Water Allocation

Stakeholder Feedback Report - Drafts Available



March 2022

Draft units of competency and skill sets for the Water Allocation and Entitlement Skills project were made available on the Skills Impact website for stakeholder review from 20 December 2021 to the 10 February 2022. This period was extended to allow more time for stakeholder affected by floods COVID-19. Please visit the website to view a full list of the documents that were submitted for consultation during these phases.

Feedback was received from a variety of stakeholders around the country via email, the Skills Impact Feedback Hub, webinars, phone and email, as follows:

	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	National
Government Federal									
Government State									
Government Local									
Employer									
Peak Industry Body									
IRC Representative									
Regulator									
Training Board									
Registered Training Organisation (RTO)									
Union									
State Training Authority (STA)									
Other									

Feedback received during the 'Drafts Available' period for the units of competency and skill sets that have been developed for the Water Allocation and Entitlement Skills project has been positive, with multiple changes and updates suggested by stakeholders to help meet the needs the range of job roles covered by these units.

Below is a summary of the feedback raised during 'Drafts Available' and how these have been dealt with. This involves a consideration of the information provided, views of industry stakeholders and from people who are part of the Subject Matter Expert Working Group process. Resolutions are constructed to consider the needs and views of stakeholders to the extent possible, and to comply with the Standards for Training Package 2012. The resolutions may represent a compromise on one or more stakeholder views with the aim of a workable outcome for industry, State and Territory Training Authorities (STAs) and training providers.

Acronyms - PC - Performance Criteria, PE - Performance Evidence, KE - Knowledge Evidence, AC - Assessment Conditions, FS - Foundation Skills, SMEs - Subject Matter Experts, CVIG - Companion Volume Implementation Guide, AHC - Agriculture, Horticulture, Conservation and Land Management

Units of Competency

AHCWAT3X1 Procure, receive and monitor water for irrigation

Organisation Type: Registered Training Organisation, STA

Coverage: VIC

Stakeholder Comments:

The unit title refers to procurement, receival and monitoring, not just access. Although the unit refers to accessing water, procurement may not be required if licences are already in place. PC 1.2 includes the identification of account types for water procurement, but there is no PC on the action of procuring. Elements 2 and 3 refer to implementing water deliveries but the first paragraph in the Application does not mention arranging deliveries and review. Suggest review wording for consistency in language throughout the unit.

Additional Stakeholder Support: Other - VIC x 1

Consideration and Proposed Resolution: Adopted

Thank you for the feedback, which has assisted the developer and the SMEs to clarify the outcomes of this new unit.

To better reflect the unit's outcomes, the title has been changed to "Access, extract and monitor water for irrigation" and references to purchasing and procuring water have been removed from the unit.

As suggested, a sentence has been added to first paragraph of the unit application - "It also includes implementing water deliveries and end of season review."

Organisation Type: Registered Training Organisation, STA

Coverage: VIC

Stakeholder Comments:

Element 2- Will there always be more than one delivery per season?

PC 2.3- Is this for a specific purpose - something that could impact on the actual deliveries of water or the need/quantities?

PC 2.7- This PC partly duplicates PC 2.5

Consideration and Proposed Resolution: Noted

Thank you for your feedback. The SMEs advised that typically most irrigators would have several deliveries of water during a growing season.

PC 2.3 Monitor weather conditions and forecasts. The SMEs advised that irrigators constantly monitor weather conditions and forecasts, and use the information to adjust water deliveries (timing and quantities) accordingly.

The outcomes of PC 2.7 are different to PC 2.5 "Extract water within licence conditions". As a private diverter, some of the licence conditions covered by 2.5 may include - use of correct infrastructure, site usage conditions, extraction times, volume and extraction flow rate during a time window, methods used to distribute water over the property, maximum application rates (ML/ha) for crop types, and managing run off.

The SMEs advised that it is possible for both a private diverter license and irrigation footprint account to apply on the same property, as long as the irrigator has access to both, but it is not common occurrence.

Coverage: VIC

Stakeholder Comments:

Performance Evidence-

use of wording 'cost effectively' in second paragraph- Identification of costs are in PCs 1.4 and 1.5 but not cost effectiveness. Suggest remove work 'effectively'.

Dot Point 4- A 'water balance' is not specified in the PCs.

