



ASSOCIATION OF BAYSIDE MUNICIPALITIES

***Draft Port Phillip Bay***  
**Environmental Management Plan**

**Submission**

**January 2017**

Prepared by the Association of Bayside Municipalities  
in consultation with the Municipal Association of Victoria

## Introduction

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The Association of Bayside Municipalities (ABM) welcomes the release of the *Draft Port Phillip Bay Environmental Management Plan 2017-2027* as part of the Victorian Government's commitment to protect and enhance the health of Victoria's marine and coastal environments.

A regional environmental management 'plan' for the Bay is critical. The ABM strongly supports the need for a whole-of-Bay approach to:

- (1) strengthen the protection of Bay values;
- (2) ensure future issues and challenges are understood, considered and appropriately addressed; and
- (3) better enable the array of Bay managers and stakeholders to work together effectively to achieve agreed outcomes.

This submission seeks to highlight Port Phillip Bay environmental management issues from a local government perspective and provides feedback on the draft Plan and the actions/activities we consider to be of particular importance to the ten councils of the ABM with direct frontage to Port Phillip Bay.

We look forward to being able to work with Government to develop a whole-of-Bay environmental management plan that provides clear targets and associated actions and responsibilities – for councils and other Bay stakeholders.

## About the Association of Bayside Municipalities

The ABM is an association of the ten councils with frontage to Port Phillip Bay. Together these councils represent 1,287,938 people (22% of Victoria's population). The ABM councils play an active and integral role in the management and protection the environmental, social and economic values of Port Phillip Bay.

The ABM has a proud history of working closely with other Bay stakeholders through its advocacy and projects. In recent times the ABM has focused on coastal climate adaptation, working towards a whole-of-bay approach to planning for and responding to the impacts of climate change on the coast. The ABM invests in ongoing data analysis, modelling and on ground projects to strengthen knowledge and understanding to inform the protection and management of the environmental, social and economic values of the Bay.

## The role of councils in the environmental management of Port Phillip Bay

Councils can have a variety of important roles that relate to the environmental management of the Bay, including:

- as a Committee of Management appointed by Government under the *Crown Land (Reserves) Act 1978*
- as a strategic land use planning authority
- as a service provider to Parks Victoria or other Committees of Management
- as an asset manager

Generally where local government is a Committee of Management, it performs the following functions:

- Governance – budget development and maintenance, administration
- Maintenance – mowing, landscaping, carpark and access, pedestrian and cycling access,
- Building/site administration – leases and licenses, collection of fees
- Building/infrastructure management – toilets, carpark and access, stormwater assets, signage, rubbish bins, BBQs, picnic tables and benches, playgrounds, drinking fountains, lighting
- Facilities management – toilet cleaning and maintenance, rubbish collection, parking control
- Natural resource management – revegetation, pest plant and animal control, cultural heritage protection, vegetation protection
- Beach management – beach cleaning, beach renourishment, dog control, safety signage
- Festivals and event administration

Councils consider primary responsibility for the marine environment, and health of the Bay to the high water mark, to be the responsibility of the Department of Environment Land Water and Planning (DELWP).

However, the actions of councils can have an impact on the environmental quality of the Bay through the management of foreshores, and stormwater drainage responsibilities. This includes all councils within the Port Phillip Bay catchment, not just those that directly interface with the Bay.

## General feedback

The *State Environment Protection Policy (Waters of Victoria) – Schedule F6 Water of Port Phillip Bay (1997)* sets out the requirement for an Environmental Management Plan for Port Phillip Bay and what it must achieve.

The requirements include:

- determining priority management issues
- outlining actions that respond to the priority issues
- identifying management responsibility for particular issues
- coordinating the management for protection of the Bay's beneficial uses and values
- identifying specific management actions for nutrients, suspended solids, pathogens, litter and marine pests
- providing a process for reviewing and reporting progress to the community.

The ABM is concerned that the draft Plan does not meet these requirements.

EMP requirements <sup>1</sup>	Comments
Determining priority management issues	Commentary required regarding the impact of recreational / economic bay uses on the bay environment as a management issue eg. Boating, fishing, dredging in terms of impacts on water quality, habitat and marine life.
Outlining actions that respond to the priority issues	<p>It is not clear how the actions will address the priority issues or challenges as described in the Plan. The Supporting document goes some way towards describing tangible actions, as “proposed activities”.</p> <p>Councils seek clarity as to the relationship between an action (Plan) and proposed activity (Supporting Document)</p> <p>It is of concern to councils that “sub actions, lead organisations and specific interventions and activities will be provided in the final draft”. It is unclear if these elements are to be developed in consultation with councils and other relevant bay stakeholder prior to any “final draft” being released?</p>
Identifying management responsibility for particular issues	<p>The Plan refers to “potential partner organisations” rather than clearly identifying ‘management responsibilities’. This results in a lack of clarity about who might be leading a management action/activity. As councils are routinely listed as a potential partner organisation clarity is required about what obligations this role might entail.</p> <p>It is concerning that the draft Plan notes that the final Plan will include `a more detailed list of sub-actions,</p>

