

Introduction

Please find following key information about making a submission.

Who can make a submission?

Anyone is able to comment and make submissions on the Water for Victoria Discussion Paper.

How will submissions be used?

We want the final Water Plan to reflect the community's views. All submissions received will be reviewed and used to inform the final document.

Will submissions be publicly available?

Written submissions will be publicly available and will be able to be read by others, unless you have requested and been granted confidentiality status.

Why do I have to register to make a submission or comment online?

The information provided in the registration form will help us analyse the responses and help us know which issues are of concern to communities and stakeholders in which areas of Victoria.

Can I provide a submission in another format?

Given the high volume of submissions anticipated it is strongly preferred that the online form or the downloadable template be used. This will ensure the most effective evaluation of the issues raised in submissions. However, if another format best suits the needs or requirements of your organisation you are welcome to use another format.

How do I make a submission?

You can provide your submission in three ways:

- ➔ **Online** via the [online submission form](#), or by [uploading your submission](#)
You will need to register to make a submission. Submissions and comments will close at 5.00pm AEDST Friday 13 May 2016.
- ➔ **Email** using the waterplan@delwp.vic.gov.au email address. You are welcome to use the email template available for download, or your own preferred format.
- ➔ Post your submission to:

Water Plan Project Team
Water and Catchments Group
Department of Environment, Land, Water and Planning
Level 10, 8 Nicholson St
East Melbourne 3002

As part of making a submission, you will need to agree to the privacy collection notice and statement of confidentiality. These are outlined in both the online submission and upload forms.

Do I have to respond to all of the questions in the submission form for my views to be heard?

Not at all. You are welcome to respond to as many, or as few, of the questions as you would like.

Can I comment on other areas not addressed in the Discussion Paper?

The Water for Victoria Discussion Paper and consultation process is asking Victorians to take a look at some particular aspects of water – particularly those outlined in the ‘proposed strategic directions’.

These have been put forward as areas where community members and stakeholders can make the most impact in the decision-making process within the final Water Plan document.

You are welcome to comment on other areas not addressed in the Discussion Paper which you feel should be a part of this document. However, we do recommend that you first check the Department’s consultation website: haveyoursay.delwp.vic.gov.au to see if your area of focus falls within a different policy document or consultation process.

Submission Template

Chapter 2: Climate change

Proposed objective: Victoria will continue to invest in climate science to understand the impacts of climate change now and into the future. The water sector will play an important role in both climate change mitigation and helping our communities to adapt to climate change. Our water sector will be prepared to minimise the disruption that extreme events like flood and bushfire may cause to the provision of this essential service.

2.1. The Discussion Paper proposes that:

'The government will continually build our understanding of the impacts of climate change by working with a range of partners such as communities, research organisations, businesses and industry. This will help ensure that the Victorian Water Sector is well prepared to plan for and adapt to future climate change.'

Do you agree with this idea? If so, who should the water sector be working with on the impacts of climate, and how?

This proposal is supported very strongly. All sectors named should be involved in work on the matter to meet the challenges ahead. From the Werribee River Association's point of view, the Werribee River itself, its standard of health and normal functioning should be a major focus.

2.2. The Discussion Paper proposes that:

'The water sector, including water corporations and catchment management authorities, will maximise its contribution to climate change mitigation by achieving carbon neutrality. The government will work with the water sector to consider implications for the sector and determine an achievable time period for this to occur. In the interim, the water sector will:

- **Contribute to carbon reduction targets set by the government**
- **At least match the state's renewable energy target through the development of renewable energy sources or purchase of renewable energy generation certificates**
- **Exploit carbon sequestration opportunities identified catchment management authorities**
- **Maximise the energy efficiency of its operations and premises.'**

Are there any other opportunities or challenges that we should be aware of?

No new fossil fuel resource taking, including coal mining, or coal seam gas extraction should be allowed to begin in any of our water catchments. Those that do exist should be phased out.

2.3. The Discussion Paper proposes that:

'The government will track the impacts of climate change on our environment and communities by:

- **Developing a monitoring, evaluation and reporting framework for the water sector**
- **Collating information collected to guide ongoing action to address the impacts of climate change**
- **Using the framework to guide evidence-based decision making and adaptive management across the water, catchment and agriculture sectors.'**

How strongly would you support this direction? Do you have any further advice for the Department on this proposed direction?

Please explain your response:

This direction is supported very strongly. However, the information gained, at all levels of detail should be freely available to all members of the community.

Any other comments about Chapter 2: Climate change?

Chapter 3: Waterway and catchment health

Proposed objective: To protect all waterways from the adverse impacts of human use and improve the condition of priority waterways to support environmental, social, cultural and economic needs and values of communities now and into the future.

3.1. The Discussion Paper proposes that:

'Through implementation of regional waterway strategies, which identify priority waterways in consultation with local communities, the government proposes to:

- **Improve the health of 36 priority waterways, by focusing investment on large-scale projects to achieve targeted outcomes over the next 30 years**
- **Continue investing in on-ground work and environmental water management of other local priority waterways identified in regional waterway strategies for community benefits**
- **Establish long term evaluation sites and ensure that waterway managers monitor and report back to communities on the progress of securing environmental outcomes.'**

How strongly would you support this direction?

