

17 January 2020

Latrobe Valley Regional Rehabilitation Strategy  
Department of Jobs, Precincts and Regions  
55 Grey Street  
Traralgon VIC 3844

**SUBJECT: SUBMISSION FROM THE VICTORIAN ENVIRONMENTAL WATER HOLDER  
ON THE LATROBE VALLEY REGIONAL REHABILITATION STRATEGY OVERVIEW**

Dear Sir/Madam

The Victorian Environmental Water Holder (VEWH) welcomes the opportunity to provide feedback on the Latrobe Valley Regional Rehabilitation Strategy (LVRRS) Overview. The VEWH understands that using water to create 'pit lakes' in disused coal mine voids is likely to be the most viable way to achieve safe, stable and sustainable rehabilitation of mines in the long term.

The VEWH has a strong interest in the any impacts that filling pit lakes may have on flow regimes in the Latrobe River system and is supportive of the strategy's proposed objectives for decisions concerning water access for mine rehabilitation. The VEWH's key interest is in how these objectives will be achieved, and the VEWH will continue to work collaboratively with the Department of Environment, Land, Water and Planning (DELWP) on the proposed water access arrangements for mine rehabilitation for inclusion in LVRRS.

The VEWH is a statutory authority established under the *Water Act 1989*. The VEWH is responsible for managing Victoria's environmental water entitlements to improve the environmental condition of Victorian rivers, wetlands and floodplains.

The VEWH is an entitlement holder in the Latrobe system, with water holdings available in Blue Rock Reservoir under the *Blue Rock Environmental Entitlement 2013* and access to water under the *Lower Latrobe Wetlands Environmental Entitlement 2010*. The entitlements are actively managed in partnership with the West Gippsland Catchment Management Authority to maintain and improve the condition of environmental assets in the Latrobe River, Latrobe River estuary and the lower Latrobe wetlands which have international significance and obligations to protect their ecological character. The VEWH also holds entitlements to water in the Macalister and Thomson systems and flows from these systems are often coordinated to achieved benefits in the lower Latrobe system.

Due to the impacts of river regulation and water extraction needed for towns, industry and agriculture, environmental flows in the Latrobe system are needed to provide support to:

- stands of endangered vegetation communities such as swamp scrub in the Latrobe River estuary
- migratory fish, such as short and long-finned eels and threatened Australian grayling
- estuarine and freshwater fish that are important to recreational anglers, such as black bream and Australian bass
- colonial bird breeding rookeries in Dowd Morass.

Decisions made under the LVRRS are likely to influence water security, flow regimes and ultimately the health of the system, particularly in consideration of projected drier conditions into the future. The Latrobe River has a long history of modification and regulation and as a result is already a stressed system, therefore where possible, the VEWH encourages consideration of opportunities to enhance (or at least maintain) the condition trajectory.

Potential risks from the VEWH's perspective following findings of the LVRRS Regional Water Study by DELWP are summarised below:

- A likely reduced occurrence of storage spills with ongoing use of water to fill mine voids. Natural spills are critical important for meeting larger flow component requirements.
- Increased risks to riverine flows if entitlements used to fill mine voids do not include appropriate use limitations, especially in dry years and under climate change.
- Significant shortfalls in the water required to meet environmental objectives already exist and increased extractions due to future water use change may be of further detriment on an already stressed Latrobe River system.

The Regional Water Study shows there are no alternative sources of water to fill mine voids other than existing surface water supplies. Therefore, it is critical that stakeholders work together to determine the conditions for how this water might be accessed in a way that uses the best available information and allows for review and adaptation over time. This will be important to minimise any potential impacts on the environment and other water users in the system, including the ability to provide for the environmental, cultural, social and economic values of the Latrobe river system into the future.

Sincere regards,



Dr Sarina Loo

Co-Chief Executive Officer  
Victorian Environmental Water Holder.