



Level 3, 60 Leicester St  
Carlton Victoria 3053  
Ph: (03) 9347 5188  
[vnpa@vnpa.org.au](mailto:vnpa@vnpa.org.au)  
[www.vnpa.org.au](http://www.vnpa.org.au)

## **Draft Marine & Coastal Strategy Submission**

### **The Victorian National Parks Association**

**10 September**

Thank you for the opportunity to make comment on the *Draft Marine and Coastal Strategy (The Draft 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 advocate for protection of Victoria's natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

We are very pleased to see the commitment from the state government and relevant agencies to make moves to improve the planning and management of Victoria's spectacular seas and shores, to bring forth the vision as outlined in the Marine and Coastal Policy (The Policy) for "A healthy, dynamic and biodiverse marine and coastal environment that is valued in its own right, and that benefits the Victorian community, now and in the future."

Our marine and coastal environments have been overlooked and are often the first to be stripped of much needed funding and resources. With over 80 per cent of Victoria's marine life found here and nowhere else on earth, this Strategy needs to be ambitious and strong for these important ecosystems to be managed well.

Our comments below on the Draft Strategy are based on the need to achieve The Policy's vision.

We have split this submission up into the following sections:

- **Section 1: General comments**
- **Section 2: Five gaps, five improvements and five strengths**
- **Section 3: Summary of recommended new actions**
- **Section 4: Consistency with other policies, acts and plans**
- **Section 5: Table of specific comments on each action**

## 1. General comments

- Overall, the draft strategy is moving in the right direction. We're pleased to see it include a central focus on Traditional Owner rights and obligations, and climate adaptation and response.
- But it falls short in many critical aspects. The strategy is not visionary enough and does not set the broader agenda to address the range and depth of threats impacting our marine and coastal environment. It desperately needs more ambition, insight and strength.
- Many actions cater for a 'business as usual' approach and what already has funding or political commitment.
- It does not reflect urgency – many of the timeframes for actions are still years away.
- The strategy in its draft form is unlikely to meet the vision of the Policy for "A healthy, dynamic and biodiverse marine and coastal environment that is valued in its own right, and that benefits the Victorian community, now and in the future."

## 2. Gaps in the draft strategy

### a. There is a lack of focus on the broader marine environment

Our highly-visible coasts are well considered in the draft strategy, but the marine environment away from the coast is largely neglected. More actions to address threats from marine invasive species, impacts of extractive industries and tourism, and efforts to enhance the health of our marine protected areas are needed.

Victoria's marine and coastal environments are unique and special places that deserve to be protected and conserved for the future. The temperate, tropical and cold-water ecosystems and seascapes in Victoria's marine and coastal environment have high levels of biodiversity with over 10,000 marine species, 80 per cent of which are found here and nowhere else on the planet. There are also a large number of threats to the values of our marine environment, which were organised thematically by VEAC in their Marine Environment Report (2019) into six categories including climate change, physical change, biological change, catchment processes, pollution and community or industry demand.

Our concern is that many of these categories have been skimmed over in the Strategy. Whilst Traditional Owners' rights and obligations, and climate adaptation were well covered, industry and community demand have been largely missed.

We would like to see actions around the following areas strengthened in the Strategy:

- Stronger marine habitat and species adaption focus
- Improved marine park management
- Marine pest planning, management and accountability across the whole state
- Stronger emphasis on habitat protection and connectivity on crown land
- Industry accountability for minimising impact on marine values, for example the fishing and offshore energy sectors
- Marine threatened species management and emphasis on existing legislative tools

### b. Marine Protected Area management lacks ambition

One of Victoria's key marine assets, our Marine Protected Areas (MPAs) network, is skimmed over in the draft strategy. We need better marine protected area management, and to fill the gaps in Victoria's MPA estate. Furthermore, MPAs should to be restored with resourcing and funding that has been dramatically cut over the years. This will help improve resilience of our marine areas to

adapt to climate change, as well as connecting Victorians to these underwater treasures through education and citizen science programs. We also need to investigate whether our current MPA network is meeting the objectives that were set out at the creation. To enable these improvements, the Strategy should include specific recommendations for funding and resourcing MPAs.

Improved action for MPA management is supported across a range of policies, plans and recommendations including:

#### Victoria's Marine and Coastal Policy, 2020

The Policy states:

'5.2 Maintain, enhance and monitor a comprehensive, adequate and representative system of well-managed Marine and Coastal National Parks, sanctuaries, nature conservation reserves and coastal Crown land reserves.'

#### Biodiversity 2037 Plan

Given that our MPA network protects representative samples of different habitats across the state (although not all habitats are representative in each bioregion), this statement from the Biodiversity 2037 Plan, also supports investment and action in MPAs to improve extent of and condition of habitats:

'A net gain of the overall extent and condition of habitats across terrestrial, waterway and marine environments.'

