

# West Gippsland Catchment Management Authority response to LVRRS Overview

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## 1. What is your level of knowledge of mine rehabilitation in general?

Have some understanding.

## 2. What is important to you when you think about the rehabilitation of the Latrobe Valley coal mines?

- That the current and future health of the Latrobe River system and the Gippsland Lakes Ramsar site is preserved throughout the mine rehabilitation process and beyond.
- These waterways provide significant economic, environmental, cultural, recreational and community benefits, are priorities for rehabilitation in the West Gippsland Waterway Strategy, and are already flow stressed under existing water use.
- Given these waterways are already flow stressed, and this is likely to increase under future climates, it is unlikely that continued water extraction at current levels (i.e. using the current water used for power generation for mine rehabilitation) can sustain environmental values.
- The health of the Latrobe River system is particularly important to ecological resilience at the regional scale given the extent of impact on waterways and catchments currently occurring in east Gippsland through fires.

## 3. What do you feel are the most important things Government can do as part of the planning, rehabilitation, and post-rehabilitation stages of the Latrobe Valley coal mines?

- Ensure that a robust and technically defensible ecological risk assessment of proposed water access rules for mine rehabilitation is completed. This should explicitly include the main lakes in the Gippsland Lakes system (i.e. Lakes Wellington, Victoria and King), in addition to the Latrobe River (to Lake Wellington), relevant tributaries (including the lower Thomson) and the lower Latrobe wetlands. The risk assessment should identify any unacceptable risks and mitigation measures to ensure that those risks are not realised. Potential risks could include: changes to flow regimes, water quality and reduced fish passage.
- The LVRRS is an unprecedented opportunity for Government to take affirmative action to secure the long-term health of a major river system in Australia by providing its environmental water requirements and undertaking complementary works in response to decades of degradation from the impacts of power generation and other land/water uses. Government should facilitate:
  - Provision of the environmental water requirements for the Latrobe River system (including high, medium and low flows in dry, average and wet years). This should include an assessment of the merits of a range of options such as: increasing the size of the current Environmental Entitlement (EE) in Blue Rock; establishing EEs in Lake Narracan and Moondarra; modifying entitlement rules including passing flows; and regulating water interception in the catchments (e.g. farm dams and plantations).
  - Completion of works to complement the provision of environmental water requirements (see our response to question 10 for more detail).

**4. What do you feel are the most important things the coal mine operators can do as part of the planning, rehabilitation, and post-rehabilitation stages of the Latrobe Valley coal mines?**

No response provided.

**5. What do you feel are the most important things community and stakeholders can contribute as part of the planning, rehabilitation, and post-rehabilitation stages of the Latrobe Valley coal mines?**

- As the state government statutory authority responsible for waterway health in West Gippsland (including active management of environmental entitlements), West Gippsland Catchment Management Authority has a clear role in the rehabilitation process for the Latrobe Valley Brown Coal mines. Please see our response to question 6 for further detail.
- Other organisations and community groups with a strong stake in the process include: VRFish, Field and Game Australia and Landcare.

**6. How would you like to be engaged in the rehabilitation process for the Latrobe Valley Brown Coal mines?**

- As the state government statutory authority responsible for waterway health in West Gippsland (including active management of environmental entitlements), West Gippsland Catchment Management Authority has a clear role in the rehabilitation process for the Latrobe Valley Brown Coal mines. It is vital that we are engaged in this process. We would appreciate the opportunity to discuss how this is best achieved.
- WGCMA is currently completing work that may be useful in finalising the LVRRS and/or its implementation. WGCMA is happy to keep DJPR/DELWP informed of the progress of this work, make this work available when complete, and is keen to work with you to incorporate it into the Strategy where appropriate.
- WGCMA is also interested in assisting you to finalise the Strategy and to explore the issues/opportunities outlined in our submission.

**7. Overall, do the principles outlined in Section 4 of the LVRRS Overview meet your expectations (considering the important issues you identified above)?**

Neither agree nor disagree.

