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Draft Victorian Recreational Boating Strategy Submission

The Victorian National Parks Association

20 September, 2021

Thank you for the opportunity to make comment on the *draft* Victorian Recreational Boating Strategy (the draft boating strategy). The Victorian National Parks Association is a community based non-government organization dedicated to the protection of Victoria's natural heritage within the public land estate, on private land, and in the sea. We have been advocating for protection of Victoria's natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

Whilst we hear the need for the upgrade of many boating facilities, we would like to ensure Better Boating Victoria and the Victorian Fisheries Authority take responsibility of their role as a key marine and coastal authority/user group, under the Marine and Coastal Act, Policy and Strategy (soon to be finalised), and the need to lead with a collaborative approach to marine and coastal planning and management. The Marine and Coastal Act, and policy has the following objectives which should be followed: Acknowledge Traditional Owners' rights, aspirations and knowledge, Protect and enhance the marine and coastal environment, Respect natural processes, Strengthen resilience to climate change, and Use and develop sustainably.

In its current draft, the Victorian Boating Strategy does not do this, and appears to be a plan for expansion of facilities only, with little regard to environmental impacts, Traditional Owner rights and obligations, or other foreshore and marine users.

We also wish to reflect our concerns that this strategy from engaging with our stakeholders, that this consultation did not appear to be circulated to stakeholder groups more widely, and the need going forward that all users of the marine and coastal environment should know about and be entitled to have their views heard.

We wish to make comment on the following:

- 1. The strategy is inconsistent with the Marine and Coastal Policy and the Marine and Coastal Strategy**
- 2. Environmental impacts barely considered**
- 3. The strategy does not adequately consider Traditional Owner rights and obligations**
- 4. Management issues not addressed**
- 5. Exclusion of other foreshore and water users**
- 6. Inadequate stakeholder consultation**

1. Inconsistent with Marine & Coastal Policy and Strategy

In our view the draft Victorian Recreational Boating Strategy (the draft boating strategy) is **inconsistent** with the *Marine and Coastal Policy 2020*, and the *draft Marine and Coastal Strategy 2021*, in relation to the need to be responsive to environmental impacts and optimise environmental outcomes.

The Marine and Coastal Policy states (page 49):

“10.5 Support a sustainable network of facilities for recreational boating and water-based activities in line with strategic plans, and be responsive to:

- a. identified demand
- b. use and safety considerations
- c. the carrying capacity of the location
- d. coastal processes
- e. environmental values.”

We do not see any consideration for environmental values considered in the proposal to expand and add new boating facilities in the draft boating strategy.

Furthermore, the draft Marine & Coastal Strategy has an action (page 16):

“3.1 Develop a Victorian Recreational Boating Strategy (2021-2030) that:

- incorporates climate change adaptation responses
- is aligned with regional and local place-based plans (e.g. management and adaptation plans)
- optimises environmental outcomes
- aligns with Traditional Owner objectives and assertions for Country.”

The draft boating strategy does not reflect these, and we wish to make particular emphasis on the need to optimise environmental outcomes and align with Traditional Owner objectives and assertions for Country.

The Marine and Coastal Policy and Strategy are a reflection of Victoria’s Marine and Coastal Act 2018 which are among Victoria’s principle guiding documents that all land managers and users must have regard to, yet the draft boating strategy barely mentions the environment and has no actions to this effect.

Victoria’s Marine and Coastal Act 2018 (the Act) sets objectives and guiding principles for the planning and management of the state’s marine and coastal environment. It establishes an integrated and coordinated whole-of-government approach to work with Traditional Owners, industry and the community to protect and manage our precious marine and coastal environment.

The Act requires a Marine and Coastal Policy (the Policy) to set out policies for planning and managing the marine and coastal environment, and to provide guidance to decision makers in achieving the Act’s objectives.

We argue that these objectives and policies have not been used to develop the draft boating strategy and while is mentioned a couple of times, the content and actions do not reflect consideration of these principles, values or objectives. The boating strategy is also not reflective of the collaborative approach needed across other water users, with no mention of how the increase in boating facilities and effort might be balanced with other water users.

In relation objective 4 of the boating strategy speaks to the need for dredging locations, this also does not appear to be consistent with the Marine and Coastal Policy which states (page 49):

“10.6 The design and location of marine-based structures and access points (including boat ramps, ports and marinas) should:

- a. consider and minimise safety risks
- b. consider sediment movement processes
- c. minimise the need for capital and maintenance dredging
- d. minimise sedimentation through catchment-based management activities (such as revegetation and erosion control).”

We strongly suggest that the next iteration of the strategy does reflect the above and attempts are made to align the boating strategy with the Marine and Coastal Act, Policy and Strategy.

