

Our Ref:WM/14/013

Project Manager –VRHS
Catchment and Water Division
Dept Natural Resources and Environment
PO Box 500
East Melbourne Vic. 3002

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Attention Project Manager –VRHS

Draft Victorian River Health Strategy

This submission has been prepared by the Waterway Implementation Committee (WIC) of the Glenelg Hopkins CMA. WIC provides strategic direction and oversees the implementation of the Waterways Program of the CMA and represents community and agencies in waterway management decisions in the south west of Victoria.

Consultation Process

The process for the understanding and development of the submission was as follows:

- Glenelg Hopkins CMA's Waterways Manager provided two presentations to the Waterways Implementation Committee, relating to the principles and implementation planks based on earlier drafts of the document as an introduction to the document.
- Dr Jane Doolan presented the document at our Waterways Implementation Committee meeting on March 5, 2002.
- Waterways Manager presented the document's themes to the Board at its meeting on February 20, 2002
- Waterways Manager presented the document to the Land and Biodiversity Implementation Committee at its meeting on March 6, 2002.
- All IC and Board members were requested to submit their comments to Waterways Manger for compilation
- A sub-committee comprising of four Waterway Implementation Committee members meet to compile all CMA comments. The outcome of this meeting was this submission.

General Comments

First, I would like to commend the author and the working group that prepared the document. The document is clear, informative and easy to read. Most importantly, the document provides Victorian water resource managers a clear direction of State policy and principles and allows the important flexibility that the regions need to adapt to their needs and aspirations.

The Glenelg Hopkins CMA is currently preparing their Regional River Health Strategy (RRHS) and therefore testing the approach and principles contained in the VHRS. The development of our RRHS would have been an extremely difficult task if it was not for the direction and principles provided in the VHRS. The VHRS has provided concise guidelines to the principles of prioritising at a regional scale.

As a priority NAP region, the VHRS has also provided principles for asset identification and collation and credible prioritisation processes. This provides us added confidence that our RRHS shall be accredited through the RCS for Federal funding as well as State Government endorsement.

WIC believes that the management approach for reaching the Vision will in time be widely accepted within the region. Risk based approach and achieving the greatest value for investment are common decision making tools for any business including the agricultural industry. Acceptance of the regional priority setting processes on this basis should be wide spread.

Specific Comments

4. Vision for Victoria's Rivers

4.1 & 4.2 Glenelg Hopkins CMA agrees with the 'Vision' (pg 40) and the approach in 'Implementing the Vision' (pg 41) as outlined in this Section. The CMA genuinely believes that the Glenelg Hopkins community shall be supportive of and responsive to the proposed management approach.

4.2.2 (pg 41) Agree with the principles, however the following points need to be considered and this section expanded.

- Recognition that if the region is to achieve best value for investment, a holistic catchment approach is likely to have greater outcomes than a specific river approach that the Victorian River Health Strategy sets the framework for. Cases are likely to arise in which even though river restoration in a sub-catchment may not be the high priority, other restoration works to enhance biodiversity or to combat salinity for example may be occurring in the area and investment into river health at the same time is likely to result in greater multiple benefits for the investment.
- Recognition that there is value in undertaking works in low priority areas as a means of raising awareness and changing attitudes in the community. The benefit of these activities as a community engagement tool is difficult to quantify, however they are considered as essential activities in our region, to expose and reinforce within the community the benefits of best practice in river frontage management in order to encourage the adoption of best management practice for themselves. There is also great value in promoting the work of the CMA in all regions not just priority regions and to maintain community expectations (at an appropriate level), that have risen over the past four years.

4.3 Statewide Targets (pg 42) – It is recommended that these are interim Statewide targets and that they are reviewed upon the completion of the Regional River Health Strategies throughout the State to ensure consistency with the regional targets.

4.4 Principles for Implementing The Vision (pg43) – Similar to our comments regarding 4.2.2. – further emphasis and recognition for setting priorities and investment decisions in an integrated catchment framework is recommended. Glenelg Hopkins CMA proposes, that upon completion of the regional issue based plans, detailed integrated catchment plans shall be undertaken for many sub-catchments. This scale of planning may review integrated river health priorities based on multiple benefits for integrated catchment priorities.

5. The Integrated Management Framework

5.1 (pg 46)

Agree that Heritage Rivers are special reaches and that their values should be protected.

In reference to the Mitchell and Ovens River systems, there is not enough information provided to ascertain why these two river systems are put on a higher pedestal than the other Heritage Rivers. Therefore, based on the information provided in the Draft Strategy it is difficult to support the promotion of these two systems as having special values above the other Heritage Rivers and it is recommend that it be deleted from the document.

