

Re: Submission for managing trade between the Goulburn system and Lower Broken Creek.

This submission is written on behalf of CW & WJ Bourke

It is clear that this is not consultation. COVID 19 is used as an excuse to rush through change, without proper consultation. The three proposed options do not benefit irrigators on Broken Creek, and will irreparably damage the environment of Broken Creek.

1. Figure 1 is misleading; there are more outfalls on the Murray (6) and Goulburn sides (3).
2. There is no evidence of consideration of potential environmental damage to Broken Creek, just the Goulburn River., in the options paper presented.
3. DEWLP and the GBCMA propose monitoring with changed flows as a result of IVT's. Major damage was done last summer with the IVT's, causing bank undercutting and trees falling in. Consideration should also be given to past efforts that indicate significant bank damage has occurred since the new weirs have been installed. (Broken Creek Management Strategy, SKM, Dr John Porter)
4. Flow at Rices Weir is an important indicator. Maximum flows should not exceed 250 M/day plus flushes at Rices Weir. IVT's could replace environmental flows.
5. IVT's should contribute to the running cost of the Creek and delivery infrastructure, currently local irrigators are subsidising IVT's. IVT's should have 6B delivery share. This has the benefit of IVT's not over committing Broken Creek and full cost recovery
6. Page 9, in principals there is no mention of 'no environmental damage to Broken Creek'.

None of the current three proposals are acceptable.

Broken Creek is a unique irrigation system, and as such requires unique solutions.

Water is supplied to lower Broken Creek by both the Murray zone 6, with 6 outfalls to the creek supplying about 25% of water and the Goulburn 1A, 3 outfalls supplying the remaining 75%, and a number of large and small GMW drains also drain the irrigation area of Broken Creek catchment.

Irrigators in the lower Broken Creek pump their water, yet are classified as gravity customers by GMW.

These rules are framed so that those that wish to trade zone 6B allocation below the choke can, and those farmers that wish to continue to grow food and or fibre are not disadvantaged by overly restrictive trade rules.

Irrigators should be able to trade water into zone 6B from zones 6 and 1A, subject to the following limitations;

- Trade water from zones 1A or 6 to 6B should only trade below the Barmah choke, subject to the Goulburn to Murray trade rules.
- If zone 6B water is traded below the Barmah choke any water traded into that zone 6B account from zones 6 or 1A is subject to the Goulburn to Murray trade rules.
- Trade out of zone 6B to zone 6. No limit
- Trade out of zone 6B to one 1A. Trade available if back trade opportunity exists from 6B.

With all changes to water flows, monitoring is important. Begin baseline modelling immediately, and if there is no measureable detriment to the environment then flows may be incrementally increased as required. Too late if the damage has occurred then try to rehabilitate the creek banks.

Following photos are a small example of damage accrued due to last summer's excessive IVT flows.



