



West Gippsland Catchment Management Authority

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Dear Jane,

Thank you for the opportunity to review and provide comment on the Draft Victorian River Health Strategy. On behalf of the West Gippsland CMA, I would like to congratulate you and all of the other contributors to the development of this very important document. The strategy is a real step forward in the protection and enhancement of our rivers. Overall, the strategy is well presented and, in principle, the WGCMA agrees with the tone and the direction of the strategy.

It is the view of the West Gippsland CMA that some of the fundamental principles contained in the strategy could be stated more clearly and should be embraced as guiding the development of strategies and options in water resources management. The principles that should be articulated in the document include:

- Discussions of "environmental flows" should be separated into environmental water requirements and environmental water provisions. The phrase "environmental flows" in the strategy is used to include both requirements and provisions. The use of the all-encompassing phrase becomes confusing, especially where it is used to include both at times and only one component at other times.
- Although the WGCMA has an excellent working relationship with Southern Rural Water, an emerging issue is the development and implementation of Streamflow Management Plans, particularly the specification of environmental water requirements and the implementation of the provisions. It is apparent that river flows are integral to the ecological health of the waterways, and as the resource manager, the WGCMA accepts that responsibility. However, it is a fundamental principle of the COAG water reforms that the resource manager is separated from resource sales. The role of rural water authorities to specify environmental water requirements and to agree with users on the best way to make those provisions could be perceived to be in direct conflict with the role of licensing and provision of water for consumptive use.
- The inclusion of Indigenous Australians, as it is undertaken in the draft strategy, is meaningless. The importance of the State's waterways in the aboriginal culture should either be explored further (eg made more meaningful) or not singled out at all.
- In the discussion of Bulk Entitlements on page 65, it is stated: "BEs for rural authorities cover the water rights held by irrigators in authority-supplied districts, plus the losses incurred by the authority in distributing the water." Although the WGCMA has had advice in the past about the principles of allocation of 'spare'

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water, Government is unclear about whether there is a plan in place, including targets, to reduce the losses in delivery systems. Further, in the absence of a clear policy regarding ownership, it is assumed that water savings through irrigation efficiency would belong to the authority rather than to the environment or even to Government. The WGCMA assumes that the person or agency paying for the efficiency gain owns the volume of water saved.

- In Appendix 3, under 'Management of Rural Drainage', a further action should be included to 'Develop a statewide policy for rural drainage management.' The lead agents for this would be NRE and the CMAs.

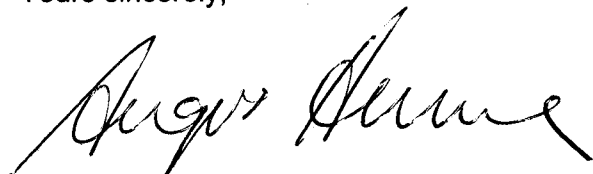
In terms of policy and the implications for the WGCMA, a few of the statewide strategies should be clarified:

- It is unclear from the draft statewide strategy whether the regions should be developing a single Regional River Health Strategy or whether, for instance, the WGCMA should have a separate strategy for each subcatchment or major river system or even separate chapters for each river or river reach.
- In reading the section on water quality and the priorities for water quality management, the section could be interpreted that the development of the Regional River Health Strategy necessarily drives the development of the Catchment Water Quality Action Plan rather than vice versa or even development of both in parallel. Government should clarify the hierarchy of plans and their development processes.
- The status of the Regional River Health Strategies as policy documents is unclear. Should the Regional Strategy include enforceable policies? Should it outline the application of enforcement mechanisms from a range of statutes, such as the Environment Protection Act or the Heritage Rivers Act?
- Does the Regional River Health Strategy(s) have to be approved by Government prior to implementation? If so, the process for approvals should be outlined to the CMAs prior to the completion of the Victorian River Health Strategy.

The WGCMA is keen to develop a Regional River Health Strategy and recognises that the process for development will require a sustained effort from human and financial resources. The CMA is keen to discuss the prioritisation of the development of the strategy amongst the other priorities faced in both planning and in day-to-day operations.

Again, I would like to take this opportunity to compliment you on an excellent draft document and to thank you for the opportunity to provide a submission toward the development of the strategy. Should you have any questions or require further information, please do not hesitate to contact me.

Yours sincerely,



Angus Hume
Chief Executive Officer