2. Environmental impacts not considered

The boating strategy proposes new infrastructure and amenities at existing and new locations across the state, including boat ramps, carpark extensions and upgrades, and we remain concerned that there has been no consideration or mention of the need to ensure environmental values are optimised, as mentioned in the draft Marine and Coastal Strategy that the boating strategy needs to do.

“3.1 Develop a Victorian Recreational Boating Strategy (2021-2030) that:

- incorporates climate change adaptation responses
- is aligned with regional and local place-based plans (e.g. management and adaptation plans)
- optimises environmental outcomes
- aligns with Traditional Owner objectives and assertions for Country.”

The number and scale of expansion of overflow carparks is huge, and there has been no consideration of the impacts this could have on the natural environment, at the foreshore, marine environment and the areas in which the carparks would be expanded.

To align with the marine and coastal policy and strategy, some of the impacts on the marine environment that would be likely be felt include:

- Native vegetation removal on the foreshore that might need to occur to expand carparks
- Boat ramp expansion needs to consider marine habitat impacts such as seagrass disturbance/removal
- Increase in boating activities in general poses increases in the chance of pollution, vessel strikes and interactions with marine life, an increase in fishing effort, and anchor damage on marine habitats

The draft Boating Strategy acknowledges (page 7) the need for users to play a role in supporting healthy waterways, yet it does not state any actions on how it will do that, or the need for promoting responsible boating for limiting impacts on the marine environment:

“A healthy environment also plays an important role in supporting the boating experience and all users play a role in supporting healthy waterways.”

Furthermore, page 53 states:

“Guidelines for responsible boat maintenance practices will also be developed.”

This is welcome in the boating strategy, yet this is not listed as an action, and we are concerned these are just words on paper with no accountability. We suggest that this is listed as an action in the table as monitoring and performance criteria or as an actions on page 56-57 of the boating strategy.

Furthermore, Objective 4 of the boating strategy speaks to the need for dredging locations, yet there is no mention of environmental considerations. This also does not appear to be consistent with the Marine and Coastal Policy which states (page 49):

“10.6 The design and location of marine-based structures and access points (including boat ramps, ports and marinas) should:

- a. consider and minimise safety risks
- b. consider sediment movement processes
- c. minimise the need for capital and maintenance dredging
- d. minimise sedimentation through catchment-based management activities (such as revegetation and erosion control).”

3. The strategy does not adequately consider Traditional Owner rights and obligations

The draft boating strategy does not adequately outline how it will work with Traditional Owners or the need to consult on cultural values and sites.

As mentioned above in section one, it is a requirement of the Marine and Coastal Act, Policy as objective number one this needs to be the case.

Although the draft boating strategy mentions the Marine and Coastal Policy, they are not reflected in the actions.

4. Management issues not addressed

With the proposal to expand boating and facilities, there is minimal consideration for how this might be managed, or the process of resource allocation to support other agencies that would need to deal with the impact of this, including the increase in boating at foreshores and on the water, which would put pressure on and require additional resources for:

- additional capacity for compliance in relation to safety and fishing (both in marine parks and outside) which impacts on organisation such as Vic Pol, Parks Victoria and VFA Fisheries Officers
- an increase in boating could result in increasing risk of vessel interactions with wildlife which may require additional resources from DELWP’s wildlife response unit
- management of additional boating assets by local councils, Parks Victoria etc.
- need for education of boat users

Another issue that has not been addressed is climate mitigation and already existing problem we have in Victoria for the already existing coastal assets and how they will be managed in the face of climate change, including who will pay. This is an issue that needs to be balanced carefully to look at the long time, before hugely increasing coastal assets.

5. Exclusion of other foreshore and water users

The draft boating strategy reflects little to no consideration for other water, foreshore users, or even other boating users other than powerboat users.

Although there are many Victorians who participate in boating activities, there are also a great deal of other water users - swimmers, beach walkers, snorkelers and divers, fishers etc. who do not own a boat, that value their ability to access the foreshore.

We are concerned that for these users, that the current proposal of expansion of boating facilities may exclude other water users, whereby boat ramps and parking may only be accessible to people with boats and be exclusive to others. This needs to be carefully managed.

In summary, the boating strategy is also not reflective of the collaborative approach needed across other water users, with no mention of how the increase in boating facilities and effort might be balanced with other water users. We would like to see the strategy more inclusive or at least how the strategy might consult other water users.

6. Inadequate stakeholder consultation

In our view, there was not adequate efforts made to circulate the draft boating strategy to other water users, or the broader Victorian community, as many marine and coastal stakeholder groups whom the VNPA works with had not heard about the release of the draft strategy. Therefore the ability to comment on the strategy was limited.

We would like to see the strategy more inclusive or at least how the strategy might consult other water users in the process of implementation of the final strategy and going forward.