

## **Inquiry into Auditor General Report No.202: Meeting Obligations to Protect Ramsar Wetlands (2016)**

Mr Peter Warner

[REDACTED]  
[REDACTED]  
[REDACTED]

**Organisation Name:** Sale Field and Game Association

**Your position or role:** Conservation Officer

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

### **YOUR SUBMISSION**

**Submission:**

Sale Branch Field and Game Australia

Submission into INQUIRY INTO AUDITOR-GENERAL'S REPORT NO. 202: MEETING OBLIGATIONS TO PROTECT RAMSAR WETLANDS (2016)

This submission is made on behalf of the 1100 members of the Sale Branch of Field and Game Australia specifically on the Gippsland Lakes Ramsar listed site.

The Victorian Auditor General Office (VAGO) report made three recommendations in its review of Victoria meeting its obligations to protect Ramsar wetlands.

**Recommendation 1.**

That the Department of Environment, Land, Water and Planning, in conjunction with Parks Victoria and catchment management authorities:

- o develop and implement robust governance arrangements for managing Ramsar sites, including clarifying roles, responsibilities and accountabilities for planning, management and reporting
- o strengthen management plans to include time frames and resourcing to ensure that actions are carried out effectively and in a timely way

We are not in a position to comment on progress in this area other than we have seen no public communication or request for comment on the recommendation to strengthen plans to include time frames and resourcing to ensure actions are carried out effectively and in a timely manner. We do believe that past plans have had little impact on protecting the Gippsland Lakes Ramsar listed wetlands and the system has continued to deteriorate largely due to increased salinity most notably at the western end of the Lakes.

**Recommendation 2.**

That the Department of Environment, Land, Water and Planning:

- o oversee the development of a finalised Ramsar management plan for the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula and Western Port sites
- o work with catchment management authorities and site managers to develop and assess options for the direct funding of management plan activities focused on high-priority threats that impact on the ecological character of Ramsar sites.

o implement arrangements to oversee how management plans are put into effect.

We have seen no evidence of DELWP working with with CMA's and Parks Victoria to develop and assess options for direct funding of management plan activities focused on high priority threats ( which in the case of the majority of the Gippsland Lakes Ramsar site is without question increasing salinity). The West Gippsland Catchment Management Authority has conducted a study (in conjunction with DELWP and Parks Victoria.) into "Dowd Morass Salinity Risk Assessment and Management Options". (1- copy attached) This study was conducted following a letter Sale Field and Game that went to Minister Lisa Neville in July 2016 (2-copy attached) highlighting highly saline water intrusion into Dowd Morass in May 2016. Our letter recommended potential courses of action to remediate the intrusion and mitigate future intrusions.

The "Dowds Morass Salinity Risk Assessment.." review itself is quite comprehensive and thorough, however unfortunately the final recommendations are basically to continue monitoring the Morass with no recommended infrastructure plans to solve the problem . We do not accept all the recommendations particularly as two of our initial recommendations to the Minister appear to have been ruled out due to cost and a misconception of the type of structure required. (i.e. construction of an effective levee at the Dardanelles between Dowd Morass and Lake Wellington to reduce potential salt water intrusions and a low cost submerged barrier on McLennan Straits to reduce saline tidal prism entry into Lake Wellington.)

Increasing salinity levels, reduced river inflows, deepening of the Lakes Entrance channel in 2008 (without an Environment Effects Statement) have led to significant increase in mean salinity levels in Lake Wellington since the designation of the Gippsland Lakes Ramsar site in 1982. Since the VAGO report in 2016, to our knowledge no management plan has been developed to reduce or even hold salinity to current levels at the western end of the site.

Salinity levels are the single biggest threat to the Gippsland site yet DELWP and other agencies responsible for the site have yet to develop a plan to halt, much less, reverse the trend of increasing salinity levels. This inaction leads us to believe that the Government agencies involved are willing to allow the system to "go marine" without presenting to Government and the people of Victoria a range of potential options with costs and benefits of what could be done to reduce the salinity in the Gippsland Lakes Ramsar site. In our opinion based on extensive first hand experience the ecological character of the Ramsar site has changed since it's listing in 1982 and is continuing to this day.

The changes include elevated salinity levels that have altered Lake and wetland characteristics, killed shoreline vegetation (common reed, tea tree , eucalyptus) which in turn has led to significant shoreline erosion in Lake Wellington and western end of Lake Victoria (we have witnessed areas with up to 3 meters shoreline erosion in 2016 alone in Lake Wellington.) Mature gum trees are continuing to die along the lower reaches of the Latrobe River. Bird rookeries have been abandoned or less used in Dowd Morass. The salt prism regularly reaches up the Latrobe River to the Swing Bridge and beyond near Sale which often inhibits the supply of vital environmental water to the Sale Common, Dowd Morass and Heart Morass, Ramsar sites. Other wetlands in the Ramsar site such as Lake Coleman could be classed as hyper saline with recent recording of salinity levels higher than seawater. Most of this and more is known or should be known by the Government agencies responsible for protecting the Gippsland Lakes Ramsar site.

