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Dr Jane Doolan  
 Catchment and Water Division  
 Department of Natural Resources and Environment  
 PO Box 500  
 EAST MELBOURNE VIC 3002

Dear Dr Doolan

**DRAFT VICTORIAN RIVER HEALTH STRATEGY**

The Wimmera Catchment Management Authority would like to thank you for the opportunity to comment on the Draft Victorian River Health Strategy. The Authority would also like to take this opportunity to congratulate the Catchment and Water Division on the timely development of the Victorian River Health Strategy. The statewide strategic management framework documented in the Strategy will provide all Victorians with a clear direction for the future management of our waterways.

The following comments have been collated from a number of sources including the Staff and Board Members of the Wimmera CMA and members of the Wimmera Regional Waters Functional Committee.

Page	Paragraph/Section	Comments
18	5	There is no doubt that community attitudes to rivers have changed but there is a definite lack of appreciation of the importance of floodplains.
18	5	The health of our waterways is inextricably linked to the management of the riparian zones and floodplains. The withdrawal of specific funding for floodplain management has been disappointing. Further funding is required to ensure that the work done by CMAs in establishing their floodplain management functions is not lost by lack of funding.
20	Scope of the Victorian River Health Strategy	The VRHS needs to consider the management of terminal lakes. It does not need to deal with day-to-day management but recognise the importance of the lakes as part of riverine systems.  Lake Albacutya is a RAMSAR wetland and considered the highest priority within the Wimmera CMA region. Many of the projects in the Wimmera, particularly environmental flows and Wimmera Mallee Pipeline project are aimed at returning to more natural flow conditions with flow on benefits to the terminal lakes system.
20	Scope of the Victorian River Health Strategy	Whilst wetlands management plans may deal with specific management issues it is worth noting that a strategic and coordinated approach to wetland management is sadly lacking in Victoria. Wetlands do come under the definition of a waterway under the Water Act.
22	Section 2.1 How Rivers Work?	It is worth noting that rivers are not static and are continually evolving. Consequently management needs to evolve with them. The community does not generally appreciate this point.

24	Figure 2.1	Chains of ponds and freshwater meadows are characteristic of river systems that need to be recognised. The community needs to move away from the perception of defined banks and long open channels as the only definition of a river.
27	Table 2.1	Removal of unsafe snags is not an impact but an activity that leads to an impact
31	Figure 2.3	Until the reader gets to page 49 the map does not mean anything and it is difficult to understand the relationship between Figure 2.3 and Table 5.1. Without understanding further what Figure 2.3 entails it is difficult to comment on the relevance of the preliminary classification
32	Figure 3.1	Throughout the ISC process there has always been a question of whether there is enough information to determine condition in the Millicent Coast Basin. That question still remains.
33	Figure 3.2	What does "significant issues" mean?
33	Figure 3.2	The darker grey colours are difficult to differentiate
36	Figure 3.4	Figure 3.2 shows the level of surface water development in the Wimmera as overdeveloped, yet Figure 3.4 shows a medium potential for increased water based economic activity appearing to be based on the previous paragraphs relating to agricultural growth. The two don't appear to be congruous. There is no source document so it is difficult to know what the figure is based on.
37	Table 3.1	No river systems west of the Avoca are included in the table. The table is therefore not representative of the scale of the salinity issue in the State.
42	Section 4.3 Statewide Targets	<b>Heritage Rivers</b> Parks Victoria is struggling in the management of Heritage Rivers. How can a measure of the condition of Heritage Rivers be obtained when Management Plans are still in draft and no condition monitoring is occurring or planned?
42	Section 4.3 Statewide Targets	<b>Designated freshwater dependent focal species.</b> What are these in each region and what is the process for determining them? Who will pay for the cost of monitoring these populations and who is responsible for meeting the target?
48	Section 5.1.2 Rivers of High Ecological Value	The Wimmera CMA has recently identified the Glenlofty Creek and the Wimmera River above Elmhurst as intact chain of ponds and freshwater systems respectively. Due to the Statewide rarity of such systems these need to be recognised for their values
49	Table 5.1	The Wimmera CMA will be keen to participate in the review of interim and suggested representative rivers recognising the value of the chain of ponds and freshwater marsh systems and their representation in the upper Wimmera catchment. Further there is a need to recognise terminal lake systems.
51	Table 5.2	Water Quality. Is there a legislative basis for the role of CMAs in water quality management?
52	Table 5.2	NRE, particularly Fisheries, may have responsibility for Fisheries Management Plans but Fisheries have to date worked independently of aspirations of other stakeholders to the point where the emphasis is on stocking and enforcement. There is a strong need for the integration of instream biota management through Fisheries with the rest of the catchment community.
53	Section 5.2.2 State Policy Context	How is the SEPP a statutory instrument of the VRHS?

