



OCEANWATCH

FOR THE FUTURE OF OUR MARINE ENVIRONMENT

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Mr Tony Slatyer
Chair, Intergovernmental Coastal Advisory Group
C/O Coastal Policy Section
Land Water Coasts Division
GPO Box 787
Canberra ACT 2601

Dear Mr Slatyer

As requested, Ocean Watch Australia would like to provide the Intergovernmental Coastal Advisory Group (ICAG) with a number of comments in relation to the Framework for a National Cooperative Approach to Integrated Coastal Zone Management.

Firstly, Ocean Watch would like to congratulate the ICAG and the Natural Resource Management Ministerial Council on the framework. For many years now environmental groups and others have been calling on all levels of government to take an integrated approach when it comes to managing our coasts and the marine environment. Recognising that *'coastal biodiversity underpins the resource base for a broad range of commercial and non-commercial uses and activities'* such as commercial fishing and understanding the linkages and coastal and marine processes at work within the coastal zone is imperative to the decisions being made, particularly in relation to development. For too long the various jurisdictions have been operating, in most cases, in silos, generally failing to consider and effectively manage for cumulative impacts of their decisions. It is encouraging to see that issues such as conserving coastal biodiversity, coastal acid sulfate soils, exotic plant species, water quality, marine debris and marine pests are now firmly on the national agenda.

We are optimistic that this framework can deliver the outcomes needed to ensure the sustainability of our coastal zone in respect of the six priority areas outlined in the framework, as well as the Australian way of life. We believe however, that the Framework requires some refinement to ensure the most effective outcomes are delivered. The objectives and implementation measures lack depth, attention to on-ground solutions and specific, measurable targets. For this Framework to be effective specific outcomes must be identified. It is also unclear how the Framework will be implemented:

- What mechanisms/institutional arrangements (existing or new) will be used to deliver on the objectives and outcomes proposed? This needs to be clearly outlined and planned for as part of the Framework and development of the Implementation Plan.
- Inter and intra governmental processes must be reviewed and refined to ensure a streamlined process for implementation if this framework is to be effective.
- It will be imperative that an adaptive management model is adopted, "SMART" performance indicators are incorporated into the Implementation Plan of the Framework and that an effective and ongoing performance-monitoring program developed.

This Framework needs to span governments and political regimes and work towards the long-term sustainability of our coast.

An effective and workable integrated framework will be a challenge, being dependent on the collaboration and integration of all levels of government, from all jurisdictions, working together for the long-term sustainability of our coast. We see some considerable hurdles within NSW for this to be effective, given the recent \$20m budget cuts being made to the Department of Environment and Conservation. We are yet to see how this will impact on the roll out of the new natural resource management structure within NSW.

Ocean Watch is committed to the protection and restoration of aquatic habitats, improved water quality and sustainable fisheries. An integrated approach by all levels of government in addressing the issues we face along the coast will certainly work towards assisting us in achieving our objectives and vision. Our comments are attached for your consideration. Please do not hesitate to contact me on (02) 9660 2262 or anissa@oceanwatch.org.au should you require further information regarding these matters.

Yours sincerely

A handwritten signature in black ink, appearing to be 'AL', with a long horizontal line extending to the right.

Anissa Lawrence
Executive Officer
Ocean Watch Australia Ltd

Comments on the Framework for a National Cooperative Approach to Integrated Coastal Zone Management

Priority Area 1 – Integration across the catchment coast ocean continuum

1.1 Research priorities

- Ocean Watch supports the recognition of “*loss of coastal habitat*” as a significant issue. Does this definition extend to a loss of “aquatic habitat”? This needs to be made explicit. Degradation and loss of aquatic habitat threatens the sustainability of the seafood, tourism and recreational fishing industries. Significant declines in fish, prawn and oyster stocks have been directly linked to the deterioration of estuarine and river habitat quality and aquatic habitat loss.
- In response to 1.1.1, Ocean Watch supports the need to develop a strategic approach to identify research knowledge gaps. This information could/should be disseminated to Universities and opportunities identified for honours and other postgraduate research projects. Consultative models such as those established for R&D corporations such as FRDC have been most effective and should be adopted as leading examples.
- In response to 1.1.3, consideration should be given to improving the accuracy of coastal aquatic habitat mapping. Currently, some of aquatic habitat maps are based on poor quality data such as aerial photos and navigational charts. These are being used in decision-making relating to marine park zoning and may result in misinformed and inappropriate outcomes at the expense of some stakeholders. This is clearly inadequate as critical submerged habitats can be omitted. A standardised mechanism for identifying significant habitat is required.

