

██████████
Department of Environment, Land, Water and Planning
PO Box 500, East Melbourne Vic 8002
By email: water.markets@delwp.vic.gov.au

CHANGES TO THE GOULBURN TO MURRAY TRADE RULES SUBMISSION

Dear ██████████,

Thank you for the opportunity for Victorian recreational fishers to highlight the environmental damage occurring on our lower Goulburn River (downstream of the Goulburn Weir) through high summer intervalley water trading (IVTs) flows. As the peak body for recreational fishing, VRFish represents the interests of 838,000 Victorian recreational fishers we applaud the Victorian Government for responding to the issue and undertaking the review to the trading rules.

Regrettably, this untenable situation has arisen due to poor water management and unsustainable development outside of Victoria. We are disappointed that Victoria is being disadvantaged for our good water management. Unprecedented levels of IVT being delivered down the lower Goulburn River services water users downstream on the Murray River and in South Australia. Prior to 2017, these water demands would have been largely delivered from the Darling or Murrumbidgee systems. In our view, drought has merely exposed serious forthcoming in the Murray-Darling Basin plan.

The feedback we have heard from recreational fishers is they can no longer accept the lower Goulburn River being used as an irrigation channel to support downstream irrigators. Recreational fishers have expressed their anger that unprecedented levels of IVT is ruining our recreational fishery and damaging our river ecosystem that our favourite native fish rely upon.

RECREATIONAL FISHING IS A \$7.1 BILLION DOLLAR INDUSTRY

Recreational fishing provides enormous economic and social values in Victoria and as a sector we must be appropriately recognised in water management decisions. Recreational fishing in Victoria is worth \$7.1 billion in both direct and indirect economic value with 838,000 people participating. Nearly a third of all inland recreational fishing in Victoria occurs in the Goulburn River catchment according to research we conducted in 2019.

*Let's make fishing
better, for everyone.*

IVTs ARE NEGATIVELY AFFECTING OUR FISHING IN THE LOWER GOULBURN

What we are hearing from fishers is that IVT is ruining their fishing experiences and impacting the future sustainability of our native fishery in the lower Goulburn River. Inappropriate water regimes resulting in high, fast flowing water levels and cold-water impacting are affecting the fishing quality over summer which is our peak fishing period. Businesses that rely upon fishing such as fishing tackle stores through to accommodation providers are being affected when the river is unfishable.

COLD WATER IMPACTS ON NATIVE FISH

The impact to our recreational fishery from IVT through unseasonably high-water flows and cold water plays havoc with the ecological triggers our native fish rely on, significantly impacting growth, survival, recruitment success and catchability.

Under normal summer flow conditions, rising water temperatures stimulate fish to bite as they are in the peak of their growing season. Juvenile fish born over the Spring need calm, warm and productive waters - not a fast flowing, cold river. Research data from the Arthur Rylah Institute backs up our argument suggesting up to 30% of young of year Murray cod are lost during these high IVT flows.

FISH HABITAT BEING WASHED AWAY

For many years, recreational fishers have been advocating the recovery of our inland native fisheries. Over decades, fishers have been working tirelessly with catchment management authorities, environmental water holders and fisheries managers to undo the wrongs of the past, repair our waterways and rebuild our native fish populations. This hard work has created arguably the best inland fishing opportunities in Victoria. Increasing levels of IVT are now putting at risk millions of dollars of river restoration, fish stocking and fish habitat enhancement.

Unsustainable levels of IVT are causing erosion of the lower bank and the loss of littoral vegetation that stabilises the riverbank and provides critical habitat for native fish. These impacts have led to unacceptably high levels of turbidity and higher rates of siltation of critical refuge pools. Recreational fishers are observing and reporting this damage first-hand, and without immediate intervention we believe will have significant ramifications for the health and abundance of our native fish now, and in the long-term.

THE ELEPHANT IN THE ROOM

Recreational fishers accept that the lower Goulburn is recognised as a 'working river' however the current situation has grossly overstepped what is considered acceptable. Although the consultation is specific to trade rules, we need to assert the 'elephant in the room'. In our view, the cause and exacerbation of the problem is large organisations monopolising the water market and further horticultural development in the lower Murray River. This is creating increased demands for water huge distances away from the available water sources which is simply unsustainable. Equally, there has not been the investment into storage infrastructure between the lower Goulburn and South Australia.

