

Discussion Paper for Community Comment – Northern Region Sustainable Water Strategy

SUBMISSION FORM

The Government welcomes and encourages comment on the proposals contained within the Discussion Paper for Public Comment – Northern Region Sustainable Water Strategy from all community members.

You need to know

The information you provide in your submission, or any other response, will be used by the Department of Sustainability and Environment only in the development of this Sustainable Water Strategy. However it may be disclosed to review panels and other relevant agencies as part of the overall consultation process. All submissions will be treated as public documents and will also be published on the Internet for public access.

All addresses, phone numbers and email details will be removed before submissions are published on the Internet. Formal requests for confidentiality will be honoured; however Freedom of Information access requirements will apply to submissions treated as confidential. If you wish to access information in your submission once it is lodged with the Department you may make a request by contacting the Administrative Support Officer of the Sustainable Water Strategies branch at the address below.

Completed forms can be posted to:

Department of Sustainability and Environment
Attention: Sustainable Water Strategies, Office of Water
PO Box 500
East Melbourne VIC 3002

Alternatively, you can obtain this form electronically from <http://www.dse.vic.gov.au/water> and email the completed form to: regional.sws@dse.vic.gov.au

Submissions should be made by 5pm 17 March 2008.

*Name: --BARRRIE DEXTER on behalf of-- BARMHA MILLEWA FORESTS WATER GROUP-----

Organisation and position held (if applicable): --Convenor

Address:

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**Compulsory fields - must complete for acknowledgment purposes*

Where did you obtain information about this Discussion Paper?

- | | |
|--|--|
| <input checked="" type="checkbox"/> Web/internet | <input type="checkbox"/> Contact with DSE Officer (Name:.....) |
| <input checked="" type="checkbox"/> Local media | <input type="checkbox"/> Group Briefing (Group:.....) |
| <input type="checkbox"/> Direct mail | <input type="checkbox"/> Other (Please specify:.....) |

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Submissions can be guided by, but not restricted to, the questions set out in Chapter 4 of the Discussion Paper.

Some general questions which may also help to guide your submission include:

- Considering the information presented in this Discussion Paper, how would you like to see the Government plan for the future?
- What do you think a successful future looks like in the Northern Region?
- What are the most important actions we could all take to secure the region's future?

The following submission:

1. Provides background on the Barmah Millewa Forest Water Group
2. Identifies our main interests
3. Offers comments on the Discussion Paper.

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1 BACKGROUND ON THE BARMAH MILLEWA FOREST WATER GROUP

Our group, undersigned, has extensive knowledge and practical experience of irrigation farming, River Murray operations and management, environmental issues, river hydraulics, forestry, biodiversity and water resources and their use. We have a mutual interest, supported by first hand knowledge of issues, to contribute to resolving:

1. The problem of the Barmah Choke and
2. Effective and efficient watering of the Barmah-Millewa Forest.

The members of the Water Group are:

Richard Anderson

Chairman, Victorian Farmers Federation Water Resources Committee
Irrigation and mixed farming
Bamawm Victoria

John (Sandy) Atkinson AM

Bangerang Elder
Bangerang Cultural Centre Co-operative Ltd
Shepparton Victoria

Gordon Ball

Director, Murray Irrigation Ltd
Irrigation and mixed farming
Mayrunga NSW.

Dr Leon Bren

Associate Professor
School of Forests and Ecosystem Science
Faculty of Land and Food Resources
University of Melbourne
Creswick Victoria

Dr Neil Byron

Commissioner
Productivity Commission
Melbourne Victoria.

