

**SUBMISSION TO  
VICTORIA NORTH EAST MURRAY RESOURCE PLAN PUBLIC CONSULTATION FEB 2019-02-10**

Dear Sir/Madam,

After attending the public consultation committee meeting at Yea (Mon Feb. 4<sup>th</sup>), we are taking this opportunity to bring to your notice what appears to be for us -and many others who were at the meeting - a glaring gap in the approach to developing the *Victorian Water Resource Plan*.

Having waded through all the documents (including the two hard copy volumes), we are unable to identify several key fundamental concepts **that** should inform your planning.

The first concept is that of MAXIMUM AVAILABLE YIELD.

Instead of calculating the maximum available yield, the proposed planning revolves around sustainable diversion limits and ignores the deficits involved in land use practices that deplete yield: even before the SDL's are considered!

The case in point that was raised at the meeting was the impact on water yield by Clear-fell Logging in the catchment of the Rubicon State Forest, where the Rubicon River and Snobs Creek are significant tributaries of the Goulburn River below the township of Eildon.

Losses of stream flow of 30% result in a deficit of flow BEFORE baseline SDL's are calculated. There are important implications identified in your frameworks and risk identification systems.

The next concept that appears to be missing is the incapacity to identify and then interdict to remedy water theft by calculating losses caused by land use practices that deplete water harvest in the catchments of our rivers.

This is of particular economic importance to the State of Victoria. The State owned Snobs Creek Fish Hatchery requires maximum flow from Snobs Creek in order to supply fish stocks to over 200 waterways across Victoria. The facility is the sole supplier of both native and salmonoid species that underpin the 2.8billion dollar recreational angling economy in all the rivers and lakes across the entire State- not just NE Victoria.

\$7 Billion in assets and 33.000 people employed associated with the recreational and angling industry!

*Theft of the catchment's potential yield is not accounted for and this is an alarming omission in your planning procedures.*

Your body is charged with criteria to" .... Ensure that water dependant ecosystems are resilient to Climate Change and other risks and threats..."

*Clear-fell logging in the headwaters and catchments of the Rubicon and Snobs Creek is clear and present danger.*

Why?

1. It reduces stream flow and yield by 30%
2. It increases sedimentation
3. It increases pollution (Trash burning, loss of soil nutrients and an increase in the level of alkali levels in the soil due to caustic ash)
4. It increases the temperature of the water
5. It suffocates all gill breathing organisms, Macrophytes, aquatic and sub aquatic insect life.
6. It increases turbidity.
7. It interrupts streamflow reliability causing disrupted stream flow patterns.

.... The list is extensive and we request an opportunity to provide a verbal presentation as this submission is inadequate to convey the complexity of the issue.

The last concept missing in the Resource Plan, is for the GBCMA to act as a regulator through "Interception".

The meaning of Interception, implies that the regulator has the power to intercede – based on the criteria listed in the risk assessment.

Interception is necessary when water loss is evident either through deliberate theft by the use of unregulated pumps, or through knowingly causing loss, through land use practices such as clear-fell logging that results in depletion of water yield from the catchments.

Interception is listed in MDB.

Failure to act when the GBCMA are aware may result in the accusation of negligence!

The failure to meet management requirements leaves your board members and managers open to criticism. The truth may be that they do not have the authority to effectively manage the catchment!?

If we are able to assist by making a verbal and more comprehensive submission – backed up with further research- then we would look forward to working toward a successful outcome.

Specifically, we would like to offer further assistance in considering:

- Water Quality
- Measuring and monitoring land use impacts on water yield in the catchment.
- Climate Change and its impact on the way we align water harvesting with its presence.
- Full water recovery.
- Compliance in the watershed and upper catchment sources.
- Cultural water

We do not pretend to be able to comment on cultural values and priorities of Indigenous values, however our consultations with Aboriginal Nations groups (notably the Taungurung), have informed us of the connection between the sources of water and their cultural importance.

The Rubicon and particularly Snobs Creek are rare and precious examples of the state of catchments prior to European Settlement.  
Unlike the rest of Victoria where agriculture and occupation of our waterways are intensive.

For Heritage and historical reasons, preservation is also criteria for the Resource Plan.

We ask for your consideration of our submission and are willing to meet at your convenience.

Sincerely,  
Rod Falconer Geoff Hall