This direction is supported very strongly. Many of our waterways, including the Werribee River, are now used as resources for economic needs with many authorities and agencies having control or responsibility for various aspects of management. This results in many poor decisions with no overall impact on the 'whole of catchments' taken into consideration.

'Over the next four years the government will build on the Victorian Waterway Management Strategy by:

- **Implementing the Regional Riparian Action Plan to accelerate priority onground riparian work**
- **Improving the health of the Gippsland Lakes by continuing to support the Gippsland Lakes Coordinating Committee and investing in on-ground works and community engagement**
- **Introducing legislative provisions to protect the Yarra River from inappropriate development and promote the river's amenity and significance.'**

What feedback would you provide about this proposed direction?

These actions are endorsed strongly.
The Werribee River Association has concerns that the Werribee River, and many lesser priority streams in an area of rapid urbanization, will be impacted heavily before many 'flow on' positive impacts of the Yarra River Act are felt.
Therefore higher priority should be given for the Werribee to benefit from the same "...legislative provisions to protect the Yarra River from inappropriate development and promote the river's amenity and significance."
Why can't we have an 'urban rivers' Act?

3.2. The Discussion Paper proposes that:

'The government will continuously improve environmental water management practice by:

- **Continuing to work in close partnership with communities, its regional partners, the Commonwealth and other state governments to achieve environmental outcomes under the Basin Plan and other intergovernmental agreements**
- **Delivering on the existing commitment to provide an additional eight gigalitres of environmental water to the Thomson River**
- **Reconfirming Central Region Sustainable Water Strategy environmental water recovery targets and identifying options to meet existing shortfalls with local communities and stakeholders in the Moorabool, Barwon, Werribee and Maribyrnong Rivers**
- **Continuing to invest in environmental works and measures to make the most efficient use of the available environmental entitlements and maximise environmental outcomes**
- **Ensuring that the Victorian Environmental Water Holder, working with waterway managers, continues to identify and report on opportunities for shared benefits from environmental watering, which will support recreational benefits to local communities and benefits to Traditional Owners. This will occur where it is cost effective and aligns with environmental objectives**
- **Ensuring environmental watering program partners monitor and report back to communities on their progress towards expected environmental outcomes.'**

How strongly would you support these steps? Have we missed anything?

These points are very sound.

However:

More could be made of the economic value to communities of environmental flows.

This matter would be of great help to communities explaining why environment flows exist at all.

Benefits such as human health, biodiversity, social opportunities, enjoyment, passive tourism, improved amenity and pride need costing.

3.3. The Discussion Paper proposes that:

'The government will protect all Victorian waterways from the adverse impacts of human use by:

- **Investigating opportunities to enhance waterway protection mechanisms through planning instruments. In the first instance, for the Yarra River, this will be explored through the work of the Yarra River Protection Ministerial Advisory Committee**
- **Improving understanding of how and where land use and management in Victoria has the greatest impact on waterway health**
- **Developing and implementing a new State Environment Protection Policy (Waters) to:**

- **Confirm the beneficial uses of Victorian ground waters and surface waters**
- **Confirm the water segments to which beneficial uses apply**
- **Set water quality indicators and objectives to protect beneficial uses**
- **Establish a contemporary risk-based framework for the management of unlicensed pollution sources – both point and diffuse sources in rural and urban areas**
- **Provide for the development of plans to manage improved water quality outcomes**
- **Enable water quality offsets to be used within catchments to maintain regulatory compliance within waterways, taking into account work previously conducted by the Victorian water industry.'**

What advice or feedback do you have for the government about this proposed direction?

This proposal is supported very strongly.
However:
The information gained, at all levels of detail should be freely available to all members of the community.
Currently there are E.coli levels of concern as noted by one water authority in a part of the Werribee, but until early 2016, not shared with or reported to the waterway manager.
There are reports that another water authority is working to extract aquifer water in one part of the Werribee, with no consultation with local community.
Then there is the question - do we know all that should be known about recharging aquifers with recycled water?

3.4. The Discussion Paper proposes that:

'The government will strengthen community engagement and participation in waterway and catchment health through:

- **Involving the community to a greater extent in planning, priority and outcome setting, on-ground work and monitoring**
- **Continued support of Landcare, Waterwatch, EstuaryWatch and other citizen science initiatives**
- **Building partnerships with recreational anglers to plan, deliver and monitor projects to improve fish habitat.'**

How strongly would you support this direction? Have we missed anything?

This direction is supported very strongly.
However:
The community has long been involved in many aspects mentioned, and worries about the capacity of some authorities who manage aspects of the waterways, to really engage and think for the whole community, and not just specific business interests. Eg Irrigation affects a whole community and not just the farming industry. Planning authorities look after development and not waterways.
The limited funds given to grant opportunities make for much disappointment when planned

activities cannot be funded.

Litter is now a major negative impact on streams; waste products from the building industry, eg polystyrene foam, waste from the take-away food industry eg paper wraps, napkins, straws, plastic drink containers, plastic bags and so on.

Encouraging volunteers to clean up after industry is a negative use of community capacity to improve waterway health for the people.

