Adam Fennessy
The Secretary,
Department of Environment, Land, Water and Planning
PO Box 500
East Melbourne VIC 3002
10<sup>th</sup> February 2016

DELWP reference: MIN012065

Dear Mr Fennessy,

## Re: Landscape Scale Regional Assessment and Connections Project (Victoria), formerly NVIRP

In May 2013, the Goulburn-Murray Water Connections Project (formerly Northern Victoria Irrigation Renewal Project or NVIRP) issued the third version of its *Water Change Management Framework* (WCMF). This increased the extent of the irrigation modernisation project by including Shepparton Irrigation Area (SIA) and Central Goulburn 1-4 Area (CG1-4A), collectively known as Adjunct Areas. This inclusion was a logical step but carried the possibility of invalidating the findings of the *Landscape Scale Regional Assessment* (LSAR) which did not specifically include SIA and CG1-4A.

To address this, Goulburn-Murray Water Connections Project commissioned Jacobs to undertake a *Regional Environmental Assessment Review – Adjunct Areas Assessment* (Jacobs 2015), and retrospectively consider the information used in the *Public Environment Report* (PER) and LSAR. The PER was a primary source for the *Landscape Scale Regional Assessment* report, and had been submitted to the federal government in 2010.

This Assessment found that the late addition of these two irrigation areas did not invalidate the assessments in the PER and in the LSAR. In the case of aquatic systems, the Assessment indicated that the effects of outfalls from the adjunct areas had been accounted for in all reaches (including groundwater), except the following: Broken River, Lower Goulbourn River, and Broken and Nine-Mile Creeks. Jacobs' examined recent studies on these three reaches, and considered that the effects of reducing inputs from SIA and CG 1-4 would be insignificant at the first two. In the case of the third, 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 of reduced outfalls to Broken Creek are outside the scope of the Connections Project (GMW, pers. com. C. Solum, 2016). It is also noted that, currently, potential reductions in outfalls to this system would be compensated by increased environmental flows passing downstream.

We consider that this *Regional Environmental Assessment Review – Adjunct Areas Assessment* is a sound examination and its conclusions have been reached logically and transparently. The Assessment comprised a rigorous, detailed and well-documented examination of the scope, methods, definitions, tools and caveats of spatial extent of each of the reports contributing to LSAR. The ERP considers that the Assessment has achieved its objective of ensuring that integration of the two adjunct irrigation systems into the Connections Project presents minimal risk of material ecological consequence, and is of the opinion that the *Regional Environmental Assessment Review – Adjunct Areas Assessment* warrants the approval and support of the Department of the Environment, Land, Water and Planning.

Yours sincerely

JANE ROBERTS

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