established. Town water supplies may be traded in some circumstances.
- viii. Trades are to be limited to the consumptive part of an allocation. Where return flows are included in the licence allocation they are not available for trade, except as return flows. Return flow is that portion of water that returns to the superficial aquifer during the irrigation of a crop. In most cases the licence allocation does not include any significant allowance for return flow.

To maintain the balance and prevent overuse return flows cannot be used or traded for other purposes. (For example, if a volume of 5 ML was pumped to irrigate a crop resulting in 2 ML of return flow then only 3 ML could be used or traded for purposes that did not create return flow, such as hydroponic operation or piping the water away from the area). Such an instance increases the importance of accurate measurements of use.

- ix. All trades must be consistent with any Commission approved plan for management of water resources and environmental water provisions that apply to the Water Resource Management Unit (WRMU) in question.
- The Commission, in consideration of individual and extenuating circumstances, reserves the right to refuse trades of water entitlements in order to:
 - protect the environment and other users from damage;

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- ensure that outcomes continue to be beneficial to the state;
- prevent non-efficient uses and monopolies in water;
- encourage and allow trading for industry water use efficiency;
- meet policy objectives;
- encourage or preserve complementarity and diversity; or
- preserve the trading market from distortion.

Any decision to refuse a trade is subject to the appeal provisions of the *RIWI Act*.

4.2 Water availability

 A trade cannot occur where it may result in an increase in the level of allocation of a fully allocated WRMU.

- The trade must occur within the limits provided by water availability and physical constraints of the relevant WRMU. Therefore, trades are normally only possible within a WRMU. Trades upstream in river systems may be further constrained by the availability of water.
- iii. Trades between WRMU's are permitted only where it will result in the source area returning to a more sustainable allocation position and where demand in the receiving area will remain below sustainable yield. (For example new allocations may only be granted in specific WRMU upon surrender of an entitlement from a different WRMU that is fully allocated or where the resource is under stress.)
- iv. Accurate measurement of use is a prerequisite for trades. Both the vendor and purchaser (where the vendor retains some allocation) are to maintain accurate measurement of use. In accordance with the Commission's policy on measurement of use this will usually be in the form of calibrated flow meter. However, the Commission may

undertake case by case determination of whether metering is necessary to assess the volume of use.

- The trade can only be for the amount V. remaining after the amount already used for that year is subtracted from the total allocation. The onus is on the vendor to establish this to the Commission's satisfaction. (For example, if a grower has an annual allocation of 10 ML and has already used 6 ML at the time of the trade, then the amount available for trade that year is 4 ML). The "year" will be the licence year, that is from the date the licence is issued, otherwise a calendar year. The full allocation would be available in subsequent years.
- vi. Water savings resulting from investment by the licensee may be traded (For example, where a water user invests in water use efficiency techniques that result in them having excess water, the excess may be traded). Where savings have occurred as a result of investment by the State, the possible trade will be at the discretion of the Commission, with commercial returns accruing to the State. In the event of joint investment, each party will normally divide returns proportional to the levels of investment by each party.

4.3 Environmental and resource management

i. Trades are subject to the provisions of the Environmental Protection Act and the Commission's Environmental Water Provisions Policy. Where significant environmental impacts are considered likely to occur as part of a trade, the Commission will either refuse the application or refer the matter to the Environmental Protection Authority for separate assessment.

- ii. The trade is not to result in unacceptable impacts¹ (ecological or social) either through direct effects or through the concentration of use. The onus is on the proponent to establish this to the Commission's satisfaction.
- 111. The trade is not to result in concentration of use, increase in abstraction within a small area, such that unacceptable impacts are likely. The onus is on the proponent to establish this to the Commission's satisfaction.
- iv. Trades must be consistent with approved plans for management of water resources (regional, sub-regional and local area management plans). If no plan exist trades must be consistent with approved Commission policy or guidelines that exist from time to time.
- v. The Commission will encourage the use of water commensurate with its quality. This may include rejecting trades that will result in high quality water being traded to a low quality use where an alterative and practical low quality option exists. This approach shall be applied consistently by the Commission across all localities.

4.4 Consultation

- Local by-laws may prescribe considerations for a trade to occur in a local area, or prevent trading in the area in question. As part of developing by-laws, the Commission will consult with relevant stakeholders. This will usually include both local interests and groups with a Statewide focus.
- Notice of the application for a trade will be given by the Commission to any person required by local by-laws to be notified. A person to whom notice has been given may

¹ Unacceptable impacts can be determined through the allocation planning process in consultation with the community.

then make submissions to the Commission in relation to the trade. The Commission will give the applicant a copy of any submissions and allow him or her opportunity to respond. The Commission will give notice of its decision on the application and the date of the decision to everybody who made a submission.

