Department of Environment, Land, Water and Planning (DELWP)

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East Melbourne, Victoria, 8002

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10 September 2021

Re: Draft Marine and Coastal Strategy – Stakeholder consultation

Dear DELWP,

On behalf of the members of the Australian Marine Sciences Association Victoria branch (AMSA (Vic)), I am pleased to provide this submission to the Department of Land, Water and Planning (DELWP) in response to consultation regarding the Draft Marine and Coastal Strategy.

The Australian Marine Sciences Association Inc. (AMSA) is Australia's peak professional body for marine scientists from all disciplines, with more than 700 members. For over 50 years, AMSA has promoted all aspects of marine science in Australia. The AMSA (Vic) actively contributes to management, research, advocacy, education, student grants, mentoring and community awareness programs regarding Victoria's marine and coastal ecosystems.

AMSA (Vic) is generally supportive of the Draft Marine and Coastal Strategy (the Strategy) which is intended to outline priority actions to achieve the Marine and Coastal Policy 2020 (the Policy)[1]. However, we do have recommendations to assist identify information gaps and measures that will comply with the requirements of the *Marine and Coastal Act 2018*, and the Policy.

Further comments in regard to the Strategy are contained in Attachment 1. Please feel free to contact the Vice-Chair at the details below for further information.

Kind regards,

On Behalf of the AMSA (Vic) Committee

Kristin Keane

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Allyson O'Brien

Chair

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[1] Department of Environment, Land, Water and Planning. 2020. *Marine and Coastal Policy*. Department of Environment, Land, Water and Planning, Victoria.

Attachment - Submission

Here we detail the actions specified in the draft plan, our response, and associated recommendations.

Action 1: Traditional Owners determine how their rights and obligations are embedded into planning and management of the marine and coastal environment.

AMSA supports consultative government partnerships with traditional owners in planning and managing marine and coastal areas. However, it is unclear how these actions will be measured and assessed and how their implementation will be monitored.

Recommendations:
- Define how the government plans to 'support' Traditional Owners, for example items identified during consultation, such as provision of funding for projects/ facilitators, training, assistance with business opportunities and planning.
- Include details regarding the proposed methodology to 'partner' with Traditional Owners to be able to achieve measure of achievement of this action.
- Further details regarding funding options may be suitable to include in Action 6.

Action 2: Improve the condition and connectivity of habitats and respect and care for our marine and coastal areas

The Policy places an emphasis on the natural heritage. In the introduction it states, "The Policy is a long-term approach intended to last for the next 10–15 years, and is designed to deliver 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." This is not as clearly defined in the Strategy, and the term biodiversity is not used (with the exception of existing plans in the definitions). Yet a healthy marine and coastal ecosystem underpins the maintenance of ecosystem services, benefits for users, health and well-being of people and goods and services.

The language of the Strategy should be consistent with that of the Policy, that is, place the same emphasis on the importance of values such as marine species, biodiversity, water and soil health. The use of language regarding environmental values is relevant to reinforce the long term approach of the Policy regarding conservation, as well as the benefits for users.

Section 7 of the *Marine and Coastal Act 2018*[2] lists the objectives to include (i) to build scientific understanding of the marine and coastal environment. The Policy communicates a requirement for

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[2] *Marine and Coastal Act 2018*, https://content.legislation.vic.gov.au/sites/default/files/2020-04/18-26aa003%20authorised.pdf Accessed: 20.08.2021

the best available information and science, however this is not defined in the Strategy. The best available science includes an evidence-based approach and building a knowledge base through scientific research. There are no research and scientific organisations/research institutions identified as collaborators for this action.

The Policy identifies a range of stakeholders, including industry, as relevant to achieving proposed strategic actions. However, the Strategy focuses on government and community measures, and does not reference all stakeholders (for this Action) that are users of marine and coastal environments. A lack of detail exists regarding the development of economic and policy instruments to incentivise landowners and promote nature based adaptation.

There are two potential limitations of a blue carbon market in Victoria, which aren't recognized in the strategy. The first is that much of the coastal areas that could be part of an emissions reduction fund (ERF) project are on private land, which means that projects are dependent on incentivizing individual landowners or requires potential costly purchasing of land. Thus specific financial/funding mechanisms are needed to support this. The second issue is that the largest sections of public land amenable to blue carbon restoration in Victoria sometimes have other competing values on site, for example, bird values in saltponds that were previously saltmarsh. There needs to be a framework in place to assess potentially competing tradeoffs in marine and coastal restoration, and guide a pathway forward.

