



Environment Victoria Inc.

COMMENT ON THE VICTORIAN RIVER HEALTH
STRATEGY

DR PAUL SINCLAIR
DIRECTOR, HEALTHY RIVERS CAMPAIGN

2 May 2002

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Environment Victoria welcomes the opportunity to comment on the Victorian River Health Strategy.

The Strategy's setting of specific targets for river restoration, the development of a framework to coordinate a range of management plans and the focus on establishing a method of prioritising river values are useful additions to policy.

Our concerns centre on the VRHS's transition from rhetoric to practice.

Without additional funding, we are concerned that the VRHS will become a smoke and mirrors device designed to convince the National Competition Council that Victoria is meeting its CoAG commitments. It is EV's view that \$15 -20 million spent over three years, in addition to the approximately \$21 million Catchment Management Authorities currently receive for waterway management, would allow Victoria to meet its CoAG commitments.

How does DNRE intend to implement the VRHS without new funding? With less than adequate funding, how is DNRE going to prioritise targets and enable CMA's to implement works programs?

VRHS has set a target of 33 Streamflow Management Plans (SFMP) to be completed by 2004¹. According to the VRHS, "SFMP's will aim, over time, to achieve the recommended environmental flow regimes as outlined in the Draft Streamflow Management Plan Framework". It is revealing that the VRHS commitment to meeting recommended environmental flows is no stronger than an aim, to be achieved over an unspecified time period. The tentative quality of the VRHS statement suggests that the

DNRE has reservations about the capacity of SFMP's to deliver significant improvements to the environmental flows of Victorian rivers.

By implication, the caution displayed by the VRHS towards the attainment of recommended environmental flows supports EV's contention that the current operation of SFMP's will not significantly improve environmental flows or effectively engage the community in decision making processes. This failure, combined with the probable failure of the VRHS to receive any new funding in the up-coming State Budget will substantially impede the achievement of environmental targets set under the VRHS.

Groundwater Management Plans

Currently there is no environmental representation on Groundwater Management Plan project groups. This is a significant breach of the CoAG principles for water reform. The Victorian River Health Strategy has set a target of developing 16 GMPs by 2003.

The *National Framework for Improving Groundwater Management in Australia* has recommended that groundwater management would be improved by applying the *National Principles for the Provision of Water for Ecosystems* to the preparation of plans. Presumably the *National Framework for Improving Groundwater Management in Australia* assumed that Principle 12 of these *National Principles* would determine the development of management plans. Principle 12 of the *National Principles* states: "All relevant environmental, social and economic stakeholders will be involved in water allocation planning and decision-making on environmental water provisions".

Despite the clear intent of this principle, no representative of EV has been invited to attend any of the 14 GMPs currently being developed in Victoria.

¹ Victorian River Health Strategy, Draft, Department of Natural Resources and Environment, February 2002, p. 70.

These experiences suggest to us that there remains a substantial gulf between rhetoric of policy contained in the VRHS and the on-ground application of CoAG obligations and nationally accepted principles of water management.