

Marine and Coastal Policy Team  
DELWP  
[Marine.CoastalPolicy@delwp.vic.gov.au](mailto:Marine.CoastalPolicy@delwp.vic.gov.au)

## RESPONSE TO DRAFT MARINE AND COASTAL POLICY

VRFish is the peak body for recreational fishing in Victoria and represents the voice of the state's 838,000 fishers. Many of our constituents choose to fish in State coastal waters and estuaries.

Overall, this high-level draft policy is trying to be everything to everyone. Our overarching concern is the application of the draft policy in its current form risks opposing all development and access, rather than just inappropriate development and access. Our expectation is that the policy must provide greater clarity to support good decision making. Concepts such as 'precautionary', 'proportionate' and 'risk-based' are highly open to subjectivity.

More work is required so that recreational fishers have the confidence that this policy will in practice result in achieving the outcome of the vision in benefiting the Victorian community.

'Marine' appears to be pinned onto existing coastal policy. We would argue that thinking and philosophy about coastal policies are vastly different to the realities of dynamic aquatic ecosystems and how these assets are utilised by user groups such as recreational fishers.

### Threats and drivers of change

As a sector we welcome steps to have enhanced State policy that plans for the needs and aspirations of the community, including greater security of access to our fishery resource.

It important to illustrate planning processes to date have been disjointed, open to subjective decision making and has failed user groups in many respects. A pertinent example is the state of neglect we find our coastal assets in which includes our boat ramp infrastructure. Given the lack of capacity for both land and boat based recreational fishing VRFish does not support decommissioning or removal of any existing assets that are presently in use. This statement needs to be clarified to ensure that valued assets are not at threat.

VRFish is pleased that ageing infrastructure is one of the key drivers for change within the draft however misses the mark with what our sector believes is an even more critical driver for change.

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

Put simply a key driver must be to appropriately plan for the needs and aspirations of coastal and marine users. Without doing so, the draft policy becomes an environmental protection process that user groups have to continue to beg for in order to protect its current access and infrastructure.

The second last paragraph in relation to population growth discusses carrying capacity of sites and the need for planning. We agree and point out that the solution is to provide access to more sites. For instance, increases in recreational fishing for pipis at Discovery Bay would be best served by creating additional access points to the beach. This would be consistent with government policy and avoid conflict and prevent localised overfishing.

### **Acknowledgement of recreational fishing and State Government policy**

The draft policy does not acknowledge the delivery of key Government policies such as *Target One Million* and *Better Boating Victoria* which is integral to the maintenance and growth of our sector. Marine and coastal access is fundamental for fishing and the implementation of these policies. VRFish is surprised that the direct economic value from recreational fishing which stands at \$2.6 billion is not acknowledged. In addition, the draft still portrays recreational fishers as extractors of the resource when in fact the key motivations for fishers are to interact with the outdoors and spend time with family and friends. Considering the social and economic importance of recreational fishing and participation rates VRFish is bewildered that not one recreational fishing photo or image appears in the draft policy.

### **Ecosystem-based Management (Chapter 2)**

Victorian recreational fishers are cognisant that healthy and productive aquatic ecosystems are critical to support sustainable fishery resources into the future. Fishers are engaged more than ever to restore fish habitats and improve water quality following planning and decision making made in isolation. For example, recreational fishers have initiated and led a program to restore lost living shellfish reefs in Port Phillip Bay. We support an ecosystem-based approach. Many of the challenges we face in our coastal fisheries is not through fishing pressure but by other threats and vectors in our aquatic ecosystem such as marine pests, lack of freshwater (nutrient) inputs impacting fish recruitment, algal blooms and pollution.

Significant resources, coordination, research and monitoring are required to achieve a truly ecosystem-based management approach. We question the ability of a Marine and Coastal Policy alone to enact an ecosystem-based management, including at a fisheries management level.

### **Value of Marine and Coastal Crown Land (Chapter 5)**

The draft policy must also provide greater leadership by shifting marine conservation outcomes for marine parks from a faith-based philosophy that locking up tracts of water will achieve the desired result, to one based on risk, the best available science and subject to regular review.

## **Ecologically Sustainable Use and Development (Chapter 8)**

Agree with this process but add that the same needs to apply to the non-financial benefits of recreational fishing.

## **Coastal Settlements (Chapter 9)**

9.1 If the optimum location for a greenfield boat ramp or other fishing access is outside a settlement this clause must not constrain that possibility. For instance there are many existing facilities in Gippsland that would have been prevented from being built by this draft policy.

9.4 This proposed policy is totally unacceptable particularly with regard to the reference to shorelines of estuaries and low lying coastal areas. These are prime locations for boat ramps and other fishing infrastructure and there are dozens of existing assets that do not comply with this policy.

9.5 If the optimum location for a greenfield boat ramp or other fishing access is outside a settlement this clause must not constrain that possibility. For instance there are many existing facilities in Gippsland that would have been prevented from being built by this draft policy.

9.6 If the optimum location for a greenfield boat ramp or other fishing access is outside a settlement this clause must not constrain that possibility. For instance there are many existing facilities in Gippsland that would have been prevented from being built by this draft policy.

9.7 This policy is so subjective that it could be used by objectors to halt almost any development. It is not acceptable in this form.

## **Buildings, Structures and Access (Chapter 10)**

Boat trailer and car parking for boat ramps must be located on Crown land. The only way boat ramps can function efficiently is with parking close to the point of launch and retrieval of vessels.

