

SEPP Waters Manager
Level 10, 8 Nicholson Street
East Melbourne VIC 3002
By email: Water.SEPPreview@delwp.vic.gov.au

Re: Submission on the Draft State Environment Protection Policy (Waters) Review

Thank you for the opportunity to comment on the Draft State Environment Protection Policy (SEPP) (Waters). VRFish would also like to take this opportunity to express appreciation for inclusion on the Stakeholder Reference Committee (SRC) as peak representative body for Victoria's recreational fishing community.

As the voice of Victoria's estimated 838,000 recreational fishers, VRFish is invested in safeguarding recreational fishing associated values and beneficial uses, along with the requisite water quality objectives. Protecting and enhancing water quality across Victoria's groundwater and surface water systems is fundamentally important to safeguarding recreational fishing, and to mitigating against risks posed by blackwater events, point and diffuse sources of pollution (including wastewater), unrestricted livestock access to rivers, and importantly, aquatic pests.

Overall, we found membership on the SRC provided a valuable opportunity to contribute to the review of the draft SEPP (Waters) and ensure integration of recreational values, and recreational fishing values in particular, in the policy and decision-making framework for the protection of water environments and their associated beneficial values. VRFish congratulates the Department for the inclusive and collaborative manner in which consultation on the draft SEPP has been carried out.

VRFish is buoyed to see that beneficial values critical to supporting recreational fishing and associated socio-economic benefits have been provided protection within the SEPP. In particular, VRFish is strongly supportive of the commitment to the holistic management of the following elements which are so fundamental to the quality and sustainability of recreational fishing:

- Water-based recreation;
- Fish passage;
- Seagrass coverage;
- Riparian vegetation;
- Ecological processes and ecosystem services;
- Human consumption of aquatic foods; and
- Cultural and spiritual values.

***Let's make fishing
better, for everyone.***

VRFish is equally heartened to see that the policy commits to not only maintain and protect existing water quality standards but improve them.

As the key statutory policy framework for setting the water quality objectives for Victoria, VRFish suggests that the language of the draft SEPP could be strengthened on a number of occasions, including:

- The concept of 'practicability' and the way it is defined (under Clause 12) should be more explicit so as to circumscribe the risk to beneficial uses and minimise the scope for interpretation by protection agencies and responsible authorities.
- What constitutes best practice and other vague concepts, such as the compliance standard of "to minimise", are open to interpretation could be better clarified within the explanatory notes.
- Clause 52 in relation to the introduction of aquatic pests, given the potential risk and severity of impacts on beneficial uses, should be mandatory rather than purely advisory in nature.

While the draft SEPP is a positive development from the outgoing SEPP (WoV), the objectives must necessarily be integrated with other policies and into supporting regulations to ensure compliance with environmental objectives and prevent them from remaining purely aspirational. Furthermore, protection agencies must be adequately resourced to meet the objectives.

Recognising the longevity and 10-year review cycle, it is critically important that a framework for monitoring the effectiveness of the policy is in place (such as through adoption of objectives in decision-making, priority-setting, management planning etc).

Thank you again for the opportunity to form part of the membership of the SRC and provide feedback on the draft SEPP.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rob Loats', with a stylized flourish at the end.

Rob Loats
Chair
Victorian Recreational Fishing Peak Body

19 June 2018