

Moorabool River SWP 24-25 Feedback Register

Name/Organisation	Feedback	CCMA Response
<p>Jackson Cass</p> <p>Moorabool Catchment Landcare Group</p>	<p>General Feedback</p> <p>Mention of total water entitlement</p> <p>The total water entitlement (2,500ML) is not mentioned until page 27 section 8. I guess this depends on the objective of the proposal and the audience, but mentioning this earlier in the document might put into context how things are prioritised. Page 7 were you mention the FLOWS study and that the current entitlement 'only provides for about 10% of the river's flow needs' might be a good spot to slip this number into.</p>	<p>Agreed - have included the total entitlement available to be released each year (2500ML) into the suggested position.</p>
	<p>Prioritisation of low flows</p> <p>Great to see low flows being prioritised with the limited entitlement. I don't need to tell you about their importance, but it's good to see the CCMA prioritising them. Especially in section 8's tier 2 priorities - prioritising higher low flows over additional/larger freshes.</p>	<p>Appreciate the positive feedback. Low flow in the previous water year was critical for keeping water in all reaches downstream of Lal Lal reservoir.</p>
	<p>Engagement with Wadawurrung</p> <p>Good to see Wadawurrung had a good opportunity to engage with the proposal in a meaningful way. Good job facilitating this and hopefully it will lead to additional meaningful engagement in the future.</p>	<p>Engagement with Wadawurrung Traditional Owners Aboriginal Corporation is vital to the year-on-year delivery.</p>

	<p>Declining Annual Rainfalls</p> <p>Section 8.1 notes 'annual rainfall total are likely to decline by 25% by the end of the decade'. I had not heard this statistic before and it is genuinely terrifying and sobering.</p>	<p>Agreed – it is making environmental water delivery an increasingly complex space.</p>
	<p>Formatting Feedback</p> <p>On page 28 in the tier 2 priorities there looks to be some text formatting issues with text being bold and a larger font size. Not sure if this is intentional or not.</p>	<p>Formatting changes have been made.</p>
<p>Phil Mitchell DEECA</p>	<p>2nd last para on p 7 – last sentence says “Up to 3 GL will be recovered in Lal Lal Reservoir to be shared evenly as well” – please delete “evenly” as how the sharing will happen hasn’t been finalised or formally announced yet.</p>	<p>Text change noted and made.</p>
	<p>The draft SWP clearly sets out the values and objectives to be supported by environmental water releases, and the planning for different seasonal conditions.</p>	<p>Appreciate the positive feedback.</p>

<p>Cameron Steele</p> <p>People for a Living Moorabool</p> <p>*note the text beside is only a summary of PALM's feedback. The entire document can be obtained upon request.</p>	<p>Why are the Environmental Values and Objectives placed third in list of values? This is a document regarding the use of environmental water for environmental purposes from an independent statutory body. Its objectives should be reflected in how the document is presented. A second concern is the content weight given to each of these values. The first two values are afforded 3 pages of description and tables, while the Environmental Values and Objectives is reduced to just a single page.</p>	<p>The layout of the SWP is set by the VEWH template and do not reflect the priority order the Corangamite CMA or the VEWH take in delivering and obtaining water.</p> <p>The environmental values and objectives are expanded on in sections 7 and 8 in the form of the priority watering actions table and scenario planning – all of which are informed by scientific evidence all of which are informed by scientific evidence. The independent scientific evidence/advice is well documented and contained within various publicly available reports that are focused on environmental values and information, including the FLOWS study. These documents and information are used by CCMA to inform how to best support the rivers environmental values.</p> <p>The CCMA has met with the VEWH to discuss PALM's feedback on the structure of the seasonal watering proposal template. As this is the first year of a template approach, the VEWH will be undertaking a review of the template to inform the 2025-26 SWP and will consider PALM's feedback as part of that process.</p>
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	<p>The language in the current draft is notably less direct “Summer/autumn freshes provide a larger flow volume than low flow in the Moorabool and are planned to coincide with school and public holidays where possible. This freshened flow improves riverside and water-based recreation opportunities, particularly camping and fishing.” PALM considers it vital that the language used is concise and unambiguous about the actual the use of environmental water. It should emphasis the fact that other benefits of environmental water are ancillary rather than shared.</p>	<p>It is noted that PALM is concerned about the Corangamite CMA’s and VEWH’s priorities in delivering environmental water. A paragraph at the beginning of section 4 and amendment to the language highlighted by PALM has been made to emphasize the reality of the legislation and Corangamite CMA’s prime environmental focus.</p>
	<p>Could opportunistic environmental releases timed to piggy-back a Barwon Water release from Lal Lal Reservoir to achieve maximum benefits, instead be deferred to fulfill perceived school holiday obligations? In the past it has been stressed that many important considerations go into determining the release of scarce environmental allocations. Existing flows, existing storages, short- and long-term rainfall forecasts, windows for breeding and migration of species, dissolved O2, water temperatures, nutrient loads, transfers of water by Barwon Water etc. These are all important factors, while timing for school holidays or social events for instance, should only be contemplated once those factors have been properly assessed.</p>	<p>All adaptive management practices are undertaken with reference to the FLOWS study and present river conditions, not the public holiday or school holiday calendar. It is agreed that water quality and other environmental parameters are primary determinants. Potential watering actions outlined in the FLOWS study also present an optimal timing range for the action.</p> <p>For example, the study recommends a priority 3 summer/autumn fresh occurs at some point in April or May. This means that, as long as the fresh is delivered in this time period, the FLOWS study suggests that benefits will be achieved. However, ambient weather conditions or other factors during this time period may influence what point the CCMA will release the fresh, for example if there is a heat wave or a prolonged period with no rain, the CCMA will move the fresh within this window to support environmental values considering these factors, including if this results in the fresh will no longer occur on a public holiday.</p>