Recreational angling is not the only benefit of having fish in a stream.

Returning native fish to waterways is a good economic, social and cultural outcome to achieve.

Greater emphasis should be made of the need to engage with 'fish' based community groups such as Australia & New Guinea Fishes Association.

3.5. The Discussion Paper proposes that:

'The government will improve waterway health knowledge, monitoring and innovation by:

- **Establishing a waterway research hub to:**
 - **Review Victoria's waterway monitoring program design**
 - **Synthesise and share available knowledge and evidence**
 - **Coordinate research to test assumptions between outputs and outcomes**
 - **Investigate new technologies to assist large scale, long term information gathering and how to perform work activities more efficiently and effectively**
- **Developing and applying Environmental-Economic Accounting for waterway and catchment health to assist in decision making**
- **Investigating carbon accounting methods for waterways.**

The waterway research hub will be based at the Arthur Rylah Institute and will work collaboratively across government and research organisations.'

What do you think about this proposal? Are there other opportunities we should consider?

This proposal is supported very strongly.

However:

The information gained, at all levels of detail should be freely available to all members of the community.

The community should be consulted in the formative stages of research to ensure their concerns about water quality are included. E.g. plastic, litter, landfill seepage and so on

Any other comments about Chapter 3: Waterway and catchment health?

Chapter 4: Water for agriculture

Proposed objective: To protect all waterways from the adverse impacts of human use and improve the condition of priority waterways to support environmental, social, cultural and economic needs and values of communities now and into the future.

4.1. The Discussion Paper proposes that:

‘Victoria will support water users to adapt to reduced water availability by:

- **Supporting an open water market, with transparent market information, and free from artificial barriers to trade, to provide users with the greatest possible flexibility to respond to changes in external factors**
- **Monitoring, assessing and reporting on the capacity of the system to deliver water**
- **Ensuring tariffs and charges reflect the costs to deliver water.’**

How strongly would you support this direction, and why?

‘The government will:

- **Continue to prioritise projects that will help it meet its 1,075 gigalitre obligation under the Basin Plan. It will maintain a focus on system efficiencies**
- **Seek to maximise the sustainable diversion limit offsets up to 650 gigalitres, with other Basin jurisdictions. Together these two directions will ensure no non-strategic water purchase is needed from the Commonwealth Government**
- **Undertake its own socio-economic impact analysis into the impact of water recovery, to ensure that any further recovery from Victoria is based on robust evidence that it can be done with neutral or better social and economic impacts. This work will inform Victoria’s discussions with the Commonwealth.’**

What are your reflections on these proposed actions?

‘The government will develop a Victorian Rural Drainage Strategy for public release within two years. It will be prepared through an open and consultative process.’

Do you have any advice on the development of this strategy or the engagement process to support it?

4.2. The Discussion Paper proposes that:

‘Water corporations will provide water resource information for consideration in regional planning by local governments and agribusiness investment facilitation by the Department of Economic Development, Jobs, Transport and Resources. This will include information on both traditional and alternative fit-for-purpose water supplies.’

How strongly would you support this direction, and why?

4.3. The Discussion Paper proposes that:

‘The government will investigate ways to support the long term viability of Victoria’s irrigation sector by:

- **Focusing investment in rural water infrastructure that improves irrigation system efficiency and levels of service, consistent with agreed investment principles**
- **Providing specialist independent advice and incentives for whole-of-property-planning to irrigators to enable informed decisions about their water use, and how to participate in broader system modernisation projects.’**

Do you have any advice on these actions, or others the government might consider?

This proposal is supported very strongly.
However:
Salt reduction in recycled water is of importance in agriculture, and on community usage for oval & other watering.
Question:
Is this time to ask if better ways of farming the same products can be achieved, rather than remaining with irrigation solely?

‘The government will investigate ways to increase the resilience of rural communities by:

- **Investing in rural water infrastructure that increases access to water for domestic and stock use, consistent with agreed principles**
- **Improving information on the constraints and availability of Emergency Water Supply Points. The government will clarify the roles and responsibilities of local government and water corporations in the management of Emergency Water Supply Points. The government will also clarify pricing policy for emergency water supplies.’**

Do you have any advice on these actions, or others the government might consider?

'The government will consider future funding for rural water infrastructure projects using the following principles:

Net public benefit

- **The health of the environment must be maintained or improved**
- **Net public benefits to the regional economy and community values must be demonstrated.**

Long term viability

- **It is consistent with Regional Strategic Plans, Regional Growth Plans and land use planning**
- **Net benefits will be achieved under a range of future water availability scenarios**
- **It is consistent with any relevant land use suitability assessments, including soil quality, and agricultural policy**
- **User demand and support for the proposed service is demonstrated, including assessment of its long term service cost affordability.**

Value for money

- **It has undergone a positive and comparable cost-benefit analysis of social, economic and environmental outcomes, including water savings, economic growth, and environmental sustainability**
- **Cost share with proponents is proportionate to the public and private benefits.'**

What are your reflections on the proposed principles?

These principles are supported very strongly.