Dot Point 5- 'study'? Suggest reword for clarity.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback. Based on SME advice:

Suggestion adopted and "cost effectively" has been removed from the second paragraph.

Dot point 4 - Suggestion adopted and PC added - 4.6 "Complete end of year water balance for a water account and identify carry over water available".

Dot Point 5 - 'study'? This dot point has been removed as it covered in part in the PE points above, as well as in the KE.

Organisation Type: Registered Training Organisation, STA

Coverage: VIC

Stakeholder Comments:

Knowledge Evidence-

Dot points 13 and 14- This unit is about gaining access to irrigation water rather that water planning for production. Are these KE points outside the job role of accessing water?.

Consideration and Proposed Resolution: Noted

Based on SME advice:

Dot point 13 and 14 relates to PC 2.5, and has been reworded to read - " key considerations when monitoring weather and weather forecasts"

Organisation Type: Employer, Peak Industry Body

Coverage: QLD

Stakeholder Comments:

For opening statement in the application, add 'or both' in reference to an irrigation footprint or infrastructure

PC 1.1, change 'connected to the' to 'available to the'

Consideration and Proposed Resolution: Adopted

Thank you for your feedback. These changes have been made.

Organisation Type: Employer, Peak Industry Body

Coverage: QLD

Stakeholder Comments:

PC 1.5- This PC covers product (water type) reliability, which is important

PC 2.1- Change to Confirm private diverter's water licence 'and access' conditions related to water share (allocation), allocation account, reporting requirements, allowable tradeable water carry over component, and where and/or how the water will be used

PC 3.9- Add in- Confirm reporting requirements and complete

Performance Evidence- Add in 'access conditions to dot point 1 so it reads 'confirmed the licence and/or water account conditions and/or types, including access conditions and penalties that may apply'

Knowledge Evidence- change to read 'types and classes of water available in local water market and their access conditions'

Final dot point also covers reliability

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Based on SME advice:

PC 2.1- Suggestion adopted and 'access' has been added after licence

PC 3.9- Suggestion adopted and new PC added - "Confirm and complete ongoing reporting requirements"

Performance Evidence - Suggestion adopted and 'access conditions' has been added

Knowledge Evidence - Suggestion adopted and 'their access conditions' has been added.

Organisation Type: Employer, Peak Industry Body, Registered Training Organisation

Coverage: SA

Stakeholder Comments:

Merge PC's 3.3 and 3.4

PC 3.5 you only need to make sure it's an approved meter type. Maybe change it to only read 'check infrastructure'

In AC, remove 'access to water trading platform

This unit's contents make it appropriate to be delivered as a 'desktop' unit.

Additional Stakeholder Support: RTO - VIC x 1

Consideration and Proposed Resolution: Adopted

Thank you for this feedback. Based on SME advice:

Merge PC's 3.3 and 3.4 - Suggestion adopted

PC 3.5 - Suggestion adopted and PC changed to - "Check water receival infrastructure"

AC - Suggestion adopted

Coverage: NSW

Stakeholder Comments:

PC 3.5 would not apply to the work done by us, as we own the meters. Need to remove or alter.

Combine PC's 3.3 and 3.4

Having 'lead time' in the KE is important

For the FS, it might be good to reference Kilolitres as a measurement unit, as in SA they can use this denomination

Final dot point of the PE is irrelevant. If it's kept in, maybe change work 'jurisdiction' to 'suppliers'

In AC, remove 'water trading platform'

Consideration and Proposed Resolution: Adopted

Thank you for this feedback. Based on SME advice:

PC 3.5 - Suggestion adopted and the reference to meter has been removed

PC's 3.3 and 3.4 - Suggestion adopted

Having 'lead time' in the KE is important. Thank you for the supportive feedback.

FS - Suggestion adopted.

Final PE dot point has been removed as it is covered in part in the PE points above, as well as in the KE

AC - Suggestion adopted

Organisation Type: Employer

Coverage: NSW

Stakeholder Comments:

End season, it is important that irrigators are aware of any key end of season dates for both delivery and also carryover/water allocation account management. In the off river schemes, not all schemes have year round supply.

