



Review of Victoria's North and Murray Water Resource Plan

Submission by Friends of the Earth Melbourne
March 2019

Introduction

As a collective that is concerned with water management in Victoria and across the Murray Darling Basin, Friends of the Earth Melbourne welcomes the opportunity to provide a submission to the Draft North and Murray Water Resource Plan.

Friends of the Earth's River Country has campaigned for 18 years with Indigenous nations along the Murray River to protect over 250,000 hectares of Red Gum Forests in new national parks and conservation reserves. Our mission is to see a flourishing Murray-Darling Basin where Indigenous peoples enjoy sovereign rights to country.

Following Europeans arriving in Australia, we have seen over two hundred years of destruction of waterways and the surrounding catchments and ecosystems that support the health of rivers, wetlands and floodplains.

Key Points

1. Consultation

Any consultation that is undertaken needs to be meaningful to the stakeholder concerned. While we cannot comment on if stakeholders felt that their needs were met by the engagement process, we would like to make some recommendations for improvement for this plan and future water management and planning processes.

We also note that Chapter 8 seems to show that there was broad consultation with a number of Traditional Owner groups and the Murray Lower Darling Rivers Indigenous Nations (MLDRIN). It is good to see that MLDRIN "will assess the consultation with Traditional Owners and provide an assessment to the MDBA" (pg 2 of FAQs document). We support ongoing improvements in Traditional Owner consultation that enables real and meaningful engagement.

- **Recommendation 1:** One local environmental group, the Goulburn Valley Environment Group, was appointed to the Advisory Committee for this plan (pg 16). While we whole-heartedly



support the involvement of local environment groups, we also recommend that all water resource plans be viewed as a state-wide community concern. While Catchment Management Authorities (CMAs) may consult with particular groups over the year, having a formal appointment at the Advisory Group level would add more value. Water, catchments and the ecosystems they support, in any region of Victoria, are of state-wide significance. Much like VFF was given a seat at the table, we also recommend representation from a state-wide focused environment group.

2. Environmental values

Water is more than just a resource or an asset. It is more than a commodity to trade and profit from. First and foremost, the environmental values of the northern rivers need to be looked after. The recent State of the Environment Report in Victoria gives a grim picture of the state of inland waterways in northern Victoria at current. It also indicates that data about irrigation is poor and that flow regimes are poor and deteriorating (see <https://www.ces.vic.gov.au/reports/state-environment-2018/water-resources>). While we appreciate that 200 years of mismanagement of rivers and catchments will not be fixed overnight, an approach that puts irrigation needs above the environment will not lead to sustainable outcomes for the long term.

- **Recommendation 2:** We recommend that water planning and management take an 'environment first' approach, one that works with Tradition Owners to incorporate traditional ecological knowledge and traditional management.
- **Recommendation 3:** That constraints be addressed as a priority so that water available for the environmental can be used effectively.
- **Recommendation 4:** Resourcing for research and modelling to continually improve the effectiveness of environmental watering be prioritised and increased in the next round of budget funding.

3. Cultural values

The Basin Plan requires these water resource plans to identify the needs of Aboriginal people, with "a regard to the social, spiritual and cultural values of Aboriginal people and the uses of water resources for these purposes" (pg 110). Traditional Owners have looked after the inland rivers for tens of thousands of years without the destruction we are seeing occur now.

Sites in the water resource plan area have cultural heritage value (as outlined in Chapter 8), with burial sites, middens and other artefacts throughout them. They also play an integral role in Indigenous cultural practices and life, through providing natural resources, bush foods, animals, water and shelter.

Recommendation 5: Any water management projects or decisions under consideration by the Victorian government, and indeed by private landholders, should demonstrate that Traditional Owners have been involved. Free, prior and informed consent from Traditional owners must be



sought before commencing and management projects in order to appropriately consider and strike the balance between environmental and cultural values.

Recommendation 6: Ensure meaningful engagement, identification and due consideration of cultural values and incorporate Aboriginal traditional knowledge into water resource planning. This means ensuring Aboriginal people are empowered and resourced to be involved in water management.

4. Land use planning

“Statutory land use planning powers reside in the *Planning and Environment Act 1987* rather than the Victorian Water Act. Planning provisions are usually general in nature and not typically used to regulate land use activities on farms or how those activities might affect the catchment’s water balance.” (pg 382)

While we don’t have the in-depth legal knowledge of all of the legislation, we are concerned that, as mentioned in the quote above, there seems little being done to regulate water from a land use perspective. Seeing as DELWP is supposed to now be an integrated ‘super-department’ there is opportunity for cross agency involvement to address this issue.

In northern Victoria we continue to see large scale agricultural enterprise that uses enormous amounts of water, such as almonds, being expanded at a rapid rate. Yet, here we are as the driest inhabited country not taking note of climate change (its not even a consideration in the Basin Plan), with a rapidly increasing population in Victoria and rapid expansion of irrigated agriculture and horticulture with huge water needs. The almond and cotton industries are undergoing a rapid expansion that will see pumping from the Murray increase and it appears this type of expansion goes unchecked.

Recommendation 7: That Victorian government agencies work together to create a state-wide plan for sustainable land use that takes into account water, agriculture, land development, population and other factors including the impact of a drying climate, decreased flow regimes and increased drought frequency and then regulate land use planning accordingly. While this is not a part of this resource plan, it should be a complementary measure.

5. Regulation and compliance

We have seen in NSW what happens when government drops the ball on regulation, compliance and enforcement. Page 156 sets out compliance and enforcement functions, with mention of the critically under-resourced catchment management authorities.

Recommendation 8: That the Victorian government, at a statewide level, assess current compliance legislation and functions and address any gaps.

Recommendation 9: Resource compliance effectively in Northern Victoria, with people ‘on the ground’.



6. Interstate cooperation and action

For this plan to have any value at all, there needs to be a real effort by other Basin states to do their part. While this plan cannot cover off on what other states should do, we would hope that Victorian agencies and the Minister for Water push strongly for action from other states and show leadership in championing the environment and Traditional Owner involvement. Some states, the Commonwealth and their Ministers have so far done little but impede the environmental intentions of the Basin Plan.

- **Recommendation 10:** Victorian government agencies develop a multi-state approach to managing water that results in positive environmental and Indigenous outcomes.
- **Recommendation 11:** The water resource plan should call on an immediate halt and/or significant reduction in floodplain harvesting in Queensland and NSW. Without this happening, this plan will be disadvantage.

Conclusion

While some of these comments may go beyond the scope of what is in the pages of the plan, without due consideration of the aforementioned points, the water resource plan will not succeed in ensuring the sustainability and survival of waterways in the northern Victoria.

To ensure success in Northern Victoria we need an honest effort by other states, including NSW, Queensland and SA, who are part of the Bains in its entirety. Resource plans that are just state focused are not viable. Water and flow regimes do not know human-made boundaries drawn on a map.

We hope to see improved support publicly from the Minister for Water and the Department of Environment, Land, Water and Planning for the environmental components of managing water, catchments and the land use planning affecting those.

Also importantly, we want to see increased meaningful involvement from Aboriginal people (that is resourced) and a use of traditional knowledge to ensure the long-term viability of the waterways of Victoria's north and the Murray.

Thank you for the opportunity to provide input.