

Response to "A Water Resource Plan for Northern Victoria"

I believe the following points are not dealt with appropriately in the Water Resource plan.

1. Account for the environmental benefit of water that spills from the dam

Environmental water and privately held water is at times lost to spill when the Dam overflows – In 2016-17 it was noted in the Victorian Water Register Accounts that 234,362ML of Environmental Carryover was lost in spill and a further amount of private water would have been added. This water does not disappear. Benefits to the environmental assets downstream are provided for which managed deliveries are not subsequently required. This situation needs accounting clarity and recognition.

2. The aim of "... productive and adaptable industries that depend on water..." Throughout the document there is no mention of Irrigation.

Though acknowledged tacitly as 'an industry that depends on water' there is no description of the integration of environmental deliveries with irrigation deliveries and the priorities that are understood in management. This relationship needs to be spelled out.

3. Transparent Trigger points for release of excess Environmental water to consumptive pool via market.

The CEWH has made excess water available for sale to irrigators in the Goulburn system twice in the last few years and the VEWH has parcels that are available intermittently, however the trigger points that may enable this are not transparent. Through carryover and unanticipated rainfall situations, water in excess to planned requirements must arise and there is no indication of how this situation is dealt with.

4. Transparent reporting of water delivery through continuous update of the Water Register Water Accounts to show status of Environmental water.

The Water Register annual Water Accounts for 2016-17 were not available at the time that consultation began on this document and were only made available on 25 February 2019. The Accounts for 2017-18 are still not available. There needs to be a more up-to-date way of community access to monitoring of the deployment of environmental water.

5. Transparent reporting of the delivery impacts – Barmah flooding, river bank scouring on Goulburn and Murray, flooding of private land.

Losses of water through overtopping of the Barmah Choke, and consequent erosion of the capacity of that part of the river, is reported as media story and rumour. There is no mechanism for reporting the damage to the banks of the Lower Goulburn River and Mid Murray River, and any flooding of private land that are a consequence of Environmental Water delivery.

6. The accurate accounting of delivery losses needs to be calculated and audited..

Water that is to be delivered as part of MDB obligations to South Australia needs to be realistically discounted to account for the losses in stream. That water which does not reach South Australia and is regarded as loss, is in fact having some impact on environmental assets along the River and should be credited as such.

Thank You.