#### Recommendations by the Victorian Environment Assessment Council

A 2010 review of Victoria's MPAs found that they did not meet the NRSMPA's key principles of comprehensiveness, adequacy and representativeness. Further supported by both the 2013 and 2018 Victorian State of the Environment Reports, which highlighted the limited protection afforded by the current MPAs.

The Victorian Environment Assessment Council (VEAC) in 2017 concluded in its [Public Land Investigation](#), that the:

"existing system of no-take MPAs has some gaps in representation, and individual marine protected areas may not meet the adequacy criterion".

VEAC's recommendation to the Victorian Government was for

- "Victoria's marine environment be reviewed for the comprehensiveness, adequacy and representativeness of its marine protected areas when current work on marine habitat mapping and classification is completed and available."

The habitat mapping and classification has now been completed, with the development of 26 'biounits' across the state now complete, as carried out as part of VEAC's [Assessment of the Values of Victoria's Marine Environment Atlas \(VEAC, 2019\)](#).

#### Marine Conservation Priorities and Issues for Victoria Report, 2010

Furthermore, a [2010 review of Victoria's MPAs by Australian Marine Ecology](#) found that Victoria's MPA network did not meet the NRSMPA's key principles of comprehensiveness, adequacy and representativeness, and recommended some expansion of existing MPAs, in addition to new areas of habitat worthy for protection.

#### Marine Protected Area Review

[VNPA's 2019 Marine Protected Area Review](#) found that In Victoria, a mere 5.3% of coastal waters are protected in no-take areas, the second lowest percentage of any Australian state.

State of the Environment Report (2013, 2018)

Both the [2013](#) and [2018 Victorian State of the Environment Report](#) highlight the limited protection afforded by the current MPAs.

***Recommended actions:***

- *Accept VEAC's recommendations for a review of Victoria's marine environment for comprehensiveness, adequacy and representativeness of its marine protected areas - fill the gaps in Victoria's marine protected area estate*
- *Victoria's current network of marine national parks and sanctuaries is a top priority for ongoing resourcing and investment. They are a key feature of the state and deserve core departmental funding allocations for on-going long-term management and improvement.*
- *Victoria's network of marine national park and sanctuaries have a dedicated citizen science and education program*

**c. The Draft Strategy lacks actions to address particular chapters in the Marine and Coastal Policy**

The Marine and Coastal Strategy lacks or is light on actions in relation to particular chapters of the Marine and Coastal Policy, namely:

- Coastal settlements (Chapter 8)
- Marine industries (Chapter 9)
- Recreation and tourism (Chapter 10)
- Buildings, structures and access (Chapter 11)

While Action 3 in the Draft Strategy is to support sustainable use and development of the marine and coastal environment, **we are especially concerned that recreational and commercial fishing, oil and gas extraction (particularly offshore oil and petroleum extraction) or other offshore industries barely get a mention in the draft strategy.** We provide some suggestions in support of including additional actions in the strategy.

**Fishing (industry and recreation)**

The Marine and Coastal Policy supports industry that minimise impacts and risks to the marine and coastal environment (policy 9.1) and recreational uses that are sustainable and minimise impacts for the environment (policy 10.1 and 10.2). Furthermore, the previous 2014 Coastal Strategy and VEAC's Assessment of the Values of Victoria's Marine Environment 2019 provide further guidance and support for the need to address this.

The previous 2014 Coastal Strategy states:

Policy:

- Fishing stocks are comprehensively assessed and managed by identifying and managing important fish habitats, support for research, developing harvest strategies, increasing focus on ecosystem impacts of, commercial and recreational fishing
- Safe and ecologically sustainable recreational fishing is supported. This may be through the provision of facilities, enforcement of regulations, monitoring, behaviour change initiatives (e.g. Seal the Loop, Anglers Diary) and the inclusion of information in the Victorian Recreational Fishing Guide (DEPI (b) 2014)"xiii

VEAC's Assessment of the [Values of Victoria's Marine Environment 2019](#) highlights many threats and gaps in relation to these industries:

- Reductions in spawning and recruitment of commercial species can threaten the viability of fisheries, and in Victorian there are knowledge gaps on the stock structure for many species.
- There is also no sound estimate of recreational catches but some estimates have put recreational catches for key species above commercial catches both in Victoria. Meanwhile aquaculture in Victoria experienced growth of 18 per cent in 2016-17.

**Industry and recreational fishing do not get mention at all in the Strategy**, apart from once in a preamble. There are no actions specifically associated with fishing and there needs to be. See recommended actions below.

### **Energy - oil and gas extraction and other offshore industries**

The Marine and Coastal Policy supports industry to minimise impacts and risks to the marine and coastal environment (policy 9.1). We note that there are no actions in the Strategy to achieve this (other than the assumed action related to marine spatial planning).

