

Response to the Draft for Community Comment “Sustainable Water Strategy Central Region”



The Gippsland Integrated Natural Resources Forum (GINRF) welcomes this opportunity to respond to the Draft Sustainable Water Strategy for the Central Region. GINRF acknowledges that many of the issues and concerns raised in its submission on the Sustainable Water Strategy Discussion Paper have been addressed in this revised draft.

In response to the Draft Strategy, GINRF has prepared its comments under two themes 'Positives' and 'Reservation & Concerns' which are detailed below.

This response is based on a review of GINRF member organisations individual submissions and highlights areas where there is general consensus amongst natural resource management agencies in Gippsland.

Positives

- GINRF members have revised and welcomed the amount of detail included in the document which has allowed for robust discussion among the forum members.
- GINRF acknowledges that the Draft Strategy now includes some analysis of Gippsland's future growth needs for both industry and urban areas which is a move in the right direction.
- GINRF welcomes the decision not to allocate the 30 GL of uncommitted water from Blue Rock Dam until further work is completed on the environmental requirements in the region.
- GINRF welcomes the decision to allocate 10GL to the Latrobe River as a temporary measure and looks forward to working through the process of determining the future environmental needs of the Latrobe River.

GINRF also looks favourably at the decision not to allocate any further resources for consumption purposes unless the full environmental requirements have been met for the Latrobe River.

- GINRF acknowledges and welcomes the opportunity the Eastern Water Recycling Proposal provides to Gippsland in terms of the potential to substitute recycled water for industrial uses and free up natural water for environmental use, both of which will provide additional water for Gippsland's environment and urban areas.

Reservations & Concerns

- GINRF believes that it could support and assist in the effective community engagement process and improve the community's general understanding regarding water literacy. The engagement with the general community in relation to this draft was ineffective in the Gippsland Region and we believe that with more support provided to GINRF organisations, more effective community engagement could have been achieved.
- In view of the above GINRF would be prepared to assist in strengthening the engagement processes on this strategy and the Gippsland strategy in the future.
- GINRF is pleased to see that the draft has considered the growth and future needs of the power industry. However GINRF believes that there is a need for more assurances on the reliability of the population growth modelling and the impacts of climate change to ensure that the real future growth needs of Gippsland will be met.
- GINRF has a broad concern regarding the timing and probability of the Eastern Water Recycling Proposal. 3 aspects need to be addressed here:
 1. The Eastern Water Recycling Proposal is still only in the feasibility stages; however the draft is assuming that the proposal will come to fruition and that this is the definite source from which Melbourne will receive its 89 ML water resource allocation from.
 2. However, if this proposal does not come to fruition, there appears to be no contingency plan presented as an alternate source for the 89 ML of water allocation. Relating to this, GINRF raises the question of why a Northern Link has not been investigated as an alternative or contingency plan for the Eastern Water Recycling Proposal.
 3. If the Eastern Water Recycling Proposal is approved, it is estimated that it will take approximately 9 years to complete the appropriate infrastructure before being put into operation. However there is no guarantee that Melbourne's 89ML water resource allocation will not be taken from the Gippsland region before the plant is in operation and/or before the water has had the opportunity to be recycled.
- GINRF believes that by developing each regional strategy separate to one another that there is potential for inconsistencies and a disjointed view of sustainable water resource consideration at the state level. GINRF is also disappointed that the Gippsland Sustainable Water Strategy will not be considered in conjunction with the Central SWS and that the planning for the completion of this document has been postponed from its original schedule. There is a risk that certain issues that may have an impact on Gippsland's water supply capacity in the future may not be sufficiently addressed.
- GINRF believes that the broader question of the sustainable growth of Melbourne and other regional centres in a constrained water future, needs to be addressed as well as the issue of whether this planned growth fits with the State Governments Sustainability Framework. GINRF feels that the opportunity to investigate whether

the option of developing population centres based around the actual location of the water resource as opposed to investigating methods of moving the water to the population centre/s, has been lost.

- GINRF has concerns that the Environmental Flows still do not address the minimum requirements specified in the corresponding tables contained in the draft in addition to the requirements set out in the relevant environmental flow studies. It will be difficult to assess whether the increased flows make a difference to river health.
- GINRF believes there is an opportunity to increase the Latrobe River's temporary flow from 10 GL to 20 GL as well as the need to consider the amenity value of Lake Naracan and investigate alternate sources for Environmental Flows once the 10 year trial has been completed.

Once again, GINRF would like to thank the Department for the opportunity to provide a submission on the revised Draft Sustainable Water Strategy. If there are any further question or queries regarding this submission or GINRF in general, please contact Ms Carol Jeffs, Executive Officer on (03)5175 7800 or carol.jeffs@ginrf.org.au

Yours Sincerely,

Keith Hamilton
Chair