



The Goulburn Valley Environment Group Inc.

17/4/2020

Goulburn to Murray trade rule review

The Goulburn Valley Environment Group (GVEG) would like to take this opportunity to comment on the Goulburn-Murray Trade Rules review.

The Goulburn River has been adversely impacted by increased delivery of irrigation entitlements to downstream development. These impacts have become obvious over a number of years, are a predictable consequence of the operation of the water market, and run entirely counter to clear State and Federal undertakings of “no third party impacts” in all aspects of water reform over the past decades.

Sensibly the Barmah National Park was protected by the creation of maximum flow limits and clear trade rules are in place for the Barmah Choke. However these restrictions have pushed the ever-growing environmental damage onto other streams, in particular undermining of the long-term health of the lower Goulburn River.

GVEG welcomes the three key actions announced by the Minister for Water to reduce the risk to the lower Goulburn River and to get future market settings right for Goulburn to Murray trade.

The interim operational regime to achieve variable summer and early autumn flows in the lower Goulburn River has lessened some of the most extreme damage, but can only be seen as a stop gap measure till trading rules and seasonal flow limits can be implemented. We look forward to an analysis of how effective this regime has been.

Bringing all trade under the same rules so that use from a tagged account is subject to the same 200 GL IVT limit as allocation trades is also welcomed¹. This loophole had been constantly exploited by water users and traders for many years at the Goulburn’s expense

GVEG, although more concerned with the implementation of realistic summer flow limits to protect the Goulburn River, understands the need to have in place, at the same time, sensible trade rules that maximize entitlement deliveries to downstream users.

GVEG, as stated above, has a keen interest in the development of operational rules limiting the volume of water that can be sustainably delivered through the lower Goulburn River in summer and early autumn. This limit is absolutely critical to protecting the health of the river. We understand DELWP is working with waterway managers and technical experts to develop limits that respect environmental thresholds and will reduce the volume of water which can be delivered over summer and autumn. GVEG is concerned this process is being conducted behind closed doors without any community input and risks protecting the rights of entitlement holders over the environment..

GVEG believes option 3 best allows for both the protection of environmental aspects of the Goulburn River and maximises opportunities to downstream water users. This provides for a clearly defined resource cap or limit to flows and is a foundation for the setting of seasonal flow limits taking into account both the “no third party impacts” and the “no unreasonable barriers to trade” requirements of State and Basin Plan water trading rules.

As to whether any changes to option could be considered we believe this difficult to assess without a holistic approach to all compounding issues faced by the Goulburn River and those who depend on it. For instance we know there is competition for channel capacity between irrigators, the CEWH and MDBA in meeting delivery obligations. We also know that environmental water cannot be delivered to the floodplain due to constraints. However the possible benefits to both downstream users and the environment of managing constraints to increase channel capacity is currently unknown. All options including constraints management should be on the table and assessed as possible solutions to the current problem of environmental damage to the Goulburn

GVEG as general rule believes beneficiaries should bear the cost of the service (fee for service) and points out that under current rules and regulations no cost to downstream users has been assigned to environmental damage or delivery losses which impact all holders of entitlements including the environment.

GVEG remains available for further consultation or comment

Yours sincerely,

John Pettigrew GVEG President

Protecting the environment for generations to come



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Review process comments.

The Goulburn Valley Environment Group (GVEG) has been involved in many studies and reviews of flows in the Goulburn River and welcomes the current review of trade rules being undertaken. However concerns have arisen during consultation that other decisions critical to the ongoing health of the river and the services it provides to the social and economic fabric of local communities, are not being fully considered..

GVEG has submitted an early submission to this **Goulburn to Murray trade rule review** but feels compelled to elaborate on issues that we believe should be holistically considered with the trade rule decision.

In our submission we called for “realistic summer flows to protect the River” which we now clearly indicate in volumes. **GVEG believes a summer flow rate limit for the Lower Goulburn River should not exceed 30,000 ML per month.**

GVEG also believes that to achieve both deliveries for downstream irrigation and the enhancement of the riverine environment, **current flow constraints urgently need to be removed.** The Basin Plan provides both the mechanism and the financial support for **Constraint Management.**

Yours sincerely,

John Pettigrew GVEG President

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