Review of metering in the lower Murrumbidgee regulated surface water system

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Acknowledgement of the Traditional Owners of the Murray–Darling Basin

The Murray–Darling Basin Authority pays respect to the Traditional Owners and their Nations of the Murray–Darling Basin. We acknowledge their deep cultural, social, environmental, spiritual and economic connection to their lands and waters.

The guidance and support received from the Murray Lower Darling Rivers Indigenous Nations, the Northern Basin Aboriginal Nations and our many Traditional Owner friends and colleagues is very much valued and appreciated.

Aboriginal people should be aware that this publication may contain images, names or quotations of deceased persons.
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Executive Summary

Background

The Murrumbidgee River is the third longest river in Australia. The river system’s catchment covers 84,000 square kilometres and flows from the Snowy Mountains in the east into the Murray River downstream of Balranald (see map at Appendix A). The system also features the highest volume of water take managed by a single Basin state. This regulated system supplies a variety of water access entitlements to a range of water users, including small river pumpers, substantial irrigation corporations and an increasing number of large corporate enterprises.

In early December 2018 New South Wales introduced the new NSW Non-urban Water Metering Framework. In the lower Murrumbidgee (around the town of Hay), the introduction of this new policy and the continued expansion of large corporate enterprises - including changes to the mixture of crop types and the construction of large off-stream water storages - all represent changes to the way in which the Murrumbidgee regulated river system is being managed and used.

This limited assurance review was conducted under section 13.10 of the Basin Plan, and Section 173(1) of the Water Act 2007 (Cwlth). The review aims to provide the Murray–Darling Basin Authority (MDBA) and the general public with assurance that New South Wales has the appropriate systems and procedures in place to ensure metered surface water take is accurately measured and reported, consistent with water entitlement conditions and limits in the lower Murrumbidgee. It is important to note that this review only included water users that extract water directly from the regulated river around Hay. It did not provide any assessment of metered data reporting within privately-operated Irrigation Infrastructure Operators (IIOs), as IIOs are not subject to the NSW Non-urban Water Metering Framework.

Review Approach

At the commencement of this review WaterNSW provided the MDBA with procedural documentation relating to the recording and reporting of consumptive water usage.

Fieldwork for the review was undertaken in mid-May 2019. MDBA officers travelled to Leeton to observe WaterNSW processes for collecting water usage information and entering this data into the NSW Water Accounting System (WAS). This included a walkthrough of how WaterNSW Customer Field Officers (CFOs) plan and conduct meter reads; WaterNSW’s approach if they identify instances of potential non-compliance; and the quality assurance process conducted on meter read data before being entered into the WAS.

Following this, MDBA officers attended the WaterNSW head office in Parramatta to discuss changes to WaterNSW operations following the introduction of the new NSW Non-urban Water Metering Framework. This discussion included further detail regarding the collection and storage of telemetered meter data, metering requirements for water users, and the process for reporting and replacing broken meters.
Finally, MDBA officers attended the Department of Planning, Industry and Environment (DPIE) Water office in Parramatta to discuss their preparation of the annual General Purpose Water Accounting Reports (GPWARs) and the transfer of data from these reports into NSW’s annual report to the MDBA on water use, provided in accordance with Section 71 of the Water Act 2007. These reports are discussed in further detail in Section 5.

The MDBA would like to thank all the WaterNSW and DPIE Water staff that participated in the review for their co-operation and professionalism.

Review Objective

The objective of this review was to assess the adequacy and effectiveness of the measurement, recording and reporting arrangements for metered surface water usage that WaterNSW and the DPIE Water have in place to ensure:

- That metered surface water usage is correctly measured and reported in the lower Murrumbidgee (downstream of Hay).
- That the data used to determine compliance with the Sustainable Diversion Limit (SDL) will be appropriately assured when the Murrumbidgee Water Resource Plan is accredited.

Conclusion

Overall, the review found that WaterNSW and DPIE Water have effective measures in place to ensure that metered surface water usage in the lower Murrumbidgee regulated system is accurately determined and reported. However, the review did identify some areas where improvements could be made, such as further clarification of the reasoning behind the new telemetry requirements in the NSW Non-urban Water Metering Framework.

It is important to note that the specific scope of this review means that the findings do not apply to all surface and groundwater systems in NSW. The MDBA understands that metering in the lower Murrumbidgee regulated surface water system is significantly more advanced (particularly given the high coverage of telemetry) than metering in the regulated and unregulated surface water systems of central and northern NSW. That said, the MDBA further notes that NSW has committed to improving their metering and telemetry systems in these areas as outlined in the NSW Non-urban Water Metering Framework, published in December 2018.