56	Box 5.1	"Land Claim" is not an appropriate term. Native Title is more appropriate
57	Box 5.2	How will maintaining the value of Heritage Rivers be measured?
73	Box 6.2	The current arrangements for the management of BES for the environment needs to recognise that the Wimmera and Glenelg CMAs through the Inter Catchment Advisory Group (ICAG) leads the process for environmental flow management in the Wimmera and Glenelg regions.
76	Section 6.3.3 Principles for Restoring Flow Stressed Rivers	The Wimmera CMA is disappointed that the work undertaken in the region such as the Stressed Rivers Project and Water Resource Management Plan which are of statewide significance has not be recognised.
80	Section 6.3.5 Catchment Dams	These paragraphs are now obsolete.
87	Table 7.2	There is no reference to rural drainage in Chapter 5. The State needs to determine its direction and roles and responsibilities with regard to <b>rural drainage</b> .
88	Section 7.3.1 Linkages	As the new SEPP is currently in draft there are some assumptions made here that may not necessarily come to fruition.
89	Section 7.3.2 Priorities for Water Quality Management	<b>Catchment Water Quality Action Plan (CWQAP)</b> . Many CMAs actively pursued including water quality issues other than nutrients in Water Quality Strategies only to be actively dissuaded from doing so. It is disappointing that the State should decide to recognise the inclusion of these issues only now. CMAs will need to be adequately funded to undertake this task.
99	Section 8.3.4 Recreational Plans	The Wimmera CMA understands the background to the preparation of recreational plans. It is not the role of the CMA to prepare such plans. The mechanism for preparation of such plans could be through recognising that need for such plans in the Regional Catchment Strategy and the plan being prepared by the land manger. There would be direct conflict between Parks Victoria and Land Victoria if the CMA was to undertake such a role.
100	Section 8.3.4 Incentives to Fence (Last paragraph)	Funding sources have directed that incentives for fencing are not to go to funding boundary fencing. This has been a long-standing position. The statement in the VRHS directly contradicts this position. Is there to be a change of government policy on this matter?
101	Section 8.3.4 Crown Water Frontages	In relation to crown frontage management, the CMA Chairs and CEO's Forum has previously resolved:  <i>"The CMAs collectively have said that they would not be prepared to sign off the relevant schedule of the Operating Agreement for the transfer of management of Crown Water Frontages (CWFs) from DNRE to the CMAs unless there is an adequate level of resourcing tied with that transfer. The Crown Water Frontage Working Group identified that through the regional reviews of CWFs an additional amount of between \$2.5M and \$3.0M would be required to manage CWFs."</i>

107	Box 9.1	<b>Native fish species.</b> Endemic native fish species in the Wimmera are non-migratory. Generally these species do not have high conservation status. Migratory native species have been introduced to the region. As a natural part of the Wimmera system it is important that the former group are recognised as the highest priority in the region.
111	Section 9.3.4 Technical audits of river restoration works	This is a good concept but there are issues: <ol style="list-style-type: none"> <li>1. Much technical knowledge now rests with CMAs and the consulting firms who service those organisations. Does NRE have the capability to undertake the audits?</li> <li>2. What is the aim of the audits?</li> <li>3. There are costs to CMAs in providing resources. Will CMAs be funded?</li> </ol>
126	Box 11.2	CMAs need to be given clear statements of how the criteria for allocation of funds are assessed and determined so that this is a clear and transparent process. Further, CMAs need to be given the opportunity to have input into the determination of allocations. Allocations should be based on achieving Statewide and regional priorities and not upon historical allocations.
130	Section 12.1 Waterwatch	Unfortunately Waterwatch provides little to no information to CMAs to assist in the management of waterways. There is minimal use in the application of the information by the organisations responsible for natural resource management as the information is difficult to obtain, interpret and scientifically questionable.  Waterwatch does provide a good community education tool but the direction and intent of the program needs to be determined.  Further, it is unreasonable for the State to expect CMAs, RWAs and other organisations to continue to provide financial and administrative support without being adequately resourced. The State must address issues relating to staffing. If CMAs are to be the conduits for Waterwatch and the staff to be CMA staff then CMAs must be given an opportunity to determine the Statewide and regional directions.
132	Section 12.2 3 Year Training Program (Last strategy)	Training for waterway management professionals is an important issue. Consideration also needs to be given to succession planning and bringing new people into the riverine management field at the graduate level.

Further information or clarification of any comments can be obtained by contacting Mr Paul Atherton.

Yours sincerely



**JOHN YOUNG**  
**CHIEF EXECUTIVE**