Consideration and Proposed Resolution: Adopted

Feedback adopted. The following has been added to the KE: "key end of season dates, including dates for water delivery/extraction, carry over, and annual water trading"

Organisation Type: Registered Training Organisation, STA

Coverage: VIC

Stakeholder Comments:

PC 2.7 'insure you're operating within your legal requirement if required'- Please reword

Element 3: This element has a number of PCs that appear to duplicate those in element 2. I assume that this is because E2 is for private diverters and E3 is for the irrigation footprint scenario. Perhaps adding the words 'private diverter' to E2 would help to clarify meaning. Would both methods apply to one property? The PE is for either or rather than both.

Consideration and Proposed Resolution: Adopted

The suggestion to reword 2.7 has been adopted and it now reads - "Monitor water account balance and seasonal allocation announcements and ensure compliance with extraction limits".

Element 3 - Suggestion adopted and Element 2. has been reworded as suggested and now reads - " Implement water deliveries as a private diverter ".

Coverage: VIC

Stakeholder Comments:

Dot point 15- Suggest including a PC in element 1 relating to this KE.

Consideration and Proposed Resolution: Adopted

The SME working group requested that dot points 14 and 15 have been removed as they are beyond the scope of the unit.

Organisation Type: Employer, Peak Industry Body, Registered Training Organisation

Coverage: SA

Stakeholder Comments:

PE dot point 6- change wording to 'the water is being extracted from'

Consideration and Proposed Resolution: Noted

PE dot points 4 and 6 have been removed as these are covered in part in the PE points above, as well as in the KE

AHCWAT3X1

Procure, receive and monitor water for irrigation

Organisation Type: Registered Training Organisation, STA

Coverage: VIC

Stakeholder Comments:

Element 3- This element has a number of PCs that appear to duplicate those in element 2. I assume that this is because E2 is for private diverters and E3 is for the irrigation footprint scenario. Perhaps adding the words 'private diverter' to E2 would help to clarify meaning. Would both methods apply to one property? The PE is for either or rather than both.

Consideration and Proposed Resolution: Adopted

Thank you for the feedback.

Element 2 - Suggestion adopted and 'as a private diverter" has been added to the element to make evidence the differences between the elements PCs.

AHCWAT5X1 Purchase and sell temporary water for agriculture and production horticulture

Coverage: VIC

Stakeholder Comments:

Performance Evidence-

Dot point 8- Use of digital technology for these tasks are not explicit in the PCs.

Dot point 16- As for buying water, there is no explicit requirement to consult with a water broker or industry expert.

Dot point 17- As for buying water. Not explicit in the PCs for selling water.

Consideration and Proposed Resolution: Noted

Thank you for this feedback. Based on SME advice:

Dot points 8 and 17 that reference digital technology have been retained. There are several PCs that require access to, and analysis of information prior to buying water or selling water that can be mapped to these two PE points. This work is typically done using the internet and may be as simple as using a personal computer to access water authority announcements and/or using water trading platform app on a mobile telephone. The SMEs advised these are common practices. In this case, the PE is adding more specificity to the work outcomes covered by the PCs.

Organisation Type: Employer, Peak Industry Body

Coverage: QLD

Stakeholder Comments:

Title- see if you can change to 'and/ or' production horticulture...

Description- add in 'irrigated agriculture' to first paragraph

PC 1.3- Include transition losses, ie 'Determine the volume of water, including any transition losses, and timing of watering to successfully undertake the agriculture and/or horticulture'

Consideration and Proposed Resolution: Adopted

Thank you for this feedback. Based on SME advice:

The title has been changed to "Purchase and sell temporary water for irrigated agriculture, horticulture and production horticulture"

Description - Suggestion adopted and 'irrigated agriculture' has been added to first paragraph.

PC 1.3 - Suggestion adopted with a slight change to terminology - "transmission losses" has been added.

Coverage: NSW

Stakeholder Comments:

Purchase water

The irrigator needs to establish their additional water requirements to grow the intended crop and develop a strategy for acquiring this volume.

Eg. This could be for some farmers acquiring all or the majority of their supply prior to planting versus purchase through the season. For farmers with permanent plantings their shortfall is not dependent on planting decisions but they still need to have a strategy to ensure they have sufficient water to irrigate their crop.

The strategy needs to consider likely future improvements in water availability and a risk assessment of this.

Sell water

The seller needs to have a strategy for selling their water, in terms of timing of the sale and whether it is all sold at once or in parcels.

Consideration and Proposed Resolution: Noted

Thank you for the feedback.

