



**Barwon  
Water**

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**CHIEF EXECUTIVE**  
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**Our Ref:** 50/020/00151(9)  
**Your Ref:**  
**Enquiries To:** Paul Northey

April 29, 2002

Project Manager VRHS  
Catchment & Water Division  
Department of Natural Resources and Environment  
PO Box 500  
East Melbourne VIC 3002

Dear Sir/Madam,

**Re: Draft Victorian River Health Strategy**

Thank you for the opportunity to comment on the draft Victorian River Health Strategy. Barwon Water welcomes the preparation of the document, which will provide an important framework for the management of rivers in Victoria.

In responding to the draft, it is important to first outline Barwon Water's approach to water resource management. Barwon Water is the largest non-metropolitan urban water authority in Victoria, providing water and sewerage services to a permanent population of around 250,000 people over a service area of more than 8,100 square kilometres. This service area includes Geelong, the Bellarine Peninsula, along the coast to Apollo Bay and inland to Colac, Winchelsea, Bannockburn and Meredith.

The greater Geelong area is supplied by three major sources – the Barwon River, the East Moorabool River and the West Moorabool River. Bulk Entitlements for the two Moorabool catchments have been in place for some time. A Bulk Entitlement for the Barwon River was agreed to by all stakeholders at the end of last year and is awaiting Ministerial sign-off. Barwon Water also has a licence to harvest groundwater from the Barwon Downs borefield to supply additional water to the region when required. The current licence expires in August 2002 and negotiations on a new licence are scheduled to commence shortly.

Separate water supply systems provide supply to Colac and district, Aireys Inlet/Fairhaven, Lorne and Apollo Bay/Skenes Creek. Bulk Entitlements are in place for all of these supply systems. In total, the Authority manages 14 major reservoirs and weirs and 10 water treatment plants.

To identify the actions required to provide a secure water supply region over the next 20 years and beyond, Barwon Water is currently preparing a Water Resources Development Plan. A draft of the plan is currently open for public comment and consists of the following four key elements in priority order: water conservation, alternative water sources, system enhancement, new water resources. A copy of the latest Water Resources Development Plan Community Bulletin is attached for your information.

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In response to the draft strategy, Barwon Water offers the following comments which relate to the Authority's water resource management.

### Section 6.3.3 Restoring Flow-Stressed River Systems

In requiring water authorities to review their operations to see if improvements can be made to environmental flow regimes, it is important that any changes do not adversely impact on the ability of water authorities to provide a secure water supply to their customers. Bulk Entitlements form the basis for long-term water resources planning and investment decisions by water authorities, which needs to be taken into account when considering whether to open them up for review.

### Section 6.3.4 Protecting Rivers Whilst Enabling New Development

Barwon Water supports the approach described on page 79 regarding proposals for new Bulk Entitlements, which is in accordance with the approach adopted by the Authority in preparing the Water Resources Development Plan ie. making water conservation, alternative water sources and system enhancement a priority before developing new water resources. Under the new water resources section of the plan, Barwon Water has made groundwater the first priority, which is also in line with the draft strategy. It is only after the groundwater options have been developed that the plan proposes accessing more surface water via interconnecting the Colac – Geelong and/or the Geelong – Melbourne systems. Whilst this will require a new bulk entitlement for the former, neither involve the construction of new surface water storages, thus avoiding additional environmental impacts.

### Section 6.3.5 Protecting River Health By Integration Within The Water Resource Management Framework

The first line under "Surface water – groundwater interactions" on page 81 should read "Studies indicate that up to 50% .....".

### Section 6.3.6 Protecting Rivers Against Uncertainty

Following on from the comments made for section 6.3.4, Barwon Water has concerns about the progressive review of all major Bulk Entitlements, especially those that have already undergone rigorous investigation and negotiation during their development. For example, the development of the Barwon Bulk Entitlement involved more than 3 years of technical investigation and stakeholder consultation, resulting in increased environmental flows from what was proposed in Barwon Water's original application. It is considered that further review of Bulk Entitlements established through such a process is unnecessary.

### 6.3.7 Roles of Water Authorities

Any review of the Water Services Agreements that results in additional responsibilities and expenditure for water authorities must be considered in a whole of business approach and in light of the Department's expectations of water authorities to continually reduce operating costs.

### Section 9.3.3 Restoration Activities

Barwon Water supports the concept of water authorities considering options for the removal of water regulating structures where they are no longer required provided that removal would not itself involve excessive environmental impact or economic cost. The Authority is currently reviewing several such structures with a view to their removal. In addition, the new water resource option identified in the Water Resources Development Plan for Apollo Bay/Skenes Creek involves replacing an on-stream weir with an off-stream storage, which could provide another opportunity for the removal of an existing regulating structure.

Barwon Water also supports the provision of fishways where possible. The Authority in the past has installed several fishways through funding grants from the local catchment authority and believes future fishways should be funded through similar arrangements.

#### Section 9.3.5 Protection Of The Channel Against Degradation From Other Activities

In relation to the environmental management programs to be developed by Bulk Entitlement holders, Barwon Water believes that the assessment of the effects on aquatic biota in the waterway should be the joint responsibility of water authorities, catchment authorities and DNRE and, as such, should be jointly funded. With regard to operating practices to manage water temperature, the Authority points out that many storages have offtakes located close to the bottom of storages and that to alter these arrangements could be at significant financial cost.

#### Section 12 Community Engagement and Participation

Barwon Water supports the section on community involvement. As part of the preparation of the Water Resource Development Plan, Barwon Water has undertaken an extensive community consultation program to engage the community in the process. Community engagement and education will be essential to the successful implementation of the strategy.

In summary, Bulk Entitlements provide water authorities with the certainty needed for long term investment in infrastructure to service existing and future customers. Any outcomes from this strategy must not undermine the investment made in water infrastructure by the community.

Barwon Water trusts that the above comments will be of assistance in developing the final Victorian River Health Strategy and looks forward to receiving the completed document in due course.

Yours faithfully



D.B. Brockenshire  
Chief Executive

Attachment: Water Resources Development Plan Community Bulletin