For comprehensiveness it is recommended that a 'Box' is added stating 'the protection of Heritage Rivers and Natural Catchment Areas as listed under the Heritage River Act 1992 as high valued rivers is a Statewide priority' or words to that effect.

5.1.2 Representative Rivers (pg47)

It is unclear or there are conflicting messages from our understanding of the importance and priority of representative rivers. I refer to the last sentence on pg 48 that reads '*Where these reaches selected do not currently meet the definition of ecologically healthy, they will be considered a priority for restoration and will be incorporated as priorities into regional planning processes.*' This sentence implies that these reaches will be a priority in Regional River Health Strategies regardless of other priorities within the region. However, conversations with those involved in writing the document indicates that representative reach status is only one value in the many values that need to be considered in the regional planning process and therefore they will not necessarily be automatically a priority for the region. This latter approach is that which the Glenelg Hopkins CMA supports.

Table 5.1 Interim River Regions and Suggested Representative River – recommend adding the word 'reaches' onto the end of this title.

RR10 – not enough clarity is provided with respect to 'mid Glenelg River'. This area currently has a 'poor' Index of Stream Condition rating and further discussion with this CMA regarding the appropriateness of this river reach as a Representative River reach is recommended.

5.2.2 Future Planning Arrangements (pg 54)

In reference to the Regional River Health Strategy Box (pg54):

Point 1. '*This will be undertaken for each major reach...*' Glenelg Hopkins CMA with expert advice undertook an analysis of what would be the most appropriate scales for the various levels of planning. This resulted in the Glenelg Hopkins CMA region (25,000 km²) being divided into 32 sub-catchments with an average size of 780 km². The CMA considers that this scale or level of detail is the most appropriate for regional strategy development. As a guide, between 3 to 6 Index of Stream condition reaches may be contained within the one sub-catchment.

Point 4. In reference to the cost-benefit analysis – it should be acknowledged that methodologies for these analyses are not well defined and understood at this stage. Also, valuations of environmental and social assets are difficult and many of the regions do not have detailed inventories for this purpose yet. To have a rigorous cost –benefit analysis or a costing versus expected outcome as per discussions with the NAP Project Team, they will need to be developed over a longer period.

Point 6, 7, 8 & 9. These points are a mixture of what is more appropriate to be included in the specific issue based plans or sub-catchment plans. Therefore, it is recommended that they are either deleted or rearranged and expanded upon to reflect this.

It is recommended that Point 1 to Point 5 shall be included in the Regional River Health Strategy with the addition of a points referring to setting of broad targets, monitoring program, community engagement, further research and investigation, reporting and evaluation.

Figure 5.1 Proposed Regional Management Framework

On the second tier lateral arrows representing linkages and overlap between all plans would be valuable.

The terminology ‘Waterway Management Plans’ has different meanings to various regions. The Glenelg Hopkins CMA considers this to be the same as ‘River Health Strategies’ that is, an integrated plan addressing all waterway issues.

An additional tier should be added below the tier commencing with Fisheries Mgt Plans. This could be labelled ‘Geographic Based Integrated Plans’ and should have arrows from all five boxes directed into it.

Box 5.1 Indicative Asset Register

In the first column, the last word ‘recreation’ is a typing error. The Economic Asset of commercial fishing should be included.

Box 5.2 Indicative Set of Targets... (pg57)

Glenelg Hopkins CMA recommends the following:

- The target ‘*Level of reduction in nutrient loads from priority sources within catchment*’ should be moved to Ten Year Resource Condition Targets.
- The target ‘Length of river where instream habitat has been reinstated’ should be moved to Five Year Implementation Targets
- Targets that refer to excellent or good condition may require further definition of what defines excellent or good.
- *Representative rivers in excellent or good condition* – it would be more appropriate to use ecologically healthy as the criteria.
- Additional targets added to represent protection or enhancement of social assets and aquatic life (SIGNAL/AUSRIVAS).

5.2.4 Review Process

Agree with a formal review every five years. However, our CMA is proposing that the RRHS be a dynamic document with an adaptive management approach and shall be reviewed at least bi-annually to include results gained from additional investigations, priorities from sub-catchment/action plans and implementation practicalities. This review is not intended to go through formal public consultation but rather be reflective of the community’s ongoing input and new knowledge gained through implementation.

5.2.5 Community – Government Partnerships

Government endorsement will be required for regional RHSs and for each of the specific issue action plans as they are developed. Just as a point of clarification, this does not read as if it includes geographic based ICM plans, nor do we consider that it should.