Barrie Dexter

Forester
Timber Communities Australia/ River Red Gum Stakeholders
[NAFI, VAFI, FPA NSW, TCA]
Melbourne Victoria

Michael Leonard

Forester
Policy Specialist in natural resource management
Melbourne

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Donald Macleod

Chair, Industry Advisory Committee
Civil and Environmental Engineering
University of New South Wales 2006
Past Chairman Maunsell Pty Ltd and Maunsell Holdings Pty Ltd
Maunsell - Lead consultant Barmah-Millewa Forest Water Management Plan 1991
Provision of Secretariat and Technical Services to Barmah Millewa Forum 1998-2005
Chatswood NSW

Max Moor

Murray Darling Association
Barmah Victoria

2 INTERESTS OF THE BARMAH MILLEWA FORESTS WATER GROUP

The Barmah Millewa floodplain forest, one of six iconic environmental sites under the Living Murray Initiative, is the largest single tree species forest of its kind in the world. It was created by the Cadell Tilt Block and thus exists and remains dependent on the Barmah Choke.

The Choke on the one hand imposes channel capacity constraints which sometimes limit effective delivery of irrigation and environmental water downstream. If the summer/autumn managed flows including rain rejections exceed 10,200 ML/d some sections of forest flood un-seasonally. The Cooperative Research Centre for Catchment Hydrology¹ estimates that an average of 75 GL/a is lost to un-seasonal flooding during December to April. The value of this water is about \$87.6m/a. On the other hand, the constraint in the river channel ensures winter/spring flooding – the lifeblood of the forest and wetlands.

Over past several decades, the frequency, duration and extent of forest flooding has significantly declined in most years due to Hume and Dartmouth storage operations and heavy irrigation demands from Yarrawonga Pool. The current long term drought has compounded flooding problems.

The 60,000 ha forest in Victoria and New South Wales is sensibly treated as a single entity for water management purposes. In 1993 the Murray Darling Basin Ministerial Council (MDBMC) approved a 100 GL annual Environmental Water Allocation (EWA). This may be augmented by an additional 50 GL, the whole being contributed in equal parts by Victoria and NSW.

The EWA has been used on three occasions; 1998, 2000/1 and 2005/6 totalling some 940 GL valued at \$1.16b. The usefulness of the EWA has been greatly enhanced by adding the resource to river floods (usually from the Ovens River). In practice, the storage and release rules for use of the EWA typically allow for watering up to 50% (25-30% of river red gums) of the forest and wetlands at 4-5 year intervals. By contrast, under natural conditions about 80% of the forest and wetlands was flooded for a few months in winter

¹ CRC for Catchment hydrology (2003) Analysis and Management of unseasonal surplus Flows in the Barmah-Millewa Forest. Technical Report 03/2 Jo Chong December 2003.

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and spring in 75 – 80% of years with rare occasions of two consecutive years without a flood.

While there is widespread agreement that flooding a greater area of forest more regularly would be beneficial, a cross border long term solution has proved elusive.

Currently, Victoria intends to create a link between the Murray and Goulburn Rivers which, among other possible benefits, will partially meet requirements for increased summer/autumn flows downstream of the Choke. It will also enable Victoria to fully utilize Ovens tributary inflows to the Murray River.

While this legitimately meets Victoria's needs such a scheme will not necessarily maintain nor increase the opportunities for nor the efficiency of winter/spring forest flooding and may exacerbate problems.

We have already put before the Murray Darling Basin Commission for inclusion in a comprehensive study on the Barmah Choke a proposal for an integrated system designed to:

- ▲ Increase summer/autumn flows downstream of the Choke while minimising un-seasonal floodplain flooding;
- ▲ Make more effective and efficient use of EWAs transmitted with relatively low river flows, to improve regularity and extent of winter/spring flooding;
- ▲ Improve conservation of forest and wetland values and enhance biodiversity of flood dependent flora and fauna.