The MDBA concludes that the overall rating for this limited assurance review is **satisfactory with room for improvement**. The MDBA intends to continue monitoring the implementation of the NSW Non-urban Water Metering Framework as it is progressively implemented.

| Overall Rating | Satisfactory with room for improvement |
Detailed Observations

1. Telemetry system and new requirements

Background

Through consultation with WaterNSW, the MDBA understands that approximately 85% of water take from the regulated river in the lower Murrumbidgee is presently telemetered. During this review the MDBA was able to gain an understanding of how the telemetered water usage system operates in this area.

The telemetry system currently functions by using a Supervisory Control and Data Acquisition (SCADA) system to send almost-real-time water usage data to WaterNSW, where it is then integrated into the NSW WAS. This system allows WaterNSW staff to monitor water usage in real-time from their office. Further, the SCADA system includes a tamper alarm function that alerts both WaterNSW and the company responsible for meter/telemetry maintenance if and when the meters are accessed without being opened by an authorised person with an access key.

The overall system, as observed by the MDBA, has a number of positive features that provide confidence that water usage is being monitored and reported correctly, including:

- Widespread existence of telemetry and the automatic upload of the data into the WAS allows WaterNSW staff to identify any abnormal patterns of water take for follow up.
- Use of another line of evidence to confirm in-field meter reads, whereby WaterNSW staff check and confirm that the pattern of water use matches up with the in-field meter readings (discussed in further detail in Section 3).
- The alarm system, which acts as a deterrent to wilful non-compliance by ensuring that any tampering with the meter is immediately brought to the attention of both WaterNSW and the contracted maintenance organisation.

However, the MDBA does have some concerns about the new surface water metering and telemetry requirements outlined in the NSW Non-urban water metering framework. The new requirements state that meters must be installed on pumps larger than 100mm, with telemetry required for pumps larger than 200mm.

For metering at sites with multiple pumps, where each pump is smaller than the 100mm threshold but there is a cumulative capacity of more than 100mm, the framework is clear that metering is required. For telemetry there is no similar cumulative approach for sites with multiple smaller pumps, where each individual pump is less than 200mm but the cumulative pump capacity is greater than 200mm.

It was noted by Water NSW CFOs during the review that this difference in cumulative approach was causing confusion among some licence holders. The MDBA notes that while written information on metering explicitly states that cumulative capacity is considered, information on telemetry is silent on the matter, leaving readers unsure if the same approach is taken as for metering. An online
metering and telemetry requirements tool published on the DPIE website since the audit is clearer in confirming that telemetry is not required where cumulative pump capacity is greater than 200mm.

Based on the metering and telemetry requirements outlined above, it is not clear to the MDBA why the telemetry requirements do not address sites with multiple works in the same manner as the metering requirements. In addition to causing confusion, this difference in approach to cumulative pumping capacity may have an unintended consequence of rolling back the coverage of telemetry in the geographic area of this review.

The MDBA acknowledges that the new telemetry requirements are designed to improve the coverage of telemetry across the entirety of NSW. However, it is important to note that the effect of the new requirements will mean that some sites currently fitted with telemetry (that was installed and maintained by the NSW Government) will not be required to retain this telemetry. For example, one site currently fitted with telemetry that was visited during the review had several pumps that were less than 200mm individually, but had a cumulative pump capacity of 600mm. Under the new framework, this site will not be required to retain the telemetry that is currently installed.

If the metered sites visited during this review were a representative sample of the lower Murrumbidgee, then there is the potential for a reduction in the use of telemetry in the area of the review. There is effectively a regulatory gap, where customers with multiple pumps with a cumulative pump capacity of greater than 200mm will not require telemetry, while those with a single pump greater than 200mm will.

**Recommendation**

The MDBA recommends that DPIE Water publish a clear explanation as to why a different approach has been taken to cumulative pump capacity for metering and telemetry; and, to make the differing approach clear in all written material to minimise stakeholder confusion.

**New South Wales Response**

DPIE – Water

Noted.

NSW’s non-urban metering rules will apply to around 95% of licensed water take capacity in NSW, while capturing just over half of water extraction works. This reflects government’s objectives to increase the coverage and standard of metering equipment without imposing undue costs on smaller, low risk users. For this reason, water users with surface water works less than 200mm – including multiple surface water works – do not require telemetry.

