



27.7.17

Water Resource Plans

**Water & Catchments/ Department of Environment, Land, Water and Planning
PO Box 500, East Melbourne VIC 3002
WRPTeam@delwp.vic.gov.au**

Re: Draft Submission to Department of Environment, Land, Water and Planning

Draft Wimmera-Mallee Water Resource Plan

To Whom It May Concern

Friends of Lake Wallace (FLW) are writing to provide a submission to the draft Wimmera Mallee Water Resource Plan. Please note we have used page numbering from the Summary Document.

Page 4 Context

We would like the timeline to mention the catchment outside the Wimmera River in the pre-contact section. Mention of chains of wetlands is important. There is no mention of groundwater resource use in the timeline, though it is in text above on page 6.

Page 6.

We are concerned that the statement "...the draft WRP proposes no immediate changes to how water is managed in the region".

Page 10

- Is the West Wimmera specifically excluded from this plan? Even if this plan does exclude the West Wimmera in terms of obligations under the MDBC, then it should still be shown in the map on Page 10, with information about area. We believe that it could also be referred to as potential area for expansion. The description of the area could include that much of the WRP is now connected by pipeline, but there remain areas 'off line' within the Wimmera Mallee that are being considered.
- The groundwater resources should be included.
- It is unfathomable that the 3000 wetlands make no mention in this map, as they can-not be prioritised in any way if they 'don't exist'. That additional areas may be able to receive cultural or environmental watering if they are brought online (or via groundwater supplies).

Page 11

- Makes reference ". . . outside the Wimmera-Mallee WRP area sources its water supply from a water body within the area, its water use is included in the WRP." Is this an area where potential future connections could be acknowledged and mapped?
- In the list of towns, Edenhope is included, though it is excluded on Page 10 as being seemingly outside the plan.
- There is reference to sites of aboriginal cultural significance to 'riverbanks and floodplains'. We would like this extended to include 'wetlands'

Page 12

- We concur that risks are posed to water resources in West Wimmera due to climate change, extreme drought, existing land use practices, extreme wet and pests and weeds.
- Another risk is lack of data - whether it be on water values, the short and long-term effect of risks listed above, the effect of competing user groups, changing political climates etc.



- Another risk is future land use practices. This could cover changes to urban, industrial and rural practices (including irrigation expansion) that affect water resources.
- A risk brought more to attention in recent years is speculative water purchases, which may affect water availability.

Page 17.

The list of town water supplies should make mention that a take option is also from groundwater.

Page 18

Roles and responsibilities appears to exclude communities. It would be nice to include the role of people not in agencies, in the water management. E.g. landholders, licence holders, urban and rural water users, landcare groups. This section also appears to exclude the aboriginal land council.

Page 20

Water for the Environment

We would like the section on 'Environmental Water in the Wimmera-Mallee wetlands' to be extended to include reference to International Treaties on Migratory Birds, provision of water refuges during times of drought or low water, and protection of endangered ecosystem communities.

We would like to see mention of the capacity to review environmental watering for efficiency of outcomes, values, and use. For instance, there is currently a complete lack of environmental watering in West Wimmera, which seems disproportionate given the number of wetlands affected by risks including climate change, irrigation, changed landuse practices, etc.

Page 22

We would like to see the expansion of aboriginal cultural watering sites into West Wimmera. While the populations were largely removed from these areas and no native title claim currently exists, extensive evidence of historical connection to country remains in the form of artefacts. It is important there is an opportunity to re-connect aboriginal people with some of the 3000 wetlands of West Wimmera, and reduce the gap that currently exists (page 24).

Page 26

- Given that "Water for Victoria' is cited as improved recreational outcomes for communities in Victoria's waterways, we would expect this to be reflected in the description.
- We would like to see comments about the future of recreational water allocations, and or reference that the listed instead of 'can be supplied' be altered to state 'can currently be supplied'.
- Specifically, we would like to review how waterways in West Wimmera could be reviewed, as this has not previously been done, for recreational allocations. Two potential wetlands are Lake Wallace, that could be supplied from a pipeline, and Lake Charlegrark that could be fed by groundwater supplies. Harrow Weir Pool could be supplied through the Glenelg River system, or a piped GMMWater supply.

Overall comments.

Although Edenhope is mentioned we seem to be pretty marginal to the plan.

While the Plan references wetlands and some involvement of GMMWater management in that regard, there is no water coming to our region courtesy of GMMWater apart from that within our own resources. It does not advert to the absence of a secure future potable water supply to the town, let alone to the Lake, on whatever basis.



Given that the Plan is looking forward, it is surprising that it does not, as far as we could see, refer to any future extension of the grid to this area or to the current proposal in that regard. It makes much of environmental considerations but does not mention the respective priorities between those and other uses. We should be concerned about any plans to divert the water resources of the Wimmera, Glenelg and Hopkins rivers, or of Rocklands, that would be prejudicial or adverse to us.