3 COMMENTS ON THE NORTHERN RIVERS SUSTAINABLE WATER STRATEGY DISCUSSION PAPER

The Submission from the Water Group has concentrated on the interests of the Barmah Millewa Forest. It has only been generally guided by the Discussion Paper's

Concerns

1. Our Group considers that the strategy study design may contain a fatal flaw by considering only the Victorian Murray rather than adopting whole of Murray approach. While Victoria may justify a continuation of the earlier "Sharing the Murray" approach and outlook it flies in the face of a coordinated approach on River Murray matters. We consider that interstate or national agreements continuing the long history of interstate Murray Waters Agreements must be introduced preferably sooner rather than.
2. Our Group was disappointed on the limited consideration given to the environment and to Forests in particular. For example, the Strategy Objectives contain neither the word "environment" nor the word "Forests".
3. The membership of the Consultative Committee is disappointing. As structured, it contains no real community members; the CMA's are over represented particularly as they have already demonstrated a narrow range of interests.

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Comments on Chapter 3

4. The Discussion Paper uses the program “FLOWS” to estimate environmental water shortages. We were surprised to see no justification for its use. Chapter Sections or an Appendix to show its calibration and verification are essential.
5. Our Group has already observed that the Victorian Environmental Assessment Council (VEAC) recently used the same program for their River Red Gum water requirements. VEAC then managed to produce a silly answer that has already been rejected by the Victorian Government.
6. The Paper’s comments on the impact of bushfires and reduced run-off are supported. The comments could have been supported by reference to a recent report by the Forest Fire Victoria Group entitled “The Facts Behind the Fire”, Barrie Dexter and Athol Hodgson
7. The Murray salinity performance in recent years has been outstanding but strangely with little or no publicity from any quarter.
8. Table 3.4 is useful showing annual “environmental flows” as the water “left over” after meeting licenced diversions in average and a dry year.
9. Our Group remain surprised about the continuing use of the Perth annual rainfall plot when dealing with the Murray and Northern Victoria.
10. A related surprise is the quoting of CSIRO study results on the impact of global warming. While a number of recent studies also use the results of this CSIRO modelling, they like you, offer no description of the model (*how is it done*), its calibration (*does it relate well to history, not just the last few years*) and verification (*what independent observations justify its widespread use*).

Comments on Chapter 4

11. Our Group supports the possibility of trading Environmental Water Allocations (EWA).
12. The Paper should present far more detail on the likely water efficiencies savings. Gaining 22GL/a by 2012, only four years time, seems a big ask..
13. We were pleased to see a Victorian paper advocating works in environmental areas to improve watering efficiencies. This argument has been advanced within the Barmah Millewa Forum for many years without success. The water use benefits are clear from the use of the now old Hattah Lakes regulators as well as the limited works established some years ago within the Barmah Millewa Forests.
14. The page 78 reference to the “Management of Environmental Water Reserves” fails to draw on the successful Barmah Millewa EWA operating rules. The Hume storage, conditions applying to loans and paybacks, procedures controlling its use and water accounting were all well crafted by River Murray Water and deserve greater acknowledgement
15. The Murray Goulburn connector is covered on page 84 but there is no mention of any alternatives. Our Group’s comments on the Choke have already been reported under the “Main Interests” heading.
16. We would support any change to the River Murray water accounting rules that gave Victoria credit for environmental flows such as Ovens Floods that trigger a use of a stored environmental water by “piggy backing” the EWA on the flood recession.

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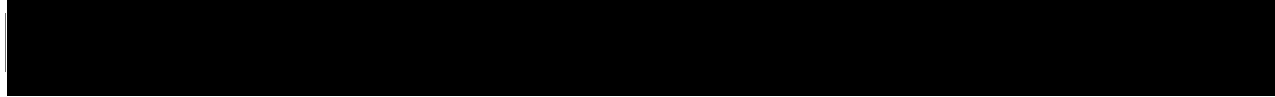
The Barmah Millewa Forests Water Group would appreciate any opportunity to expand on any of these comments. We also have no objection to our comments being added to any Northern Rivers study community comment website.

Yours faithfully

Barrie Dexter on behalf of the
Barmah Millewa Forest Water Group



Richard Anderson John (Sandy) Atkinson AM Gordon Ball Dr Leon Bren Dr Neil Byron



Barrie Dexter Michael Leonard Donald Macleod Max Moor