The Department of Planning, Infrastructure and Environment (the Department) does not agree with the assertion that it is ‘rolling back’ the coverage of telemetry in the lower Murrumbidgee. Even if a
work is not required to have telemetry under NSW’s new metering rules, a water user may voluntarily connect to the government’s telemetry system. There will be economic incentives for water users to do so, such as avoided record keeping and reporting requirements, and the potential for lower fees.

NSW will review the rules – including the thresholds for telemetry – in 2023, as part of its five year statutory review of the metering framework. The Department expects that by this time, the market for telemetry will have matured, with associated decreases in costs.

Importantly, under the new metering rules, water users without telemetry will still need to have an accurate meter, fitted with a data logger and tamper evident seals.

The Department recognises that the metering rules are complex and is committed to engaging with water users to ensure they understand the rules. The Department recently conducted a ‘metering roadshow’, stopping at 14 locations across NSW and speaking to hundreds of stakeholders. The metering roadshow highlighted that stakeholders were broadly supportive of the framework. The Department has updated its online ‘metering guidance tool’ to clarify how the telemetry requirements apply to water users with multiple works.

| Implementation due date | None received from NSW |
2. In-field meter reads

Background

Based on the MDBA’s review of WaterNSW meter reading process and procedures and discussions with WaterNSW staff, the MDBA was able to confirm that WaterNSW Customer Field Officers (CFOs) are required to conduct in-field readings of each meter between one to four times a year, regardless of whether the meter is connected to the telemetry system or not.

The MDBA understands that CFOs use their own experience and knowledge of the local area to decide when and where to conduct in-field meter reads. WaterNSW CFOs noted that they use their experience and knowledge to focus on who they perceive to be ‘high risk’ water users. These ‘high risk’ water users may include users with relatively high volumes of entitlement, users that are new to the CFOs area of responsibility, or users that may have a history of non-compliance. The MDBA observed that within the lower Murrumbidgee area there appeared to be a culture that encouraged CFOs to use their judgement when determining which meters would be observed and when, and to do so in such a way that customers do not know when the next in-field meter read will occur.

Further, by focusing on ‘high risk’ water users, WaterNSW CFOs have a better opportunity to detect significant non-compliance before it goes on for too long.

The MDBA noted the risk associated with a less systematic and relatively undocumented approach to identifying and managing risks. WaterNSW advised that they were in the process of formalising this risk-based approach to conducting in-field meter reads. The MDBA considers that formalising the risk-based approach is vital to ensuring that relevant corporate knowledge is protected and preserved and that due process is always followed. It will also improve transparency and allow other internal staff not directly involved in the meter read process to gain an appreciation of how and why WaterNSW conducts in-field meter reads in the way that they do.

New South Wales Response

WaterNSW: Noted, as this is a low risk rating In-field meter reads will be managed accordingly.
3. Water Accounting System (WAS)

Background
The MDBA undertook a walkthrough of the processes that WaterNSW undertakes when confirming in-field meter reads and entering them into the NSW Water Accounting System. This walkthrough demonstrated that in-field meter reads for telemetered meters are used as a secondary line of evidence, allowing WaterNSW CFOs to confirm the accuracy of the telemetered water data that is being fed automatically into the WAS. Where a meter is not telemetered, the WaterNSW CFOs manually enter meter reads taken out in the field into the WAS. The WAS also allows WaterNSW CFOs to formally record notes and other details observed in the field against specific meters or entitlement holders.

The MDBA identified that this system for entering water usage data contains a number of automatic and manual checks that ensure accuracy of data. For example, when confirming the telemetered usage or manually entering the non-telemetered usage, the WaterNSW CFOs that the MDBA spoke to explained how they review the historical pattern of water usage for that meter to identify any discrepancies. WaterNSW’s handling of any potential discrepancies is discussed in more detail in Section 4. The WAS also runs automated checks on new meter read usage data, and will refuse to accept meter reads where the volume is less than the previous meter read volume.

WaterNSW discussed with the MDBA the public-facing version of the WAS, known as iWAS, that is used by water licence holders to review their water account balances, order water and submit self-read meter reads. The submission of meter reads into iWAS by water licence holders includes the same automated check noted above, that prevents the entry of a meter read that is lower than the previous read.

The MDBA noted that photographic evidence of the meter read is not required when the water licence holder is entering their meter read into iWAS. This potentially allows for water users to engage in fraudulent activity by intentionally under-reporting their own water use. However, MDBA also noted that WaterNSW CFOs run a quarterly report as a part of the billing process, which performs a reconciliation of water orders against the meter read data for that entitlement holder. This reconciliation report is a key control against deliberate misreporting of meter read data by entitlement holders.

