



17 May 2002

Project Manager – VRHS  
Catchment and Water Division  
Department of Natural Resources and Environment  
PO Box 500  
EAST MELBOURNE VIC 3002

Dear Project Manager,

Thank you for providing the Victorian Farmers Federation with an opportunity to comment on the Healthy Rivers Healthy Communities and Regional Growth Victorian River Health Strategy Draft.

Please accept these comments on the strategy draft and duly acknowledge receipt of this document.

Yours Sincerely,

Paul Weller *for*  
Chair: VFF Land Management Committee



**17 May 2002.**

**Victorian Farmers Federation Submission on the “Healthy Rivers Healthy Communities and Regional Growth Victorian River Health Strategy Draft”**

The Victorian Farmers Federation is pleased to comment on the “Healthy Rivers Healthy Communities and Regional Growth Victorian River Health Strategy Draft”(VRHS). We provide a number of general comments on the directions of the draft strategy as well as a number of specific comments on individual aspects.

Where possible, the VFF supports the VRHSs endeavour to protect and enhance Victoria’s river systems. However, it must be accepted that an ‘evolution’ of our river systems has occurred since European settlement. Rivers provide for a myriad of competing social, economic and environmental functions, and the VFF believes that the real goal of the VRHS is to seek an appropriate balance of these competing requirements in order to obtain maximum benefit from our river systems.

Certainly, regulated river systems have changed natural river conditions but many riverine environments have adapted well to current conditions. There is still considerable debate as to what constitutes a healthy river, and the VFF believes that we must be careful not to drive an agenda that is focussed on returning our river systems to a pre European state. We must recognise the value of current management practices and build upon these.

**Environmental Flows**

The VFF does not support any increase to environmental flows. Releasing additional water down rivers can in fact be detrimental, and river flow should mimic the natural flow cycle. The VFF is not supportive of the state-wide target for river health that: *“by 2011: significant improvements achieved in environmental flow regimes of 20 high value river reaches currently flow stressed.”* It is important that river systems are protected and enhanced in a way that where possible, current levels of use are sustained.

Farmers are working to improve farm water use efficiency through the uptake of new technologies. The VFF does not support the singling out of farm water efficiencies to increase environmental flows. Farm water savings should be put back into productive use to further increase farm productivity.

In some situations, there may be opportunities for Governments and individual farmers to enter into arrangements to fund on farm water savings projects.

### **Communities**

The VRHS has placed a lot of emphasis on listening to the community, and an important aspect of this is to listen to the people who actually manage rivers and adjoining riparian land. These are the people who are largely contributing, both financially and through good management, to maintaining Victoria's river systems. Representations of local communities must include the private landholders who manage the land adjoining river systems. The inclusion of an appropriate definition of what is meant by 'community' in the VRHS would be a good step forward.

The focus on Catchment Management Authorities as the coordinators of river health and management targets is supported by the VFF provided they engage in proper consultation with the community. Giving local communities ownership of river health is essential.

*"The VRHS provides a framework to enable the Government, in partnership with the community to make decisions on the management and restoration of Victoria's rivers. The VFF believes that the VRHS must be clear on what is meant by 'partnership' and what the management and restoration goals for Victoria's rivers are. A clear understanding of how the realisation of these goals will be funded is also required.*

### **Measuring success**

Minister Garbutt introduces the VRHS with the statement that *"the success of our efforts will be measured by our children and grandchildren and they will be looking for the same pleasures and associations that our grandparents had. Our success will be measured in terms of the sounds of frogs, the ability to swim in waterholes shaded by river red gums, the chance of catching a cod, watching sun-dappled ripples in the water and listening to the rush of the river."* This creates a nice visual image, but is inadequate as a definitive measure of success. The VFF is aware that the VRHS sets out a framework that utilises the CMA River Health Strategies as a tool for the assessment of river health based on agreed targets. It is important that this catchment information is utilised to develop a state-based understanding of the condition of Victoria's rivers. We cannot know that we have been successful unless we have established, measurable goals for river health.