1.2 Freshwater flows

- It is encouraging to see consideration given to the impacts of altered freshwater flows, sediment flows and nutrient loads on coastal zone habitats. Reduced freshwater flows have significant implications for fish breeding and migration and combined with increased nutrient loads, can lead to outbreaks of aquatic weeds etc. Increased siltation in waterways, smothers seagrass beds and further compromises fish habitat.
- A national approach is required to standardise the level of treatment of effluent from sewage treatment plants (STPs) flowing into estuaries, rivers and from coastal outfalls, ensuring a level suitable to reduce nutrient loading and minimise the impact on aquatic habitat. A national direction and commitment to reuse effluent and stormwater should also be instigated.
- In response to 1.2.3, the development of national principles to guide decision makers on estuary flow management to address artificial entrance management is encouraging. It is important that the principles reflect the systemic impacts from decisions they make in a “catchment”, on the “coast” and eventually, “ocean” ecosystems, including the importance of estuary flow to fish stocks.

1.3 Communication

- Communication and coordination between and within government departments across jurisdictions and levels will be a fundamental success factor for the effectiveness of integrated coastal zone management. This Framework does not outline how communication and coordination will be undertaken. Intra and intergovernmental

processes and functions across all levels and jurisdictions will require reviewing and in some cases reengineering to ensure the integrated coastal zone management is streamlined and does not become ineffective due to bureaucratic “red tape” or inefficiencies. Without considerable resources being allocated to addressing these problems, the framework will be a poor investment on the part of the national government and is destined to become just another “great idea that had a lot of potential”.

- This framework must span political regimes and governments terms to focus on long-term sustainability needs.
- In response to 1.3.1, one of the greatest risks to the coastal zone are developers who do not have an understanding or regard for coastal processes and the value and importance of these processes. Guidelines such as those developed by the NSW Coastal Council relating to coastal design should be developed and extended. The roles and responsibilities of developers needs to be communicated to real estate and developer peak bodies and regulations tightened to ensure all developers receive an accreditation before coastal developments are approved.
- In response to 1.3.2, communication between NRM and other facilitators and extension officers working within the catchment, coastal-ocean-continuum is imperative to ensure flow of information and ideas, and effective implementation of strategies and plans. It will also be important at a State level, particularly within NSW that NRM facilitators work closely with Catchment Management Authorities for effective and integrated outcomes.
- In response to 1.3.3 it is imperative that local government, indigenous communities and other stakeholders such as commercial fishermen are engaged in decision making to ensure more effective outcomes are achieved. Recognition is required that indigenous communities have unique and valuable knowledge of coastal and marine processes that can add value to decision making. This needs to go beyond “consultation” and extend to participation. There is also a need to engage other stakeholders such as commercial fishermen who have intimate knowledge of estuaries, rivers and marine environments. Contributions from stakeholders such as fishermen is often undervalued to the detriment of the decision making process.

1.4 National networks

- In response to 1.4.1 we support the initiative to establish and use existing networks relevant to integrated coastal zone management. It is important that these are extended to include marine networks such as the Marine and Coastal Community Network and SeaNet Fisheries Extension Network and the National Seafood Industry Environmental Management System Pilot Program. Better recognition is required of the linkages to marine networks working on NRM issues.

1.5 State of the Environment Reporting

- SOE information providers also includes local governments and some industries.
- In response to the proposed implementation objective, a priority should be the standardisation of reliable coastal zone information across States, territories and local governments for interpretation at a national level.
- In response to 1.5.1, identifying standard key indicators of progress against the objectives of coastal zone management *at a national level*, state level and local level is fundamental to improving SOE reporting.
- In response to 1.5.1, baseline data should include fish stock assessments, aquatic species abundance, distribution and other relevant marine information. It should be noted

that this data may not be consistent between States and steps are required to standardise the method of collection and assessment.

Priority Area 2 – Land and marine based sources of pollution

2.1 Coastal and Estuarine Water Quality

- In response to 2.1.1, there is a need at a national level to work with industry, particularly water authorities who are point source polluters. Unless industry, in particular big water polluters are involved in the development and implementation of the framework through NRM plans, coastal catchment projects, government policies and programs, the outcomes in respect of integrated management will be ineffective.

