

GIPPSLAND ENVIRONMENT GROUP; SUBMISSION TO

DRAFT GIPPSLAND REGIONAL COASTAL PLAN.

17th March 2015

The Gippsland Environment Group (GEG) is disappointed in the calibre of the Draft presented, and considers it a missed opportunity to commence the process of resolving the obvious environmental issues that exist within the Gippsland Lakes, its catchment and feeder streams.

This picture book draft document does not appear a plan in the normal sense; but rather a summary of responsibilities of a wide range of disparate Victorian Government agencies, statutory authorities and four Local Governments that appear never to have to report on their achievements. The Draft does however frequently refer to the Gippsland Lakes Ministerial Advisory Committee, a politically appointed committee that has no responsibilities under the Victorian Coastal Management Act 1995 to Parliament or the public for coastal management. This is interesting, as the Draft relies on the Gippsland Lakes Environmental Strategy prepared by this committee. It should be noted that the Committee is referred to as a Taskforce on Page 9, and as a Council on Page 28.

It appears that the Board should be reminded that they are actually the **Gippsland Lakes and Coast, Regional Coastal Board**, as the current environmental problems of the Gippsland Lakes are not addressed in the Draft. The Plan needs to acknowledge that the state of the coast and the Gippsland Lakes are inseparable, and one cannot be addressed in isolation without the other. Any Plan therefore needs to include a much larger focus on the health of the Gippsland Lakes.

The Draft concentrates mainly on tourism, visitation pressures, economic values; foreshore management and flooding . This is a particularly limited scope when one considers that the Coastal Strategy 2014 identified that the term coast meant “catchments, rivers and drainage systems that affect the coastal zone including estuaries”.

We would recommend that the Plan address the following :-

- **Implementation of a comprehensive Audit of the Ecological Function of the Gippsland Lakes.** The Coastal Board last implemented an audit in 1998, and since then the ecology of the lakes has crashed and there is an urgent need to carry out what would be an ‘honest independent existing conditions survey’
- **An investigation into the salinity of the Gippsland Lakes, and the impact that the dredged deeper entrance has had on the tidal prism and the lakes’ ecology.** Since the entrance was dredged deeper in 2008 without the requirement of an EES, the base line salinity of the lakes has risen substantially, and is impacted on seasonally by drought and flood.
- **Implementation of Management Controls.** The location and **installation of Stream Flow Gauging Stations** must be addressed. **Continuous Water Quality monitoring equipment** must be installed at these same sites to monitor the concentration and loads of nutrients , heavy metals and endocrine disrupters that are currently discharging to the Gippsland Lakes.
- **Investigate the installation of submerged salinity barriers along the lake chain.** Salinity barriers to combat the incremental salinity creep in the lakes have been suggested for the last 50 years. The V.F.U. made this suggestion in November 1972. With the rapid increase in salinity post dredging of 2008, it is critical that salinity be addressed by engineering means.

- **Reassess the Sinclair Knight Mertz recommendation that Submerged Salinity Barriers be investigated for installation in McLennan Straits.** This would save Lake Wellington fringing wetlands from the post 2008 salt incursion from Lake Victoria.
- **Investigate the impact on community health of increased salinity in the lakes post 2008..** Increased salinity stratification has resulted in increased nutrient released from the lakes' sediment ,and this in turn feeds algal blooms. Scientists are now identifying a connection between Blue Green algal blooms and Motor Neurone Disease (MND). Salt stratification also enhances the release of methyl mercury from the sediment, and mercury in the lakes' food chain has already been identified as a health risk. Further. The mosquito Aedes Camptorhynchus frequents marine conditions and carries Ross River Virus and Murray Valley Encephalitis.
- **Implement comprehensive Water Quality Monitoring in the Gippsland Lakes and feeder streams.** The Feb. 2015 EPA Gippsland Lakes and Catchment literature review states ;
 1. More information is required; Mercury needs more investigation.
 2. Elevated mercury levels require further investigation.
 3. Water quality in most smaller systems remains a knowledge gap.
 4. There is little information of dissolved oxygen in fringing wetlands.
 5. There is little information on Toxins in the Gippsland Lakes catchment.
 6. No published data on salinity in Lake Reeve, and it is considered a knowledge gap.

It appears that there has been a conscious effort by Gippsland Lakes management not to monitor/test water quality , the result being that changes to the lakes' ecology have not be identified and reported.. "ie. there is no evidence to suggest ; etc...."

- **Investigate the pollution currently discharging from the tailings dam at the Stockman Mine site into the Tambo river.** Also investigate the potential for a failure of the proposed enlarged tailings dam in the future to destroy the complete ecology of the Gippsland Lakes.
- **Investigate the impact of the current proposal to construct canoe access in the Heritage reach of the Thomson river at the Horseshoe Tunnel Meander.** This work will involve the excavation and replacement of some 3,000 cubic metres of in-stream rock; as well as the construction a high impact access road to site to facilitate the access of heavy machinery.
- **Investigate land subsidence on the Coast, Gippsland Lakes and West Gippsland.** The Draft Plan does not address land settlement. This is currently of concern and will have a large impact along the coast on shoreline erosion and flooding. There are also serious catchment issues that must be investigated, with areas around the Morwell Open Cuts having subsided between 1.2 to 2.4 metres as the result of differential settlement.

The Gippsland Environment Group trusts that this submission is considered and acted on. We request a meeting with the incoming Coastal Board to support the matters raised.