'The water sector will work proactively with the Department of Economic Development, Jobs, Transport and Resources' Invest Assist and agribusiness facilitation service, and with the Regional Partnerships to:

- **Clarify and communicate roles and accountabilities in facilitating agricultural development opportunities in new or existing areas**
- **Ensure water users and potential investors have access to the water-related information that they need to make timely and informed decisions about potential new environmentally sustainable agricultural developments.**

The water sector will work proactively across the Department of Environment, Land, Water and Planning to streamline water-related regulation and approval processes while maintaining protections for third parties and the environment.'

What feedback or advice do you have on this proposed direction?

'The water sector will support agricultural development by providing information and advice on long term water supply, availability and reliability.'

Regional Partnerships provide a mechanism to consider if proposed land use zone changes are consistent with rural water infrastructure investment government's food and fibre objectives, where this is a regional issue.'

How strongly would you support these steps? Have we missed anything?

4.4. The Discussion Paper proposes that:

'The government will review water-use licences to ensure they are contemporary, relevant to the conditions and responsive to regional differences, and consistent with the Basin Salinity Management 2030 (see Discussion Paper for further details) and the State Environment Protection Policy (Waters) which is currently under review (see Chapter 3 Waterway and catchment health).'

Are there any particular factors you feel should be part of this review process?

'The government will provide ongoing support for Victoria's water quality and salinity management activities and monitoring to ensure ongoing compliance with its obligations under the State Environment Protection Policy (Waters), the Murray-Darling Basin Plan and the Basin Salinity Management Strategy 2030.'

How strongly would you support this direction, and why?

'The government will develop priorities for the next five years of the Victorian Irrigation Drainage Program, in consultation with landholders and other stakeholders.'

What feedback or advice would you provide to the government about this direction?

Any other comments about Chapter 4: Water for agriculture?

Chapter 5: Resilient and liveable cities and towns

Proposed objective: Water will support the transformation of Victorian cities and towns to be the most resilient and liveable in the world. We will plan and manage all elements of the urban water cycle in an integrated and innovative way to improve environmental, social and economic outcomes for our communities.

‘Government will support resilient and liveable cities by adopting a whole-of-government approach. In particular, the water, urban planning, and local government portfolios will align key strategies, including the water plan, Plan Melbourne Refresh and the Metropolitan Open Space Strategy to support the water-related outcome areas described in this chapter.’

What feedback or advice would you provide to the government about this direction?

This proposal is supported very strongly.
However:
Urban planning needs to allow for greater public space to be allowed when green-field housing and other construction works are permitted along waterways.
The work of VCAT should be reviewed to ensure better environmental and social outcomes are achieved adjacent to waterways.
Local communities should have ready access to easy-to-follow and readable web or other planning documents. The current situation leaves a lot to be desired.

5.1. The Discussion Paper proposes:

‘The government will make the best use of all water sources by:

- **Promoting the use of all available sources to support liveability outcomes where the water sources are fit-for-purpose**
- **Requiring water corporations to assess the use of all potential water sources in the development of their Urban Water Strategies (these strategies are required under the current Statement of Obligations for water corporations)**
- **Promoting an evidence-based approach to diversifying our water portfolio that enables informed community consideration of the role of all potential water sources.**

How strongly would you support this direction, and why?

This direction is supported very strongly.
We raise again the issue of water authorities acting without community involvement and acting for their responsibilities alone.

‘The government will support enhanced stormwater management to realise multiple benefits, with a particular focus on protecting urban waterways by:

- **Reviewing current obligations and management practices to ensure that all types of**

development more effectively manage adverse stormwater impacts and there are effective economic incentives to mitigate the impacts of runoff

- **Supporting best practice through updating integrated water management standards in planning schemes, as part of ensuring we have the best mix of tools to address stormwater management.'**

What feedback or advice would you provide to the government about this direction?

This proposal is supported very strongly.

However:

There are instances where enforcement of regulation is not possible as local government won't or can't afford to pay for staff, or litigation is too difficult, costly or time consuming.

E.g. polystyrene foam being left to blow into open swales leading to the river, off building sites in a government development in Werribee.

'The government will support more effectively realise opportunities from recycled water and wastewater management by:

- **Improving and clarifying regulatory arrangements for recycled water schemes, particularly clarifying roles and responsibilities and other key issues identified in previous reviews of the regulatory framework**
- **Encouraging water corporations and waste management agencies to explore waste-to-resource opportunities**
- **Promoting the use of innovative solutions to improve management of on-site domestic wastewater and sewerage infrastructure, including through the proposed IWM planning framework.'**

How strongly would you support this direction, and why?

5.2. The Discussion Paper proposes that:

'Local and regional integrated water management planning will engage the community to deliver on the following core outcome areas for urban water management:

- **Safe, secure supplies in an uncertain future**
- **Effective management of wastewater**
- **Flood resilience**
- **Healthy and valued waterways**
- **Healthy urban landscapes and places.'**

What feedback or advice would you provide to the government about this direction?

This proposal is very sound, but reference needs to be made to the quality of water itself, in that it should be of very good quality, allowing fishing and swimming to take place.

Our community group has been asked on more than one occasion about consumption of fish, and it would be helpful if a definitive statement was made on whether fish in blue-green algae affected waters are able to be consumed.