Recommendations:
- Identify the implementation of scientific research to support an evidence based approach to decision making, and to confirm the key role of science in management. This will compliment measures identified in other key management documents such as Conservation Action Plans and Regional Catchment Strategies.
- Include language related to biodiversity and ecosystems to reinforce the environmental values to be conserved and better protected through the development and implementation of the Strategy.
- Identify scientific organisations / research institutions as a collaborator providing best practice science to support the implementation of the Strategy, and to demonstrate conformance with Section 7 (i) of the *Marine and Coastal Act 2018* which requires building a scientific understanding of the marine and coastal environment.
- Identify all stakeholders/ coastal marine users—as all user activities have the potential to impact on marine and coastal habitats—regardless of existing regulatory approvals and management measures.
- Qualify the development / application of economic and policy instruments for incentivising landowners, and make reference to this process being fair and equitable.
- Embed links to information in reports as relevant to assist with data sharing.
- Enable a blue carbon market in Victoria by, 1) providing extra financial incentives for

landowners to restore blue carbon ecosystems on their property and 2) establishing a framework to assess potentially competing restoration values in marine and coastal environments.

Action 3: Support sustainable use and development of the marine and coastal environment

This section does not identify commercial industries (such as fisheries, resources and energy) as relevant matters or stakeholders. These activities may be regulated separately, with a certain level of risk authorised by managing agencies - however, this regulatory process does not preclude the potential for impacts to environmental values. These activities and associated stakeholder groups are relevant to the overall sustainable use and development in marine and coastal ecosystems.

Financial and business planning is critical to fund and achieve the actions of the Strategy, including significant capital for foreshore and asset protection. The development of various nature based solutions is on-going as an alternative to hard engineering structures for coastal protection, with less capital investment, and in accordance with relevant engineering guidelines.

A number of strategies such as the Victoria Recreational Boating Strategy[3] and various port strategies are referenced to achieve this Action. Scientific research is a key component to achieving best practice, and identifying this as a separate action will assist to mitigate information gaps that may exist in other strategies and frameworks.

Recommendations:

- Identify all stakeholders/ coastal marine users, owing to all user activities having the potential to impact on marine and coastal habitats.
- Include consideration of nature based solutions as part of the coastal infrastructure investment framework. In certain circumstances, this approach may assist with the maintenance of ecological connectivity by minimising habitat fragmentation and conserving connectivity. The benefits of this may be further supported through investment in evidence based research[4].
- Provide clear guidance on the requirements of quality science and knowledge to inform evidence-based decision making, to align with the Policy and link with the international agenda, i.e., The United Nations Sustainable Development Goals.

Action 4: Adapt to impacts of climate change

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[3] Department of Transport. 2021-2030. Draft recreational boating strategy, draft for consultation. Department of Transport, Victoria.
[4] Chausson, A., Turner, B. 2020. *Mapping the effectiveness of nature based solutions for climate change adaptation*. Global change biology, Volume 26, Issue 11, pp: 6134-6155

Scientific research is the basis to achieving an evidence based approach and identification of gaps in knowledge regarding climate change. This is relevant to climate change, which is identified in the Strategy as one of the three key threats to marine and coastal ecosystems[5].

The review of local planning schemes and high risk areas (e.g. sea level rise, coastal erosion) may determine whether the financial / policy instruments (referred to in Action 2) may allow for natural coastal migration.

It is unclear whether any of the collaborators represent industry groups – industry groups are relevant owing to their potential contribution to climate change, and potential impacts of climate change on their industry.

Recommendations:
- Provide clear guidance on the requirements of quality science and knowledge to inform evidence based decision making, to meet the objectives of Section 7 of the Marine and Coastal Act 2018.
- Make reference to science organisations/ research institutions as collaborators to provide input on evidence based science approaches to climate change management.
- Include reference to inclusion of all stakeholders, including industry, that have the potential to contribute to, and be affected, by the impacts of climate change.
- Ensure that state and local government policies, used to assess development, includes information underpinned by evidence based science within their policies regarding climate change.
- Include specific mention of preference for nature-based solutions for climate change mitigation (eg. Blue carbon) and adaptation (nature-based coastal defense).

Action 5: Implement integrated planning of the marine environment

One key criterion is how effective Marine Spatial Planning (MSP) will be influencing the management actions and mitigation measures necessary to protect habitats and species (for the 30 marine protected areas (MPA) (24 no-take marine protected areas (comprising 13 marine national parks and 11 marine sanctuaries) and six multiple-use marine protected areas)) and potential habitat connectivity between these areas. While these MPA are managed for ecosystem protection, conservation of natural features and recreation (with no extractive uses allowed)[6]may also provide for other benefits, such as fishery and recruitment spillover where connectivity is designed as a network

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[5] Department of Environment, Land, Water and Planning. 2020. *Marine and Coastal Policy*. Department of Environment, Land, Water and Planning, Victoria.

