

Gippsland Lakes and Coast Regional Coastal Board



18<sup>th</sup> March 2015

Dear Sirs

**Re Draft Gippsland Coast Plan 2015**

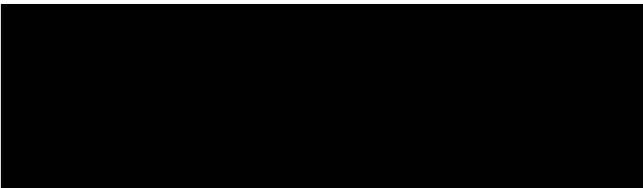
I am a regular visitor to the Gippsland Coast and also Gippsland Lakes, my family having owned properties at Metung for many years. My visits these days extend right along the coast from Corner Inlet through to Mallacoota, but still occasionally on the Lakes.

Recent visits to the area show a lack of investment in managing the natural and visitation assets of the region. Of greatest concern is the decline in ecological health of the Gippsland Lakes. Successive Governments have shied away from instituting a single management Authority for the Lakes in particular. The Ministerial Advisory Committee has appeared to run an ad hoc approach that is far from strategic and some would suggest a politically partisan program that has not advanced the lakes management positively for some time. Simply this undervalues the role the lakes play in the whole of Gippsland Coastal region's attractions.

I attach for you earnest consideration a number of dot points of general and specific concerns

I look forward to hearing that they have been considered

Regards



## Comments on Gippsland Coastal Board – Draft Regional Coastal Plan

### General Comments

- Whys does the Plan drop out the Gippsland Lakes from the Title of the document – does this suggest an undervaluing of the Lakes as distinctly different to that of primary coastal areas or does it suggest a lower priority by the Coastal Board.
- The Coastal Plan seems incomplete without inclusion and detailed discussion of the Lakes. There is no single management authority looking after the Lakes and a myriad of agencies seem to have partial or connected interest – Gippsland Ports are only navigational managers and are not managing the lakes. The Gippsland Lakes Ministerial Advisory Committee (Taskforce?) has no management responsibilities being an Advisory Committee only. In fact this Committee has all the appearance of being a politically partisan promotion group rather than focused on fearless advocacy for balanced utilisation plus nonpartisan and ecologically sound management. Some of their outputs are pointedly misrepresentations or deliberately deemphasise the challenges facing the Lakes e.g. the Condition Report Card
- There is a significant gap in management for the ecological and shoreline management around the Gippsland Lakes. The current focus seems to be about utilisation for economic returns rather than good conservation and balanced utilisation with fisheries and water quality not receiving adequate attention. In particular the fisheries appear to be haphazardly managed and stocks of Bream have crashed over the last 7 years. The Fisheries branch appears to have a limited interest in managing the fish stocks and or monitoring the same. The continued commercial fishing of the lakes for a limited return commercially is impacting on the fish stocks across the board, thus making fishing in the lakes an unattractive proposition for recreational anglers. This grossly affects tourism to this end. Consideration needs to be given to a holistic management approach for the lakes and should exclude commercial fishing.
- It appears that the Ramsar Wetlands has no single responsible agency for their management- surely this should be a DELWP/PV responsibility
- The decline in the wetland health due to salinisation is of great concern yet this does not seem to rate a mention in this strategy
- Nor does the health of Lake Coleman and Lake Wellington feature from a water quality and ecology point of view – there are significant issues of contaminants and pollution from a range of sources that is not currently being addressed in any significant manner by the agencies.
- Climate change - no mention of the impact on the Gippsland lakes and Ramsar values
- The Gippsland Lakes Environmental Strategy - is a document that is at best a partisan document in as much as the recommended actions are dominated by partisan policy and ideological positions rather than a balanced and fearless review of the trajectory and challenges confronting the Lakes. Many of actions are being treated superficially or are underfunded. The Lakes are undergoing a significant change in ecosystem balance since the opening of the Lakes Entrance channel in 2008 through deeper dredging that has allowed for larger vessels – but also has resulted in a significant ecological shift due to the shift to fully marinised lake system. This will progressively see a shift in the lakes ecosystem away from

an estuarine to a marine dominated system. The potential for impact to Lake Wellington and its surrounding wetlands and farmlands through salinisation is very significant.

#### 4.5 Key challenges and actions - Visitation

Risks –

- This section is lacking any advice system re early impacts and need to warn visitors of health risks due to algal bloom in the Lakes or indeed near the Latrobe Valley Outfall sewer on Ninety Mile Beach for contaminant warnings – this may also need to include health warnings on contamination of fish species

#### 5.3 Key Challenges and actions – Foreshore Management

- Parks Victoria – management of foreshore – although well-meaning, this organisation has been stripped of capacity to manage large tracks of coastal land with reduced staff and budgets – A review of the management needs and budgets needs to be undertaken as observations on the ground show the limitations of PV's ability to deliver programs on the ground have been compromised.
- Where do the Ramsar wetlands sit in the foreshore area – part lake and part foreshore – management needs to be clarified

#### 6.3 Key challenges and Actions Flooding and Erosion Actions

- Why is PV excluded from these actions – they are the foreshore managers?
- This section does not look at coastal erosion issues around the lakes – these are current due to a range of reasons – and not necessarily climate change scenarios – e.g. Banksia Peninsula and parts of Raymond Island

#### Other comments

- There is little mention of the need for systematic monitoring of systems across the various areas and partitions of management including natural values – this is a major omission as without systematic monitoring of an appropriate spatial and temporal density, then systems decline without early warning. Water quality monitoring for example receives limited priority due to a lack of funds by the EPA and CMA's – again the spatial and temporal monitoring is insufficient to adequately describe the health of the lakes and waterways let alone be able to truth Models such E2. This also applies to other estuaries and waterways along the coast.
- Why is the Gippsland Lakes Ramsar Strategic Management Plan being reviewed by the East Gippsland CMA when they have no management responsibility for the assets??