'Government proposes the following elements as part of a new framework for urban water planning for Victorian cities and towns:

- **Sub-regional IWM planning – Government will identify priority areas for IWM planning and will continue to support existing IWM processes**
- **Local IWM planning – Local IWM planning will be developed where required to identify integrated water cycle servicing solutions to meet place-based outcomes and guide delivery plans of the various participants**
- **Responsibilities for IWM planning – Government will work with water corporations, local government and other key parties to determine roles and responsibilities for IWM planning**
- **Formalised agreements, guidelines and templates – Government proposes to work with water corporations, local government and other key parties to provide guidelines and templates for the development and implementation of IWM plans. This process will also consider the need for support for local government in the development and implementation of IWM plans. Arrangements for implementation of IWM planning will be formalised through agreements between water corporations, local government and other delivery partners**
- **Legislative and regulatory support for IWM plans – Government will also consider options for embedding IWM planning into relevant legislation.'**

How strongly would you support these core elements of a new framework, and why?

These elements are strongly supported. The Werribee River has virtually no flows below the Werribee Diversion weir, and for some years has had constant b-g algae outbreaks, *Azolla* and

Lemna minor coverage. A local urban IWM plan involving all parties on the river, might improve matters into the future for the growing community and the council vision for the Werribee CBD.

‘Government will enable widespread adoption of IWM through the following:

- **In consultation with the Department of Treasury and Finance and the Essential Services Commission, developing economic evaluation and cost allocation guidelines to support whole-of-life investment decisions to be incorporated into IWM planning**
- **Requiring water corporations to consider alternative servicing strategies when making investment decisions**
- **Working with industry to refine and embed the ‘avoidable system cost’ project and other mechanisms to support whole-of-life assessments**
- **Working with the sector to support capacity building, particularly in regional towns and cities, including considering the potential benefits of IWM facilitators**
- **Providing support for local councils to assist in facilitating IWM planning processes, particularly in resource constrained locations across the state**
- **Supporting research undertaken by academic institutions, such as the Cooperative Research Centre for Water Sensitive Cities**

What comments do you have about this direction? Have we missed anything?

'Government will better integrate urban water management and land use planning and development by:

- **Integrating water outcomes in key government strategies, such as the Plan Melbourne Refresh, Metropolitan Open Space Strategy, Regional Growth Plans, the Biodiversity Strategy and the Yarra River Protection Project, and major projects (such as the Level Crossing project)**
- **Aligning water outcomes with urban land use planning instruments and standards, such as state and local planning policy frameworks and Environmentally Sensitive Design performance standards for buildings**
- **Working with water corporations to clarify expectations on how their land can be better used to optimise liveability outcomes**
- **Working with water corporations, planning agencies and local government to develop water sensitive urban planning and design guidelines that incorporate IWM, which will need to be tailored to reflect local circumstances. The guidelines will initially focus on Melbourne, and will then be adapted for use across Victoria.**

How well do you think these steps will work to better integrate urban water management and land use planning and development? What advice would you give to the government?

These steps will assist with what is perceived to have been a reluctance to adopt WSUD in some areas, and will add impetus to a better performance in the future.

5.3. The Discussion Paper proposes that:

'Government will:

- **Build on T155 and the Schools Water Efficiency Program to develop a collaborative behaviour change campaign for residential and non-residential customers working with industry and appropriate research institutions**
- **Partner with water corporations and local government to build an informed and engaged community, including ensuring water-related data and information is available and accessible to water customers and the community.'**
- **Develop a program to support efficient use of water by industry**

What feedback or advice would you provide to the Government on this proposed direction?

A collaborative behaviour change campaign is strongly supported. T155 and SWEP programs can be built on to engage and inform the community.
Making water related data and information available and accessible is also supported strongly. Water quality data needs to be gathered from more locations as many point source sites need to be monitored.
Water quality data on parameters other than those in Waterwatch need to be included ;
E.g. heavy metals, hormones and anti-biotics.
Further work on reduction of salt in waste water needs to be encouraged.

Any other comments about Chapter 5: Resilient and Liveable cities and towns?

Chapter 6: Recognising and managing for Aboriginal values

Proposed objective: Victorian water planning and management frameworks will consider the cultural value that water has for Aboriginal people through participation. Our existing water planning and management processes will have regard to the rights and interests of Victoria's Traditional Owners through collaboration. This will be achieved through aboriginal participation in water management.

6.1. The Discussion Paper proposes that:

'The government will support an expanded program of projects to identify Aboriginal water values, uses and objectives across Victoria and to facilitate their inclusion in the water planning and management frameworks.'

How strongly would you support this direction, and why?'

This proposal is strongly supported, as it will give further recognition to Aboriginal people and the role they play in the wider community, and their water values and uses will enhance the liveability and health of our waterways.

6.2. The Discussion Paper proposes that:

'The government will consider Aboriginal values and ecological knowledge into water planning and management frameworks. A range of mechanisms for achieving priority Aboriginal water objectives will be developed through partnership and collaboration between water resource managers and Traditional Owners. This will include exploring opportunities for achieving shared benefits.'

What feedback or advice would you provide to the Government on this proposed direction?

