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Goulburn to Murray Trade Rule Review  
Department of Environment, Land, Water and Planning  
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East Melbourne  
Victoria 8002  
Emailed to: water.markets@delwp.vic.gov.au

**Response regarding proposed changes to the Goulburn Valley Inter Valley Trade Arrangements**

Friday, May 8 2020

I write on behalf of the Riverland Horticulture Working Group (RHWG) in South Australia. This group consists of irrigators of Winegrapes, Almonds, Summerfruits, Avocados and two major irrigation Trusts: Central Irrigation Trust and Renmark Irrigation Trust.

Members of the RHWG have expressed serious concerns about the proposed changes to the Goulburn Valley Intervalley Trade Arrangements and the implications of these changes for the irrigator communities downstream from the Goulburn in Victoria, New South Wales and South Australia

Members note that both the Victorian and New South Wales governments have authorised Inter Valley Trades (IVT) from the Murrumbidgee and the Goulburn to exceed their limits in recent years. In particular the Goulburn Valley has consistently exceeded its limit each year since 2014/15 with the exception of the 2016/17 water year.

The apparent consequence of this has been the unconstrained developments downstream of the Murrumbidgee and the Goulburn Rivers. These developments now demand more consumptive water than has previously been the case despite the evidence of the past several decades, that the Murray Darling Basin has been overallocated.

The imposition of trade restrictions from these valleys, relative to prior custom and practice as outlined in the consultation paper, will have serious, negative impacts on irrigator communities downstream of those valleys; irrigators who have been farming in the Basin for many decades before these recent more developments.

As indicated, these proposed changes will not merely threaten Victorian communities but also their fellow irrigators in New South Wales and those of us here in South Australia.

We urge the Victorian Government to acknowledge and rectify the problems created, through effectively approving and encouraging the recent developments. Our members ask that that the Goulburn IVT not be constrained as proposed, thereby providing water for those developments or alternatively that the government utilises and increases engineering programs to bypass the Goulburn.

Yours faithfully

Chris Byrne, Acting Chair  
Riverland Horticulture Water Group

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