

## RE: Submission for Goulburn to Murray Trade Rule Review

This Submission is sent on behalf of: *Neville Holland*

After Reviewing the proposed changes to Goulburn to Murray Trade Rules we have the following views:

**1/ This is a severe Restriction of Water Trade for Zone 6B Customers.**

Customers along the Lower Broken Creek will be subject to the following limitations to Trade water in for use:

-Zone 6 into 6B – Subject to Barmah Choke Rule and virtually never allowed.

-Zone 1A into 6B – Subject to IVT open. Highly competitive and rarely open. Farmers will be unable to compete with water Brokers and Large Investment companies to access IVT trade.

-Zone 7 into 6B – Subject to Back trade Opportunity and usually at a higher cost to 1A and 6 water. Access to this water would see farms along the Broken Creek unviable in their local markets, as their water costs would be representative of the Zone 7 area.

-Zone 6B into 6B – This is a very small pool of water available for trade.

-Tagged 1A/6B accounts not subject to IVT Rules, only provide for Irrigation Use from 15 August, when our Irrigation season starts, to 15 October.

**2/ 6B Customers are paying Delivery Share but do not have guaranteed access to water.**

Copied from the Victoria Water Register “A **delivery share** is an **entitlement** to have water **delivered** to land in an irrigation area.”

This is an entitlement GMW Customers pay for, it gives them the right to Irrigate for the entire Irrigation Season and is not constrained by where you source the water from, or type of Allocation, whether Permanent or Temporary. Proposed new Trade Rules would see customers unable to access their water allocation FOR THE ENTIRE Irrigation System. We believe this would be a breach of our Delivery Share Entitlement.

**3/ Limited Access to Trade Water is a De- Valuation of Land Values.**

**4/ MDBA uses GMW Channel Infrastructure to deliver water Downstream in the Murray but pay NO costs.**

GMW Customers paying Delivery Share fees are the ones paying the cost to deliver water downstream, however 6B Customers are being limited access to this water themselves.

**5/ Consultation with Lower Broken Creek Customers has been extremely poor.**

Many Customers have little or no knowledge of the proposed changes. They have not been given the chance to consider the full effects to them and their businesses.

**6/ The volumes of water along the Broken Creek are a very small part of the entire scheme for the Murray System**

Our understanding is that GMW has been able to meet all irrigation requirements for use along the Broken Creek, both 6B Allocation and tagged allocation use, plus meet all other supply demands. We therefore can see no reason to change the current trading rules for the Lower Broken Creek in any way.

**THEREFORE**

**WE BELIEVE THAT THE CURRENT INTERIM RULES (STATUS QUO) FOR LOWER BROKEN CREEK SHOULD CONTINUE UNCHANGED.**

**HISTORICALLY THIS HAS ALWAYS BEEN THE CASE AND WE SEE NO NEED FOR THIS TO CHANGE.**

Yours Sincerely

A handwritten signature in black ink, appearing to read "Neville Holland". The signature is written in a cursive, flowing style.