



Curlew Sandpiper (*Calidris ferruginea*). DAN WELLER

**SUBMISSION TO**

# *Western Port Ramsar Site Management Plan (draft)*

4 December 2025

**Victorian National Parks Association**

Level 3, 60 Leicester Street, Carlton VIC 3025 • 03 9341 6500 • [vnpa@vnpa.org.au](mailto:vnpa@vnpa.org.au) • [vnpa.org.au](http://vnpa.org.au)

ABN 34 217 717 593



## **Western Port Ramsar Site Management Plan (draft)**

### **Submission from The Victorian National Parks Association**

#### **About the VNPA**

The Victorian National Parks Association (VNPA) is an independent member-based organisation, working to improve protection of Victoria's biodiversity and natural areas, across land and sea.

The VNPA has been actively working to protect Victoria's wildlife and biodiversity for over 70 years and has been involved in working in collaboration with local and state groups for the protection of Western Port for decades.

#### **Comments on the Ramsar Site Management Plan (draft)**

- **Scientific references**

Many of the scientific references cited are outdated. While this may reflect limitations in available sources, it underscores the need for this review—and future reviews—to be based on contemporary science to ensure an accurate assessment of the LAC. The limitations of the current evidence should be clearly acknowledged, particularly when it is used to estimate Limits of Acceptable Change (LAC), highlighting the importance of updated research.

- **LAC assessments**

- **Wetland Bathymetry**

The Critical CPS assessment states that there is no loss of intertidal mudflats. The draft plan should, however, acknowledge potential projects already proposed that could alter this, specifically the VRET, which proposes approximately 12 hectares of wetland reclamation.

- **Threatened Species (Birds)**

The assessment indicates that the LAC is exceeded for eastern curlew but met for all other species. However, this conclusion is based on outdated bird survey data from 2011–2015, which is over ten years old. It may not accurately reflect the current status and could overestimate compliance. The limitations of this data should be clearly acknowledged, and a precautionary approach adopted.
- **Commercial development pressures dropped from the latest draft compared to the previous management plan**
  - The latest draft downplays commercial development pressures compared to the previous management plan. It fails to acknowledge or assess the impacts of commercial activities, including direct habitat removal—pressures that were clearly recognised in the prior plan. This threat is absent from the list of high-priority risks (Table 10), yet it remains critical and must be elevated.
  - Crucially, the risk assessment does not account for the direct removal of wetland habitats caused by commercial development, representing a major gap. The consideration of physical damage has effectively been ignored, dismissed, or downgraded, leaving the draft plan seriously deficient in addressing one of the most significant threats to wetland ecological character.
- **Does not consider impacts of future capital dredging**
  - The draft plan ignores any reference to the impact of capital dredging and only acknowledges maintenance dredging.
  - The large volume of dredging proposed as part of the Victorian Renewable Energy Terminal (VRET) could be the largest dredging project in Western Port since its Ramsar declaration in 1982 and warrants particular care and detailed assessment of impacts on the bay's biology and ecology.
  - Capital dredging should be considered as part of the draft plan.
- **No assessing of impact if potential imminent commercial developments and their proposed removal of wetland habitat**
- **Opportunity to align with the Marine and Coastal Strategy actions**

- **Management Strategies**

Some management strategies are broad and lack detail and accountability. We provide some suggestions below.

- **Water quality 1.1** *Reduce nutrient and sediment inflow*  
(specific targets should be identified)

- **Theme: Protecting Flora and fauna.** The draft plan states that:

*Similarly, while the relevant authorities assess individual development proposals, a coordinated approach to assessing the effect of multiple actions and developments may be required to adequately maintain ecological character.*

We recommend strengthening this statement to ensure clarity and alignment with the [Marine and Coastal Strategy](#) by directly referencing Marine Spatial Planning Action 5.5 (p. 30). The marine spatial planning framework developed by DEECA provides clear guidance and a process for integrated and coordinated planning, management, and decision-making across marine sectors.

Additionally, the strategies listed under this theme do not directly address the reduction of wetland loss, which is a significant concern. They focus predominantly on invasive species and overlook the impacts of commercial development and habitat removal.

Relying solely on EES processes to identify and assess these pressures is inadequate. This represents a substantial gap in the draft strategy and risks allowing wetland loss to occur unnoticed and unaddressed.

- **Ramsar administration management strategy 6.1.**

*The draft plan identifies:*

*Apply the appropriate State and Commonwealth environmental impact assessment processes for activities that have the potential to impact on the Ramsar site and Matters of National Environmental Significance (MNES). Investigate mechanisms for adequately assessing cumulative impacts from multiple developments through this process.*

However, cumulative impact assessment has consistently been limited under current State environmental assessment frameworks, which evaluate projects individually

rather than collectively. As a result, this action is unlikely to succeed within the existing EES context without a broader review of that process.

Victoria already has a mechanism capable of assessing cumulative impacts: marine spatial planning. The State has committed to implementing this through the Marine and Coastal Strategy (Action 5.5). It is therefore important that Strategy 6.1 in the draft Ramsar Management Plan explicitly links to—and helps deliver—the marine spatial planning framework.

- **Theme 4: Improving our knowledge**

The management strategies outlined in Table 15 appear limited and do not address the highest-priority threats, including commercial impacts and habitat loss. With major industry proposals underway—such as the Victorian Renewable Energy Terminal—there is a clear opportunity to identify current knowledge gaps, particularly regarding proposed dredging and potential wetland loss.

These gaps should be explicitly recognised to inform the next management plan review and the assessment of any changes to ecological character. The plan should set out what new knowledge is required over the next seven years to enable a robust assessment against the LAC. Accurate evaluation of the LAC cannot be achieved using outdated science that does not reflect current conditions.

- **Monitoring Priorities**

Table 17 outlines the frequency of monitoring priorities. We recommend also specifying when each priority is due to support transparency and accountability.

- **Actions Plan**

We recommend that the annual action plans be made publicly available.

The draft plan notes that:

*“Melbourne Water will integrate these agency plans into a single action plan for the Western Port Ramsar Site Management Plan by December each year. This will ensure that responsibilities for individual management actions are clearly defined, priorities*

*and sequencing are logical, implementation is focused and coordinated, and funding opportunities are identified.”*

- **Auditor General Report**

In 2016 the Auditor General released a review of Victoria's management Ramsar sites. The report recommended Victoria develop and implement robust governance arrangements for managing Ramsar sites and ‘strengthen management plans’ to include timeframes and resourcing to ensure actions are carried out ‘effectively and in a timely way’.

The draft plan should be strengthened by including timeframes and years when the management actions are due to ensure Victoria is meeting its Ramsar obligations.

As also stated in the report, plans need to clearly link management actions and targets to the ecological character of the site. Previously, some plans assessed by VAGO only partly meeting this requirement.

- **State of the Marine and Coastal Environment Report, 2025.**

We understand that, at the time the draft plan was written, the *State of the Marine and Coastal Environment Report* had not yet been released. However, it was published in November 2025, and its findings are highly relevant. For example, the report highlights a continuing decline in migratory shorebird populations, which has clear implications for management priorities.

Thank you for the opportunity to comment. For follow up please contact [shannon@vnpa.org.au](mailto:shannon@vnpa.org.au).