2.2 Coastal Acid Sulfate Soils

- For many years research has been undertaken relating to ASS and strategies, such as NATCASS developed. Although there have been some improvements in some area, key hot spots have not improved. Significant investment is needed in on ground works.
- Direct incentives and education are required for rural communities, in particular landholders to prevent further ASS problems occurring and if possible, reverse some of the damage through rehabilitation. Landholders need to understand the systemic impacts of works undertaken on their land on aquatic habitat and fish stocks.
- Consideration should be given to listing ASS as a Key Threatening Process under the EPBC Act and under applicable state threatened species legislation. As a result a national threat abatement plan should be developed and this linked into the integrated framework.

2.3 Marine debris

- In response to the proposed implementation objective to minimise the impact of marine debris on marine wildlife, while this is necessary, it should be extended to “reduce” marine debris. We should be targeting and address the source of the problem rather than the consequence.
- In response to 2.3.2, linkages to the integrated oceans management work program while necessary, will not work effectively without a solid education program for countries to the north of Australia such as Indonesia. Until the range of sources of the problem are identified and systematically targeted, marine debris will continue. By investing in educating those that contribute to the problem, significant ongoing investment could be reduced with respect to cleaning up the problem.

2.4 Commercial Vessel Waste

- In response to 2.4.1, incorporated into reviewing the effectiveness of the implementation of MARPOL, consideration should be given to accessibility and understanding of MARPOL to people from a non-English speaking background and its effective enforcement. Education is key.
- In addition, the role of AMSA in administration and enforcement of MARPOL with respect to commonwealth/state waters should be given priority consideration. AMSA should be provided with the resources and necessary jurisdictional powers to provide an enforcement role, with an ability to impose penalties on those foreign or local vessels that breach the MARPOL regulations.

- Clarification may also be necessary in some circumstances to revisit, as part of this review process, the roles and responsibilities between States and Commonwealth government with respect to commonwealth waters where States are provided with some management responsibilities, as it relates to MARPOL.
- Other measures to reduce conflicts between economic gain versus environmental degradation, for example through ACCC rulings to restrict coal carriers and cargo ships being paid excessive demurrage costs at the expense of causing significant environmental damage from extended anchorage off the coast should be given priority consideration. The situation off Newcastle where up to 50 ships can be anchored at any one time is a classic example of the serious environmental degradation occurring through pollution and debris from ships as well as anchor damage to major prawn trawling grounds.
- The implementation measures adopted with respect to marine debris need to go beyond "review" to "implementation" of actions arising from any reviews undertaken.

2.5 Recreational vessels

- There is some confusion regarding the definitions of recreational vessels and commercial vessels. Ocean Watch considers that commercial vessels includes commercial fishing vessels and other commercially operated vessels such as cruise liners, ecotour vessels both within commonwealth and state waters. Recreational vessels includes just that, pleasure craft type vessels. If this interpretation is incorrect, then clarification may be required with the heading provided under 2.4 to read "Ocean going commercial vessels" and 2.5 to read "Small Commercial and Recreational vessels".
- Ocean Watch suggests that the proposed implementation objective to determine an agreed approach to managing inappropriate disposal of wastes from recreational vessels *and commercial vessels* is an implementation measure rather than an objective. A suitable objective would be to reduce inappropriate disposal of waste from recreational vessels and minimise the impacts to aquatic habitats.
- Public participation and education is fundamental to the success of addressing recreational vessel debris/ pollution through programs such as the Clean Marinas Program etc.

2.6 Dredging

- There is considerable community pressure, particularly in some regional areas of NSW for local/state governments to undertake works to keep coastal lakes and estuaries open to the sea. In the majority of cases public amenity is outweighing the importance of the natural coastal processes associated with ICOLLS. Any framework to address dredging should be expanded to include ICOLLS dredging through education to local and state governments, communities and developers and other relevant authorities of coastal processes with respect to ICOLLS and beaches.

Priority Area 3 – Climate Change

3.1 Understanding climate change

- In response to 3.1.1, Ocean Watch is supportive of the identification of best practice and national practice research and response priorities relating to climate change that are based on solid risk management principles.
- In response to 3.1.2 the identification of coastal zone areas particularly vulnerable to climate change impacts should include identification of marine and estuarine habitats also at risk from climate change.
- In response to 3.1.3 modelling should be expanded to include changes to coastal marine ecosystems that go beyond tropical reef systems such as the Great Barrier Reef. Temperate marine communities are also potentially at risk.