**VNPA is concerned that offshore gas and petroleum exploration (and other energy projects and offshore industries is not covered in the Strategy), particularly with the level of activity across our state including off the Twelve Apostles and Gippsland. There are some known impacts, with many unknowns on the marine and environments and this industry as a whole needs to be addressed in the Strategy.**

We would like to see the development of a strategic and integrated process for assessing marine energy proposals.

We also note that Policy Chapter 8 Coastal Settlements (specifically 8.1 & 8.9), Chapter 10 recreation and tourism, Chapter 11 - Buildings, structures and access (specifically 11.12), are not well addressed in the Strategy, however due to capacity we have not been able to compile suggested actions to address them.

#### ***Recommended actions:***

- *Perform independent stock assessments for key fisheries species*
- *Monitoring and reporting of the impact of recreational fishing*
- *Development of a strategic and integrated process for assessing marine energy proposals.*

#### **d. Marine invasive species action absent**

There is still no comprehensive state wide plan to address threats to the marine environment from invasive species in Victoria – there are estimated to be at least 100 different species of marine pest in Port Phillip Bay alone, let alone the rest of the state. An action to develop a state wide plan should be added to the draft strategy.

Parks Victoria has responsibility of managing marine pests in marine protected areas, and other waters by the Department of Agriculture. While there is information on both of these agencies websites, there is no plan for the planning, management and coordination across the whole state. Marine pests pose such a huge threat to marine ecosystems, and can require an emergency response depending on the level of that threat. These considerations clearly warrant a state-based plan.

#### ***Recommended action:***

- *Develop a comprehensive state wide plan to address threats to the marine environment from invasive species in Victoria*

### e. Actions on threatened species neglected

Attention to threatened marine and coastal species in the face of climate change and other threats is necessary, and must use all the policy and legislative tools available. For example, there are threatened species protection tools under the Flora and Fauna Guarantee (FFG) Act 2020, which include producing action statements for listed species and using critical habitat determinations to protect key areas.

The FFG list of threatened species has been updated in 2021 to more accurately reflect the number of threatened species in Victoria by aligning with national criteria. There are currently 1,994 species, and over 40 communities listed under the act.

Environmental Justice Australia recently released report '[Using law and policy to protect the critical habitat of Victoria's threatened species](#)' shows that prior to the update, only 42% of listed species had accompanying Action Statements (required in the FFG Act), and of those 93% were more than 10 years old. See table below.

**FIGURE 1: LISTED THREATENED SPECIES UNDER FFG ACT AND ACTION STATEMENTS (AS AT NOVEMBER 2019)**

CATEGORY	TOTAL LISTED SPECIES	LISTED SPECIES WITH PREPARED ACTION STATEMENT	ACTION STATEMENT >10 YEARS OLD
Amphibians	12	6	4
Birds	81	43	42
Communities	41	18	18
Fish	31	16	11
Invertebrates	73	24	23
Mammals	42	33	29
Plants	Vascular and non-vascular: 359 + 19 = 378	131	126
Reptiles	29	13	11
Total	687	284 (42.3% of all listed species)	264 (92.96% of Action Statements)

Source: [https://www.environment.vic.gov.au/\\_data/assets/pdf\\_file/0024/115827/20191114-FFG-Threatened-List.pdf](https://www.environment.vic.gov.au/_data/assets/pdf_file/0024/115827/20191114-FFG-Threatened-List.pdf); ... <https://www.environment.vic.gov.au/conserving-threatened-species/action-statements>

In relation to the marine and coastal environment, a quick analysis of the updated FFG list of threatened species shows approximately 51 marine and coastal threatened animal species (birds, invertebrates, fish, mammals) listed (see table below, which excludes marine plants due to lack of time to analyse). Of the 51 marine and coastal animals on the list, only 16 have action statements (31.4%). This means that 68.6% of threatened marine and coastal animals, unless within a marine or coastal park, do not have any plans in place to improve their protection, despite this being a requirement of the FFG Act. Furthermore, none of them have management plans.

Scientific Name	Common Name	Category of Threat	Subgroup	Habitat Type	Action Statement
<i>Acanthiza iredalei hedleyi</i>	Slender-billed Thornbill (Lowan Mallee)	Endangered	Birds	Coastal	N
<i>Actitis hypoleucos</i>	Common Sandpiper	Vulnerable	Birds	Coastal	N
<i>Amphiura trisacantha</i>	Brittle Star species	Endangered	Echinoderms	Marine	N
<i>Apsolidium densum</i>	Sea Cucumber 5251	Endangered	Echinoderms	Marine	N
<i>Apsolidium falconerae</i>	Sea-cucumber	Critically Endangered	Echinoderms	Marine	N
<i>Apsolidium handrecki</i>	Sea Cucumber 5052	Endangered	Echinoderms	Marine	N
<i>Arctophoca australis forsteri</i>	Long-nosed Fur Seal	Vulnerable	Mammals	Marine	N
<i>Athanopsis australis</i>	Southern Hooded Shrimp	Endangered	Crustaceans	Marine	N