DON'T SHIFT THE BUCK TO OTHER WATERWAYS

VRFish is acutely aware that changes to both operating and trade rules have the potential to shift the issue to other waterways. With the lower Broken creek already

running at full capacity when IVT is being delivered, shifting delivery of IVT above seasonal flow recommendations to the Campaspe River is not the answer. The risks associated with needing more water to be pushed through the Barmah choke must also be considered. Changes to the Goulburn-Murray trade rule must not negatively impact other waterways through merely shifting the problem.

OUR PRINCIPLES FOR TRADING ALTERNATIVES

Examining the three possible alternatives, our concerns are the options still appear to have been designed to maximise the trade in water. The trigger for the Goulburn-Murray trade review was due to the environmental damage that has been caused. Therefore, the objective must be to remove the risk of further damage and implement a trade rule that will facilitate repair of the river, regardless of the effect on trade. This includes:

1. Maintaining summer flows below 940ML/day during December to March in the lower Goulburn River (In line with the Goulburn Broken CMA's flow recommendations in its seasonal watering proposal and the Victorian Environmental Water Holders seasonal watering plan). This is essential for our fish and our fishing.
2. Delivering water during naturally higher flow periods outside of summer months, in line with recommended flow regimes.
3. Respecting the nuances in the natural variability of river flow and impacts of rainfall events.
4. Not to be counterproductive to the delivery of water for the environmental that is critical for ecosystem functions.
- 5.

The dynamic and seasonal based rule options appear to shift the delivery of IVT to Spring. This presents a problem for environmental water delivery because large volumes of entitlement are delivered during this period. This water achieves numerous environmental objectives beneficial to native fish in both the lower Goulburn and numerous downstream sites as water is 're-used'. Recreational fishers advocated and fought hard for many years to return the health of our river systems through the delivery of environmental water. If environmental water holders are unable to deliver recommended watering actions in critical periods, the risk of forfeit associated with deliverability constraints will have devastating consequences for not only the lower Goulburn ecosystem, but also many downstream sites.

Delivery of water for the environment achieves a multitude of fish objectives in the lower Goulburn River, such as migration, connectivity, habitat and cues for spawning. After the Spring fresh, follows a recommended period of around 6 weeks of low flows. This enables deposited seed to germinate and transported nutrients and sediments to ignite productivity, supporting juvenile fish and healthy riverbanks. This critical period of low flows is vitally important for our native fish and must be considered in the development of new trade rules.

Delivery constraints within the current system significantly impact the ability of entitlement holders to deliver the water that is needed for critical ecosystem functions. Whilst the lower Goulburn is constrained to a maximum of 9,000 ML/day it will be extremely difficult to achieve the desired environmental outcomes and deliver the

volumes of IVT required. The simple fact that Goulburn-Murray Water are required to notify irrigators to remove their pumps from the river for deliveries above 3000 ML/d is a clear indication to us that the current operating rules are broken, and the environment is playing second fiddle. In our view, lifting delivery constraints to allow higher volumes of water down the lower Goulburn River at times when the system would experience high flows is a high priority if IVT is to be delivered in a sustainable manner.

The 'annual cap' rule of 40 GL or less a month appears to be the most sustainable option and is the least complex of the three alternatives. It appears to provide the protection needed for the lower Goulburn river whilst still allowing sustainable levels of trade to the Murray system.

Our position remains one that sees an end to high summer flows on the lower Goulburn River. The delivery of large volumes of IVT throughout peak fishing periods such as the weeks following the Murray cod opening and the January school holidays is significantly impacting recreational fishers, local businesses and the health of this important fishery.

We recognise this is a complex issue, and in the absence of modelling how these possible alternative trade options will work in a variety of situations, it remains difficult for us to land on a preferred option. We understand this work is currently underway and will be used to inform a Regulatory Impact Statement and further consultation in a few months' time.

Our formal submission has outlined the devastating impact IVT water is having on the quality of recreational fishing, our native fish populations, fish habitats and the health of the lower Goulburn River. Reforms and change to IVT rules are urgent and essential.

Yours sincerely,

Rob Loats
Chair
Victorian Recreational Fishing Peak Body

1 June 2020