



The Goulburn Valley Environment Group Inc.

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Goulburn to Murray Trade Review

GVEG supports the actions taken by Victoria over the past 2 years in limiting summer IVT flows and paving the way for the current review process.

We have participated in this review and other studies of the Goulburn River over many years and highlighted the threat of IVT flows on river health over 10 years ago.

We are disappointed that new irrigation development and water trading downstream has been encouraged by all Basin Governments despite hostile climate predictions, poor water efficiency and delivery losses and escalating environmental damage (third party impacts) to upstream rivers.

We believe that this downstream development is not sustainable given climate change and reducing water resources predictions. Sacrificing the health of our Goulburn River for short term benefit of these developments makes no sense at all.

Comments on Review recommendations.

GVEG cannot support in any form Option 2 as recommended by the review for the following reasons:

1. **Base flows of 1,100ML per day will flood the Lower Goulburn's sandbars** almost entirely for the total summer autumn period. This has the potential to impact gains made over past years use of environmental flows and improved vegetation growth in the river channel. Our communities will also be deprived of traditional social access.
2. **The inclusion of three 3,000ML pulses over the summer autumn period** will also impact regenerated vegetation and lead to bank erosion by not allowing sufficient time for essential bank drying over this period of the year.
3. **The proposed infrastructure project to facilitate the delivery of three 6,000ML pulses** is far above any past experienced delivery flows in the lower Goulburn River. We do not believe these flows have been fully assessed by the scientific panel, nor subjected to a thorough risk assessment process.
4. **There is no provision for, or funding of ongoing monitoring, scientific assessment and risk management** in the recommendations. All are critical requirements to safeguard against further environmental damage.
5. **Unnecessarily proscriptive operating rules** impact the ability of the GB CMA, GMW, MDBA, Environmental Water Holders, and our community to co-operate in the efficient

delivery of irrigation demands and environmental outcomes both in the Lower Goulburn and downstream. **More flexibility** must be included into the rules to avoid severely limiting into the future, benefits achieved by closely working relationships between these organisations and our community.

GVEG supports option 1 with the following comments and qualifications:

Option 1 is a comprised option tailored to meet both environmental safeguards and continue downstream deliveries in all but exceptional years.

GVEG supports variable flows of up to 940ML per day as this gives, not certainty, but the best chance of options considered for improved river health and allows for some sandbar exposure.

GVEG supports a two-part water allocation trade rule and the restriction of tagged water use in line with this rule.

GVEG cannot support three 3,000ML flushes included in the option 1 proposal, as stated above these will heavily impact regenerated vegetation and lead to bank erosion by not allowing sufficient time for essential bank drying over this period of the year. **We suggest these historically high flushes be reduced to one or two**, again to increase the chances of improved river health.

A Scientific / community advisory group should be implemented to review the implementation of agreed Trade and Operating rules. This group is required not only scientific motoring and review but to also capture community knowledge and co-operation.

Budgetary resources must be provided to assure essential monitoring, reviewing and adaption of the new Trade and Operating rules.

Note

Complimentary infrastructure works, constraints management, on the Goulburn River should be prioritised. This is a requirement of the Basin Plan for the efficient use of environment water and connecting the river to its floodplain.

The removal of constraints would also increase the ability to deliver both environmental and IVT obligations over the winter-spring period. These obligations are already restricted at times due to channel capacity.

Constraint management and the use of funds for these works should not be used solely to increase summer/autumn flows through the Lower Goulburn.

GVEG supports option 1 with qualifications, however believes Trade and Operating Rules should, over time, be amended to further reduce, summer / autumn flows to reflect more natural conditions in the Lower Goulburn River.

Yours sincerely,

A rectangular image showing a handwritten signature in black ink on a light-colored background. The signature is cursive and appears to read 'John Pettigrew'.

John Pettigrew GVEG President

Protecting the environment for generations to come