Frankly there are too many public authorities and other groups addressing these water issues without regard to their respective roles and the justification of the roles of one over the other. In other words there is a lack of coherence and coordination in this area. That would seem a serious problem.

Comments by our group, into the Victorian Parliamentary Inquiry into the Management, Governance and Use of Environmental Water, that are relevant to this draft Wimmera Mallee Water Resource Plan are provided below.

- a. **The existing governmental structures in Victoria contain a built-in bias towards irrigation, as reflected in the priorities of GWMWater.** The environmental features that depend on water sustain much of the natural habitat which in turn sustains human populations and their critical every-day needs. We would like to see a better balance in users, with the needs of the environment protected.
2. **The current environmental watering program does not provide watering from groundwater systems where irrigation is surrounded by wetlands that could benefit from such programs.** E.g. Lake Charlegrark in Western Victoria is a very important wetland, both from Indigenous Cultural Values, modern social amenity, environmental values for waterbirds and wildlife. Climate change has affected the region, and there are likely effects on the waterways from the groundwater extractions. **We believe there should be research as to whether areas where there are high volumes extracted for irrigation should have a preserved amount for waterways as well, including wetlands that need watering from this groundwater, not just from surface waters.**
3. **Barriers to more efficient use of environmental water and how these may be addressed.**
 - a. **Our group is located in the West Wimmera region of Victoria. We have no surface water irrigation capacity.** The only irrigation is via groundwater pumping. Due to the costs involved, at this time no government authority is willing to pump groundwater to supplement environmental flows. Therefore, it is essential that our region is connected to a piped network to allow environmental watering to occur. Efficient delivery to wetlands affected by climate change, altered water regimes and extractions can involve pipes directly to the high priority point. For instance, although Environmental Flows are let out of Rocklands for the Glenelg River, there are a number of points e.g. at Harrow, that are more efficient locations for delivery. Directing the water via pipe directly to this site saves water, efficiency and provides multiple benefits to the community.



- b. **When considering lakes and water features their proximity to population affects their importance.** If a lake is central to a town's environment the absence of water and its sustainability, no matter how temporary, will adversely affect that town's morale, wellbeing and commercial viability. Because of climate change, changes in land contouring and land use, a major water feature, such as a critical lake that has for a century or more been considered both permanent and integral to a town's environment, should be supported by an irrigation structure that would ensure its viability for all community purposes at all times.
- c. **In light of changed environmental values over time, there should be opportunity for regular research and review about the location and volume for environmental watering.** For instance, there is a greater focus on indigenous cultural watering than there was a decade ago. Based on the use and type of waterway important to indigenous people and in preserving signs of their culture, this affects waterways and their values. A similar argument can be made for social values based on current populations. For instance, while not every waterway can be watered, those where a local population can also attract tourists, protect the surrounding environment, and showcase a casestudy of the local region should be considered e.g. Lake Wallace in Edenhope, as the multiple benefits are hugely apparent, and it also serves to keep tourists away from some other wetlands.
- d. **Determining effects of environmental watering should look at environmental, economic and social effects.** For instance, does the project protect endangered species, migratory birds, water supplies, town amenities, health, viability of rural communities? Trials of the effects of different types of environmental watering may find that multiple beneficiaries can be achieved at some sites previously excluded. E.g. town wetlands.
- e. **While efficiency and cost are obvious considerations the intangible effects of decisions and non-decisions on towns, farms, flora and fauna are transcending considerations and should not be lightly dismissed at any stage.** Transparency in decision-making and on factual issues is an imperative for good governance. In terms of costs, it must be recognized that the public expect more from their water resources than just the support of agricultural production. Rural communities have high expectations of amenity considerations.
- f. **It is unfair that water is not reserved for their town wetlands, and that irrigators can operate without an allocation of environmental water in their communities.** The pricing should be borne by the beneficiaries, which include irrigators who have licences to earn money from their water, and from the general public who benefit from the environmental protection. We believe the protection of environmental water supplies is similar to the protection of National Parks and reserves, it is something everyone contributes to. A single community should not bear the brunt of watering costs, unless they wish it added on the competitive water market.



2. *To do something practical about protecting and restoring Edenhope's unique environment, contributing to the health, wealth and wellbeing of our community.*
3. *To undertake sustainability education and awareness raising initiatives.*

Friends of Lake Wallace – our Terms of Reference

1. *To pursue urgently, all available means of restoring the viability of Lake Wallace as Edenhope's centrepiece, its major recreational facility, its importance for mental health, sport and tourism and in particular, secure against drought the town's future environmental water supply.*

ANDREW FARRAN,

President,
for and on behalf of the
Friends of Lake Wallace