Purchase water

The outcomes described in the feedback are covered by the PCs in Elements 1 and 2, with the possible exception of the need to consider 'future improvements in water availability and a risk assessment of this". The SMEs advised that PCs 1.7 and 1.8 state - "Monitor water market allocation announcements, product releases, pricing and other announcements that may affect water purchase" are sufficient for an entry level unit on water trading, especially when applied in the context of seeking advice from water brokers, legal, financial and agronomy professionals which are referred to in Element 2. To include "a risk assessment of future improvements in water availability" is beyond the scope of this unit.

Sell Water

The outcome in the feedback is covered in PC 5.2 Develop a strategy for selling water, and sequencing water sales if required

Organisation Type: Registered Training Organisation, STA

Coverage: VIC

Stakeholder Comments:

Performance Evidence (continued)

Dot point 6- The term 'water trading platform' does not appear to have been included in the KE

Dot point 7- There does not appear to be an explicit requirement to consult with a water broker in the PCs.

Consideration and Proposed Resolution: Adopted

Thank you for this feedback

Dot point 6 - 'water trading platform' has been added to the KE

Dot points 7 and 16 - Feedback adopted and these point have been removed

Organisation Type: Employer, Peak Industry Body

Coverage: QLD

Stakeholder Comments:

PE Dot points 8 and 17- might not be required, as it's often intuitive based on crop and return.

Consideration and Proposed Resolution: Noted

Thank you for this feedback.

PE Dot points 8 and 17 - The use of digital technologies has been retained, but the requirement to "undertake financial analysis" has been removed. There are several PCs that require access to information that is typically provided via digital platforms. For example; 1.1 Monitoring the water market announcements, and 2.1 Research water market products. Industry stakeholders have advised this is typically done via the internet which requires use of digital technology.

AHCWAT5X1 Purchase and sell temporary water for agriculture and production horticulture

Coverage: SA

Stakeholder Comments:

PC 1.5, Keep 'security level' in. It's important in VIC

FS, No need to include Kilolitres for SA

Additonal Stakeholder Support: RTO - VIC x 1

Consideration and Proposed Resolution: Noted

Thank you for this feedback. Based on SME advice:

PC 1.5 The reference to 'security level' has been removed because it is not used in all water markets. The PC now reads - "Identify the water product required", which still allows security level to be covered in markets that use this concept in the description of water product types. It is worth noting that the KE includes - "water products, including types and classes, available in local water market and other markets" which also allows for security level to be covered in the markets where it is used.

FS - kilolitres has been added to the FS because SA government web site references kilolitres as a unit to measure water shares for the Murray River

Organisation Type: Employer

Coverage: NSW

Stakeholder Comments:

I agree that having buying and selling in one unit makes sense.

PC 1.5 might be irrelevant. Buying security is specific to permanent water, so might not be required for temporary water.

Mention of ACCC might need to come out of KE

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Based on SME advice:

PC 1.5 The reference to 'security level' has been removed because it is not used in all water markets. The PC now reads - "Identify the water product required," which still allows security level to be covered in markets that use this concept in the description of water product types. It is worth noting that the KE includes - "water products, including types and classes, available in local water market and other markets" which also allows for security level to be covered in the markets where it is used.

KE - Suggestion adopted

Organisation Type: Registered Training Organisation

Coverage: VIC

Stakeholder Comments:

You can remove ACCC from KE

Consideration and Proposed Resolution: Adopted

AC - Suggestion adopted

AHCWAT5X2 Identify carry over water or continuous accounting options

Coverage: VIC

Stakeholder Comments:

Performance Evidence-

Dot point 3- No explicit requirement in the PCs to consult. Identify and select only. Suggest reword for consistency - e.g. confirmed the regulatory requirements and trading rules related to the sale of water products with regulatory authority

Dot point 5- The development of a 'strategy' is not explicit in elements or PCs. Is element 2 is about developing considering options. Does that come before developing a strategy or should element 2 be about developing a strategy through the consideration of options?

Dot point 6- make the word 'purchase' 'purchased'

Dot point 7- Not explicit in the PCs. PC 3.1 ' Identify platforms, water brokers and other trading options' and PC 3.2 has the term 'select'. Perhaps an additional PC is required?

Dot point 8- Again, the word 'consult' is not in the elements or PCs.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback. Based on SME advice:

Dot point 3 - Suggestion adopted and requirement to consult regulatory authority has been removed.

Dot point 5- Suggestion adopted and dot point removed.

