

Wetland Engineering Projects Submission Guide

Belsar-Yungera and Hattah Lakes North

How to make a submission

The independent panel reviewing these wetland engineering projects needs to hear your views and insights. That means impacts from construction, how it's operated, challenges it should address - and your ideas for other ways to restore the floodplain.

Make your submission at:

<https://engage.vic.gov.au/VMFRP-SIAC-EES-Central>

Note: Submissions cannot be emailed directly. If you cannot use the online form, you can mail in a hard copy. You'll need to include a 'Submission Coversheet' which you can request from Planning Panels Victoria through the DELWP Customer Call Centre on 136 186 (select option 6).

Send in your submission before 11.59 pm on 14 November 2022.

If you have questions or would like tips on writing your submission, email Environment Victoria's rivers campaigner, Tyler Rotche at t.rotche@environmentvictoria.org.au

Online Form

The online form on 'Engage Victoria' will give you two options. After entering your personal details (Name, Address, Email, Phone) you can:

1. Copy and paste your submission into a textbox, or
2. Upload it as an attachment.

It will also ask if you'd like to be heard at the Public Hearing in January - February 2023. This could be short statement or presentation. Then answering questions from the panel. If you'd like, we can help you prepare.

Parts of a Submission

A submission doesn't need to be overly formal or long. You can just write simply and clearly.

- Introduce yourself
- Identify key issues
 - Support them with your perspective and experiences
 - Use evidence and data, if you can
- Finish with what the Panel should do next

This submission guide includes sample sentences to get you started. But focus on what you know, and what you think the Panel might miss.

1. Introduce yourself

Start by telling the Panel who you are and why you care. What is your specific connection?

"I live in Robinvale and have worked on wetland revegetation with a local group."

"I live in Melbourne and visited Hattah-Kulkyne National Park every year growing up."

"I live in Swan Hill and build microbat nesting boxes across the Murray floodplain."

If you have a unique perspective or expertise, say that up front.

2. What concerns you about the project?

Identify key issues and add your own perspective and experience.

If you can, use evidence and data to support your statements.

Your submission will be easier to read if you break your points into sections, or just number them.

There are 3 big issues with these projects.

1. Local impacts from construction
2. Indirect impacts to areas that won't get water
3. Problems with consultation

Local impacts from construction

If you have local knowledge of North Hattah or Belsar Island, Lakes Powell and Carpul, include it here.

Background - Project Operation

These projects re-engineer floodplains, turning them into irrigation bays.

That means:

1. **Clearing trees** to make way for new regulators
2. **Changing how water flows** with new levees and raised roads

The projects all follow a similar logic: a pump or regulator brings water into the site. Water flows through a creek or fills a ponded area. Levees hold the water in place and the regulator is temporarily closed.

Start by looking at the maps on pages 8 and 10 of the Summary Document:

<https://caportal.com.au/vmfrp/projects/hattah-belsar/ees>

Speak to your experience on:

- **Vegetation**
 - Are there important trees that will be removed? What does that mean for habitat and culture?
 - Are there vegetation areas that may be drowned?
 - If you're familiar with similar projects at Third Marsh on the Avoca, Lindsay Island, Banyule Swamp or Long Swamp, share what you saw there.
- **Fish**
 - Ponding water excessively creates conditions favourable to carp
 - Are there native fish that need the right timing of water flows for lifecycle cues? How should they operate the regulators?
- **Birds, frogs and insects**
 - What animals have been missing recently? What habitat do they need?
- **Water quality**
 - Have you seen blackwater events in the past from infrequent watering? Salinity or acid sulphate soils?
- **Changes to the environment**
 - Have you noticed changes to the environment? Ask any questions you have about how extreme weather, climate change and other trends will be considered.

Request scrutiny and monitoring of the impacts you've raised. Question whether the proposed restoration outweighs the risk or damage.

Tip: If you've seen good studies from independent scientists or government that supports your concerns, refer to it - and ask the Panel to read it.

Indirect impacts to areas that won't get water

If you have local knowledge of other parts of the Murray floodplain, include it here.

Background - The Basin Plan and Water Offsets

The Basin Plan aims to bring the Murray-Darling Basin back to a healthier level.

These projects form part of an 'offset' scheme in the Basin Plan called the Sustainable Diversion Limit Adjustment Mechanism (SDLAM).

The Basin Plan was fundamentally about two things: setting aside enough water for the environment and making sure it can flow to the wetlands that

need it. But the offset scheme claims you can get the same ecological outcomes for less water – you just need to re-engineer wetlands and draw in their borders.

These floodplain engineering projects are part of that larger package of offsets. If they go ahead, they will enable more water to be taken from the river. That means less for the environment – across the whole river system.

Only some areas along the river, like Hattah Lakes, have planned engineering projects. Elsewhere, there will be less water flowing through to wetlands. Think about places you love that might not have gotten the water they need as often as they used to.

That second part of the Basin Plan – making sure water can flow to the wetlands that need it – is a larger project to sustain the environment with natural flows. It's relaxing rules and raising bridges that are otherwise 'constraints' on the flow of water.

Unfortunately, the government hasn't delivered this part of the Plan. It would mean an extra 375,000 ha of the floodplain getting water – but with the river flowing below minor flood level.

If you have a special place upstream or downstream on the Murray, tell the Panel.

"I'm concerned that these projects are part of a package of measures, the Sustainable Diversion Limit Adjustment Mechanism (SDLAM), that ultimately keep more water out of the river.

If they go ahead as planned, a quarter of the volume that should be set aside for the environment won't eventuate.

*That causes a real problem for **[my special place]**. Which **[describe why it's special and the water it needs]**.*

*It also **[describe how it contributes to the whole system - are there fish or birds that breed there?]**.*

It's clear to me that the impacts of this water offset should be assessed by the Panel. These are the sort of 'cumulative effects' that Environmental Effects assessments are meant to consider."

Problems with consultation

If you participated in the consultation process, what did you think of it?

Make note times when the scope of conversation was limited – especially if it links to points you've raised above.

3. Conclusion

What do you think needs to happen next?

Re-state your main concern – and an action that you think would be appropriate.

“The destruction of so many large, old trees is alarming. The hollows in River Red Gums take hundreds of years to develop. No conservation work should permit this level of destruction. The Panel should assess construction alternatives.”

“Some of these places flood naturally, if only they had the water. This is not the place for large-scale engineering experiments, and surely not a water offset. The Panel should assess more-natural alternatives.”

“The floodplain evolved here to support grassy and sedgy riverine forest. With long-term ponding, these ecosystems may disappear. The Panel should reassess water requirements on-site.”

“I’ve seen carp outcompete native fish upstream. The damage from carp infestation will undo many of the claimed benefits. The Panel should review the carp management strategy.”

“The floodplain forest where I live needs more water. If this project goes ahead, the ‘offset’ that deprives my local forest should be assessed as a cumulative effect.’

Let us know when you’re done

These assessments will happen soon for other projects upstream and downstream.

We need to help each other.

Otherwise, government interventions will keep treating the river like it’s not connected.

When you’re done, email Environment Victoria’s rivers campaigner, Tyler Rotche at t.rotche@environmentvictoria.org.au so we can learn about your concerns, and keep you up to date.