Angling clubs holds fishing competitions and other events that require them to be functionally dependant of being adjacent to boat ramps or to the water. Many Angling Clubs have their clubrooms located on Crown land. VRFish has no confidence this draft policy has considered Angling Club infrastructure appropriately. Without proper recognition as having a function need there is serious risk these socially important clubrooms will be considered along with community halls. Angling clubs and their members act as a steward at these locations and VRFish would be alarmed if this policy puts their long-term security at risk.

Placing a blanket prohibition on private buildings and structures will effectively mean private marinas and boating and yachting clubs will no longer be able to provide additional capacity to offset the lack of public boating infrastructure. This is a dangerous thing to wish for because the capacity involved is significant now and to constrain it into the future will require a higher level of public investment in boating infrastructure than has been seen in the past.

Access is critical to fishers. We would not support the relocation of infrastructure that prevents recreational fishers of all ages and abilities to access the water and to participate in fishing. Fishers are becoming increasingly frustrated at having access to their favourite fishing spots closed off or moved away from the water on the basis of 'formalising access'. Within this Chapter we again see terms such as 'unreasonably', 'where practical' and 'formalise' which is highly open to subjectivity. This is a major concern for fishers who are seeking security in access.

### **Recreational and Tourism (Chapter 12)**

This section should recognise the social and economic importance of recreational fishing as per our opening remarks. Recreational fishing is one of the best recreational activities to connect with our coastal and marine environment and should be recognised as such. We are buoyed at the policy direction that planning on coast and marine, including development will respond to an identified and growing demand. We recommend that responding to the need must be a key driver of the policy.

Locating recreational access points and supporting infrastructure in recreational nodes is unacceptable. If the best location for a boat ramp or other fishing location is not in a recreational node then that should not cause this access point or facility to be moved to a less suitable place. Fishers need to go to where the fish are and where the safest and most practical locations allow.

### **Stewardship and Collaborative Management (Chapter 13)**

The concept that Government and land managers are stewards is an interesting one to comprehend. This concept is far too over-reaching. Managers have a critical role in planning, implementing management arrangements and operations in our coastal and marine environments. They perform this role on behalf of the community's needs and direction. There are several examples where Government and land managers have failed the community and user groups. As a user group we cannot expect Government to do everything for our sector, think for our sector and certainly not represent our sector. We need Government to better understand their role as managers and support meaningful consultation with the community. Instead a co-management approach must be aspired to. Consultation and involvement must be genuine. Bringing pre-conceived conclusions to a planning process is not acceptable.

Recreational fishers feel strongly in their role as stewards of the marine and coastal environmental and sustainability of our fish stocks. User groups (or sectors) are not restricted by political constraints or Government priorities in the pursuit of good stewardship and are therefore more agile and innovative in response to challenges faced. This Chapter severely underestimates what role our sector can lead and deliver if a genuine co-management model was supported.

## **Funding (Chapter 14)**

VRFish agrees planning of and managing our coastal and marine environment to benefit all Victorians requires funding. In practical terms unless there is a sustainable funding model to support an appropriate policy then VRFish questions why design a policy which cannot be funded or has a high level of uncertainty as indicated in the Auditor General's report. An assumption of the Framework for Sustainable Funding is no change to the number of marine and coastal managers. Investigating efficiencies across Government surely should be one of the first steps. Currently, our sector has to deal with a menagerie of Government Departments, agencies, statutory authorities, boards, local governments, committees of land management, etc. Surely it is prudent to review the current arrangements, find efficiencies, reduce administrative burden and red tape.

## **Marine Spatial Planning Framework (Chapter 15)**

Creating a process without a need is nothing more than a nebulous concept. While we respect a co-design approach has been used to prepare this draft, until such time as a need presents itself what has been prepared can only be described as the 'best guess' for now. Therefore, it is important this process remains a living process that is able to be adapted and flex as required.

That said, VRFish is supportive of a collaborative approach in strategic decision-making which is evidence-based. There are advantages for our fishers through spatial planning including greater security in access to our fishery resources and a reduction in resource conflict. On the flip side there are equally significant disadvantages through the loss of access to the coast and marine environment and to our fishery resources.

While the process to initiate an MSP is clear enough, due diligence must be undertaken whether other and existing management tools can resolve the concerns or perceived issues. VRFish has an expectation that it will be listed as a partner in most instances considering the importance and prevalence of recreational fishing in Victoria's coastal and marine environment. Equally we expect to be consulted and our advice duly considered before a process is agreed to.

If MSP planning processes are undertaken, they will be resource-intensive and will involve a great deal of discussions, negotiations and mediation to achieve a tangible outcome. VRFish is uncertain whether it has the resources required to adequately participate in lengthy and complex MSP processes under its current funding model.

## **Conclusion**

Recreational fishers need access to areas that connect us to our fishing resources. This access does not require a convoluted spatial planning process for an action which may be as simple as opening a gate or placing a stile on a fence. Recreational fishers also expect that planning processes take into account the impact to our fish stocks and particularly to the fish habitats.

The draft policy is enormous. While the direct recipients of the policy are Government and land managers, the community also expect clarity and transparency in the process how decisions are made. The draft in our view does not achieve this. It needs to be reduced to simpler and common-sense statements about environmental objectives and values that do not obstruct the need for the Victorian community to be able to access Crown land and waters for their recreation.

To deliver what is needed for fishers in a marine and coastal policy requires a re-structure of the draft policy. We are ready and willing to participate in the re-drafting of an acceptable marine and coastal policy and we believe that we can contribute positively to a revised version that addresses the points raised above.

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

15 August 2019