Dot point 6 - Suggested adopted and typo fixed

Dot point 7- Suggestion adopted and dot point removed.

Dot point 8 - Suggestion adopted and dot point removed.

Organisation Type: Registered Training Organisation, STA

Coverage: VIC

Stakeholder Comments:

Knowledge Evidence-

Dot point 13- Question. Is this to inform a risk analysis or should this be a sub-dot point of the dot-point of considerations for developing a strategy for carry over water?

Consideration and Proposed Resolution: Noted

Thank you for your feedback. Based on SME advice:

Dot point 13 - While the knowledge in this bullet point may provide some context in the development of a strategy for carry over water, the SMEs advised to keep it separate from the following dot point, which focusses on consideration of data that relates to water availability in the next season.

Organisation Type: Employer, Peak Industry Body

Coverage: QLD

Stakeholder Comments:

PC 1.2- New wording '1.2 Determine quantity of water available to be carried over and confirm application process (by water authority) based on water entitlement' This includes automatic and manual situations

PC 4.4, add in 'as required' here-' Negotiate lease of space if required' as this inclusive of North Qld practices.

PE Dot point 8. Can we delete this? Strictly speaking you do not need to consult with a water broker. It is not always required as it doesn't always involve a sale transaction, and can be for a persons own use.

KE dot point 14- add in another sub-dot point 'carry over access conditions or scheme rules as determined by state and territory legislation'

Consideration and Proposed Resolution: Adopted

Thank you for this feedback. This unit has been revised in response to feedback from several stakeholders. Based on SME advice: PC 1.2- has been reworded to "Determine regulatory limits on amount of water that can be carried over "

PC 4.4 - Suggestion adopted and the PC has been changed to "Negotiate lease of space, if required and complete documentation"

PE Dot point 8. Suggestion adopted and dot point deleted.

KE dot point 14 - Suggestion adopted and dot point added "carry over access conditions or scheme rules as determined by state or territory legislation"

Organisation Type: Registered Training Organisation

Coverage: SA

Stakeholder Comments:

Everyone knows what Carry Over water is. Just use this term when in doubt.

Element 1 is appropriate and fit for purpose.

Remove ACCC from this unit as well.

Additional Stakeholder Support: RTO - VIC x 1

Consideration and Proposed Resolution: Noted

Thank you for the supportive comments about the terminology and Element 1.

Based on SME advice:

A paragraph has been added in the Unit Application to explain the use of the terms carry over water and continuous accounting options, including parking excess water -

"In this unit the terms 'carry over water' and 'continuous accounting options' are used interchangeably to describe an arrangement which allows a water access right holder to retain water allocations not taken in a water accounting period for possible take in the next water accounting period. Continuous accounting options may also include parking excess water."

KE reference to the "Australian Competition and Consumer Commission" has been removed.

Coverage: NT

Stakeholder Comments:

Make sure 'continuous accounting is universally understood to mean the same thing. Clear with Qld. Ask Qld if they have 'Annual Accounting', otherwise the terminology might be problematic.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback.

Based on SME advice, the following paragraph has been added to the Unit Application -

"In this unit the terms 'carry over water' and 'continuous accounting options' are used interchangeably to describe an arrangement which allows a water access right holder to retain water allocations not taken in a water accounting period for possible take in the next water accounting period. Continuous accounting options may also include parking excess water."

Organisation Type: Employer

Coverage: NSW

Stakeholder Comments:

The strategy for carryover or continuous accounting, its application also includes exploring what options may be available for carryover parking. This is increasingly being used by irrigators who own less water entitlements than their irrigation demand.

Rather than describing as storage facilities where carryover may be available, at least in the southern systems it is about understanding what product offerings may be available to park carryover water.

I am struggling to see the difference between three and four in this section.

Leasing of water entitlements is not the same as carryover parking. Leasing of water entitlements is an option which probably is not covered in the information.

Consideration and Proposed Resolution: Adopted

Thank you for this feedback. Based on SME advice, the unit has been significantly revised to clarify the outcomes, including better differentiation between Elements 3 and 4.

This piece of feedback was utilised when these changes were made, including removal of leasing of water, creating greater clarity around the application of your carry over strategy and exploring your carry over options.

Organisation Type: Registered Training Organisation, STA

Coverage: VIC

Stakeholder Comments:

Performance Evidence (continued)

Dot point 9- Not explicit in the PCs

Consideration and Proposed Resolution: Noted

Dot point 9 - that references digital technology has been retained, but "software" has been removed.