<i>Attheyella dedeckeri</i>	copepod	Endangered	Crustaceans	Marine	N
<i>Australatya striolata</i>	Riffle Shrimp	Endangered	Crustaceans	Marine	N
<i>Australomedusa baylii</i>	Brackish Jellyfish	Endangered	Cnidarians	Estuarine	N
<i>Balaenoptera musculus</i>	Blue Whale	Endangered	Mammals	Marine	Y
<i>Bassethullia glypta</i>	Chiton 5254	Critically Endangered	Molluscs	Marine	N
<i>Carcharias taurus</i>	Grey Nurse Shark	Critically Endangered	Fish	Marine	Y
<i>Carcharodon carcharias</i>	Great White Shark	Endangered	Fish	Marine	Y
<i>Charadrius leschenaultii</i>	Greater Sand Plover	Vulnerable	Birds	Coastal	N
<i>Charadrius mongolus</i>	Lesser Sand Plover	Endangered	Birds	Coastal	N
<i>Clarkcoma australis</i>	Brittle Star species	Critically Endangered	Echinoderms	Marine	N
<i>Diomedea epomophora</i>	Southern Royal Albatross	Critically Endangered	Birds	Coastal	Y
<i>Diomedea exulans</i>	Wandering Albatross	Critically Endangered	Birds	Coastal	Y
<i>Haliaeetus leucogaster</i>	White-bellied Sea-Eagle	Endangered	Birds	Coastal	Y
<i>Macronectes giganteus</i>	Southern Giant-Petrel	Endangered	Birds	Coastal	Y
<i>Macronectes halli</i>	Northern Giant-Petrel	Endangered	Birds	Coastal	Y
<i>Megaptera novaeangliae australis</i>	Southern Humpback Whale	Critically Endangered	Mammals	Marine	Y
<i>Michelea microphylla</i>	Michelea Species 5256	Critically Endangered	Crustaceans	Marine	N
<i>Mugilogobius platynotus</i>	Flatback Mangrovegoby	Endangered	Fish	Estuarine	N
<i>Neophoca cinerea</i>	Australian Sea-lion	Endangered	Mammals	Marine	N
<i>Pelagodroma marina</i>	White-faced Storm-Petrel	Endangered	Birds	Coastal	N
<i>Pentocnus bursatus</i>	Sea Cucumber (species 5258)	Critically Endangered	Echinoderms	Marine	N
<i>Phoebetria fusca</i>	Sooty Albatross	Critically Endangered	Birds	Coastal	Y
<i>Phoebetria palpebrata</i>	Light-mantled Sooty Albatross	Critically Endangered	Birds	Coastal	Y
<i>Platydoris galbana</i>	Sea slug	Endangered	Molluscs	Marine	N
<i>Pluvialis fulva</i>	Pacific Golden Plover	Vulnerable	Birds	Coastal	N
<i>Pluvialis squatarola</i>	Grey Plover	Vulnerable	Birds	Coastal	N
<i>Pseudocalliax tooradin</i>	Ghost shrimp	Endangered	Crustaceans	Marine	N
<i>Ralpharia coccinea</i>	Stalked Hydroid species	Critically Endangered	Cnidarians	Marine	N
<i>Rhodope rousei</i>	Marine opisthobranch	Critically Endangered	Molluscs	Marine	N
<i>Rowedota shepherdii</i>	Sea-cucumber species	Critically Endangered	Echinoderms	Marine	N
<i>Seriollella brama</i>	Blue Warehou	Conservation Dependent	Fish	Marine	N
<i>Sphyrna lewini</i>	Scalloped Hammerhead	Conservation Dependent	Fish	Marine	N
<i>Thalassarche bulleri</i>	Buller's Albatross	Endangered	Birds	Coastal	Y
<i>Thalassarche carteri</i>	Indian Yellow-nosed Albatross	Endangered	Birds	Coastal	Y
<i>Thalassarche cauta</i>	Shy Albatross	Endangered	Birds	Coastal	N
<i>Thalassarche chrysostoma</i>	Grey-headed Albatross	Endangered	Birds	Coastal	Y
<i>Thinornis cucullatus</i>	Hooded Plover	Vulnerable	Birds	Coastal	Y
<i>Thunnus maccoyii</i>	Southern Bluefin Tuna	Conservation Dependent	Fish	Marine	Y
<i>Thyone nigra</i>	Sea-cucumber species	Endangered	Echinoderms	Marine	N

<i>Tringa glareola</i>	Wood Sandpiper	Endangered	Birds	Coastal	N
<i>Tringa stagnatilis</i>	Marsh Sandpiper	Endangered	Birds	Coastal	N
<i>Tursiops australis</i>	Burrunan Dolphin	Critically Endangered	Mammals	Marine	N
<i>Xenus cinereus</i>	Terek Sandpiper	Endangered	Birds	Coastal	N

(NB: this table excludes coastal plants).



