

Greater Shepparton City Council Submission to the Goulburn to Murray Trade Rule – May 2020

The Greater Shepparton City Council (GSCC) thanks you for the opportunity to provide comment on the 'Goulburn to Murray trade rule review' consultation paper. The Council has had serious concerns over the passage of high volumes of water and its impact on the banks of the lower Goulburn River as well as other environmental values over the last number of years.

The Council has noted that information provided by DELWP as part of the consultation has identified that inter valley flows have increased significantly since 2014. The Council has also identified that bank erosion has increased since 2014 together with the destruction of bank stabilising vegetation caused by the increased prolonged unseasonal flows since 2014. Council has discussed the issues surrounding high, prolonged and unseasonal flows with the Goulburn Broken Catchment Management Authority (GBCMA) and has been advised that there is also evidence that there has been a loss of semi-aquatic and aquatic vegetation which impacts on habitat and food source values for river fauna.

Council also believes that cold water pollution caused by water being released from Eildon to provide for inter valley transfers during summer and autumn has a detrimental effect on the native fish population of the lower Goulburn River and to a lesser extent on the Murray River around the junction of the two rivers. Any fishery is only as good as its food source. Fish will thrive and breed if there is an abundant food supply but growth will be stunted and breeding will be curtailed if there is an insufficient food source. Council is aware that studies are being undertaken by Arthur Riley Institute on the impact of cold water releases on invertebrates within the lower Goulburn and in particular the freshwater shrimp.

The impact within our region is two-fold, not only are there detrimental environmental impacts on the lower Goulburn River and the Barmah Choke though transfer of irrigation water as mentioned above but also the residual effect of the reduced volume to be utilised within the Goulburn Murray Irrigation District where the cost of a significantly under-utilised world class irrigation delivery system, that is generally protected from the impacts of salinity and water logging, is being apportioned across a significantly reduced number of agricultural producers.

Council have discussed the options that are contained within the consultation paper with representatives of the GBCMA who manage the health of the Goulburn River. We are aware that the GBCMA will be presenting a submission to DELWP and Council wishes to ensure our submission supports their position.

GSCC understand that any of the three new trade rule options that have been put forward in the consultation paper can effectively protect the environmental assets of the Goulburn River if an effective operational rule is developed to manage and limit flows. We have been advised that in order to protect environmental values, the trade rule and operational rule should aim to maintain flows at or below 30 GL per month over summer and autumn.

Under the dynamic and seasonally based rules Council is concerned that consistently high flows during winter and spring may impact on the ability to provide environmental flows during the same period. We believe that this can be managed through development of an operational rule that accounts for such a scenario. This also raises concerns around the community's perception of how the River is managed and may lead to a decrease in public confidence in the value and impact of environmental flows. Education and timely information on environmental flows will assist in alleviating any concerns the community may have.

Our community has seen a significant reduction in water availability for irrigation purposes, with the savings being provided to enhance environmental flows in our rivers. If the high volumes transferred can't be reduced or managed more appropriately and we continue to experience similar circumstances to those of the last few years that continue to create environmental problems for the lower Goulburn, Council is worried that the community will lose faith in environmental flows.

Council understands that there are delivery constraints associated with flows in the lower Goulburn River and these need to be addressed to ensure that environmental damage is decreased and environmental benefits are augmented.

To ensure this occurs it is believed that resources need to be provided to overcome the constraints and to improve the environmental ecology of the lower Goulburn River. There is also a need for a rigorous monitoring regime that regularly reports to the community on the success of environmental flows and the impacts of these high flows under the inter valley transfers.

In summary, the community of the Goulburn Valley identifies with the aesthetic values of the lower Goulburn River as well as the recreational pursuits that the River and its environs provide. The Goulburn River is a heritage river and therefore deserves to have its natural assets protected. The Greater Shepparton City Council supports changing the existing Goulburn to Murray trade arrangements to protect the Goulburn River from long-term environmental damage.