There are several PCs that require research of current water market information that can be mapped to this PE point. This work is typically done using the internet and may be as simple as using a personal computer to access water authority announcements and/or using water trading platform app on a mobile telephone. The SMEs advised these are common practices. In this case, the PE is adding more specificity to the work outcomes covered by the PCs.

Coverage: VIC

Stakeholder Comments:

Knowledge Evidence-

Dot point 9- Question. Risk is included in PC 2.5 and PC 4.1. No mention of risk management strategies. Should risk management strategies be explicit in the PCs or removed from KE?

Consideration and Proposed Resolution: Adopted

Thank you for your feedback. Based on SME advice:

Dot point 9 - the reference to "risk management strategies" has been removed, as these are not required in this unit.

Coverage: NSW, QLD, SA

Stakeholder Comments:

- -The documents seem comprehensive and well written
- -At first glance I can't think of anything you have missed
- -The competencies aiming to be trained are well explained
- -I like the fact you will be relying on performance as well as knowledge based evidence for assessment.
- -As training documentation, I can't fault them. However, as with all training, the real outcomes are determined by the trainer's knowledge, ability and communication skill
- -The breadth of different licences and water products will make coverage of all those in the market difficult within training sessions. I'd suggest reasonably local training programs that concentrate on those products, licences and authorities etc that apply within that region -And, as always with training, the varying experience / skill levels of the participants will make targeting tough the concepts will bore some, and others will struggle with them. Again, participant selection and trainer ability will determine whether this is an issue

Consideration and Proposed Resolution: Noted

Thank you for your feedback. The Units of Competency and their related Assessment Requirements have been designed to enable trainers and assessors to customise their use for various regulatory frameworks and water markets across the nation.

Organisation Type: State Government, IRC Representative

Coverage: WA

Stakeholder Comments:

Water Allocation and trading is in its infancy in WA. To our knowledge, the work is not undertaken. The WA governing bodies are currently looking into creating legislation that codifies and allows for water trading, and we await these documents eagerly as they may inform our future trading practices.

Consideration and Proposed Resolution: Noted

Thank you for your feedback.

Organisation Type: Employer

Coverage: VIC

Stakeholder Comments:

We the Subject Matter Expert Working Group helped establish this set of drafts and await industry feedback

Additonal Stakeholder Support: Peak Industry Body - NSW x 1, IRC Rep - NSW x 1, Regulator - NSW x 1, Govt State - QLD x 1, Employer - QLD x 1, Peak Industry Body - QLD x 1, Employer - SA x 1, Peak Ind Body - SA x 1, RTO - SA x 1, Peak Industry Body - TAS x 1, IRC Rep - TAS x 1, Regulator - TAS x 1, Govt State - VIC x 1, Employer - VIC x 1, Peak Industry Body - VIC x 1, RTO - VIC x 1

Consideration and Proposed Resolution: Noted

Thank you for providing industry advice to help develop the draft units.

Organisation Type: State Government, Peak Industry Body

Coverage: TAS

Stakeholder Comments:

Tasmanian water interests have been informed of the training are trying to have industry contacts provide feedback.

Additonal Stakeholder Support: Govt State - TAS x 1, Employer - TAS x 1

Consideration and Proposed Resolution: Noted

Thank for informing stake holders in Tasmania about the draft training products. We look forward to receiving their feedback through validation.

Coverage: NSW

Stakeholder Comments:

In the northern MDB systems of NSW they have continuous accounting and use limits, in some cases irrigators trade annual allocation because they will be exceeding their annual use limit. This needs to be captured in the section on understanding the relevant rules, the relevant Water Sharing Plan will have these limits. (I don't know enough about QLD to understand how their different systems work).

In some systems inter valley transfers are possible but limits apply which means the trade may be closed, irrigators needs to understand the limits and monitor for opening and closing. This also applies to the Barmah Millewa choke trade limit.

Consideration and Proposed Resolution: Adopted

Thank you for your feedback. The three new AHC Water Sector Units of Competency and their related Assessment Requirements have been designed with the potential to be contextualised for use in different jurisdictions and water markets.

In response to feedback on the first drafts from stake holders in different states, the units have been fine-tuned to help ensure they can be trained and assessed in various water markets.