In addition, the MDBA notes that any misreporting of water usage in the lower Murrumbidgee regulated river would be also detected by any of the following:

- The widespread prevalence of telemetry
- The requirement for regulated river water licence holders to submit an up to date self-meter read and an order for water before taking water
- The in-field meter reading procedure described by WaterNSW.

These controls significantly reduce the risk of water theft or misreporting (either accidental or deliberate) of water usage going undetected in the lower Murrumbidgee.
Overall, the MDBA found the WAS and iWAS to be relatively advanced and user-friendly systems. They allow both WaterNSW staff and water users to monitor water usage; they promote water user compliance with account limits; and they allow users to enter data and follow correct procedures in an easy way.

| Risk Rating | Low |

**Recommendation**

Noting the overall effectiveness of the system, the MDBA recommends that as part of any future upgrade to the iWAS system (planned or otherwise), WaterNSW should consider incorporating photo upload functionality as a requirement of submission of water licence holder self-meter reads in order to further reduce the likelihood of any misreporting of water usage.

**New South Wales Agreed Actions**

WaterNSW: Incorporating photo upload functionality will be considered as part of iWAS upgrade within the new IBS System project.

| Implementation due date | 31 December 2020 |
4. Potential compliance issues

Background

It is important to note that WaterNSW does not have a direct role in water compliance investigation and enforcement in NSW. After the creation of the Natural Resources Access Regulator (NRAR) in April 2018, responsibility for enforcing compliance with metering requirements, licence conditions and water account limits was shifted to NRAR. However, WaterNSW does have a key role in detecting potential non-compliance due to their on-ground role collecting water usage data from meters.

After reviewing WaterNSW procedural documents, and discussing the matter with WaterNSW, the MDBA is satisfied that WaterNSW has a well-developed procedure regarding evidence collection when potential compliance issues (e.g. meter tampering) are identified by CFOs. This procedure includes processes to ensure that useful evidence is collected, contemporaneous notes are taken and retained, and this information is forwarded on to NRAR in a timely manner for them to investigate. Furthermore, discussions with CFOs in the lower Murrumbidgee indicated that they possess extensive knowledge of the local area (for example, familiarity with irrigated farming methods) that would assist them to identify potential non-compliance issues during the course of their standard meter reading duties. The MDBA notes that, when identified, there appears to be a culture of recording and reporting these issues in a timely manner.

The WAS is also used to identify potential non-compliance. WaterNSW use the WAS to produce regular reports (at least monthly) identifying any accounts with a negative account balance. WaterNSW CFOs will then follow up with landholders to identify the cause of this discrepancy. For example, a landholder with multiple entitlements may have placed their water order against the incorrect entitlement, resulting in a negative account balance for that specific entitlement, even though they have a sufficient balance on the originally intended entitlement. Where any intentional, egregious or repetitive breaches are identified, WaterNSW will forward this on to NRAR for action.

The MDBA considers that the above observations suggest the risk of metering-related deliberate non-compliance is somewhat mitigated as field staff (usually WaterNSW CFOs) are able to identify and report the non-compliance. Further, the evidence collecting procedures help ensure that NRAR are given the relevant information and evidence required to accurately assess alleged breaches, help ensure that any enforcement actions arising from investigating these matters are defensible.

| Risk Rating | Low |

New South Wales response

WaterNSW do not make an assessment of compliance or non-compliance when negative account balances are identified, but will contact customers to identify why the negative account balance has occurred. Further, WaterNSW submits a monthly report to NRAR detailing all negative account balances, regardless of their materiality.
5. Section 71 reporting

Background

A Section 71 (s71) Report on water usage is prepared by each Basin states annually and submitted to the MDBA. The reports are analysed by the MDBA in order to ensure annual water usage in each SDL resource unit complies with the SDL. NSW DPIE Water prepares the NSW annual s71 Report based on the data collated in their annual catchment-based General Purpose Water Accounting Reports (GPWARs).

The GPWARs are produced by DPIE Water in line with Australian Water Accounting Standard 1 (AWAS 1) and provide a transparent ‘one stop shop’ for water information, which includes climatic conditions, consumptive and environmental water use and water trade volumes. The water usage data in these reports is based on the water usage data entered into the WAS by WaterNSW, which is considered by DPIE Water to be highly accurate, and is accepted as correct once it is finalised by WaterNSW. DPIE Water noted that, once finalised, the GPWARs are used as the basis of NSW reporting to a number of different government agencies as well as the MDBA’s s71 Reporting.