The VRHS is to be the *"blueprint for the future management of our rivers."* If this is the case, we really need to be sure that the VRHS accurately reflects the view of the whole community, and that the community will support and pay for the cost of improving river health.

### **Recognising agriculture**

The VFF is pleased to note that the vision for Victoria's rivers includes a statement about rivers *"providing the essential basis for efficient, high value sustainable agriculture and other resource-based industries."* The recognition that rivers support *"rural production including \$5.2 billion of irrigated agricultural production"* is also a very positive step. Agricultural production is a key use of our river systems and its economic value to the state and continuing development must be recognised and provided for within the VRHS.

The VFF is also supportive of the statewide target included in the VRHS that “ *by 2005 a quarter of agricultural production produced from natural resources that are managed within their capacity. By 2015, this will increase to half of agricultural production.* ” The VFF is strongly supportive of this goal. Improved utilisation of finite resources is good value for Victoria.

However, this recognition of the role of agriculture is juxtaposed with the statement that land managers; “ *will undertake their business to ‘Best environmental management standards’ in accordance with their ‘duty of care’ responsibilities, recognising their dependence on a healthy resource base and recognising their role in the stewardship of natural resources.* ” Most private land managers already recognise that they have a ‘duty of care’ and are working to protect riparian zones and the condition of their river frontages.

Best environmental management standards are recognised within the farming community as an essential part of sustainable farm management. However, improved river health does not just benefit those who farm alongside river reaches. What the VRHS must reflect is that, if private landowners are being asked to protect something that will benefit the community as a whole, the community must provide financial assistance.

### **Paying for the past**

The VFF refutes the assertion within the VRHS that our river systems are continuing to degrade. The VRHS fails to adequately recognise the current management practices of private landholders to mitigate degradation, and improve river health.

### **Economic assessment**

It is vitally important that the true health of our rivers is determined. Box 1.1. provides some indicative economic values and costs of healthy rivers. This is a good start, but in order to gain a clearer understanding of the true status of river health, a full economic costing needs to be provided. Most particularly, a full assessment of the worth of rivers to Victoria’s agricultural irrigation areas is essential.

### **Water quality**

The VFF is extremely supportive of maintaining good quality water supplies and this should remain a fundamental goal of the VRHS. Land management practices continue to evolve to support better river health outcomes.

### **Management of the River channel**

The VFF recognises that it is a goal of the VRHS to reduce the level of flood mitigation measures that may include restrictions on barriers and clearing of in-stream woody debris. It is essential that the ecological perspective for channel management should not come at the cost of protection of private and community assets.

### **Return to native species**

The VRHS defines an ecologically healthy river as one that “ *the majority of plant and animal species are native and no exotic species dominate the system.* ” There are numerous cases that demonstrate that a balance between native and introduced plants can provide for a sustainable river environment. For example, some productive crops

and pastures can work effectively to improve soil health and prevent the flow of nutrients into river systems. The cost of transforming Victoria's river networks to a state where native vegetation predominates should be properly assessed.

### **Fencing**

A goal of river rehabilitation in many areas is to seek to fence off river access. However it should be recognised that fencing, particularly in areas where flow is not regulated can be an extremely expensive and time-consuming task as flooding usually washes away fences. If this is a key requirement for the management of river health, the Government must provide financial support for fencing activities.

### **Water Markets**

The VFF sees water markets as a viable means for transferring water from low value to higher value sectors. In such situations it is essential that the environment's rights to water be clearly defined. The bulk entitlement for the Murray River is a good example of where this has occurred. However, it must be recognised that water markets can only function effectively if a farmer's rights to water are clearly defined.

The VFF is opposed to any moves to have existing bulk entitlements reviewed, but the VFF would encourage reviews of how current bulk entitlements for environment are managed.