

Our Ref CM03/0041
Your Ref

6 August, 2002

Project Manager, VRHS
Catchment and Water Division
Department of Natural Resources and Environment
PO Box 500
EAST MELBOURNE 30902

Attn: Ms Carol Roberts

Dear Carol,

DRAFT – VICTORIAN RIVER HEALTH STRATEGY

Reference is made to a letter from the Minister for Environment and Conservation, the Hon. Sherryl Garbutt, advising of the draft Victorian River Health Strategy and of any comments Wimmera Mallee Water (WMW) might wish to make.

WMW is appreciative of the opportunity to make comments and apologies for the lateness of this reply.

The following comments are provided:

- In general, the document is very well researched and prepared. The overall intent and objectives of the strategy are supported.
- One area where the document is somewhat silent is in the intimate link between the catchment and the river flow and quality. While mention is made of the related catchment issues and the need for a whole of catchment approach, it is felt that this important link could be further strengthened within the document.
- The document could benefit by a clearly described responsibility matrix. There have been many changes in agency responsibilities, mainly split between DNRE, the Rural and Urban Water Authorities, the Catchment Management Authorities, the Environment Protection Authority and in some respects, local government. Responsibilities for flood plain management, water diversions, works constructed on rivers and streams, management of river frontages, particularly over those stretches of river also used by water authorities to convey water all need to be well defined. It is felt that this should be done within this report so that the responsibilities can be clearly defined from a management perspective. *Table 5.2* on page 51 goes part way to achieving this but more detail is suggested as being necessary.

- The strategy proposes setting targets on river health at various locations. This is consistent with the MDBC Integrated Catchment Management Policy for lowering salinity in the river systems. However, setting the targets is expected to be difficult, particularly when catchment health plays such a large and longer-term role in river health.
- *Figure 2.3* could have a legend which defines what each of the numbers between 1, and 19 actually mean.
- *Table 3.1* appears to be missing some key rivers such as the Wimmera and Glenelg. It is noted that the Wimmera River has not been officially classified as a “stressed river” and this is considered very unusual given its poor health, particularly in the reach of the Wimmera which has a Heritage River listing. This is also somewhat unusual given the State Government’s commitment to improving environmental flows in the Wimmera and Glenelg Rivers from the proposal to pipeline the remaining Wimmera Mallee domestic and stock channel system.
- There does not appear to be much stated about the social and recreational values of water bodies such as weirs and small lakes in the rivers, particularly in northwestern Victoria. Where these occur, they are fed by the local stream systems and serve as very popular venues in otherwise quite dry and hot climates. Consideration could be given to how these water bodies could be accommodated into the overall strategy.
- On page 41 under the heading “Management Approach for Achieving the Vision”, consideration could be given to including some vision for the health of the surrounding catchment. River health will not improve without an accompanying improvement in catchment health.
- In the Statewide targets given on Page 42, it is questioned whether the 20-year targets are actually achievable, given the many and complex processes which need to be considered. Many of these processes are likely to take much longer than 20 years to show an improvement, particularly where they are catchment rather than stream based.
- In *Section 5.1.2* “Other Rivers of High Value”, consideration needs to be given to the natural conditions which used to prevail before European settlement occurred. Strategies, which will change river systems to something different, need to be thought out before any major remedial works or operational criteria are implemented. An example is the provision of environmental flows in streams which have a natural “no flow” regime during summer and lakes and wetlands which have a normal drying out cycles.
- *Table 5.1* is taken from the LCC recommendations, which are recommended for review. There is some concern when reading *Sections 5.1.2 and 5.2* that rivers which ultimately do not end up on the list in *Table 5.1*, will result in reduced funding opportunities for dealing with flow, water quality and environmental sustainability issues. The funding arrangements need to be fair and equitable across the State recognising however, that this needs to be priority based.

- The targets suggested in *Box 5.2* on page 57 have been reviewed from a practical perspective. It is expected that some will be very difficult to quantify given the variability of many catchments and prevailing climate conditions. Trends in salinity over 5 and 10-year periods are good examples. It is suggested that some specific catchment and river systems be used as “models” and a brief study be undertaken to test how these targets and performance monitoring data will be set and how practical and realistic the results actually are.
- In regard to the management arrangements, many of the suggested initiatives and principles outlined in *Section 7* are already being implemented in the Wimmera. Reflection of RWA responsibilities in Water Service Agreements is supported. However, river systems across the State from which abstractions are taken are all located in different climate zones and entitlements and operational criteria will vary. The bulk entitlement process currently underway in the Wimmera takes these issues into consideration and operating within this regime is supported.
- It is likely that meeting the suggested management responsibilities outlined in the draft strategy will require a greater resource in the RWAs. Without funding assistance from Government, this will need to be funded from within the existing ratepayer base. Increases in rates will result unless adequate Government funding is available to the RWAs. In a similar way to the Victorian Biodiversity Strategy, implementing the management responsibilities across all involved agencies is expected to involve a potential duplication of effort. In the interests of efficiency, it is envisaged that the Department of Natural Resources and Environment will play a key role in the centralised preparation of flora and fauna registers and other supporting databases from its existing database systems; copies of which can be passed across to the RWAs for their ongoing use.
- As a final comment, the intent of the draft strategy is clearly consistent with pipelining of the channel system across the Wimmera Mallee. The Wimmera and Glenelg River systems are now benefiting from environmental flow allocations as a direct result of the construction of the Northern Mallee Pipeline. The intention to pipeline the remainder of the open channel system across the Wimmera and Mallee regions will provide much greater environmental flows to these very important river systems which will return significant environmental benefits. The River Health Strategy will be a valuable and fundamental resource to assist managing these flows and in demonstrating improvements in these two river systems.

I trust these comments are helpful. Once again, my apologies for the lateness of supplying these to you. Should you require any clarification of the issues raised in this response, please feel free to contact me on ☎5362 0217.

Yours sincerely,

PETER W JACKSON
Manager, Technical Services

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