8 Management of Riparian Land

8.3.4 (pg 99)

‘CMAs will develop Recreational Plans for riparian areas of high value with heavy recreational pressure’ - Local Governments also have a significant role in recreational management, particularly in urban areas. Many recreational areas have Committee’s of Management usually under the auspices of Local Government. It is recommended that the box be reworded to read ‘CMAs, Local Government and the relevant land managers work together to develop Recreational Plans for riparian areas of high value with heavy recreational pressure.’

pg 101 – *‘NRE, in partnership with the CMAs, will develop guidelines for occasional or controlled grazing in riparian land.’* Occasional grazing is a controversial issue that needs to be managed on an area- to-area or site-to-site basis. It is recommended that guidelines and implementation is the CMA’s role and that Statewide guidelines are not appropriate. Obviously, Statewide research and knowledge would be extremely valuable for CMA’s to consider and utilise. It is recommended that this box be deleted.

pg 101 – Crown Frontage Role

CMA’s cannot take on the role of managing Crown Frontage without adequate resources to manage the land appropriately. The CMA’s credibility and ability to encourage best practice will be severely damaged if CMA’s have the responsibility of managing crown frontages without the necessary resources to implement it.

11. Management Arrangements

11.3.2 State Funding (pg 124)

Box *‘The Government will review the Tariff Replacement Fund allocation every three years.’* If this box is read in isolation, which is likely to be the case for some readers, it can imply a review for increases or decreases on an unknown basis. Therefore, it is recommended that it read *‘The Government will review the Tariff Replacement Fund allocated every three years to ensure that it is consistent with inflation.’*

(pg 125) - *‘These are different for each region because they reflect, to a large extent, the number of landholders in the region and therefore, to some extent, the significance of river health problems within the region.’* Glenelg Hopkins CMA considers that there is no correlation between number of landholders and the significance of river health issues and recommends that the second part of this sentence be removed.

Supportive that TRF and HWP allocations are complimentary so that the total State allocation to the region represents the best outcome.

Glenelg Hopkins CMA is pleased that there is criteria developed and implemented to allocate State funding in a transparent and accountable manner. It is also anticipated that this would also be undertaken via a consultative approach with all CMA’s. However, it needs to be acknowledged that CMA’s need stability and security from

funding sources to be able to undertake good corporate governance and establish and maintain the required capacity to undertake it role.

Based on the Glenelg Hopkins CMA's 2001/02 budget, 35% was State base allocations and 65% was other competitive funding sources, of which all was a commitment for twelve months only. If all of the HWP allocation was also to effectively be competitive between CMA's, Glenelg Hopkins CMA who only receives a relatively small TRF allocation, would find the risk in employing/retaining staff and committing to large projects for more than twelve months would be a large constraint in achieving river health outcomes.

Added to this, large fluctuations in base funding sources could result in communities expectations and targets in the regional RHSs, not being able to be met. Therefore, it is recommended that upon the development of Regional RHSs, the HWP allocation is reviewed using the criteria in Box 11.2 and subsequently reviewed at the review of the regional RHSs. In addition, an amount of up to 15% of HWP be able to be reallocated between CMA's based on the criteria in a transparent and consultative process on an annual basis.

Box 11.2 (page 126)

Point 5. To provide balance of government investment between the TRF and HWP is appropriate as the TRF is not a sound basis for allocating Government investment. However, to use the HWP to balance funding between other funding sources discourages and penalises CMA's that seek opportunistic funding through these sources.

Appendix 3 Lead Responsibilities For Specific Functions Related To The Management of River Health

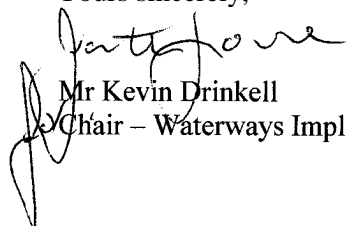
'Administer licences for the extraction of sand and gravel from waterways and floodplains'. The Glenelg Hopkins CMA has been advised that there is a requirement for a works on waterways permit under the Waterway Protection By-Law for this activity. Also, recent advice was that for one-off extraction sites for volumes less than 4000m³ a Licence from NRE was not required.

Management of Rural Drainage – *'manage other regional drainage systems'* and *'manage community surface drainage schemes – as per existing arrangements'*. These ambiguous role definitions highlights the need for State direction and framework for rural drainage to ensure that this significant issue is managed appropriately throughout the State. Many surface drainage schemes have no existing arrangements as many Local Governments have relinquished there past involvement in the schemes.

Crown frontages – as stated previously, CMAs will not be able to undertake the role of Crown frontage management without adequate additional resources to ensure that crown land is managed to best practice.

I wish to reiterate our congratulations and support on developing a comprehensive and informative document. If you wish to discuss any aspect of this submission please contact Janette Lowe, Waterways Manager, Glenelg Hopkins CMA or myself.

Yours sincerely,



Mr Kevin Drinkell
Chair – Waterways Implementation Committee, Glenelg Hopkins CMA