



18th June 2018

SEPP Waters Manager
Department of Environment, Land, Water and Planning
Level 10, 8 Nicholson Street
EAST MELBOURNE VIC 3002

Dear Sir/Madam,

RE: West Gippsland CMA submission regarding Draft State Environment Protection Policy (Waters)

The West Gippsland Catchment Management Authority (WGCMA) thanks you for the opportunity to comment on the Draft State Environment Protection Policy (Waters) and is pleased to provide the following comments.

The WGCMA is supportive of the objective of the draft policy to document clear and relevant water quality standards and obligations to protect and improve the health of our water environments. We note that the review is a key action in the implementation of *Water for Victoria* and aims to streamline policy to reflect community values, apply updated science, better clarify industry obligations, and provide for greater accountability.

The WGCMA is the designated Site Coordinator for the Corner Inlet and Nooramunga Ramsar site, and this submission focusses on Clause N3 – Corner Inlet Load Reduction Target. WGCMA has also developed a joint submission with the East Gippsland Catchment Management Authority (EGCMA) that relates specifically to the Gippsland Lakes and this has been submitted separately.

The specific comments provided in this submission are found in Attachment 1.

If you would like to discuss this or any other matters further with us please contact Catchment Planning and Delivery Manager on 1300 094 262

Yours Sincerely

Martin Fuller
Chief Executive Officer

Attachment 1: WGCMA Comments: Clause N3 – Corner Inlet Load Reduction Target

General comments

- Impact Assessment Document, **Table 7 on page 76** has the incorrect years (i.e. baseline and target years have not been adjusted to 2013 and 2033)
- SEPP Draft **Document Box 13 on Page 72/73**: The preferred 'Scenario C' looks to be missing text in the summary of management actions column. It's not just BMPs but also traditional works and so should include the wording 'Traditional activity to focus in Jack and Albert River catchments and much of Corner Inlet' (as per Table 7.2.1 on pg 56 of the WQIP).
- Add the major partner organisations from the WQIP to **action 2.3 in table 4-2 on page 14** of the SEPP Implementation Plan
- In developing the SEPP objectives, the WGCMA raised a number of issues and were assured that the explanatory notes to the SEPP would be used to address these (or at least provide clarification or caveats around these concerns). These issues related to the uncertainty associated with the science and modelling used to generate the load targets. On review, the WGCMA have not been able to locate/see these statements. Therefore the WGCMA are keen to ensure statements along the following lines are included:

WGCMA has expressed support for this clause wording, with the caveat that uncertainties around the science and modelling that could affect the accuracy of these load targets quantities be included in supporting information such as explanatory notes and the PIA. Supporting information should also prescribe an adaptive management approach that allows target to be refined based on improved knowledge

WGCMA comments on environmental quality indicators and objectives for Corner Inlet

- WGCMA seek clarification of the level of confidence in the environmental quality indicators and objectives for Corner Inlet (**table 9 on page 86**) given the paucity of data.

WGCMA comments on regional target setting

- **p. 20 of the draft policy - 18. Developing interim regional targets in priority areas**
WGCMA strongly support the following section in the explanatory notes in order to avoid consequential impacts on our ability to maintain beneficial uses. "Interim regional targets must be set according to priorities for environmental protection and rehabilitation as determined through preparation of a regional waterway strategy under section 190 of the **Water Act 1989**, with priority given to maintaining beneficial uses in areas of high conservation value and maintaining beneficial uses that are currently protected. Works will continue to be undertaken on a priority basis to the extent that resources allow and as developed through annual business planning processes."
- **p. 13 of Draft Implementation Plan:**
Support Actions 1.1 to 1.4 in Table 4.1 and request CMA involvement in these.
WGCMA do not support increased reporting on RWS implementation as per Action 1.5. Annual reporting to DELWP should be limited to fulfilling annual reporting obligations on DELWP funded projects.