The Federal government has developed "National Guidance on Notifying Change In Ecological Character of Australian Ramsar Wetlands" which the Victorian Government is expected to comply with in respect to Victoria's Ramsar sites. Following are excerpts from the Guidelines, which are particularly pertinent to the Gippsland Lakes Ramsar site.

"Under the Convention a notification of change is required if the ecological character of a site has changed, is changing, or is likely to change as the result of technological developments, pollution or other human interference. Notification concerns changes to the ecological character of a site, rather than changes to the criteria for which the site was originally listed. While change in ecological character can be positive or

negative, a change in ecological character for the purposes of notification is limited to 'human-induced adverse alteration'.

The following principles have been established to guide notifications in Australia.

- Assessment of change will be undertaken with respect to critical components, processes and benefits/services of the ecological character of the site.
- An assessment of change to support a notification must be based on best available science.
- The fact that a site was undergoing human-induced ecological character change at the time of listing does not preclude the need for an assessment, and possible notification of change, if there is evidence of significant ongoing adverse ecological change.
- Where the natural variability of a site cannot reasonably be established for the critical component (process, benefit or service) against which change is being assessed, a notification, if made, will only be on the basis of 'is likely to' change.
- A notification will not be made where the apparent character change has been identified as arising from the use of inadequate data sets at the time of listing.
- A notification will not be made where climate change is the principal cause of identified ecological character change.

A formal notification is made after the completion of an assessment, acceptance of the case for change by the Administrative Authority (DEWHA), and consultation with the parties responsible for the ownership and management of the site. This is followed by the preparation of a Response Strategy. The Strategy sets out the management goals and objectives for the site following the notification, the suite of activities underway to meet the objectives, and the roles and responsibilities of the relevant parties.

Once the objectives identified in the Response Strategy have been achieved, the Convention Secretariat will be advised of the outcome. This will be one of two things: the site's ecological character will have been restored; or where remediation to the ecological character of the site at the time of listing is neither possible nor feasible, agreed revised objectives for the site will have been met. "

In our opinion the Gippsland Lakes Ramsar site meets the criteria whereby a formal notification of change to ecological character is required.

Further we do not believe that Australia should or can use the exception criteria in the reporting guidelines such as the "use of inadequate data sets at time of Listing" or by using "climate change is the principle cause of identified ecological character change" to avoid notification to Ramsar of the ecological change for the Gippsland Lakes. We strongly recommend that the "Inquiry" follow up and review this issue.

Unfortunately even if a notification is made of the change in the ecological character of the site, it by no means requires action to be taken by Australia to restore the ecological character of the site. We are afraid that Government Agencies may put a case within the guidelines that "remediation to the ecological character of the site at the time of listing is neither possible nor feasible, agreed revised objectives for the site will have been met"

We submit, that DELWP as a priority should develop a list of options with broad cost/benefits for review by Government and the community, followed by a decision on which options the Government and the people of Victoria want to include in the Gippsland Lakes Site Management Plan that will reduce salinity in the Gippsland Lakes particularly the western end. This should not be a decision for the respective Government Agencies alone. Ideally this should also be reviewed by the Federal Government as a potential source of funding for some or all of the selected options.

We believe the Management Plan options should as a minimum include plans/measures to:

- reduce salt inflows from Lakes Entrance up through the Lakes system
- low cost submerged salt barrier on McLennan Strait to inhibit salt prism migration to Lake Wellington but allow fish, boats and floodwaters to still enter and exit Lake Wellington. (as outlined in SKM Lake Wellington Salinity Investigation of September 2010 (3 – copy attached) and not the \$200M structure costed and rejected by a EGCMA study in 2015
- a low cost levee barrier on the eastern end of Dowd Morass to inhibit saline water from Lake Wellington

migrating into the Morass at times of high lake levels.  
- Increased environmental flows into the Lower Latrobe system.

We also believe that an audit of the Gippsland Lakes site should be undertaken by the CSIRO to document the change since the last Audit undertaken by it. This Audit will undoubtedly demonstrate the urgent need for action to remediate the decline in the Lakes environment.

Consideration should also be given to establishing an independent Government body to manage and also provide oversight to the Gippsland Ramsar site. The 2016 VAGO report noted that there was a need for :  
“ the Department of Environment, Land, Water and Planning, in conjunction with Parks Victoria and catchment management authorities:

- o develop and implement robust governance arrangements for managing Ramsar sites, including clarifying roles, responsibilities and accountabilities for planning, management and reporting
- o strengthen management plans to include time frames and resourcing to ensure that actions are carried out effectively and in a timely way”

Due to the community values of, complexity, current and future threats to the Gippsland Lakes, oversight by an independent Government body may be the best way to ensure the relevant agencies undertake their roles and responsibilities to ensure ongoing health of the Gippsland Lakes.

Recommendation 3.

That the Department of Environment, Land, Water and Planning lead the development of a state wide approach to monitoring the ecological character of Ramsar sites, through a specific monitoring, evaluation and reporting framework.

We fully support this recommendation and have no comments to make.

**Do you have any additional comments or suggestions?:**

John Hirt the President of Sale Field and Game will be making a verbal submission to the Panel in Sale on December 4. Gary Howard and Peter Warner will also be in attendance.

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**Signature:**  
Peter Warner