6.3. The Discussion Paper proposes that:

'The government will build increased participation of Aboriginal Victorians in water management by:

- **Building the capacity of the water sector to collaborate with Traditional Owners**
- **Seeking advice from Aboriginal water reference groups**
- **Supporting the appointment of Aboriginal people to key positions in the water sector**

- Investigating further opportunities for scholarships and internship programs.

The government will work with Traditional Owners to identify barriers to them accessing water to meet cultural flows objectives and to inform their decision about whether to enter the water market.'

What comments do you have about this direction? Have we missed anything?

Any other comments about Chapter 6: Recognising and managing for Aboriginal values?

Chapter 7: Recognising recreational values

Proposed objective: Victoria will recognise the shared benefits enjoyed by recreational users on and around water storages and waterways, while maintaining the rights and obligations of entitlement holders. Recreational communities will be included in water planning and management decisions to improve their resilience to the impacts of drought and climate change.

7.1. The Discussion Paper proposes that:

'The government will enhance the water planning and management framework to ensure that water sector agencies:

- **Consider recreational benefits along with the multiple uses of water and waterways in annual and long term planning**
- **Undertake effective engagement to support consideration of community recreational objectives in planning and management decisions**
- **Establish collaborative approaches between the water sector, community members and other agencies to achieve recreational and regional outcomes.'**

What feedback or advice would you provide to the government on this proposed direction?

The proposal is very strongly supported:
This will encourage water agencies to consider the community in a region, and encourage a sharing of information between agencies and authorities.

As previously noted in our comments to CH.5 –
The work of VCAT should be reviewed to ensure better environmental and social outcomes are achieved adjacent to waterways.

7.2. The Discussion Paper proposes that:

'The government will build capacity of recreational water users by:

- **Requiring water agencies to provide better, more recreational user-friendly information about their water and waterway management activities, and the resulting opportunities or limitations on recreational enjoyment of our waterways**
- **Requiring water agencies to be more transparent about water and waterway management decision making and outcomes**
- **Providing more coordinated avenues for accessing information about the water framework and statewide recreational values across multiple relevant information sources and agencies.'**

How strongly would you support this direction, and why?

This proposal is very strongly supported.
We have previously noted comments on blue-green algae and consumption of fish, and the presence of e-coli readings being known but not shared.
We note now that there are very few native fish in our local waterways. The presence of pest

species and the loss of habitat are some of the causes. We would like to see a program whereby the current situation is improved.

7.3. The Discussion Paper proposes that:

'The government will ensure the transparent allocation of costs of providing recreational benefits by:

- **Building our understanding of the costs of providing improved recreational outcomes**
- **Where additional costs are incurred to provide increased recreational benefits, determining a transparent method of cost recovery on a beneficiary pays basis.'**

What comments do you have about this direction? Have we missed anything?

This proposal is very strongly supported.
Licences and permits are some of the acceptable ways to recover costs.

Any other comments about Chapter 7: Recognising recreation values?

Building knowledge of costs is important, as is the economic worth of recreational benefits.

Chapter 8: Water entitlement and planning frameworks

Proposed objective: Victoria will have improved and responsive water entitlement and planning frameworks that enable us to better adapt to climate change.

8.1. The Discussion Paper proposes that:

'To ensure that our entitlement framework remains robust in the face of emerging pressures on resource availability and sharing, the Government will:

- **Support the actions to account for significant water uses and take active steps to understand and manage the impact of water use on other users and on the environment (e.g. domestic and stock use, stormwater)**
- **Maintain landowners' rights to domestic and stock water use in a way that does not undermine water resource management. To ensure we also protect the security of the system, and equitable access to water, a review of reasonable use limits is proposed, to**

be undertaken in consultation with the community

- **Investigate the costs and benefits of converting take and use licences into water shares and other related products for unregulated and groundwater systems, beginning with a pilot study in northern Victoria for selected systems with high demand**
- **Consider opportunities for individuals to capture water during high flow periods in some systems within the sustainable limits of the resource. This would not increase the total volume of entitlements, although the reliability of entitlements may consequently increase**
- **Build transparency by investigating the merits of amalgamating various resource and system management instruments and policies into a single water resource instrument that would describe water sharing arrangements for a specific area or water system. This would include surface and groundwater system management rules and water resource management roles and responsibilities.'**

How strongly would you support this direction, and why?

8.2. The Discussion Paper proposes that:

'The government will enhance the existing water resource planning framework by:

- **Ensuring that Victoria's water security planning arrangements do not duplicate any requirements under Commonwealth legislation**
- **Ensuring that future planning considers Aboriginal values, recreational and liveability values for water**
- **Requiring the Department of Environment, Land, Water and Planning to annually review progress on the implementation of state planning commitments and compare observed water resource trends with the planning scenarios to inform resource management and grid investment decisions (Chapter 9)**
- **Requiring a mid-term review of sustainable water strategies every five years informed by more detailed monitoring and reporting of progress against strategy actions**
- **Requiring the department to annually provide simple and easily accessible information on the drought preparedness of Victoria's water sector to the community**
- **Ensuring that the community will be consulted as part of planning for urban water security**
- **Ensuring that the temporary or permanent qualification of rights would only occur as a last resort.'**

What feedback or advice would you provide to the Government on this proposed direction?