- iii. Where by-laws do not exist, trading may still occur, provided it is consistent with this policy. In this case the Commission may consult with the applicant and people who it believes may be affected by the trade and should be given an opportunity to put their views.
- iv. The issue of a licence as a result of a trade shall comply with the provisions of *the RIWI Act* relating to the advertising of applications for a licence.

4.5 Security interests

- i. As prescribed by the *RIWI Act*, the Commission will maintain a public register of licence details of people who have a security interest in a licence. The details will only be added to the register if the licence holder applies for such action to be taken. The person requiring the security interest cannot make the application. It is envisaged that if a licence holder wants to use a licence as security for a loan, a condition of the loan will be that the licence holder applies to have the security interest noted.
- 11. Any person who has a registered security interest in a licence will be notified in writing of any application to trade an entitlement of the licence as well as other event that may alter any of the terms or conditions or otherwise significantly affect the licence.
- The Commission will not approve the trade until the person who has the security interest provides written consent.

- iv. Special provisions in the *RIWI Act* apply where a property is sold. In this case the vendor and the purchaser have 30 days after the sale of the land to apply to trade the entitlement to the new owner. The Commission must approve the trade if the licence conditions have been complied with.
- The trade of entitlement will affect property values. It is the responsibility of the vendor and purchaser to consider these implications as part of a trade.

4.6 Speculation

i.

Tradeable Water Entitlements are intended as a business tool that provide increased flexibility to legitimate water users, including allowing new businesses to establish in fully allocated areas. The Commission will discourage the use of TWEs as speculative investment alone, as this may lead to water not being used productively.

- To discourage speculation, licensed entitlements that have not been used (sleepers) are non-tradeable and will be re-allocated consistent with Commission policy², which might include merit selection, auction, ballot, first-in-first-served allocation or some other mechanism. This may occur either through the expiry of a development condition, cancellation of a licence, or when a licence is renewed for a lesser volume.
- iii. However, where the licensee is able to clearly establish (to the Commission's satisfaction) that genuine extenuating circumstances (rather than speculation) have resulted in all or a significant part of the licensed entitlement not being used, the unused component of the entitlement may be traded. Significant

² The Commission will prepare a policy on *Management of Unused Licence Allocations* to provide guidance on how the Commission will deal with this issue.

investment in an irrigation/industrial project would normally be required to establish that the licence was not intended for speculation. This determination will be at the discretion of the Commission.

- iv. Allocations not being used because of efficiency gains adopted by the licensee are available to be traded or used elsewhere. The Commission shall not recoup these allocations but would expect that they be utilised.
- v. The re-distribution of any recouped unused allocations will be at the discretion of the Commission consistent with approved policy.
- vi. Under the provisions of the *RIWI Act* the licensee may appeal against the decision of the Commission to recoup all or part of an entitlement.

4.7 Administration

- Each component of the water entitlement should be clearly defined, including volume, reliability of supply, tenure, delivery capacity or abstraction rates and conditions as appropriate.
 - The Commission will maintain a register of licences and entitlements, which will be updated to incorporate the outcomes of approved trades.
 - The Register will be open and available to the public. Licences are also subject to the requirements of the Freedom of Information Act.
 - iv. The release of information will be in accordance with the Commission's policy *Provision of Information*³.

v. It is the responsibility of both the vendor and purchaser to ensure adequate contractual documentation is used as part of the trade.

Applications for trading are to be submitted to the Commission (at either the regional office or head office) using the appropriate application form. This, together with additional information requested by the Commission and the Commission's existing resource management data, will form the basis for assessing the acceptability of an application for trade.

4.8 Broking

- Commission staff will not act as brokers (for a fee or otherwise). It is the responsibility of allpotential buyers or sellers to identify parties interested in trades. Potential purchasers should be encouraged to advertise their intent in the relevant area. The Commission's licence register is also available as a source of information for people seeking potential vendors.
- ii. While accepting no responsibility for the behaviour of any other party, the Commission will encourage water brokers and water exchanges to meet reasonable standards of ethics and disclosure. Should it consider that a broker is acting in an unacceptable manner the Commission would refer the matter to the appropriate authority.

The Commission considers price disclosure to be an important component of a functional market. Applicants will be required to disclose the prices associated with a trade. Price data will be publicly available and published periodically by the Commission. (See 6.1 Market Information).

4.9 Other considerations

 A temporary trade cannot be on-traded to a third party. In other words, a person who has an agreement to operate under another person's licence cannot enter into an agreement for a third party to operate under the licence.