3.2 Managing impacts and opportunities

- The Government must take some serious steps with respect to managing the impacts and opportunities arising from climate change. In particular, unless strong measures are implemented to curtail greenhouse emissions, particularly from fossil fuel energy providers (ie coal), the effectiveness of the outcomes will be reduced. Serious steps are required to incorporate programs to encourage cleaner and alternate energy options.
- In response to 3.2.1, what actions are proposed to minimise impacts on coastal communities? This implementation measure needs to be specific so that the effectiveness of outcomes can be monitored and measured.

Priority Area 4 – Pest animals and plants

4.1 Weeds and Feral Animals

- Ocean Watch believes that the proposed objective to conserve and protect coastal biodiversity and reduce the cost of eradicating weeds and feral animals is not specific and does not reach the core of the problem. Within this framework we should be seeking to *reduce weeds and feral animals in Australia* rather than simply reducing the cost. It is easy to reduce the cost – we just ignore the problem! We assume the wording of this objective was referring to efficiencies.
- In response to 4.1.2 the review of Weeds of National Significance should be expanded to include marine weeds such as *Caulerpa taxifolia*. As has been done for terrestrial based weeds, an assessment of the economic costs associated with lost commercial fishing and other marine based industries as a result of marine “weed” threats must be undertaken. This needs to be linked with any assessment undertaken in response to marine pests discussed in 4.2.
- In response to 4.1.3 the success of this measure will be the level of engagement of public participation and education programs in place.

4.2 Introduced marine pests

- No comments. Ocean Watch is supportive of the proposed objective and implementation measures.

Priority Area 5 – Planning for Population Change

5.1 Planning and population

- ‘Coastal biodiversity’ is identified as of “national significance” in the framework. To ensure the preservation of such biodiversity and the sustainability of commercial and recreational activities that are based upon these natural resources “working” effectively, attention needs to be provided to improved land-use planning to ensure protection of critical aquatic habitats. In regard to aquatic biodiversity, the an implementation measure should be no loss of any wetland, saltmarsh or other critical aquatic habitat.
- In response to 5.1.1, local planners should be included within the stakeholders to which information can be disseminated.
- A review of development pressures, particularly along the east coast of Australia is warranted to determine how the principles of integrated coastal zone management can best be applied to ensure sustainable outcomes. There is too much focus by local planners and developers and to some extent local and state governments on short term economic gains against long term sustainable planning.
- Consideration must also be given to changes in demographics in relation to how and where people will take holidays. The trend seems to be one of a greater portion of the country now being accessed by “grey nomads”. As the population ages, this growing pressure will increase in areas previously identified as hot spots.

Priority Area 6 – Capacity Building

6.1 Information

- In response to 6.1.3, cooperation between these stakeholders should be expanded to include industry. Data and information provided should extend to marine related information including fish stock assessments so as to build the catchment, coast, ocean continuum in decision making. Education as to the linkages will be necessary.

6.2 Education and Training

- Ocean Watch supports initiatives to develop an understanding of indigenous traditional and cultural interests in the coastal zone and appropriate education and training programs for indigenous communities, however, we must also recognise the valuable role indigenous communities can play in helping us understand the coastal zone. This framework should be seeking integration between indigenous with non-indigenous that is not “one sided”, but rather mutually beneficial. Indigenous communities should be given recognition for their knowledge and effective management practices within the coastal zone. We are falling into the trap of arrogance if we assume that we can teach them!
- As has been clearly stated in the discussion, there are a large number of organisations across Australia that provide an education and training role in respect of coastal issues. Although all are most likely useful in their own right and serve a valuable purpose we need to take a strategic approach to the way that we educate. An integrated approach to education is required whereby the national framework provides a “curriculum” from which to set the agenda for education. Educators need to be included through the process in setting implementation measures and performance indicators with respect to this to ensure effective outcomes can be delivered. In addition adequate resources must be made available to all types of educators (including community groups), in line with the recognition that education is a critical component to the success of this framework being effectively adopted across all jurisdictions.

- Ocean Watch has serious concerns about the importance being given within NSW to environmental education, in particular addressing natural resource management and coastal issues. With the recently announced \$20m budget cuts to the relevant departments, efforts need to be made at a national level to ensure NSW are fully supportive (not just from “in kind” but in terms of allocating the necessary resources) to addressing the outcomes required under this framework. It is clear that the coastal zone, including marine environment is under increasing pressure from development and population growth. Politics must not cloud the decisions being made with respect to long terms sustainability planning initiatives.

6.3 Incentive Measures

- Ocean Watch is supportive of further investigation and promotion of effective economic incentives. Effort should be focused on landholders contributing to ASS and sedimentation and water quality problems as well as developers.