'The government will strengthen planning for environmental water through requiring sustainable water strategies to consider any new opportunities for environmental water recovery targets, taking into account the findings of Long-term Water Resource Assessments. Sustainable water strategies will rely on evidence based principles, priorities and community input.'

What comments do you have about this direction?

'The government will:

- **Require ongoing annual resource reporting and regular outlooks by rural water corporations, to support analysis of statewide water trends and enable individuals to make better informed decisions**
- **Clarify the requirements for community engagement by water corporations**
- **Require rural water corporations to consider shared benefits when planning their water storage and operations management.'**

What comments do you have about this direction?

'Future sustainable water strategies will consider opportunities to enhance Aboriginal values of water.'

How supportive of this direction are you, and why?

'Future sustainable water strategies will consider opportunities to enhance recreational values of water.'

What comments do you have about this direction?

'In addition to the proposed directions for IWM planning outlined in Chapter 5:

- **The guidelines to be developed for the urban water strategies will be informed by the sub-regional and local IWM planning. The guidelines will be developed in the first half**

of 2016

- The urban water strategies will incorporate water corporation drought preparedness planning
- Urban water corporations will consider the potential for shared benefits during water resource and operational planning
- For Melbourne, government will work with Melbourne Water and the metropolitan water corporations to ensure that timing of these strategies and plans are aligned, streamlined and efficiently delivered.'

What feedback or advice would you provide to the Government on this proposed direction?

8.3. The Discussion Paper proposes that:

'The Government will finalise the Victorian Floodplain Management Strategy with a proposed release in mid-2016. The Victorian Floodplain Management Strategy seeks to assist in planning for and mitigating flood risks, strengthening communities to invest in projects to mitigate the risks of floods, and empowering communities to respond to and recover from floods. '

How supportive of this direction are you, and why?

Any other comments about Chapter 8: Water entitlement and planning frameworks?

Chapter 9: Realising the potential of the grid and markets

Proposed objective: Victoria's water grid and markets will help Victoria realise the greatest benefit from our valuable water resources. Victoria's water grid and markets will enable water to be accessed from a wider range of sources. Through the water market, users will be able to move water to where it is most valued and delay or avoid costly water supply augmentations. This market-based approach enables sharing water security benefits in ways that are fair, responsive and transparent. Our communities will be more resilient to changes in supply and demand, such as climate change and population growth.

9.1. The Discussion Paper proposes that:

'The government will continue to refine the trading rules in irrigation areas to facilitate trade and enable farmers to manage their business needs.

The government will work with the Murray-Darling Basin Authority to provide appropriate and timely information for northern Victorian water users about the risk of congestion in the basin and how trading rules are used to manage physical constraints in the southern Basin.'

What feedback or advice would you provide to the Government on this proposed direction?

'The government will catalyse development of the water market in southern Victoria by establishing a five-year southern market trial from 2016–21. The trial will support the development of fit for purpose water markets in southern Victoria to share water security benefits more broadly, manage variability in water availability over time and across regions, and make better use of the grid.

The trial will not only consider market rules but also the role of the desalination plant, entitlement structures, allocation policies and storage and delivery changes. Initially, the trial will focus on trade between urban and water corporations.

A strategic partnership, led by the Department of Environment, Land, Water and Planning in partnership with water corporations, and other relevant parties will be established to reduce barriers to water trading.

A key component of this trial will be to build understanding of the grid through improved system information and modelling.

The government will also continue to explore opportunities to further develop markets in the west, including the capacity to improve access to the grid.'

How supportive of this direction are you, and why?

The market trial is strongly supported as an investigative way to build understanding and to seek

possible improvement and security of supply.

'The government will investigate the potential for broader water trade:

- **Within unregulated and groundwater systems**
- **Between these systems, where they are connected**
- **Between these and the regulated system, where this is connected.**

What comments do you have about this strategic direction?

9.2. The Discussion Paper proposes that:

'The government will commit to continuous improvement of the water market information and systems including:

- **Increasing transparency of the water market and water resources by making data on market behaviour, how water is held, and the distribution of water resources more accessible.**
- **Ongoing improvement of the Victorian Water Register with consideration of moving applications online and addressing the current obstacles to this.**

This will assist in meeting water corporations' and water market participants' expected levels of service.'

What comments do you have about this strategic direction?

9.3. The Discussion Paper proposes that:

'The government will establish a new centralised function based in the Department of Environment, Land, Water and Planning to provide oversight and a system-wide perspective of Victoria's water resources and inform strategic statewide investment decisions.'

How supportive of this direction are you, and why?

9.4. The Discussion Paper proposes that:

'The government will explore options for additional water connections to better use the state water grid to share the water security benefits of the grid and desalination plant more broadly

What comments do you have about this strategic direction?

Any other comments about Chapter 9: Realising the potential of the water grid?

Chapter 10: Jobs, economy and innovation

Proposed objective: Victoria's water sector will deliver efficient and innovative water services to support jobs, growth and economic development across Victoria. Through strong governance, efficient service delivery, secure funding and innovation the water sector will support productive industries and investment, public health and wellbeing, and improve community and environmental outcomes across Victoria.