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³ The *Provision of Information* policy is under preparation and should be available in 2002.

ii. In the management planning process the Commission will determine sustainable limits and set allocation priorities that may include

> reserving allocations of water for specific purposes such as future town water supplies or State Agreements. In the interim, until they are required for town water supplies, these reserves may be accessed for other purposes. This temporary access will be by way of a non-renewable licence. Water service providers or others seeking to access these reserves may be required to purchase or lease these allocations at current market price at the time the allocation is to be utilised.

iii. To achieve effective management of water resources, it may be necessary for the Commission, from time to time, to review and amend sustainable yields, environmental water provisions and WRMU boundaries. While the Commission will make every attempt not to distort the trading market some amendments may affect the market price of water.

- iv. Should the need arise to reduce sustainable yields the Commission will, after consultation, initiate a strategy to recoup the necessary allocations in accordance with the provisions of the *RIWI Act*.
- v. In the event that new water becomes available and sustainable yields are increased or previously reserved water becomes available resulting in "new water" entering an operating market, the Commission will give consideration to a range of mechanisms including auctioning the newly available water to maintain equity and minimise market distortion.
- vi. In the future, when the market is mature and stable, consideration may be given to allowing the establishment of a secondary market that could permit trading in options. This market would only be established after due consideration of Water Resources Management Committees and the Board of the Commission.

5. Implementation

Implementation of this Policy will occur via a combination of three mechanisms; the preparation of Plans for management of water resources, by-laws and through the assessment of applications for trade.

5.1 Plans for management of water resources

Plans are prepared, with community input, at three levels and a brief description of each follows:

Regional management plans identify water resource values, including ecological and other environmental values, at a regional level, and establish how these values are to be protected. They define the likely future uses of the water resources and may give a preliminary indication of the quantity of water that could be diverted from the region including the possible scale and nature of any development. Another important purpose of these plans is to indicate how water resources planning and management will be integrated with land use planning and management. Because these are high level plans they will usually include little reference to trade issues.

Sub-regional management plans identify water resources values, including ecological and other environmental values at a sub-regional level, and will specifically define EWRs and EWPs (although, where appropriate, these may be of an interim nature). They will establish how ecologically sustainable development of water resources is to be facilitated by the Commission, including the quantity of bulk water allocations for particular consumptive uses and how the rights to water are to be allocated to meet various needs. The plans will also show the strategies that will be adopted for implementation including sub-regional water allocation licensing policy.

Allocation policy issues dealt with in these plans need to be compatible with this TWE Policy or specifically deal with potential conflicts or limitations on the implementation of this TWE Policy. Some entitlements may not be tradeable due to water resource management constraints identified in these subregional plans. (For example, these plans may specifically preclude trades between groundwater and surface areas.)

Local area management plans cover part of a single water resource (eg. a groundwater sub-area). These plans will establish how rights to water are to be allocated to meet various needs including the quantity of water that can be diverted on an ecologically sustainable basis. Allocations to specific future uses and the licensing policy will be defined, together with the nature and extent of the delegated authority that may be conferred on a relevant water resources management committee.

Both sub-regional and local area plans may identify the sustainable yield of a particular resource, which sets the allocation limit. Once this is set only trades or property will allow new enterprises to move into the area.

These plans will also specify the "start up rules" for trades to occur in the area in question. There may be several conditions that must be met before trades can occur. For example, the plan may specify what degree of allocation above use is acceptable as drought security, which then sets the maximum allocation that can be traded. Allocation for drought security may not be tradeable.

5.2 By-laws

By-laws will be used to implement "local rules" that may govern trading in a particular WRMU. They will be an important mechanism of both implementing the Local Area Management Plan and providing flexibility in trade rules suited to the local area. Such by-laws should be consistent with the relevant Management.

Different rules may be appropriate for the various subareas within the locality covered by a plan. Therefore different By-laws may be prepared to govern trades within these sub-areas that are covered by a single plan.

By-laws may specify where trades are or are not possible and what conditions (in addition to this policy) need to be met for a trade to occur.

5.3 Assessment of application

The third mechanism for implementation of the policy is through the Commission's assessment of applications for trade. Applications need to be lodged with either the Commission's regional office or to the Commission's Resource Allocation Branch within the Hyatt Centre.

Upon receipt, the application will be dealt with according to the process shown in Appendix 1.

6. Monitoring, review and reporting

6.1 Market information

Price and other market information are essential to ensure water trading occurs efficiently and equitably. The collection and provision of market information will fall to the Commission until the market matures and brokers are established to provide information to potential buyers and sellers.

Marsden & Jacobs (1999) have suggested a wellinformed market participant requires the following information:

- what prices have been transacted from over both the short-term and previous year;
- what volumes have been traded, from where, to where and on what terms;
- what buyers and sellers are currently in the market place and what terms they would be likely to trade on.

The Commission will assist in the provision of points (i) and (ii) through an annual TWE report, covering price, volume, locality information and the purpose of the trade. This will be provided publicly through the Commission's web site and from regional offices. Locating buyers and sellers is the responsibility of the market participants, however the Commission's register of licence holders, their location and licensed entitlement will be made available to potential market participants upon request. Up to date information on trades and prices will also be available from the register.

