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Project Manager VRHS
Department of Natural Resources and Environment
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Dear Madam

Victorian River Health Strategy - Comments

Thank you for the opportunity to provide comment on the draft Victorian River Health Strategy.

Goulburn-Murray Water (G-MW) exists to supply water to its 24 000 customers which include irrigators, domestic and stock users, urban water authorities and industry. These customers are scattered across northern Victoria. G-MW and its customers rely on continued access to rivers and streams for water supply. Land adjacent to rivers and streams provides sites for pumps and associated infrastructure and in some cases provides sites for channels and drains.

In addition, G-MW manages major storages and associated infrastructure across the north of the State. G-MW's infrastructure assets are valued at around \$3 billion dollars and this supports annual farm gate production valued at approximately \$1.4B and a regional economy of \$8B. In turn, this supports the social, economic and environmental fabric of northern Victoria.

A few general comments are discussed below and detailed comments are attached.

1. Overall G-MW supports the VRHS as a comprehensive document that advances the integration of water resource management and sustainability. While some detail and issues will require clarification and further discussion, overall the issues have been identified and the management direction is logical and coherent. There are a number of issues and proposals within the Strategy that directly impact, or affect, G-MW and its customers and we expect considerable involvement in the further development of these proposals.
2. The strategy makes mention of a number of principles, for example "environmental duty of care". Our view is that these principles need to be further developed in light of real life experience to ensure that they are

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capable of being applied in real life situations. The expectation that organisations such as G-MW will adopt these principles, or take action (for example to supply environmental water) to meet these principles, needs to be tested against organisation's statutory responsibilities and capabilities.

3. The proposal to protect the Ovens River is supported but an overall Government approach to this issue is required. It is of no use to have one Agency supporting protection of an area, while another Agency might be promoting development based on the water resources of the river.
4. G-MW strongly supports the proposal that regional RHS will set priorities for the management of water quality and that SEPP (Waters of Victoria) will recognise these targets.
5. The scope of the Strategy (p20) needs to include on stream storages. G-MW storages need to be considered as part of the continuum of rivers. Storages can have impacts on downstream river systems and they can also be affected inflowing rivers and activities in catchments. G-MW is preparing Storage Management Plans that, amongst other things aim to enhance water quality and biodiversity at storages and if possible, reduce impacts of storages.
6. G-MW supports the establishment of sustainable use limits for all Victorian rivers. In our area the MDBC Cap sets the overall sustainable use limit for extractions from rivers while in unregulated streams, streamflow management plans will set extraction limits.

If you wish to discuss any of these issues further please contact Mr Pat Feehan, Manager Natural Resources, phone 0358 335 687 , e-mail pfeehan@g-mwater.com.au.

Yours sincerely



Denis Flett
CHIEF EXECUTIVE

Response to "Draft Victorian River Health Strategy"

Goulburn-Murray Water

Detailed comments

P 19 Objective Agree

P 20 Scope Agree but needs to include reference to on stream storages

P. 26 Last dot point in Section 2.3. It may be important to establish the point at which the balance between ecological and economic values changes for a waterway. Important to point out that this does not mean that ecological values no longer exist or don't need to be managed, just that conflicts will tend to be resolved in favour of economics (e.g. chemical control of native aquatic macrophytes in irrigation channels and drains).

P 27 Presents a number of land water management activities that affect river health – the problem is – which one(s) give the best return for investment – an ecological risk assessment approach (ERA) could be useful. There may also be other forms of risk assessment and ranking required for non-ecological risks (e.g. BGA blooms and stock health).

P 29 The concept of an ecologically healthy river being one that retains features and functions of that river prior to European settlement might require some substantial readjustment of people's perspectives of what a river should look like. For example, it is likely that pre settlement flows (especially at low flows) were lower and channel morphology would have been substantially different – refer to Scott (2001) (CSIRO report "43/01 Water erosion in the Murray-Darling Basin: Learning from the past". By Anthony Scott. Available from <http://www.clw.csiro.au/publications/technical2001/>)

The box on P29 refers to flow regimes, water quality and channel characteristics. Flow regimes map to environmental flow/BE processes; water quality maps to SEPP and catchment targets; but there is no equivalent for channel morphology.

The development of a robust suite of more precise ecological performance indicators, as per last para of this page, should be a high priority assigned to NRE for delivery within a specific timeframe.

P 34 – second para – refers to instream weeds as currently not being a problem. This is not correct! G-MW is aware of a number of aquatic weeds that are currently a problem or have potential to be a serious problem, for example Cabomba in Lake Nagambie and Lake Benalla, Nymphaea at Lake Nagambie, Arrowhead along the River Murray and Broken Creek and there are many others.

P 36 Plantations – needs to refer to CRC for Catchment Hydrology research currently underway.

P 37 table 3.1 The original table on which this Table is based included reference to Broken Ck. This is the stream with the greatest salinity impact and it should be mentioned in this table.

P 38 Conclusion – agree with dot points under management framework.

P 41 – Management approach Agree, but would also like to see another management principle highlighting the need for prioritising action to achieve the above on the basis of cost effectiveness. This is acknowledged in 4.2.2, but should be given more prominence.

