



Victorian Waterway Management Strategy survey

A guide for Friends of Gippsland Lakes members - short survey

The Victorian Government (DEECA) has released the draft Third Victorian Waterway Management Strategy - the ten-year plan that guides how the State manages its rivers, wetlands and estuaries - and is asking for public feedback. This guide suggests how you might respond to the short survey. These are starting points, not a script; please use your own words.

FoGL's position, in a sentence: we support the strategy's vision and many of its goals, but several of its mechanisms - especially how it would treat internationally protected wetlands such as the Gippsland Lakes when they come under pressure - need strengthening before they can actually deliver on those goals.

There is also a separate detailed survey covering individual policies and actions. This guide is for the short survey. If you would like to go deeper on a specific policy (for example Policy 26 on Ramsar sites), the detailed survey is the place for it, and FoGL can help.

Part one: the Vision

This vision describes what Victorians would like to see for our waterways over the next 50 years:

Victorian waterways are sustained diverse ecosystems that provide environmental, social, cultural and economic benefits for everyone, even as our climate changes.

Waterways are collaboratively managed with Traditional Owners, acknowledging and enabling their custodial obligations to care for Country.

Victorians value and understand these waterways as living and life-giving systems, actively participating in waterway decision-making and management.

We support the vision, but not strongly. The vision should recognise waterways as living entities with intrinsic value in their own right, rather than framing them solely in terms of the values, benefits, or services they provide to people.

Part two: the four outcome questions

These ask how strongly you support or oppose the strategy's four goals. We suggest Support for all four - the goals themselves are sound. Where the strategy falls short is in how it proposes to achieve them, and the comment boxes further down are the place to say so.

1. Living, connected waterway ecosystems and habitats

Suggested response: **Support**

This is an excellent goal. The concern is that, elsewhere, the strategy would allow a protected wetland like those fringing the Gippsland Lakes to be re-set to a lesser condition if maintaining it is judged too

costly or unfeasible - which works against this very outcome. Support the goal, and note that protected sites should be held to a “maintain or restore” standard.

2. Victorians value, care for, use and enjoy waterways

Suggested response: **Support**

Community connection to waterways matters. One reservation: the strategy is framed around what waterways do for people, and its welcome idea of waterways as “living entities” in their own right appears in the opening but does not shape any actual decisions. Support the outcome, and in the comments ask that the health of the waterway itself come first.

3. Efficient and effective waterway planning and management

Suggested response: **Support**

Well-run management is essential. The catch is that the strategy repeatedly uses “feasible” and “cost-effective” as tests (without ever defining them) including as triggers for stepping back from legal obligations. Support efficiency, and ask that those terms be defined and never used to override binding protections.

4. Traditional Owner cultural rights and responsibilities for waterways

Suggested response: **Support (or Strongly support)**

This is one of the strongest parts of the strategy and FoGL backs it firmly. Traditional Owner goals for the Lakes - healing Country, restoring inflows, joint management - line up with the Lakes’ Ramsar protection. Support it, and note that the two reinforce one another.

Part three: feedback on the seven parts

You can comment on any or all of the seven parts - you do not need to address them all. Part 4 is where the issues most important to the Gippsland Lakes sit. Points you might draw on:

Part 1 - Strategy framework and context

- Support the long-term, climate-aware vision.
- Ask that the “living entity” idea run through the whole strategy, not just the opening chapters - at present it changes the language but not the decisions.
- Suggest the vision lead with the health of the waterways themselves, not only their benefits to people.

Part 2 - The management approach

- The “resilience / transition / transformation” approach in response to climate change is reasonable for waterways generally, but should not apply to legally protected sites.
- Ask for a clear exemption so that Ramsar wetlands, Heritage Rivers and listed species are managed on a “maintain and restore” track only - not allowed to decline or the species they support become locally extinct.
- Point out that “feasible” and “cost-effective” are used as decision triggers but never defined, and ask DEECA to define them.

Part 3 - Traditional Owners’ cultural rights and responsibilities

- Strongly support - the best-developed part of the strategy.
- Encourage that cultural water and partnership commitments be properly resourced, not just acknowledged.
- Note that Traditional Owner goals for the Lakes and the Lakes’ Ramsar obligations support each other.

Part 4 - Waterway management themes (the key part for the Lakes)

- **Ramsar sites:** support the goal of keeping the Lakes’ ecological character intact, but object to the part of Policy 26 that would let a protected wetland be re-set to a less biodiverse “new ecological regime” when maintaining it is judged not cost-effective or feasible - there is no basis for that in the Ramsar Convention. Ask that the response be a recovery plan, not ‘managed decline’ that lowers the bar.

- **Environmental water (inflows):** reduced freshwater inflow is one of the Lakes' main pressures - water quality, salinity and the wetlands all depend on it. The region's recovery target (up to 99.5 GL returned over a decade) is smaller than the shortfall on a single feeder river: the Latrobe and its estuary alone carry a 129 GL/yr environmental water deficit. Ask that a recovery target the State has set modestly never be used as an excuse to step back from protecting the Lakes. More secure and ambitious environmental flow releases are urgently needed.
- **Salinity:** a defining threat to Lake Wellington, yet salinity is not a dedicated theme anywhere in the strategy. Ask for it to be brought back as a theme and tied to protecting the Ramsar site.
- **Estuaries:** decisions about the artificial entrance at Lakes Entrance directly affect the Lakes' salinity and ecology. Ask that any entrance-opening assessment be required to be consistent with maintaining the site's ecological character.
- **Water quality:** the nutrients and sediment that drive algal blooms and sea grass meadow die-back are dealt with in a separate local plan, not the strategy. Ask the strategy to carry a clear commitment to reducing nutrient and sediment loads reaching the Lakes. Express concern at EPA cutbacks to the marine water monitoring program in the Gippsland Lakes being cut from monthly sampling to every two months, potentially jeopardising future trend detection and hydrological modelling.
- **Groundwater:** protections for groundwater-fed wetlands are left to discretion. Ask for a firm minimum level of protection for high-value sites.

Part 5 - Urban waterways

- Largely sensible modernisation and not a priority for the Lakes. General support is fine, or you can skip this part.

Part 6 - Communities value and enjoy waterways

- Support the citizen-science and stewardship commitments.
- Ask that community monitoring genuinely feed into official decisions.

Part 7 - Delivering the strategy

- A real concern: actions are subject to budget decisions and "willingness to pay," which makes delivery uncertain.
- Ask that work protecting Ramsar sites not be left to the same discretionary budget cuts as ordinary projects - the legal duty is not optional, so its funding should not be either.
- Support a strong, well-funded Environmental Contribution (the levy that pays for the program).

Part four any other feedback

Two bigger-picture points you might make:

- The threats that matter most to the Lakes - salinity, inflows, nutrients and entrance management - are each handled by separate plans that sit outside this strategy, with nothing tying them back to the Lakes' international protection. Ask for a clear line of accountability, and a single overarching body or taskforce with the authority, funding and responsibility to closely align all the existing plans and programs, and advocate strongly for the long term protection and restoration of the Gippsland Lakes.
- Commonwealth approval powers for Ramsar sites may soon be handed to the State. That makes this strategy more important, not less - so its protections for internationally significant wetlands like the Gippsland Lakes must be firm and explicit.

Thank you for taking part. Even short responses count, and a strong community showing helps these arguments land. The survey is open through DEECA's Engage Victoria consultation page <https://engage.vic.gov.au/victorian-waterway-management-strategy>

To go further on specific policies, or for help with the detailed survey, contact FoGL at contactfogl@gmail.com.