**8. Are there any changes you would suggest to the proposed principles outlined in Section 4 of the LVRRS Overview? If so, please provide a short explanation as to why you have suggested these changes.**

Part One: Objectives of the Strategy

Principle 1: Opportunities for future economic, environmental and social sustainability are fundamental to the long-term well-being of the region. Should they therefore be included in the assessment of the long-term benefits to the community and maximised, rather than optimised as part of a secondary process?

Principle 2: Is there a need for 'where appropriate' at the end of this principle? Suggest removing it as it could be read as diminishing the role of Traditional Owners.

Principle 4: This principle could be read as implying that ground stability and movement is a higher priority than safety and sustainability. Is this principle needed at all given principle 11 covers instability risks?

Principle 8: Suggest adding “and off-set” following “or minimised”. Offsets may be needed to help ensure that the long-term costs to the community and government are minimised, as per principle 1.

Add a principle around flexibility to adapt arrangements throughout the rehabilitation process given the high uncertainties associated and long-time frame associated with rehabilitation. Add a principle about the cost of water to mine operators for mine rehabilitation needing to reflect that mine rehabilitation is not an essential service (unlike power generation), and not impact the price of water for other water users.

Part Two: Role of government

Add a principle around government’s vital role in clearly defining the scope of the analyses required to implement the intent of the principles in part one, and ensuring that the analyses completed by the mine operators are completed to an acceptable standard.

## **9. Are there any specific elements of the LVRRS Overview that were not clear, or need further information to be provided in the LVRRS?**

The definition of community is not clear. For the purposes of the Strategy, community must include all potentially impacted communities. The community that is potentially impacted is not geographically limited to the immediate environs of the mines. It is also not clear where stakeholder agencies such as our own fit into the Strategy. We suggest where “community” is used, “and stakeholders” is added, to cover stakeholder agencies.

## **10. Do you have any further comments on the LVRRS Overview?**

- There is significant opportunity to achieve non-flow improvements in the Latrobe River system by undertaking activities such as: removal of barriers to fish passage on the Latrobe and Tyers rivers, riparian and in-stream rehabilitation; removal of constraints to enable watering of floodplains and wetlands; and works to improve the quality of water entering the river and the Gippsland Lakes. NB. Non-flow improvements should be viewed as additional and complementary to additional water for the environment. i.e. Not a trade-off for increased water for the environment.
- The WGCMA developed a long-term vision for the rehabilitation of the Latrobe River about ten years ago, which is embedded into our Regional Catchment Strategy, Regional Waterway Strategy and supporting plans including annual Seasonal Watering Plans. Realisation of this vision over the last decade has however been significantly limited by available investment.
- Enormous scope remains for increased investment to improve river and wetland health across the Latrobe catchment. WGCMA is very well placed to lead this and would deliver this in partnership with the local community including Traditional Owners (GLaWAC), VRFish and Landcare.
- While we recommend that it is timely to ‘refresh’ the long-term vision for the Latrobe River with the community and partners, as a starting point the following could be logical areas of local geographic focus (subject to testing with the community and partners):
  - Lower Latrobe River and floodplain from around Rosedale to Lake Wellington (including the lower Latrobe Ramsar listed wetlands): To protect Ramsar values in situ where feasible, and to provide for their upstream migration;
  - Tyers River: A flow starved river in good physical condition;
  - Tanjil and Morwell rivers and Traralgon Creek: All heavily impacted by flow regulation for power generation;
  - Waterhole Creek: An opportunity to contribute to the urban renewal of Morwell through implementation of a largely unfunded management plan for

this creek which was developed by WGCMA in collaboration with the local community and partners;

- Moe River: A significant source of sediment to the Latrobe River and Gippsland Lakes; and
- Narracan wetlands (associated with Lake Narracan): The Latrobe Landcare Network have developed a concept to rehabilitate this area and are currently looking for funds for a business case.

WGCMA would welcome the opportunity to discuss the above with you.

**Stakeholder group**

State government statutory authority

**Postcode**

3844

**Age Group**

No response provided.

**Gender**

No response provided.