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Ref: Meeting Obligations to Protect Ramsar Wetlands (2016)

Dear Committee Members,

My particular interest is in creating the strongest possible protection for the Ramsar wetlands of Westernport Bay in Victoria. However, outdated planning overlays still permit heavy industry development in the area. Until these overlays are redrawn to exclude such development, the bay's Ramsar wetlands remain under threat. I believe this violates both the letter and spirit of the Ramsar Convention.

The world is still in the early stages of responding to the climate crisis. One of our most important duties is to take an unequivocal stance regarding environments that are most sensitive to the crisis - wetlands.

Unfortunately, some companies, and governments, don't see it this way. The current proposal for an enormous gas import terminal on the western shore of Westernport Bay is a glaring example.

An Environmental Effects Statement (EES) is being prepared for the gas terminal project. One might say, 'well, at least the rules are being followed.' But I see it differently. First, the EES process, as seemingly lengthy and thorough as it is, is more like window dressing - virtually every project that has been evaluated under EES rules has been approved. Second, governments and corporations hide behind the EES process and avoid any further discussion. It's common to hear official statements like, 'We don't want to circumvent the EES.' Case closed.

There is so much about Westernport Bay, and its Ramsar wetlands, that we don't know. And the EES process does *not* require that we find out. So, if the project goes ahead, we will be blind to the possible consequences. This amounts to the opposite of wetlands protection.

I am deeply concerned that EPA regulations that once had proscriptive powers are now likely to mandate risk-based analyses to determine whether a proposed project near or in a Ramsar wetland is justified. This allows developers to hide behind clever use of science and statistics - a game in which deep-pocketed project proponents hold all the cards. When you can buy the test results you want then 'risk-based' assessments are just a charade.

As Convention participants, we have the chance to demonstrate exceptional care for our wetlands and so encourage other signatories to do the same. Perhaps Victoria is doing a better job protecting the state's other Ramsar sites, I don't know. But if Westernport Bay is the test, I say the state's environmental protection laws and regulations fail.

The Victorian Auditor-General recommends that authorities, '... assess options for direct funding of management plan activities focused on high-priority threats that impact on the ecological character of Ramsar sites.' But it is likely the fate of the proposed gas terminal in Westernport Bay will be decided in 2020. So, this high-priority threat to Westernport Bay's Ramsar wetlands exists now.

For our natural environment, the time for risk assessments and attempts to 'balance competing interests' is long gone. Either we protect our Ramsar wetlands or we don't. Trying to decide the level of threat they can withstand misses the point entirely. Let's not threaten them at all.

I wish the committee well in it's endeavours.

John Wilkins