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29 May 2020

Retail Entitlements and Markets
Department of Environment, Land, Water and Planning
PO Box 500
East Melbourne, Vic 3002

SUBJECT: Goulburn to Murray trade rule review

Please accept this submission from the Victorian Environmental Water Holder (VEWH) to the *Goulburn to Murray trade rule review: consultation paper*.

The VEWH supports the protection of the environmental values of the lower Goulburn River via the trade rule review and implementation of an operational rule. Unseasonal high flows in summer and autumn due to the delivery of inter-valley transfers (IVTs) cause significant damage to vegetation and bank condition of the lower Goulburn River, undermining some environmental outcomes of winter-spring environmental water deliveries.

Key points include:

- The VEWH supports the implementation of environmentally-sustainable flow limits in summer-autumn that protect the environment, as well as the social and economic benefits that a healthy lower Goulburn River provides the local community.
- The operational rule should prioritise the recovery of lower bank vegetation to stabilise the banks of the river in the short to medium term and be based on the advice of the Goulburn Broken Catchment Management Authority.
- A shift in timing to earlier delivery of IVTs (i.e. IVT delivery in spring) is more likely to coincide with the delivery of held environmental water in the lower Goulburn (which is critical for local and downstream environmental outcomes). Further analysis of any such shift is required to understand the trade-offs in environmental impacts and benefits across the connected Goulburn-Murray system.
- An updated Goulburn to Murray trade rule and operating rule may shift the risk of environmental harm from high summer-autumn operational deliveries in the Goulburn River to other waterways such as the Campaspe, Loddon, lower Broken Creek and Murray (Barmah choke). Further analysis is required to understand the whole-of-system benefits and impacts of the proposed trade and operational rules.
- Clarifying delivery rights in the river channel, as well as greater flexibility in in-channel flow rates in the lower Goulburn River, will also help optimise outcomes for the environment and entitlement holders.

Given the relatively complex nature of the trade rule options combined with the importance of limits set through the operational rule, we would like to see the Regulatory Impact Statement assess all proposed options. Without the detail of the operational rule, it is not

possible to sufficiently assess the impact of the trade rule options on the environmental health of the lower Goulburn River or the delivery of environmental water entitlements in the Goulburn system.

Please contact the VEWH Office on 03 9637 8951 or at general.enquiries@vewh.vic.gov.au should you like to discuss this submission.

Yours sincerely

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Victorian Environmental Water Holder