Also included on the updated FFG Act threatened list are the following communities:

- San Remo Marine Community (has an action statement)
- Port Phillip Bay Entrance Deep Canyon Marine Community (does not have an action statement)
- Coastal Moonah (*Melaleuca lanceolata subsp. lanceolata*) Woodland Community (does not have an action statement)

The percentage of marine species with action statements is below the percentage of species on land, and with far fewer marine species listed, shows the low prioritisation for marine and coastal areas and wildlife in general. It is clear that Victoria's marine and coastal dependent threatened species are in dire need of increased action, including those tools already available under Victoria's *Flora and Fauna Guarantee Act 1988 (FFG Act)*.

The Marine and Coastal Strategy has the opportunity to prioritise utilising the key legislative tools under the FFG Act to strengthen threatened species management. This could include creating and updating action statements, developing management plans and using Critical Habitat Determinations for listed marine and coastal species. Currently it has no mention of threatened species.

To support the use of Critical Habitat Determinations, Environmental Justice Australia's report mentioned above recommends developing these Critical Habitat Determinations for threatened species such as the Hooded Plover, as an important tool for regulatory function in influencing and guiding the conduct and practices of key public agencies and local councils, whose functions and powers bear on Hooded Plover critical habitat (*pg17-19*).

The report states:

- The factual description of critical habitat should inform recovery planning for threatened species and communities, including in the form of Action Statements made under the FFG Act (*pg15*).
- The making of critical habitat determinations, and design of protective tools based on them, is one important device enabling public administrators to discharge their duties under the Act. This will be particularly important in the context of public authorities with responsibilities for statutory decision-making and works affecting areas that are, as matter of fact and scientific opinion, critical habitat for threatened species or relevant to key ecological processes (*pg16*).
- The making of a CHD for Hooded Plover would have certain direct consequences under the Act, specifically for public authorities. Other consequences, such as preparation of a Habitat Conservation Order or Public Authority Management Agreement, would require further action by Government. The making of these more specific and, arguably, more targeted instruments would give regulatory form to the CHD. Nevertheless, absent these regulatory devices, a Hooded Plover CHD would still have important regulatory function in influencing and guiding the conduct and practices of key public agencies and local councils, whose functions and powers bear on Hooded Plover critical habitat (*pg18*).

The Biodiversity 2037 plan also addresses threatened species and supports greater action to protect them. Section 3.3 states:

Implementation should consist of:

- Broader scale threat management that benefits multiple species and provides a preventative approach, reducing the risk of species becoming more threatened.

- Specific threat management to meet the unique needs of individual species or situations.

There is an opportunity in the Draft Strategy to take threatened species management to the next level beyond the FFG Act, in line with the Biodiversity 2037 Plan.

One such process to achieve this could be to develop a risk assessment for threatened marine species and communities at risk from climate change or other impacts such as habitat destruction. A [similar process has been used for threatened species impacted by forestry operations across Victoria's 5 Regional Forest Agreement \(RFA\) regions](#) (a relatively new requirement). The risk assessment has supported the identification of interim measures to protect threatened species and communities from hazards posing significant or high risks in the short-term. This process, or something similar could also be adopted in the Strategy for marine species.

**Recommended actions:**

- *Develop action statements for all marine species and communities listed under the FFG Act and management plans for key species identified in a risk assessment process (see last action)*
- *Develop guidelines on how critical habitat determinations or conservation orders are enacted and what areas are eligible for critical habitat determinations, for listed threatened FFG species. (The Marine and Coastal Council could play a role in providing advice on this).*
- *Complete a risk assessment process for threatened marine species and communities at risk from climate change or habitat destruction (similar to the process used for threatened species impacted by forestry operations).*

## 2. Improvements needed

### a. The development of an Environmental Management Plan for Westernport Bay

The implementation and reviewing of the Port Phillip Bay Environmental Management Plan (action 2.7) is good. However Westernport Bay, Victoria's second largest bay, has missed out on a similar Environmental Management Plan, with no commitment to develop one. This is an issue considering how highly Westernport Bay is contested for industry, along with impacts from catchment inputs. We recommend a supplementary action be added to include the "Develop and implement an Environmental Management Plan for Westernport Bay, as a mechanism to improve water quality, protect beneficial uses, and address threats specific to Westernport Bay."

### b. Blue carbon mapping to be expanded to include high conservation value areas

A welcome action is to map coastal and marine areas with a high potential for blue carbon (action 2.5), however this action could be expanded to include the mapping of high conservation value areas in general.

### c. Coastal Crown Land

The draft strategy provides for good incentives for private land owners to aid in adaptation of habitats, however stronger focus could be added for public land. This could include allowing for the rezoning of areas likely to support coastal nature adaptation, and overlays such as Environmental Significance Overlays that prevent the development of land directly behind coastal conservation areas to enable the environment to adapt and retreat.