Based on the discussions with DPIE Water, the MDBA is satisfied that the GPWARs are produced in a way that accurately reflects the water usage data that is collected, reviewed and entered in the WAS by WaterNSW.

As a part of this review, the MDBA compared the water usage data from the 2017-18 Murrumbidgee GPWAR with the Murrumbidgee water usage data from the 2017-18 s71 reporting data.

The s71 Reporting data is compiled in a Microsoft Excel spreadsheet. Water usage, as taken from the GPWARs, is entered into one part of the reporting template where it is then processed and a final volume of consumptive water use is produced in a different part of the reporting template. This consumptive water usage volume is the number that is used by the MDBA to determine compliance with the Sustainable Diversion Limit (SDL).

The MDBA’s comparison of the Murrumbidgee GPWAR with the Murrumbidgee Section 71 Reporting data found the following:

- Water usage data from the GWPAR was entered into the Section 71 Reporting data template accurately and in the correct location.
- The final volume of consumptive water use in the Section 71 Reporting data was correctly calculated, with some changes made to the equations that process the raw data to ensure that all relevant water usage data was included in the final volume. These changes were made during the extensive quality assurance process undertaken by the MDBA, and are discussed in greater detail below.
- Issues were identified where the equations that process the raw data were not updated, leading to some relevant water usage data being excluded. However, it is important to note that this exclusion had been identified, and there was no impact on the final volume of consumptive water use that is used to determine compliance with the SDL.
Discussions with the MDBA technical team responsible for SDL accounting and compliance determined that, as noted above, there is a significant amount of quality assurance that goes in to finalising the annual Section 71 Reporting data. This includes discussions between DPIE Water and the MDBA technical team where issues with the data are identified. It was through this process that the issue regarding the calculation of the final volume of consumptive water noted above was identified and resolved.

The MDBA notes that the Section 71 Reporting data process in its current form is complex and time consuming, requiring a significant amount of manual work from both MDBA and DPIE Water staff in order to confirm the data. The MDBA is satisfied that the manual assurance systems currently in place, as well as the significant amount of corporate knowledge held by both the MDBA and DPIE Water staff involved, substantially mitigates the risk of misreporting of the annual water usage data.

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<th>Risk Rating</th>
<th>Low</th>
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New South Wales response

No response received from NSW.
Appendix A – Map of the Murrumbidgee Water Resource Plan area


Note: The red box indicates the geographic area in the lower Murrumbidgee where fieldwork for this review was conducted.
# Appendix B – Engagement Report Rating and Findings Rating

## Engagement Report Rating

<table>
<thead>
<tr>
<th>Report rating</th>
<th>Explanation</th>
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<tbody>
<tr>
<td><strong>Satisfactory</strong></td>
<td>Controls are adequate and effective in addressing key risks. No critical, high-rated or moderate-rated findings identified. Any findings identified have been assessed as low risk.</td>
</tr>
<tr>
<td><strong>Satisfactory with room for improvement</strong></td>
<td>Controls are largely adequate and effective in addressing key risks. No critical or high-rated findings identified. Any findings are moderate or low.</td>
</tr>
<tr>
<td><strong>Requires improvement</strong></td>
<td>Controls only partially addresses the key risks. Some high-rated and/or medium-rated findings were identified.</td>
</tr>
<tr>
<td><strong>Unsatisfactory</strong></td>
<td>Controls are ineffective in addressing the key risks. Most findings were rated as critical and/or high and urgent corrective actions are necessary.</td>
</tr>
</tbody>
</table>

## Findings/Observations – Risk Ratings

<table>
<thead>
<tr>
<th>Finding rating</th>
<th>Explanation</th>
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<tbody>
<tr>
<td><strong>Low</strong></td>
<td>The event is of low consequence. Remedial action (if noted) should be considered.</td>
</tr>
<tr>
<td><strong>Moderate</strong></td>
<td>The event may threaten an element of the organisation’s objectives. Remedial action should be implemented in the short to medium term.</td>
</tr>
<tr>
<td><strong>High</strong></td>
<td>The event may threaten the achievement of the organisation’s objectives. A high priority should be given to implementing remedial action.</td>
</tr>
<tr>
<td><strong>Critical</strong></td>
<td>The event represents a significant control weakness which could stop the achievement of the organisation’s objectives. Remedial action should be implemented as a matter of urgency.</td>
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Office locations
Adelaide
Albury-Wodonga
Canberra
Goondiwindi
Toowoomba