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Our Ref: B21-7

26 April 2002

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

Dear Jane

RE: DRAFT VICTORIAN RIVER HEALTH STRATEGY

I refer to the letter dated 6 March 2002 from the Hon Sherryl Garbutt MP, Minister for Environment and Conservation advising of the release of the Draft Victorian River Health Strategy and inviting the Gippsland Coastal Board to comment. A sub committee of the Board considered the Draft Plan and the following submission is submitted on behalf of the Board.

As you would be aware, the Gippsland Coastal Board is appointed by Minister Garbutt. The functions of the Coastal Board are defined in the Coastal Management Act 1995 and include the following:

- To develop Coastal Action Plans for land within the region;
- To provide advice to the Minister on coastal developments in the region and any matters referred to it by the Minister;
- To provide advice to the Victorian Coastal Council on coastal developments in the region and any matters referred to it by Council;
- To facilitate the implementation in the region of the Victorian Coastal Strategy, Coastal Action Plans and approved coastal guidelines for the region;
- To liaise with and encourage cooperation of Government departments, municipal councils, public authorities, industry, community groups, and persons and bodies involved in the planning and management of the region in developing and implementing strategic solutions to matters affecting the conservation and use of the region's coast.

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General

- The philosophy and ambitious intent of the strategy are applauded. In particular, "The objective for the VRHS", "Scope of the VRHS", "Vision for Victoria's rivers", four key elements on page 9, and the management approach and statewide targets on page 10.
- The adaptive management concept and the learning from experience approach are applauded.
- It is applauded that the VRHS recognises that the Regional Catchment Strategies are the relevant high level documents. The links to other documents is also a strength.
- The general emphasis on the "triple bottom line" is applauded, however the Board questions what indicators will be used to measure and assess targets, their applicability and intended outcomes. For example, how will the strategic framework provide consistent statewide baseline information on aspects of the resource base relevant to river health, the second dot point under "Adaptive management" on page 13? Which agency/stakeholder will have responsibility for collating and making available this information? What will be their scope/methodology of operation? How will they be resourced to provide this information to stakeholders, including the community?
- In managing land use capacity for agricultural production, how will the benchmarks by 2005 and 2015 be set and subsequently achieved? (see page 10)
- The Board is concerned about the emphasis on river management and *restoration*. We suggest river management and *rehabilitation* would be more achievable as a strategy. "Restoration" suggests attaining pre-1770 condition. It is questionable that any waterway can be *restored* to this condition, considering the intensity of previous and ongoing impacts.
- The relationship of rivers with Ramsar values should be considered in this document, for example in terms of water allocation, quality and quantity.
- Pre- and post- fire management can have a marked effect on rivers, this should be considered.
- Coordinated management/partnerships between states should be covered. For example, interstate Gippsland rivers include Wallagaraugh, Cann, Genoa and Snowy.
- The review of LCC recommendations is endorsed.
- In relation to native fish species, the Strategy's concept that "prevention is better than cure" is supported. Reference should be made to possible future introduced species and subsequent threats they could have on our river systems. Education is needed for the community to recognise the risks of releasing aquarium species and transferring fish (and live bait) between systems.
- The document as a whole was laborious to read and it is recommended that it be reviewed with this in mind.

Specific

- P.9, Box, under "Vision for Victoria's rivers": The dot point "supplying clean and safe drinking water" should be the first dot point. Government policy should consider the provision of clean and safe drinking water as the first priority over agricultural and industrial usage.
- P.12, Partnership with regional communities: The Board recommends community input be achieved via designated groups with membership representing community diversity and with a focus on natural resource management. It is strongly suggested that the scope of appointment, resourcing and accountability be adequate for these groups to perform their roles.

- P.12, Special protection for rivers and streams of very high value: There is a need to ensure all stakeholders, including the wider community, are aware these rivers are designated due to economic and social values, not only because of environmental values. This includes accepting the impacts of upper catchment activities on the qualities of river environments downstream.
- P.13, Environmental flows and water allocation: In the opening paragraph, second sentence, insert the words "and other industries" after the word "agriculture".
- P.14, Water quality: In reference to key threats, third paragraph, this should include reduced environmental flows and rural and urban effluent discharges.
- P.14-15, Management of riparian land:
 - A logical framework is recommended to ensure appropriate recognition of the land manager/management relationship.
 - Point 3: Responsibility for riparian condition is identified to be the CMA; there also needs to be designated responsibility for weed control and maintenance of riparian vegetation. In particular, clarifying this responsibility ensures all landholders (private and public) have knowledge of the appropriate decision makers and managers.
 - With p.15, Management of the river channel: The Board strongly recommends the use of best practice research and methodology to be utilised in decisions which relate to erosion of riparian land and river banks and consequent protection against erosion. These decisions need to recognise the ecology of the river/waterway and community opinion.
- P.15, Management of the river channel, with Chapter 9: These recommendations are applauded in contributing to an ideal environment for native fish species.
- P.20: The scope of the VRHS: The definition of "river" to include channel, riparian zone, floodplain and estuary/terminal lake is applauded. Catchment health and impacts of activities on waterways has resultant effects on estuaries where those waterways terminate.
The VRHS is commended for recognising that specific management issues related to wetlands, estuaries and coastal development are covered in strategies separate to and outside of the scope of the VRHS.
- P.27, Table 2.1:
 - Management of riparian land/Grazing banks: Key impacts should include "use of natural terrain to contain cattle on grazing leases within State forests, including waterways".
 - Catchment Management/Catchment clearing: There is a need to include loss of large woody debris, which reduces likelihood of deep pools within the river channel. The flow regime of Australian rivers, particularly in Victoria, should include deep pools alternating with riffles, with dense vegetation along the riverbanks.
 - Management in the river channel/Recreation: boating: Remove the word "boating". Add other key recreational impacts including mining activities, sluicing, 4 wheel drives (as examples).
 - All Key Impacts are negative; can positive key impacts be included?
- P.30 Box 2.1: Include Index of Stream Condition and AUSRIVAS within criteria for determining ecological value. Also include value as a catchment which incorporates species under threat from human impacts and use of the river.
- P.95, Section 8.2: The problem of tenure and the need for coordination is well recognised in this section.
- P.99 8.3.4, bottom box: This should be reworded. CMAs should ensure coordination between stakeholders in the development of Recreational Plans including coordination of existing and proposed plans.

- P.117-118 Box 11.1: There should be a separate section called "Strategic Authorities" to include, for example, Victorian Coastal Council, Regional Coastal Boards, CaLP Boards, Murray Darling Basin Commission.
- P.122, 11.2.1 first dot point: Regional Coastal Boards should be included.
- P.127 Box 11.3: The "Beneficiary Pays" section is not clear, especially the meaning of primary and secondary beneficiaries. In addition, how will the payment/tax be applied?
- P.129-132, Section 12.1, Community engagement and participation: The vision to prioritise the inclusion of the community as major stakeholders is applauded. It is strongly encouraged that funds be allocated to provide adequate and responsive education within communities, particularly in relation to water quality programs such as Waterwatch. This funding should also include accountability and measurement criteria to ensure that education is applicable to the ongoing needs of the community.
- The recognition and application of Appendices 1 and 2 are applauded.

Should you require further information please contact me at the Board's Bairnsdale office (telephone 5152 0448).

Yours sincerely



Andrew Buckley
Executive Officer

Cc John Ginivan, Executive Officer, Victorian Coastal Council