P 41 – priorities – “the highest environmental and community gain” – assume community refers to “social and economic”.

P 42 Statewide Targets – the 2005 Targets seem overly ambitious – 2005 is after all only 3 years away. Concept of 1/4 of agriculture production produced from natural resources managed from within their capacity is an interesting one that probably needs considerable community debate about what it actually means and is it achievable?

P 43 – Principles – Agree – under Stewardship what does “duty of care” mean? – would be useful to include a definition. Strictly speaking, it has a reasonably tight definition within the Common Law, but I suspect that this is not the way it is used here (see also P 75 comment).

P 47 The protection being afforded the Ovens Rivers requires a whole of Government approach so that Agencies and local communities know that future development opportunities might be limited.

P. 53 Sec 5.2.2 The framework established by the SEPP for goals and objectives is of pristine water quality. Not sure if that will work for some lowland streams. Not sure of how the SEPP *provides a framework for the RCSs*. Must they conform to the SEPP?

P 55 figure 5.1 Agree on approach.

P 56 – Indicative asset register – under environmental assets why aren't water quality and quantity (or flow regime) listed. Both are important environmental assets of a river – provide habitat.

P 67 and Table 6.3 Note three tier management priority. No further winterfill licences during plan development for a category 1 is considered severe.

Category 3 should include 20% loss when trading downstream.

There is really little difference between category 2 and 3. Needs discussion with NRE.

P 69 Section 6.2.3 Welcome inclusion of groundwater within consideration of allocation of the entire water resource of catchment.

P 75 Box – what does duty of care mean or imply?– dot point “no further diversions” needs to be clarified to mean “no further **new** diversions” or no net increase in diversions. Our interpretation of environmental Duty of Care is that *persons will take all reasonable measures to prevent all reasonably foreseeable environmental damage and loss to other persons*. The meaning of the term here seems to be extended from prevention of loss and damage to others to some sort of duty to *the environment*. The thing that needs to be pointed out here is that Water Authorities have no rights to issue new BEs – that is the right of the Minister. We only issue private diversion licences as the Minister’s delegate. So this dot point should really refer to the Minister, not WAs.

It would be interesting to see how demand management works in a situation where persons have property rights in water and there is a water market.

P 75 – Stressed Rivers – would be useful to list those rivers considered stressed and the criteria for this listing.

P 76 box – second dot point – expectation of providing improved flow regimes - does this mean WAs are expected to provide environmental flows because of some ill defined principle. The sort of woolly thinking here is an example of what can happen when you try extrapolate a perfectly sound principle into a context where it is no longer totally appropriate.

P 77 box – is this an achievable principle?

P 79 box Agree.

P 80 Sec 6.3.5 Risk to existing water allocations arising from major changes in land use has been highlighted. This is important to recognise as land use change and climate change has the potential to overshadow our efforts in licence management.

P 81 boxes - agree with both.

P 82 Section 6.3.7 Agree with sentiments – obviously G-MW expect to be strongly involved in the process to review Service Agreements as it could have business and price impacts.

P 85 Section 7.2 – implies that there is something wrong with developing water quality action plans to address specific issues. It seems to me that this is the only way to move forward – plans that attempt to address all known or likely water quality issues are likely to be so complex and unwieldy that they are likely to never be produced or implemented. The value of the specific issue approach is shown by the production of nutrient water

quality strategies for most of Victoria over a relatively short period of time. Agree that single issues plans can give multiple benefits. We need to be suspicious of grand designs that never get off the ground. Is there anything wrong with some coordinated action that puts runs on the board while the bigger picture is still being put together?

P 88 Box SEPP –Strongly agree.

P 89 Section 7.3.2 see P 85 comment. The only problem is that, unlike the box on p. 85, this is not specific enough and it is possible to read into this that the SEPP has primacy.

P 91 Box see P 85 comment

P 92 *First box* Agree - This may need a higher priority than is indicated.
Second box and boxes on P 93. Why does NRE have to undertake the research? – others may be better placed to do it (eg Universities, CRCs, CSIRO etc). what is needed is for NRE to ensure (or coordinate) the research happening.

Section 8 Management of riparian Land – generally support approach – need to mention here our storage management process and perimeter land revegetation and point out that storages need to be considered as part of the river corridor. Agree

P 102 Section 8.4 Floodplain linkages is an important issue for G-MW particularly in the context of Loch Garry and the Lower Goulburn Floodplain proposal. These show that restoring floodplain linkages will be a difficult social process.

P 107 Box 9.1 the quality of the decision making could be enhanced by including involvement of a broader range of stakeholders, especially water authorities, in the priority setting process.

P 108 Needs broader consideration of weir removal not just for fish passage reasons

Second box these are considerations in G-MW project management procedures.

P 119 roles of NRE and EPA should mention their roles in research and monitoring
Agree

P 127 Box 11.3 Cost sharing principles –polluter pays principles and legacy of history as important cost sharing principles seem to have been forgotten.

P 136 First box Agree
Second box Agree – who pays?

P 139 *Immediate priorities for research* – does include risk assessment approaches – Strongly support some of these priorities, especially the assessment methods, but feel that

further time and consideration are required. This is the first time that rivers have been approached holistically. It may be better to workshop this in three months time.