10.1. The Discussion Paper proposes that:

'Government will improve the performance of water corporations by:

- **Setting clear and unified expectations of performance and reflecting them through appropriate instruments, such as corporate plan guidelines**
- **Working with water corporations and the Essential Services Commission to develop clear, fit-for-purpose indicators that measure performance in terms of service delivery and value for customers and the community**
- **Undertaking a benchmarking exercise for Victoria's water corporations to encourage performance improvement and innovation.'**

How supportive of this direction are you, and why?

'The government will improve the governance of catchment management authorities by:

- **Implementing key directions in Our Catchment, Our Communities**
- **Communicating priority matters to catchment management authorities' boards**
- **Developing new Statements of Obligations for catchment management authorities under the Water Act 1989 and the Catchment and Land Protection Act 1994.'**

What comments do you have about this strategic direction?

'Government will ensure the governance arrangements for the Victorian Environmental Water Holder are efficient and effective in meeting its statutory environmental management objectives.'

What comments do you have about this proposed strategic direction?

'The government will:

- **Continue to review and refine charging arrangements for environmental water holders, and the way these are expressed in the environmental entitlements to ensure they are consistent with government policy**
- **Require environmental water holders and water corporations to negotiate service levels and charging arrangements in good faith, with negotiations undertaken within the context and timing of Essential Services Commission price review processes, any applicable intergovernmental commitments to which Victoria is a signatory, and relevant budgetary processes and constraints**
- **In developing charging arrangements between environmental water holders and water corporations, require parties to negotiate towards achieving agreement based on the following principles:**
 - **Prices for services to environmental water holders should be cost reflective**
 - **Prices should reflect the level of services received**
 - **Prices should be efficient in terms of providing signals for the efficient and sustainable use of water infrastructure**
 - **Prices should not deter environmental watering.'**

What feedback or advice would you provide to the Government on this proposed direction?

'The water sector will continue to improve community engagement, involving the community and industry in how it plans and delivers its services.'

How supportive of this direction are you, and why?

This direction will ensure a knowledgeable and supportive community, respecting and caring for our water, waterways and water industry.

'Government will promote diversity within our institutions by:

- **Requiring Victoria's water corporations and catchment management authorities to focus on diversity in executive leadership positions across the sector**

- **Partnering with the water sector and peak industry bodies to establish a Women in Water Leadership Program to train senior women in the sector**
- **Investing in Aboriginal participation through increased access to capability building opportunities, including sponsoring Aboriginal people in relevant study and training courses and funding water sector agencies to provide traineeships.'**

What comments do you have about this proposed direction?

'Government will clarify the role of the water sector in emergency response and recovery by providing an enabling environment under the all-hazards all-agencies emergency management framework that is consistent with its skills, resources and capabilities, and with relevant protections in place.'

What feedback or advice would you provide to the Government on this proposed direction?

'Government will strengthen its assurance framework with a suite of tools, systems, processes and training to ensure the sector can maintain business continuity, and is well equipped to mitigate the risks and challenges posed by extreme events and other emergencies.'

How supportive of this direction are you, and why?

10.2. The Discussion Paper proposes that:

'Government will consider options to facilitate third party access to water and wastewater infrastructure on transparent and commercial terms that protects community interests.'

What comments do you have about this proposed direction?

'Government will consider options to update and modernise the compliance and enforcement regime to ensure it remains effective and aligns with Victorian government policies.'

What feedback or advice would you provide to the Government on this proposed direction?

This proposal is strongly supported.

Litter and rubbish are major threats to waterway health, biodiversity and amenity.

A review of existing legislation needs to be undertaken to ensure our laws are 'litter smart,' to combat the growing problem of plastic, take-away food items, drink & other containers, cigarette butts, fishing line and packaging, and polystyrene foam which form the bulk of collected items in clean-ups.

'Government will improve legislative and regulatory frameworks by identifying opportunities to reduce unnecessary red tape and streamline processes, including contributing to delivery of the government's commitment to reduce the burden of regulation by 25 per cent.'

What feedback or advice would you provide to the Government on this proposed direction?

10.3. The Discussion Paper proposes that:

'Government will:

- **Maintain the Environmental Contribution as a key tool to deliver the water plan's strategic priorities**
- **Implement the key recommendations from recent evaluations of the management of the Environmental Contribution to ensure its investment continues to align effectively with its legislative objectives, and enhance governance arrangements to ensure improved transparency, accountability and decision making.'**

What comments do you have about this proposed direction?

10.4. The Discussion Paper proposes that:

'Government will incentivise innovation in the water sector through:

- **Supporting collaborative programs where they deliver value, including the IWN**

program

- **Establishing a Minister’s Innovation Award to promote and recognise innovation in the water sector**
- **Ongoing participation in the CRC for Water Sensitive Cities**
- **Working with water corporations to make information more accessible to communities to assist them in being active participants in water management**
- **Working with local government to assess opportunities to more effectively share knowledge and expertise about innovative local scale solutions**
- **Ensuring expectations and measures for water corporations relating to innovation performance are effective.'**

How supportive of this direction are you, and why?

Any other comments about Chapter 10: Realising the potential of the water grid?

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