

Ref: F13/896



28 April 2021

Goulburn to Murray Trade review
Department Environment, Land, Water and Planning
<https://engage.vic.gov.au/goulburn-murray-trade-rule-review>

Dear Sir/ Madam,

Re: Goulburn to Murray Trade review Regulatory Impact Statement

Thank you for the opportunity to comment on the Regulatory Impact Statement for the Goulburn to Murray Trade review. We appreciate this effort to address the environmental and cultural damage that has occurred in the Lower Goulburn that have been created through high volumes of water trade between the Goulburn and the Murray systems in recent years. Making this submission is consistent with Moira Shire Councils Vision of “working together to be a vibrant and prosperous rural community”.

Introduction

- Council acknowledges that current inter-valley trade (IVT) rules have contributed to significant environmental damage to the Lower Goulburn River.
- Council wishes to see existing trade and operating rules be updated in a manner that provides improved environmental outcomes for the Lower Goulburn, without significantly impacting irrigators access to water.

‘Dynamic rule’ option

- Council endorses Option 2 and the subsequent ‘Dynamic trade rule’ as the preferred choice, as outlined in the Regulatory Impact Statement (RIS) document.
- This option has been informed by extensive scientific research and more closely aligns with the natural flow variability within the river throughout the year.
- The recommendations outlined in Option 2 achieve long-term environmental recovery of the Lower Goulburn and ensure a low risk of further environmental damage.
- This trade opportunity significantly benefits irrigators, protects Aboriginal cultural sites and prevents further environmental damage to the Lower Goulburn river.

Future ‘dynamic rule’ option (6,000ML/day)

- Council endorses the supplementary infrastructure option of moving in-channel pumps to the top of the banks, to strategically enable high flow pulses.
- This infrastructure option requires a large amount of preliminary community consultation and it would be expected that the irrigation users of the pumping infrastructure would not cover the costs of moving these pumps due to this alteration being required to achieve operational outcomes beyond individual farms.
- Moving the in-stream pumps would subsequently benefit irrigators within the broad systems by increasing IVT options, due to the physical increase in strategic pulse flow volumes.
- Council recognises the extensive amount of community consultation that has occurred during this review process and is grateful for the opportunity to make a submission.

Lower Broken

- The Lower Broken Creek is known as an alternative avenue for bypassing the Barmah Choke to deliver additional flows to the Lower Murray.
- Council wishes to ensure that long-term management considerations are also conducted on the Lower Broken Creek, so that environmental issues are not shifted to this system.

Regards,



Sally Rice
General Manager Community