6.2 Policy review

The Commission's Water Resource Allocation Committee (WRAC) will review the effectiveness of this policy annually for the first three years of its implementation. After which time, it will be reviewed after a period not exceeding five years. Where the committee believes it is necessary they will recommend to the Board of the Commission that modifications be made. Significant changes to the policy would require the Commission to consult with the community and stakeholders.

Glossary

"allocation" is the volume of water which has been allocated for use from a water resource each year.

"aquifer" means a geological formation or group of formations capable of receiving, storing and transmitting significant quantities of water.

"bore" means a specific type of well accessing groundwater, generally a small diameter well.

"Commission" refers to the Water and Rivers Commission established by section 4 of the Water and Rivers Commission Act 1995.

"domestic allocation" refers to the volume of water required for household purposes and the irrigation of a small domestic garden.

"environment" means livings things, their physical, biological and social surrounding and interactions between all of these.

"environmental value" (also known as beneficial uses) is a value or use of the environment or any element or segment of the environment which is conducive to public benefit, welfare, safety, health or aesthetic enjoyment and which requires protection from pollution sources.

"groundwater" refers to the water that occurs in pore spaces and fractures in rocks beneath the ground surface.

"policy" refers to a guideline that is not directly supported by any legislation but has been adopted by the Water and Rivers Commission as its guideline when assessing developments.

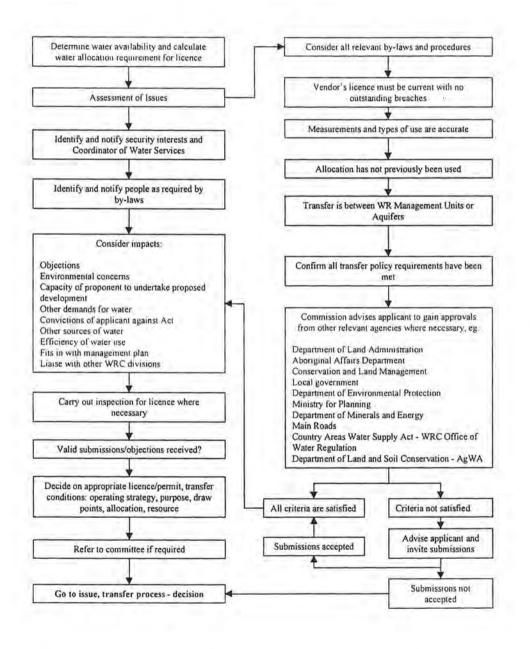
"sustainable allocation limits" refers to the volume of water that can be harvested each year from a water resource with acceptable impacts.

"water entitlement" refers to the volume of water that can be harvested, under licence, each year from a water resource with acceptable impacts.

"Water Resources Management Unit (WRMU)" refers to a defined area and aquifer or stream from which water is abstracted. A defined area may have a number of WRMU's. eg Multiple aquifers.

Appendix 1

Transfer assessment process



Further enquiries

Any project where the proponent/operator is unable to comply with the Statewide policy, or where site conditions prevent the application of this policy, should be submitted to the Commission as early as possible in the development of the proposal so that the matter may be resolved.

Any enquiries relating to the content of this policy should be directed to:

ANDY LAWSON	
TELEPHONE	(08) 9278 0447
FACSIMILE	(08) 9278 0585

WATER AND RIVERS COMMISSION HYATT CENTRE 3 PLAIN STREET EAST PERTH WA 6004 TELEPHONE (08) 9278 0300 FACSIMILE (08) 9278 0301

For further enquiries on any matter relating to the management of water resources in the regions, please contact the following Water and Rivers Commission regional offices

Region	Telephone	Facsimile
Mid West Region	(08) 9964 5978	(08) 9964 5983
Pass Street, Geraldton 6530		
or		
82 Olivia Terrace, Carnarvon 6701	(08) 9941 4621	(08) 9941 4931
North West Region		
Chiratta Road, Karratha 6714	(08) 9144 2000	(08) 9144 2610
or		
Lot 22 Bandicoot Drive, Kununurra 6743	(08) 9168 1082	(08) 9168 3174
South Coast Region		
5 Bevan Street, Albany 6330	(08) 9842 5760	(08) 9842 1204
or		
Suite 1, 55 Strickland Street, Denmark 6333	(08) 9848 1866	(08) 9848 1733
South West Region		
U2 Leschenault Quays,	(08) 9721 0666	(08) 9721 0600
Austral Parade, Bunbury 6230		
OF		
21 School Street, Mandurah 6210	(08) 9535 3411	(08) 9581 4560
Swan Goldfields Agricultural Region		
7 Ellam Street, Victoria Park 6100	(08) 6250 8003	(08) 6250 8050

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