

29 November 2019

Re: Review of Auditor General Report 2016 recommendations into Ramsar Site Management Vic.

Dear Sirs/Madam,

My husband and I have been lucky enough to call the Gippsland Lakes region home since 2012. Over the last 2 years we have developed an interest in finding out more about “the Lakes” on the back of a related campaign on recreational fishing. We were both somewhat “bamboozled” by the plethora of documents, research papers and reports on the health of the Gippsland Lakes from various Government and other agencies. We however discovered that much of the Gippsland Lakes and importantly its wetlands, a critical component of the health of the Lakes, were registered with Ramsar International in 1982. We read the 2015 version of the Gippsland Lakes Ramsar Site Management Plan and met with representatives of both the East and West Gippsland Catchment Management Authority to discuss various components including pointing out some errors in data measurement points.

We acknowledge that much work has been done in the form of on-ground environmental works and community engagement through the various versions of the current Victorian Minister for Water appointed Gippsland Lakes Co-ordinating Committee (GLCC). We were unable to find detail on the terms of reference for the GLCC nor its membership without further enquiry. We thought this information at least should be housed on the Love Our Lakes portal to inform the community. The current Committee aims(ed) to deliver, through the instrument known as the Gippsland Lakes Priorities Plan (2016-2021) an integrated program of practical, on ground environmental works and community engagement, to protect and improve the health of the Gippsland Lakes. Up to \$2.5 million dollars per annum of Victorian Government Funds to implement priority actions is granted via project grants to approved applicants.

The Committee is tasked to make “evidence based recommendations” to the Minister on the allocation of funding based on, for example the Gippsland Lakes Ramsar Management Plan and Regional Waterways plans. There are however still deficiencies in Managing the Gippsland Lakes Ramsar Site and there remain many gaps in science and ongoing monitoring of this the largest estuarine system in Australia. The Gippsland Lakes Priorities Plan itself includes a gap analysis and states that “there will be insufficient resources for implementation of all identified management actions in 2016-2021” and “it seeks to build on processes to refine the list to a smaller number of priorities that can be addressed over the next 5 years”.

Armed with the Priorities Plan, 2015 Ramsar Management Plan and numerous other recently published documents from a variety of Government and Scientific sources, we met with representatives of the EGCMCA who are tasked with Ramsar Management for the Gippsland Lakes. We can only say when discussing many of the benchmarks for Limits of Acceptable Change(LAC) under the Ramsar plan, such as salinity levels, seagrass, fish and other related matters, we were underwhelmed to hear that many of these LAC’s were no longer relevant and likely to be amended. As a primary part of our campaign related to iconic fish species in the Gippsland Lakes important for recreational fishing, we raised the catch data benchmark LAC for Black bream. The advice was that this would be changed to “abundance of any overall fish species or similar” despite Black bream being an important recreational and sports fish species for local and visiting anglers who contribute much to the local economy. These fish have been under threat from changes to the Gippsland Lakes due to the degradation of the nursery habitat in seagrass beds (only measured twice in 20 years! ) and the salt wedge, which stimulates spawning, being driven further up the rivers rather than lower in the system as once was with Black bream and other estuarine species in abundance throughout the Lakes. It would seem that there is an “acceptance” that the Gippsland Lakes

will become marine due to “climate change, “low fresh water inflows to the Lakes” (despite environmental water flows from the catchment but impacted by increased human interventions and development surrounding the Lakes and its feeder rivers) and the permanent opening of the entrance to the Lakes in 1889.

Many of the other documents we furnished at the meeting were declared as out of date (despite many only being 2 years old). This raises another matter of a central repository for Government Departments and commissioned reports or scientific papers. Having worked in a Government department on secondment it was not unusual to spend a lot of time on a “report” only to find that another unrelated department was working on something similar. This is a huge wast of limited resources and government funds. The “Love Our Lakes portal” holds some of the scientific and related documents to the Gippsland Lakes, however not all the reports, and many of those on the portal or sourced from elsewhere we were advised are “no longer current” or have been superseded. These are not labelled as such (archived) which makes research difficult.

The 2015 Ramsar Management Plan for the Gippsland Lakes mentioned a rolling review to measure the LAC’s. We were advised that the a document, a revision of ecological character description of the GL Ramsar site, had been submitted at Federal level and was awaiting sign off by the Federal Minister for the Environment. We wrote to our local Federal member who was unable to get hold of it and we again wrote recently to be advised basically that any such document was with DELWP Vic not the Commonwealth???!.

I have been reviewing correspondence from last year with DELWP and was advised in one correspondence that the LAC’s have “improved” in response to your audit in 2016. There are no specifics to this statement and I am unable to find a report to support this available publicly.

The correspondence also stated that in response to action 3 of your report, a statewide monitoring, evaluation, reporting and improvement (MERI) framework was under development and by now (12 months since the correspondence) should be publicly available. As I am unable to find it by the usual means available to a member of the public I have asked DELWP to provide it.

In summary we acknowledge that some good on ground work in restoring the health of the Gippsland Lakes has or is being undertaken. Accepting that the Lakes will become entirely marine and the impact that this will have on flora, fauna and marine species is however untenable. This is a lazy response particularly with so many gaps in the available science and rigorous monitoring of threats (last CSIRO audit 1998). The Gippsland Lakes Annual report (16/17 ? where is 17/18) identifies processes but is weak on how much projects have improved high risk priorities. This is likely to lack of baseline data despite the Ramsar LAC’s often identifying benchmarks. We remain concerned that there are still too many agencies involved in managing the Lakes creating a “Yes Minister” vortex and that much remains to be done. Just changing the “goal posts” particularly without rigorous monitoring over time is not the answer. If different departments are to continue managing the Lakes then reporting mechanisms should complement each other and there should be only one robust overall reporting mechanism relating to Ramsar which is transparent, easily understood and readily available. If you require further information please contact me via email

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