

GOULBURN TO MURRAY TRADE RULES.

Goulburn Valley Association of Angling Clubs (GVAAC) wish to provide the following submission with regard to the review of the Goulburn to Murray River water trade rules.

The increase demand for irrigation entitlements from downstream development over the past twenty years has had a major impact on the Goulburn River. The high summer flows that have come as a result of high IVT demand has had a negative influence on native fish species. The delivery of very cold irrigation water at a time (Spring/Summer) when iconic fish species like the Murry Cod are in breeding mode has had a detrimental effect on their spawning and natural recruitment. The high summer flows are destroying the ecosystem and have stripped the banks of vegetation and caused silting and erosion. These high summer flows have made it impossible for anglers to access the river in many areas along the Goulburn due to it flowing at minor flood level for months on end.

Last year the VIC. Environmental Water Holder sent 100GL (approx. \$60 million) down the Goulburn River during the winter months to provide a fresh flush to assist the native fish at a time of low water level and to also assist with the distribution of seeds along the bank during a time when many wattles flowered along the Goulburn River and its tributaries. The entire initiative of the later was destroyed by the IVT with high flows over the summer period. How can such an expensive initiative be justified during a time when water is such a rare commodity and an IVT will simply undermine the entire process? It just goes to show that the IVT needs to be delivered during the winter/spring months as only then will it provide benefits to the Goulburn River and the irrigators downstream with on-farm water storage facilities.

Our preferred option for the Goulburn River would be that no IVT water was to be delivered down the Goulburn over the summer months.

Of the rules proposed the Dynamic Rule seems to be the best fit for reaching the desired outcome of limiting flows while maximising trade and reducing risk to Murray Entitlement Holders.

However of concern is that in Attachment 2 the recommended Summer/Autumn flow is 940ML/day for optimal environmental results and the proposed option have Summer/Autumn limits of 50GL/month or 40GL/month.

The 940ML/day equates to 26GL/month for a 28 day month and 29GL/month for a 31 day month, which totals 141.9GL over December to April. This is roughly the Legacy Commitments, which does not allow for much market IVT if the account is fully allocated and not drawn down during winter/spring.

Therefore the amount of water that can be traded through the Lower Goulburn is dependent on the amount of Legacy Commitments used and what can be fed through the Lower Campaspe and Lower Broken Creek Systems.

Tagged trading in winter/spring in addition to the Dynamic rule may be a way to increase Trade while protecting the environment.

It may be an idea for downstream users to have storages on site so that they can capture their water in the Winter/Spring trade period when higher flows are acceptable. Additionally creating a channel system that does not require set environmental flows to deliver water from the Goulburn to the Murray system would allow for greater Trade over the high water demand period.

The different rules and limits should be run through hydraulic simulations to see the impact on the environment and determine if the rules will achieve the desired outcomes.

The Goulburn Broken Catchment Management Authority project below uses a hydraulic model which could be useful for testing out the different trading rules impacts.

https://www.gbcma.vic.gov.au/downloads/Constraints/Goulburn_Constraints_Business_Case_-_Environmental_Flow_Inundation_Modelling_and_Mapping_January_2016_.pdf

Also the below paper may be a good guide for maximum Winter/Spring flows.

https://www.gbcma.vic.gov.au/downloads/Constraints/2010-04_Goulburn_River_Environmental_Flows_Hydraulics_Study_-_Executive_Summary_-_Environmental_Flows_Scenarios.pdf

Yours Sincerely,

Noel O'Connor

GVAAC Secretary.