

10 May 2021



Managing trade between the Goulburn and the Lower Broken Creek
Department Environment, Land, Water and Planning

Dear Sir/ Madam,

Re: Managing trade between the Goulburn River and the Lower Broken Creek

Thank you for the opportunity to comment on the consultation paper and Fact Sheet 3 regarding the management of trade between the Goulburn River and Lower Broken Creek. We value the effort to address the environmental and cultural damage that has occurred in the Lower Goulburn due to the high volumes of water trade between the Goulburn and the Murray systems in recent years and that this has consequences for the Lower Broken Creek system. Making this submission is consistent with Moira Shire Councils Vision of "working together to be a vibrant and prosperous rural community".

Council appreciates that due consideration is being given to the Lower Broken Creek system given its unique situation. Council is also supportive of the intent to not unnecessarily restrict delivery to or water trade for the Lower Broken which would occur if the same rules as the proposed Goulburn – Murray Trade rules were applied. Council is also supportive of the intent to avoid using the Lower Broken as a bypass of the Barmah Choke.

In Councils submission to the Water Market Transparency Options paper (8 November 2019) a number of our priorities were:

1. "water trading rules that will limit manipulation of the water market buy investors not directly involved in irrigation";
2. "the market operates in a way that does not discriminate between small and large users (including corporates) in terms of their ability to understand, navigate and use the system"; and
3. "the water market operating in a way that supports a diversity of farming operations including family farming operations so as to ensure our local communities survive and thrive".

As a tagged use entitlement holder the Moira Shire has a direct interest in the outcome of these proposed trade rule changes. The preferred option presented (Option C) does not have any significant operational disadvantages for our water use in that part of the Shire. However, in understanding our community and having listened to the other tagged use entitlement holders we have the following observations and concerns:

- the issues associated with Lower Broken Creek trade review are much more complex than the Goulburn system review;
- no risk assessment has been conducted on the health of the Lower Broken Creek based on the proposed trade rule changes;
- we have concerns about further restrictions to trade opportunities from remaining IVT avenues; and
- the window of opportunity proposed to enable irrigators to buy water from Goulburn system (1A) and trade to Broken (6B) until the end of October is considered too restrictive and complex for farmers to be able to work with

In light of these concerns we would prefer the do nothing option (BAU) until a lot more research and in particular a risk assessment be conducted to understand the effects of any trade rule changes on the Lower Broken system in the same way that occurred on the Lower Goulburn. This should include DELWP consulting further with the small number of tagged use irrigators along the Lower Broken Creek to ensure that every potential option is reviewed to achieve the best outcome for both irrigators and the environment. The implications of making a long-term decision now, before enough information has been collected may prove to be detrimental from both a financial, social and environmental perspective for the local Moira community.

Kind regards



Sally Rice
General Manager Community

