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**RE: Victorian Catchment Management Council comments on the Draft  
Victorian River Health Strategy**

### **General Comments**

The RHS is an exciting, well-considered initiative that paves the way toward better management and restoration of Victoria's rivers. It is pleasing to see the importance of effective engagement of regional communities is clearly acknowledged.

The VCMC has a statutory role to advise on statewide priorities for catchment management. Due to a lack of decision making frameworks (and supporting information) priority setting is something that neither the VCMC nor its partners NRE have been able to accomplish efficiently and/or transparently.

The development of the RHS has been long anticipated and this draft is a welcome and important addition to state NRM decision making tools. The role of this document in providing a framework for regional and statewide decision making and priority setting can not be underestimated. The VCMC is wholly supportive of the directions offered by the RHS framework and applauds the efforts of those involved to try and set priorities and targets toward achieving improved river health.

The adaptive management approach is to be applauded (Ch. 13) as is the important role that research will continue to play in information for current and future RHS development. The notion of presenting the strategy as a series of achievable steps is also a positive initiative, while the vision gives reason to be optimistic about the future health of Victoria's rivers.

The VCMC have distributed the RHS to members so far not engaged in the process. The following comments may provide a new perspective for your consideration.

### **Some Specific comments**

- p.16 Although the document generally reads well there are discrete sections where it is a touch verbose or repetitive and could benefit from tighter editing. For example the introduction provides an enormous range of information that could be further summarised or picked up later in the document. It would also be worth considering a re-ordering of material here and placing the purpose of the document closer to the start of the introduction.
- p.22 The VCMC notes the efforts to link the RHS framework in with regional communities and existing institutional frameworks. Community participation through the CMA structures is an important element that will be fundamental to implementation of the RHS framework and in ultimately improving river health. The many referrals in the document to community and regional decision making are welcome and important.

p. 29 The definition of an ecologically healthy river makes reference to the fact that no exotic plant or animal species should dominate a river system. However, in the management approaches discussed later in the strategy, little attention seems to be given to the issue of stocking of some waterways with exotic species. The control of non-indigenous fish is described (p. 109) but, apparently, the *status quo* will remain, where applications for stocking (of trout, for example) are assessed by a regional consultation committee. If CMAs are responsible for the development of regional River Health Strategies (RHSs), they clearly need to be involved in these deliberations.

However, one must question why *any* stocking of exotic species should be practiced, particularly given that there is currently no consistent, cost-effective, nor regular monitoring of fish communities (p. 137).

p. 31 Figure 2.3 – This figure is incomplete. What is the significance of these numbers in the definition of river regions?

p. 40 As noted above, throughout the document, particularly in the Vision (Chapter 4), great emphasis is placed (correctly) on the importance of community engagement. However, more emphasis may be required upon the need to first engender an appreciation for the value of rivers and the manner in which different management actions impinge upon river health.

The vision suggests that "our communities will be confident and capable of appreciating the values of their rivers ..." but more may be required to suggest how this might occur in addition to that in Section 8.3.5 (p. 102). Certainly, monitoring programmes such as Waterwatch, together with opportunities to participate in priority setting are important (Section 12.1) but there are many in the community who have yet to reach 'first base' and recognise those values which are at risk. Indeed, the strategy acknowledges that 'primarily, individuals will be relied upon to manage their own enterprises in ways that acknowledge their 'duty of care' and their role as stewards of natural resources" (p. 130). Awareness needs first to be established, if community commitment to healthy rivers is to be enduring.

p.42 The VCMC acknowledges the effort of the RHS to identify targets in the short, medium and long term. This is an important step in helping support regional and state decision making, development of priorities/activities and providing a base for future evaluation activities. It is difficult to make a judgement on the merit of some of these targets, in the absence of more detailed information, elsewhere in the strategy, about current conditions. For example, a stated target for 2021 is for 'an increase of 3000km in the length of the rivers in excellent or good condition'. However, Figure 3.1 (p.32) gives the statewide data in percentage terms, rather than total length, so that direct comparison, and therefore judgement about the merit of the target, is difficult.

Also, what criteria will be used to judge whether, in fact, "significant improvements" have been achieved?

And, do we have the requisite understanding and assessment tools (or will we have them in time) to judge, in 2005, whether agricultural production is produced from natural resources that are managed "within their capacity"? Or, to define "sustainable catchment limits"?

p. 55 The VCMC is again pleased to note the RHS placing itself within the existing institutional and planning framework of the CMAs and the RCS. The proposed management framework in 5.1 seems sensible theory with clear mechanisms for

practical integration into existing regional community planning processes - wonderful!

- p. 56 Box 5.1 – one asset that is not acknowledged here is that of good management. For example, a land manager who takes care to protect and maintain the riparian zone, in a manner that is consistent with 'best practice' and the objective of an ecologically healthy river system, is an important 'asset' to be considered within the development of the regional RHS.
- p. 81 The issue of protecting rivers against uncertainty is critical. It is suggested here (para 3, Section 6.3.6), that uncertainty due to climate change "may fall disproportionately on the environment...". As far as possible, environmental flows should have security *equivalent* to other uses – and environmental flow regimes should take this into account.
- p. 82 The first box on this page indicates that the BE 'conversion' process will be completed not later than 2003. Rather than wait and review the environmental provisions of all BEs thereafter, why not make provision *now* for environmental flows in those cases where the BE conversion process is not yet complete? At one stage, were not environmental flows part of the BE process anyway?
- The second box refers to the review of Water Services Agreements with water authorities. This review needs also to consider the requirements of COAG, on the issue of having a separation between water regulators and service providers.
- p. 132 In addition to those competencies listed, for waterway management professionals, another is the need for a sound understanding of the use and application of river health indicators, particularly in the context of adaptive management.
- p. 138 In Section 13.2, an improved understanding of the "factors which influence community understanding and engagement in the management of river health", is identified as an important area of research. However, it is not identified as an immediate priority (Table 13.1, p. 139). Given that the strategy rests heavily on community involvement and commitment to the river health 'cause', an understanding of those factors which inform and influence current responses to river health issues, should also be of high priority. Recent research (for example by Dr. Daniel Terrill on the Murray River), has highlighted the mismatch between the intentions of policy-makers and the current understanding of river health issues by riparian managers.

In closing the VCMC wishes to reconfirm its support for the Victorian River Health Strategy. The Draft document provides a clear framework for decision making, priority setting and the implementation of on-ground activities. The VCMC congratulates NRE, the Reference Committee and the Scientific Panel in the development of this important and unique document. The RHS sets an important standard for a range of other NRM documents currently under review and development.

Yours sincerely



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