

Hon. Greg Hunt
Minister for the Environment
Department of the Environment
GPO Box 787
Canberra City, ACT 2601
9th February 2016

Dear Minister,

GMW Connections Project: 2015 Revision of EWPS

The Goulburn-Murray Water (GMW) Connections Project recently completed its periodic review of Environmental Watering Plans (EWPs), in accordance with its obligations under the Water Change Management Framework (WCMF). Although 15 wetlands & waterways were originally short-listed as needing to be evaluated for mitigation water and EWP development, this 2015 review covers only seven EWPs, being those that do need mitigation water and are still the responsibility of GMW. Excluded from this review process were four wetlands and waterways for which responsibility for environmental water management has been transferred to North Central CMA, as given in *Review of EWPs with EWMPs in preparation*, and four that had previously been found not to need mitigation water, so ostensibly not needing an EWP, as given in *Review of EWPs with no mitigation requirements*.

EWPs scheduled for review

The EWPs that were reviewed in 2015 were for: Lower Broken & Nine-Mile Creek, Broken River, Lake Leaghur, Little Lake Boort, Round Lake, Pig Swamp, and McDonald's Swamp.

The review was limited to checking that the hydrological data relating to incidental water used in each mitigation water assessment was correct, and updating the text. The text update comprised: making editorial corrections such as names of organisations and entities; documenting the review process especially in relation to consultation; and adding more essential background information and context, such as on governance. The review was an opportunity for GMW to standardise the EWPs, and to make sure the hydrological content was correct before the eventual transfer of the sites to the relevant CMA (GBCMA and NCCMA in this case).

In our opinion, limiting the review to being an update (rather than a revision) and to ensuring the correctness of the hydrological (incidental) information was sensible for this stage. The updates were appropriate, and have resulted in EWPs that are uniform in scope, and consistent with the scope and contents specified in the Water Change Management Framework.

Constraining the review to being an update has meant, however, that there has been no attempt to improve the EWPs in areas which are noticeably weak, by contemporary standards: we note in particular specific objectives, monitoring and risk assessment. We recognise that an appropriate time for addressing these, and for updating ecological and hydrological knowledge, is when the EWP is re-written as an EWMP, concurrent with or following transfer of responsibility, and is likely within the next two years. In anticipation of this, our feedback on individual EWPs in 2015 included advice pertinent to converting EWPs to EWMPs.

Review of EWPs with EWMPs in preparation

Although responsibility for managing mitigation water was initially vested in GMW Connections Project, it was not intended that this would remain with GMW beyond the completion of the Connections Project (set for 2018). The process of transfer was initiated in 2015, with responsibility for mitigation water for four wetlands & waterways (Lake Murphy, Lake Elizabeth, Loddon River & Twelve Mile Creek, and Campaspe River Reach 2)

being formally transferred to North Central CMA, who have undertaken to write an EWMP for each wetland & waterway. The mitigation water volume for each has been converted to an environmental entitlement held by the VEWH.

We strongly support the early transfer of affected wetlands and waterways to the relevant CMA. We believe that this will facilitate both long-term and seasonal water resource planning for the CMA, by making it easier to develop an integrated approach to environmental watering at the valley-scale. We also support GMW Connections Project contention that updating the EWPs for these four sites is no longer necessary. As experienced reviewers of EWMPs for DELWP, we are confident that EWMPs are more comprehensive vehicles for planning and monitoring ecological management than are EWPs.

Review of Wetlands & Waterways with no mitigation water requirements

Previously, using the protocol set out in the WCMF, the environmental values of four wetlands & waterways (Johnson Swamp, Lake Yando, Campaspe River Reaches 3 and 4, and Lower Broken & Nine-Mile Creek) had been found to be not dependent on incidental water; therefore, these had no requirement for mitigation water, and no need for an EWP. This finding was driven by the fact that the incidental volume estimated to be reaching each of these four wetlands & waterways in the baseline year was a small to insignificant part of the total volume needed to sustain its recognised environmental values. Such an assessment could change if the incidental volume had to be retrospectively revised; and such a revision could arise if the implementation of modernisation since 2010 changed the number (and/or volume) of outfall channels, or altered delivery of mitigation water.

As part of its 2015 EWP review, the Connections Project took a precautionary approach, and checked the hydrological information used in the original assessments for the four wetlands & waterways with no mitigation requirement, as with other sites being updated. Three were as previously estimated (Johnson Swamp, Lake Yando, Campaspe River Reaches 3 and 4) and therefore their original EWPs could remain unchanged, but this was not the case for the fourth (Lower Broken Creek & Nine Mile Creek).

The incorporation of the Adjunct Areas into the Connections Project in 2011 raised the issue of the effect of irrigation modernisation on outfalls from the Shepparton IA to Broken Creek, and how this related to the EWP. GMW has advised that, as outfalls from the Shepparton IA were effected by an earlier modernisation program (the Future Flows Project), any compensatory arrangements for possible environmental effects to Broken Creek are outside the scope of the Connections Project (GMW, pers. com. C. Solum, 2016).

Because of this, the EWP for Broken and Nine-Mile Creek was updated in the same way as other EWPs.

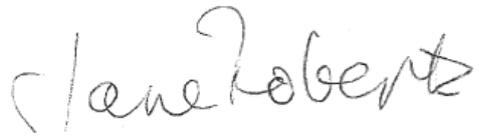
Concluding Advice on EWPs

Two waterway EWPs and five wetland EWPs, first developed in 2010, were subjected to a progress review as required by the WCMF. In each case hydrological data were examined and original estimates of mitigation water requirements were reaffirmed. For one EWP, Lower Broken and Nine-Mile Creeks, estimates of the volume of incidental water received had significantly changed with the incorporation of modernisation in the Shepparton and Central Goulburn 1-4 Irrigation Districts into the Connections Project in 2011, however environmental protection arrangements for this are part of a different project, the Future Flows project, not the Connections Project.

The ERP is of the opinion that the review and updating of these EWPs was in accordance with the provisions of the WCMF and that the EWPs now provide a suitable basis for developing sound ecological objectives and monitoring of progress as part of the preparation of EWMPs and handover to relevant CMAs. We note that all of the 15 wetland & waterways sites were reviewed transparently and consistent with the intent and detail of the guidance in the WCMF. In all cases they represent significant steps towards the objectives of the Connections Project. It is the opinion of the ERP all of these documents warrant your approval.

ERP wishes to record its gratitude for the open and constructive support given it by GMW Connections personnel and the positive collaboration of CMA officers.

Yours sincerely,

A handwritten signature in cursive script that reads "Jane Roberts".

JANE ROBERTS

A handwritten signature in cursive script that reads "Terry Hillman".

TERRY HILLMAN