VNPA also supports the action of implementation of a 'Coastal Waters Reserve' for Victoria, recommended by VEAC, and accepted by the state government in 2001, which is summarised in VEAC's Marine Environment Report (2019):

“In 2001, the government accepted the recommendation of VEAC’s predecessor the Environment Conservation Council, in its final report for the Marine, Coast and Estuarine Investigation (2000), that a coastal waters reserve be established for the major portion of Victoria’s marine waters that are not otherwise designated for a specific purpose. The primary objectives for the reserve were to provide for a diverse range of activities that are compatible with long-term sustainable use and provide for the integrated management of Victoria’s marine, estuarine and coastal area. This government-accepted recommendation (under the Crown Land (Reserves) Act 1978) has not yet been implemented. (pg22).”

VNPA recommends that an action be added to the Strategy to implement R12 from the Marine, Coast and Estuarine Investigation (2000) for a ‘Coastal Waters Reserve’. This would allow for protection of state waters outside of marine protected areas, or marine spatial planning zones.

**d. Marine protected area focussed education programs**

Action for community to respect and care for marine and coastal areas (action 2.8) is supported, however a focus on Victoria’s marine protected areas should be included with emphasis here.

**e. Population pressure**

The draft strategy does have an action (action 3.6) around monitoring the carrying capacity and visitor experience in high-use areas of the Great Ocean Road, including visitor numbers and behaviour, and impacts of visitation on the values. Emphasis is needed to also ‘**reduce**’ impacts.

## 2. Strengths of the strategy

- a. Strong focus on Traditional Owners’ right and obligations for the management of the marine and coastal environment.
- b. Climate change response and adaptation.
- c. Blue carbon initiatives including mapping of high potential areas for investment.
- d. Building and upskilling of marine and coastal land managers with tools and knowledge for effective planning and management.
- e. Good emphasis and focus on implementing one of Victoria’s newest marine planning and management tools, Marine Spatial Planning.

## 3. Summary of recommended new actions

- Accept VEAC’s recommendations for a review of Victoria’s marine environment for comprehensiveness, adequacy and representativeness of its marine protected areas – fill the gaps in Victoria’s marine protected area estate
- Victoria’s current network of marine national parks and sanctuaries is a top priority for ongoing resourcing and investment. They are a key feature of the state and deserve core departmental funding allocations for on-going long-term management and improvement.
- Independent stock assessments for key fisheries species
- The monitoring and reporting of the impact of recreational fishing
- Development of a strategic and integrated process for assessing marine energy proposals.
- Comprehensive state wide plan to address threats to the marine environment from invasive species in Victoria
- Develop action statements for all marine species and communities listed under the FFG Act and management plans for key species identified in a risk assessment process (see last action).

- Develop guidelines on how critical habitat determinations or conservation orders are enacted and what areas are eligible for critical habitat determinations, for listed threatened FFG species. (The Marine and Coastal Council could play a role in providing advice on this).
- Completed a risk assessment process for threatened marine species and communities at risk from climate change or habitat destruction (similar to the process used for threatened species impacted by forestry operations).
- The development of an Environmental Management Plan for Westernport Bay
- Blue carbon mapping to be expanded to include high conservation value areas
- Implementation of government accepted ECC recommendation for a 'Coastal Waters Reserve' for Victoria, to allow for integrated planning and management in areas without existing protected marine national parks for example.
- Marine protected area focussed education programs – Action for community to respect and care for marine and coastal areas (action 2.8) is supported, but with emphasis on Victoria's marine protected areas should be included with emphasis here.
- Population pressure – monitoring the carrying capacity and visitor experience in high-use areas of the Great Ocean Road, including visitor numbers and behaviour, and impacts of visitation on the values should emphasise the need to reduce impacts.

#### 4. Consistency with other policies, acts and plans in the draft strategy

As the case with the Marine and Coastal Policy, it is important for the Strategy to be consistent with and how it interacts with the network of other policies, plans and legislation that have regard to marine and coastal environments. We see areas for improvement to align with the Biodiversity 2037 Plan for example.

Of most concern is the relatively little importance of marine parks in the Strategy which in our view is inconsistent with the Biodiversity 2037 Plan. For example The Biodiversity 2037 plan states:

“Victoria’s nature-based tourism is built on the quality of the state’s natural assets – our national parks, reserves and marine protected areas” and outlines the importance of “A net gain of the overall extent and condition of habitats across terrestrial, waterway and marine environments.”

Yet the draft Strategy barely mentions marine protected areas nor tourism impacts on them.

Furthermore in relation to funding, section 6.1 states of Biodiversity 2037 states:

“The government will analyse and adopt a variety of mechanisms to drive this funding boost. This will promote increased investment from all sectors so that expenditure can be coordinated and directed towards the most strategic and effective biodiversity actions across land, waterways and marine areas.”