[6] Victorian Environmental Assessment Council (VEAC) (2019) *Assessment of the Values of Victoria's Marine Environment – Report*. Victorian Environmental Assessment Council, Melbourne

of well-connected zones (Harrison et al. 2012)[7]. No-take zones may also promote ecological resilience by supporting complete trophic webs and larger- bodied individuals (Bates et al., 2019; Behrens & Lafferty, 2004; Micheli et al., 2012; Mumby, Wolff, Bozec, Chollett, & Halloran, 2014)[8]. Outside of these areas, certain regulated activities are undertaken (such as commercial fisheries, resource industries, sea dumping) - and while these are authorised, they still impact environmental values. Hence, the principal focus for marine management (for these activities, and other external factors such as climate change) is to optimise the resilience of species, habitat and ecosystems to disturbance.

Marine Spatial Planning requires information on the range of values across all marine and coastal ecosystems, to be able to evaluate potentially competing uses. However, data across the wide range of values of the marine and coastal environment is still quite poor for many values and ecosystems. Thus, investing in the research to quantify spatially explicit values of marine and coastal ecosystems should be a priority to support MSP.

Recommendations:
- Include a definition for responsible body.
- Describe how the preceding chapters of the Strategy are to be incorporated into the MSP.
- Integration of science (monitoring and research), critical to support decision-making. AMSA strongly supports evidence based decision making from the best available science. Australia's marine systems remain poorly studied and improved knowledge and long-term data sets are needed to better understand and monitor Australia's marine environment, habitats and biodiversity, and develop adaptive management solutions for the most pressing threats.
- Frame planning options within Australia's national and international commitments to the protection of biodiversity. It is essential that alternative options, provided to, or collected from, stakeholders do not compromise the fundamental goals, and essentially science-based design principles of the network.
- Target monitoring across coastal research areas. This will assist with greater prioritisation of areas lacking in scientific information and provide increased knowledge for management decision
- Invest in the research to quantify spatially explicit values of marine and coastal ecosystems to support MSP.

[7] Harrison, H. B., Williamson, D. H., Evans, R. D., Almany, G. R., Thorrold, S. R., Russ, G. R., Jones, G. P. (2012). Larval export from marine reserves and the recruitment benefit for fish and fisheries. Current Biology, 22(11), 1023–1028.

[8] Bates, A. E., Barrett, N. S., Stuart-Smith, R. D., Holbrook, N. J., Thompson, P. A., & Edgar, G. J. (2014). *Resilience and signatures of tropicalization in protected reef fish communities.* Nature Climate Change, 4(1), 62.

Action 6: Identify resource needs and funding for sustainable marine and coastal management

The practical implementation of all of the actions in the Strategy will require a level of funding, for e.g., training, community awareness, and professional time. Appendix C indicates that (at this time) funding is not allocated for the Policy chapters on ecosystems and habitats, natural features and landscapes, cultural values and heritage sites, coastal settlements, marine and coastal industries, recreation and tourism, buildings, structures and access, stewardship and collaborative management and marine spatial planning framework. It is unclear how certain aspects of these policies will be funded. The Strategy is intended to be the driver of delivering the Policy, and inclusiveness of funding details will demonstrate how the actions will be implemented. It will also assist with informing business cases as discussed in the chapter on implementing and evaluating the Strategy.

Recommendations:

- Describe the methodology to determine funding allocation to achieve all requirements of the Policy.
- Include reference to fund for additional scientific research to meet the requirements of an evidence based approach to decision making.

Implementing and evaluating the strategy, page 33

Recommendations:

- Promote government support and funding for robust science relating to the existing and emerging issues and threats to Victorian coast.

Roles and responsibilities, page 34

Section 7 of the *Marine and Coastal Act 2018* requires (i) evidence based approach by science. It is relevant therefore to make reference to researchers, research and externally peer-reviewed assessments. This will assist to comply with this requirement, link the process with Australia's international obligations under the United Nations Sustainability Development Goals and increase the robustness of decision making for coastal and marine environments.

Recommendations:

- Include references to scientists and researchers individually within the roles and responsibilities, as scientific evidence based approach is required to comply with *Marine and Coastal Act 2018*, and as shown in Figure 1.
- Add evidence based approach to Figure 1.

Appendix A: Why develop a draft strategy, page 37

Details regarding the on-going reviews of the Strategy, including at the 5 and 10 years, are absent, and this would be useful to understand the processes related to identifying and making improvements to management practices.

Recommendations:

- Include details regarding the dates for review of the current draft and the introduction of Stage 2 of the Plan. It would be useful to include criteria in respect to how this review will be undertaken, noting that this may be required to be updated to comply with the best practice at the time.