



Environment Victoria comments on the Draft Water Management Plan for the Upper Ovens River

The Upper Ovens River is one of the few rivers in Victoria where the majority of reaches are classified as being in moderate or good condition¹. The Sustainable Rivers Audit ranked the Ovens River as equal third for ecosystem health and catchment condition of all the 23 river valleys of the Murray-Darling Basin², and it is one of only 3 catchments in the Basin where end-of-system flows are considered good by the Murray-Darling Basin Authority³. The Upper Ovens is a major contributor of flows to the Heritage listed Lower Ovens and the Murray River system, and is recognised for its high environmental values.

The Draft Water Management Plan marks a major step forward in the integration of surface and ground water management in Victoria and we welcome the approach to conjunctive management in a catchment where ground and surface water are highly connected. However we have serious concerns about the proposed water sharing regime and the trigger point for Stage 5 (irrigation ban) restrictions. These are discussed below.

Strengths of the Draft Plan

We strongly support development of management zones (prescription 1), the inclusion of groundwater (prescription 2) and the transitional arrangements for groundwater users (prescriptions 12 to 16). We also support the restrictions on the issuing of new licences (prescriptions 18-25) and the rules on trade, transfers and metering.

The transfer of the compliance point from Bright to Myrtleford and the introduction of a restriction regime at flows of 100 ML/day at Myrtleford are also supported.

Weaknesses of the Draft Plan

The restriction regime and irrigation ban trigger point suggested under Prescription 3 are a major concern.

The Draft Plan correctly identifies low summer flows as the major threat to river health in the Upper Ovens. While flows at Myrtleford may have on occasion reduced to 1 ML/day under natural conditions, no evidence has been presented in the Draft Plan or to the consultative committee as to what the resilience of the river is to prolonged or repeated periods of flows at

¹ Index of Stream Condition, DSE 2004

² Sustainable Rivers Audit, MDBC 2008

³ Guide to the proposed Basin Plan, MDBA 2010

these low levels. To our knowledge there have been no studies of what the impacts of running a perennial stream like the Upper Ovens at such low flow levels might be, or of the cumulative impacts of repeated low flow periods. For example, a long period of low flow will almost certainly inhibit the movement of large bodied fish through the catchment and prevent their access to the upper reaches of the system.

The environmental flows study recommended a minimum flow of 137 ML/day to meet full summer low flow objectives (Table 8). While the inclusion of ground water use in the Draft Plan and the revised trigger points for implementing restrictions make it more likely that some level of flow will be maintained, a 1 ML/day minimum is two orders of magnitude difference from the recommendations.

Exposing a river with high environmental values like the Upper Ovens to the degree of risk that prolonged periods of flow of 1 ML/day would incur is unacceptable in our view. We suggest that a more appropriate trigger for a total ban on extraction would be at least 7 ML/day. This would allow for mixing of the water body to maintain water quality and preserve the perennial nature of the river, while still providing adequate reliability for extractive water users.

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