		<p>Errors in the new template of section 4 have been amended to accurately reflect the Corangamite CMA’s approach to environmental water delivery.</p>
	<p>PALM strongly calls for a clear matrix in the SWP on what allowance there is in the timing of releases so there is no detrimental impact on the planned ecological outcomes of those releases. Until that occurs PALM withdraws its in-principle support for using environmental flows to support recreational values.</p>	<p>A matrix is not necessary as the timing window for each Potential Watering Action, for maximum environmental benefit, is already listed. This information comes from the FLOWS study. All releases are timed such that they sit <i>within</i> the listed timing window for maximum beneficial environmental impact while also addressing section 33DD-2 of the Water Act: In performing its functions, the Water Holder must consider opportunities to provide for the following, consistently with its objectives and the requirements of this Act or any other Act—</p> <ul style="list-style-type: none"> (a) Aboriginal cultural values and uses of waterways; (b) the social and recreational uses and values of waterways. <p>It is also worth noting that, in the VEWH’s Seasonal Watering Plan, the prioritisation criteria clearly shows that cultural, recreational and economic benefits are considered after environmental consideration.</p> <p>Seasonal Watering Plan 2023-24: Section 01 (vevh.vic.gov.au).</p>

		<p>See 'Figure 1.2.1 Criteria for prioritising actions to deliver water for the environment' on page 12. This figure will be the same in the 2024-25 SWPlan.</p> <p>The new VWMS may have principles to support consideration of shared benefits from environmental watering actions.</p>
	<p>Page 4. Please confirm if the MSAC was a result of the Flagship Project or if it predated it?</p>	<p>Page 4 – MSAC predated the commencement of the Living Moorabool Flagship project.</p>
	<p>Page 6. The draft specifically excludes the reference to farm dams which was acknowledged in previous SWPs. The 2023-24 iteration states “The amount of water that enters the river is also substantially reduced by the many farm dams in the catchment, estimated at more than 4,000.” Given the recent work by PALM, and the Action within the Central and Gippsland Region Sustainable Water Strategy concerning the impact of farm dams, the removal of this reference is a serious omission. It should be updated and reinstated.</p>	<p>Page 6 – noted and included.</p>
	<p>Page 6. Is the storage manager at Lal Lal solely Central Highlands Water or is Barwon Water also a manager?</p>	<p>Page 6 – CHW is the manager, Barwon Water has a water storage there but is not a manager.</p>

<p>Page 16. The table Environmental Objectives in the Moorabool System needs to be shifted to the start of the Scope of the Environmental Watering on page 21 to inform the use of abbreviations.</p>	<p>Page 16 – Due to the document being a VEWH template section, section 5 (Environmental Values and Objectives) cannot be moved to be before section 7 (Scope of Environmental Watering).</p> <p>Instead, the following text was inserted before table 5 -</p> <p>Note: further explanation of the environmental objectives can be found on page 16.</p>
<p>Page 17. This is not the “upper Barwon River”. “New and emerging shared benefits” should best read “ancillary” rather than “shared”.</p>	<p>Page 17 – typo fixed, shared benefits left as is because it involves the sharing of benefits from the prime driver of environmental values.</p>
<p>Page 19. There was no “Meeting to discuss and seek input on the draft proposal”. This reference should be removed, and it clearly stated there was no such meeting.</p>	<p>Page 19 – typo fixed to suit new engagement approach.</p>
<p>While it is acknowledged that the watering year has not been completed by the time of the Moorabool Stakeholder Advisory Committee (MSAC) usually met to discuss the upcoming SWP, PALM regards such meetings were pivotal in allowing people to respond to the SWP draft in an informed manner. The current arrangement does not allow for the appraisal of this year’s watering to date to allow for considered input into the</p>	<p>Corangamite CMA acknowledges that previous SWP meetings with MSAC were a valuable opportunity to discuss SWP development in person. The aim of the changed meeting is to create a more meaningful opportunity to reflect and have conversations around the delivery of environmental water.</p>

	<p>document. Further, the ability to put questions to catchment managers and particularly a representative from the VEWH in an open forum was a valued part of the process. This is now gone but should be reinstated.</p>	<p>Members of the Moorabool Stakeholder Advisory Committee will have the opportunity to question catchment managers and the Victorian Environmental Water Holder in an open forum at the mid-year meeting.</p>
	<p>PALM seeks clarification on what adjustments might be able to be made to the SWP after the community receives its briefing “on the use of water in the current water year (2023-24)”.</p>	<p>The mid-year MSAC meeting will be primarily focused on discussing the use of the water in the current water year, of which the MSAC is updated on via email throughout this period. Attendees at the end of water year meeting won’t be able to provide input into the 2024-2025 SWP, but will be able to provide feedback on the delivery of water in the 23-24 year. This feedback will inform future SWP development. As described in correspondence via email to the MSAC, all feedback on the 2024-25 SWP was to be provided by email or phone in the 2 week feedback period which is how all feedback has been received over the last few years.</p>