We wish to point out the emphasis on marine areas in the above statement, and draw the correlation that funding and resourcing for MPA management has dropped significantly over the years and has not been restored. This has resulted in severe cuts to the marine program, significantly decreasing science monitoring, compliance, education, citizen science work. The marine protected area program should to be restored with resourcing and funding that has been dramatically cut over the years.

We also do not see this reflected in the strategy with substantial actions to support this for the wider marine environment.

Marine protected areas also have huge importance in climate resilience. They store at least 850,000 tonnes of carbon, making them important climate sinks (Biodiversity 2037, pg5). Coasts are important buffers for storms and sea level rise, both of which will increase under climate change. Coasts are also critical components in hydrological cycles, which were a key focus of Biodiversity 2037.

Furthermore, we would like to see how this strategy integrates with the Natural Environment Climate Adaptation Action Plan, which also provides direction and funding opportunities.

Coastal protection makes \$24 million-\$56 million per year from avoided costs (e.g. from erosion and storms) (Section 6.1, Biodiversity 2037), making them a great place to invest for environmental and community outcomes. **Despite this, much of the funding for marine and coastal areas appears to be initiative funding in the state budget, which can come and go. Our marine and coastal areas are a key feature of the state and deserve core departmental funding allocations for ongoing long-term management and improvement.**

## 5. Specific comments on each action in the Strategy

ACTION	COMMENTS
<p><b>ACTION 2:</b> Improve the condition and connectivity of habitats and respect and care for our marine and coastal areas</p>	<p><i>2.1. Set strategic directions that support the recovery and enhancement of marine and coastal habitats across public and private land in Regional Catchment Strategies (specifically for estuaries and coastal wetlands) to ensure the clear delineation of Regional Water Strategy scope.</i>  This should already be underway given the extra focus and responsibility of Catchment Management Authorities to have regard to the marine environment. Would be good to see this in the current RCSs as 2026 is still years away. Recovery and enhancement of marine and coastal areas largely left to incorporate into Regional Catchment Strategies, and would like to see this reflected directly for the marine environment and the associated managers i.e. Parks Victoria or DELWP.</p> <p><i>2.5 Map coastal and marine areas of Victoria with high potential for blue carbon.</i>  Support this action but suggest it's expanded to include mapping of high conservation habitat across the state.</p> <p><i>2.7 a) Implement the Port Phillip Bay Environmental Management Plan 2017-2027 and undertake 5-yearly evaluation in 2022-23.</i>  Support this action but could be strengthened to include the need for an EMP for Westernport, or Include a new action to 'Develop and implement an Environmental Management Plan for Westernport, as a mechanism to improve water quality, protect beneficial uses, and address threats specific to Westernport.'</p> <p><i>2.8 Promote community respect and care for marine and coastal areas.</i>  Need for specific marine and coastal protected areas specific education, citizen science, tourism support program focussed on MPAs .</p> <p><i>2.2. Implement Conservation Action Plans for coastal and marine parks and reserves to maintain and/or restore the core natural values and resilience of protected areas.</i>  To do this there is need for dedicated and an adequate number of marine experts in the responsible agencies to deliver this effectively.</p> <p><b>Suggestions for new actions and gaps:</b></p> <ul style="list-style-type: none"> <li>• There are no actions related to marine pest management, despite their inclusion in the policy.</li> </ul>

	<ul style="list-style-type: none"> <li>• There is no mention of work around managing Ramsar areas and their relevant plans or aspirations</li> <li>• The strategy is weak on water quality and soil actions, marine protected areas and threatened species management</li> <li>• Accept VEAC's recommendations for a review of Victoria's marine environment for comprehensiveness, adequacy and representativeness of its marine protected areas – fill the gaps in Victoria's marine protected area estate</li> <li>• Current network of marine national parks and sanctuaries is one of priorities for resourcing and investment</li> <li>• Comprehensive state wide plan to address threats to the marine environment from invasive species in Victoria</li> <li>• Develop action statements for all marine species and communities listed under the FFG Act and management plans for key species identified in a risk assessment process (see last action).</li> <li>• Develop guidelines on how critical habitat determinations or conservation orders are enacted and what areas are eligible for critical habitat determinations, for listed threatened FFG species. (The Marine and Coastal Council could play a role in providing advice on this).</li> <li>• Completed a risk assessment process for threatened marine species and communities at risk from climate change or habitat destruction (similar to the process used for threatened species impacted by forestry operations).</li> <li>• The development of an Environmental Management Plan for Westernport Bay</li> <li>• Blue carbon mapping to be expanded to include high conservation value areas</li> <li>• Implementation of government accepted ECC recommendation for a 'Coastal Waters Reserve' for Victoria, to allow for integrated planning and management in areas without existing protected marine national parks for example.</li> <li>• Marine protected area focussed education programs – Action for community to respect and care for marine and coastal areas (action 2.8) is supported, but with emphasis on Victoria's marine protected areas should be included with emphasis here.</li> </ul>
<p><b>ACTION 3:</b> Support sustainable use and development of the marine and coastal environment</p>	<p><i>3.4 Trial the implementation of a coastal infrastructure investment framework for managing built assets on Crown land in three distinct organisations spanning the coast from Portarlington through to Marengo. Evaluate this trial and revise as needed.</i></p> <p>It is unclear what is meant by 'built assets' here. Built infrastructure should be avoided on any area of conservation (or scenic) significance, especially in national parks. Given that the coastal strip of native vegetation is, for the most</p>

