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Mr. Edward Meggitt
(Director Goulburn River Trout Pty Ltd)

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THE SENATE SELECT COMMITTEE
ON THE MURRAY DARLING BASIN PLAN.
Email: murraydarling.sen@aph.gov.au

Dear Committee members,

Re: SUBMISSION TO THE SENATE INQUIRY ON MURRAY DARLING BASIN PLAN & CONSTRAINTS MANAGEMENT STRATEGY

Thank you to the Senators who have instigated this inquiry to the Murray Darling Basin Plan (MDBP). The MDBP is having a most corrosive effect on the communities along the rivers of the Murray Darling Basin. The primacy of the perceived environmental benefit over the economic and social wellbeing of the communities of the basin is misguided, unjust and inequitable.

This submission will confine itself to the impact of the proposed Constraints Management Strategy (Goulburn River Reach Report) and its impact on Goulburn River Trout Pty. Ltd.

THE MDBA PROPOSAL

In brief, the MDBA constraints management strategy is looking at 3 alternative flow releases from Lake Eildon, to piggy-back off high tributary flows to flood the plains of the lower Goulburn and Murray. The releases being examined are 12 000 mega-litres per day (ML/day), 15 000 ML/day and 20 000 ML/day. (The Goulburn River channel capacity at Molesworth is about 10 000ML/day.) Therefore all three scenarios will see varying spill out of the channel onto private property.

To facilitate the increased flow of water, the MDBA is proposing “constraint measures” such as the compulsory creation of easements over freehold title, to allow flood inundation on private property, as well as physical works (such as raising bridges etc.).

This proposal will have negative impacts upon our business, Goulburn River Trout Pty Ltd.

GOULBURN RIVER TROUT - A SNAPSHOT

Goulburn River Trout has been in operation since the mid-1970s, and has developed its operations on the flood plain below Eildon, in the knowledge that the dam provides significant advantage in the form

of flow control (especially in summer) and flood protection. Indeed, without Eildon Dam our business would not exist. Rather, due to the advantage Eildon confers to our business, we have become the largest trout supplier in the country.

Goulburn River Trout employs about 25 people, making it a significant employer in the Alexandra region. We breed, grow and process about 1,000 tonnes of rainbow trout annually. This is a delicious, healthy product of great benefit to our community. We supply all the major centres of Australia and export to SE Asia. Standing stock on the farms at present is about 400 tonnes of trout, worth \$3 million to \$4 million.



THE IMPACT

At the mid Goulburn reach advisory meetings (of which we have been a part), Goulburn River Trout had a good opportunity to put our position in respect of the impact of various flows down the river. It became apparent, as these meetings took place, that the general feeling amongst the advisory group was that a flow of 12,000ML/day (Eildon gauge) was the maximum flow rate that communities along the river could tolerate.

Goulburn Murray Water (GMW) was clear in its position that the maximum release from Eildon, that it would consider, is 9,500ML due to the fact that releases above this level cause flooding on private property around Molesworth. GMW was concerned about its legal liability in respect of planned (non-flood) releases above 9,500ML/day.

However, despite these views being expressed by the community of affected land holders and the water manager (GMW), the MDBA has not removed 15,000ML/day or 20,000 ML/day as options. In the mid Goulburn advisory group meetings, it was made clear to the MDBC that these flow rates, would cause too much inconvenience, stress and general hardship for land holders along our stretch of the river.

Specifically, in the case of our business (Goulburn River Trout), a release from Eildon of 20,000ML per day, which could easily translate to a flow of 25,000ML to 30,000ML at the farm (given the contribution of tributaries), could lead to disastrous flooding and significant stock loss. At a flow of 15,000 to 20,000ML/day, we have to go to an emergency footing on the farm (known as Walnut Island), whereby

flood gates are lowered and pumps are activated to discharge water from the farm, over a levee bank. This whole process has significant operational risk, and is certainly not a scenario we like to visit too frequently.

In essence, the MDBA proposal is significantly increasing the risk profile of our business. To mitigate this risk will involve the expenditure of \$300 000 to \$400 000 on an improved standby pumping station. Obviously, in the case of a trout farm, the creation of a “constraint easement” is not a viable option as flooding for any period will see the loss of stock. For Goulburn River Trout, the equation we are being presented with has a binary outcome: 1, we survive the flood or 0, we become flood inundated and lose all our stock.

GENERAL COMMENT ON RISK

At present, GMW’s response (during “normal” operation) to anticipated rain, and increased tributary flow below Eildon, is to cut back the release from the dam to mitigate flooding. The proposed change to this condition, whereby the Eildon release is increased to “piggy-back” high flows down the tributaries is fraught with risk. Constraint management is based upon planned outcomes, however, where does the responsibility lie for unplanned outcomes and unintended consequences? If an expected weather event is misread, and more water comes down the tributaries than projected, much more significant flooding may occur. Landholders need to know where the liability lies in such an event. Will the commonwealth be underwriting the man-made contribution to the flood or are specific authorities (MDBA, GMW or CMA) going to be held liable? In our area, landholders are paying particular attention to the class action that alleges that the negligent operation of the Wivenhoe and Somerset dams in the lead up to and during the 2011 floods in Brisbane.

It is unacceptable to landholders that this increased risk be transferred to us. The environmental flows being proposed are for environmental and broader community benefit, therefore the risks and costs must be worn by these beneficiaries.

It is really concerning that there is no risk redundancy factored into the constraints strategy. At Goulburn River Trout, we feel this confidence in generating a flood of a specific order is misplaced. Having our operations on the river for more than 40 years, we can recall many rain events that were incorrectly forecast by BOM, leading to significantly greater tributary flows than predicted.

All planned flooding models should have some degree of risk redundancy built into the planning; and the margins of error should widen, the further down the Goulburn we travel. At Molesworth, I would suggest at least 20% is an appropriate figure. Therefore a desired flood of 15 000ML should see planning to create a flood of 12 000 ML/day, allowing 3000 ML/day contingency.

SPECIFIC REQUEST IN RELATION TO FLOWS

At Goulburn River Trout, we would like to see the advice of the mid Goulburn advisory committee properly reflected. **Specifically, the advice provided by GMW that 9,500ML/day was the maximum allowable release from Eildon (normal operations) on the basis that any greater release caused flooding around Molesworth, should be set as the maximum for environmental flows under the MDBA constraints process.**

To take account of tributary flows, the second hurdle that should be met is that the **Eildon release should be regulated to a maximum flow of 15,000 MI/day at the Molesworth gauge.** (If the tributaries (above Molesworth) are contributing 15,000MI/day then the release from Eildon should be at the minimum release of 130ML/day.) This requires more and better gauging of the tributaries and very dynamic control at Eildon.

CLOSING COMMENT

We would like to thank the Senate Committee for taking our submission into consideration. We would ask that the Senate Enquiry bring the MDBA Constraints Management Plan around to more appropriately reflect on the social and economic impacts of the proposal. Goulburn River Trout, like many other land owners on our reach of the river, feel we are at risk of becoming collateral damage in a process driven by the ideological pursuit of perceived environmental gain. To flood farms and people is not an acceptable price for periodic watering of trees and billabongs, which to most of us, seem in pretty good shape.

Yours Sincerely.

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