part (except for far East Gippsland) mostly very thin, any infrastructure should be, and can be, better situated on private land of low conservation significance. The principle in the Marine and Coastal Policy “coastal dependant” has to be legitimate. We suggest this action be reworded.

*3.5 Develop Coastal and Marine Management Plans*

We would suggest including some priority location in this action and strongly suggest Westernport Bay is one of them.

*3.6 a) Pilot a system to assess and monitor the carrying capacity and visitor experience in high-use areas of the Great Ocean Road, include factors such as visitor numbers and behaviour, and impacts of visitation on the values of these areas.*

The draft strategy does have an action (action 3.6) around monitoring the carrying capacity and visitor experience in high-use areas of the Great Ocean Road, including visitor numbers and behaviour, and impacts of visitation on the values. Emphasis is needed to also reduce impacts.

*3.8 Determine feasibility of a marine and coastal hub of knowledge and expertise to connect marine and coastal managers to the latest science, research, technical expertise and to each other to support planning and management of the marine and coastal environment.*

Strongly support, however this is dependent on having adequate number of marine experts in lead organisations. Parks Victoria for example barely has enough rangers, or planners with marine expertise compared to the amount of land managed. We support this action including some wording that could help to improve this situation.

**Suggestions for new actions and gaps:**

- Has actions for ports, tourism and visitation, and infrastructure but fishing industry and oil and gas industry are not sufficiently addressed. VNPA is concerned at the offshore gas and petroleum exploration and production off the Twelve Apostles and Gippsland and the many known and unknown impacts on the marine and environments.
- The implementation of a comprehensive recreational fishing monitoring program
- Independent stock assessments for key fisheries species
- Development of a strategic and integrated process for assessing marine energy proposals.



	<ul style="list-style-type: none"> <li>Population pressure – monitoring the carrying capacity and visitor experience in high-use areas of the Great Ocean Road, including visitor numbers and behaviour, and impacts of visitation on the values should emphasise the need to ‘reduce’ impacts.</li> </ul>
<p><b>ACTION 4:</b> Adapt to impacts of climate change</p>	<p><b>Suggestions for new actions and gaps:</b></p> <ul style="list-style-type: none"> <li>It would be good to address the importance of resilience work for the marine environment, as the marine environment is largely looked over in this chapter, being largely coastal focussed. Furthermore, emphasis on supporting the work in marine protected areas to support work already being done by Parks Victoria for example marine pest management would help to ensure the marine environment is supported.</li> <li>There is no mention of further Coastal Adaptation Plans under the Marine and Coastal Policy to be developed other than the three already in development (Wye River, Eastern View, Ocean Grove). It would be good to see an action relating to how future plans will be prioritised and at what location.</li> </ul>
<p><b>ACTION 5:</b> Implement integrated planning of the marine environment</p>	<p><i>5.5 Undertake marine spatial planning in a priority area as identified through the state-wide assessment.</i> Support this action, however its current wording implies that just one Marine Spatial Plan at one location will be done. We suggest editing the text to say ‘areas’ to allow for more than one plan at one location.</p> <p><b>Suggestions for new actions and gaps:</b></p> <ul style="list-style-type: none"> <li>The state wide review currently in progress, is not listed as an action, which we believe is because it is already underway and has funding. We suggest the state wide review be added as a separate action to allow for possible future state wide passes and support for more than one marine spatial plan at a priority location, and more detailed planning within a larger planning area. We suggest this new action be worded something like: “the state wide review recommends multiple planning priority areas for Marine Spatial Planning, or for more detailed planning within larger planning areas.</li> </ul>
<p><b>ACTION 6:</b> Identify resource needs and funding for sustainable marine and coastal management</p>	<p><i>6.2 Collate state-wide funding needs (including for the purposes of building adaptation and resilience) that are identified through regional and local plans (e.g. Marine and Coastal Management Plans, adaptation plans).</i> We are concerned with the timing of this action (2023-2024) is pushed out too much, as it would be important to prioritise which programs get the funding. Given it won’t be completed until 2024, the policy will likely only have two years left, which does not leave much time for achieving the Strategy’s actions.</p>