<sup>1</sup> As described in the Draft Port Phillip Bay Environmental Management Plan – Supporting Document (page 3)

	<p>with clearly identified lead organisations’ but does not articulate how those sub-actions and lead organisations will be determined. Consultation with the nominated organisation is essential prior to any decision regarding the allocation of responsibility.</p> <p>Councils are identified as a “potential partner organisation” in 14 of the 21 priority actions.</p>
Coordinating the management for protection of the Bay’s beneficial uses and values	<p>Councils support a coordinated approach to the environmental management of Port Phillip Bay.</p> <p>Councils would welcome greater commentary as to how the State will lead greater coordination of management responsibilities, either through this Plan or other mechanism such as the Marine and Coastal Act Review.</p> <p>The lack of coordinated management is an impediment to effective implementation of this Plan.</p>
Identifying specific management actions for nutrients, suspended solids, pathogens, litter and marine pests	<p>Council support the need for specific management actions, however question whether the actions described in this Plan are “specific” in addressing issues associated with nutrients, suspended solids, pathogens, litter and marine pests. The identification of more specific actions and targets would add clarity and usefulness to the Plan.</p>

Councils provide support in principle for many of the proposed actions described in the Plan, however are concerned about the following overarching issues.

### **Relationship between the “draft Plan” and the “Supporting Document”**

It is unclear why details of proposed actions are included in the Supporting Document and not the Plan itself. We consider these proposed actions to be integral components of an effective Bay Environmental Management Plan and therefore more appropriately located in the Plan. It is also unclear why the “Supporting Document” details important information relating to the Bay and its management that get very little mention in the Plan.

Having multiple documents has been challenging. Repetitive content or the wording of actions changing between the two documents has led to misinterpretation and confusion. One document that contains the full descriptions of actions is a more useful resource for the people and organisations expected to implement them.

### **Lack of clear targets**

Some targets are mentioned in the Supporting Document, but for the Port Phillip Bay EMP to be effective there needs to be targets particularly across areas of nutrients, pollutants, litter, pathogens and in understanding the extents of and changes to habitat and marine life.

### **Shared understanding of the ‘problem’ or ‘issue’**

It would be of assistance if linked to each action statement was a summary of the problem – what are we trying to address or what are we trying to prevent occurring in the future? It is often unclear ‘why’ the action is required. For example, Action 5.3 states that monitoring and reporting need to be improved, but there are no details about what gaps or issues existing with current monitoring and reporting that warrant this action. Also, Action 2.1 sets out to ‘build capacity’. What are the capacity gaps the Plan is seeking to address?

A shared understanding of the problem is required. This would assist councils, and potentially other stakeholders, in providing feedback on the actions described in the plan, and the subsequent “sub actions” and “specific interventions and activities” to be developed for the final draft”.

### **Apparent gaps**

The draft Plan has a number of gaps in relation to issues and actions critical to the overall environmental management of the Bay. Some of these gaps are addressed in the “Supporting Document”. The introductory section of the Supporting Document states that the document “is designed to be a stand-alone companion document to complement the” Plan. This statement does not help clarify the status of the Supporting Document.

[Page 15 of the draft Plan, paragraph 3] no reference has been provided for the statement “Monitoring data and modelling results show that this target has been achieved”.

### **Development of ‘final draft’**

It is of concern to councils that the draft Plan states “sub actions, lead organisations and specific interventions and activities will be provided in the final draft”. It is the expectation of councils that DELWP consult directly to gather information and that councils have the opportunity to comment on these elements prior to any “final draft” being released.

Many actions in the Plan are linked to a wide range of potential partners. Councils request clarity on the underlying assumptions behind the role of council as a partner, and resourcing and management expectations associated with each action.

## **Specific feedback on the draft Plan**

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### **Vision**

The vision for the Plan is “a healthy Port Phillip Bay that is valued and cared for by all Victorians”. We support this vision.

### **Goals**

The goals outlined in the Plan are:

- Stewardship of the Bay is fostered across community, industry and government
- Health and community enjoyment of the Bay is enhanced by best practice water quality management
- The Bay's habitats and marine life are thriving

The ABM supports these goals.

### **Priority Areas**

The priority areas described in the Plan are:

- Connect & inspire
- Empower action (work together)
- Nutrients & pollutants
- Litter
- Pathogens (human health)
- Habitat & marine life
- Marine biosecurity

ABM supports these priority areas in principle. The ABM appreciates that it is not possible for the Plan to address every issue related to the environmental health of the Bay. Dredging, fishing, coastal erosion and inundation and shipping/boating pollution were not considered priorities for this Plan.

While all of these matters are described as being ‘significant in the eyes of government and the community’, it is noted that they are ‘all managed through other mechanisms, regulation and legislation’. We consider that there needs to be greater commentary and recognition regarding the effects of these activities on the health of the Bay. It is our view that many of these activities that have a direct impact on the Bay environment need to be articulated and acknowledged and in some cases included in the Plan.

There is minimal commentary regarding the complexity of Bay ‘uses’ and their impact on the Bay environment. While management of these uses is not the role of this Plan, it is important to acknowledge their impact on the environmental health of the bay, particularly water quality and marine health. For example, pollution from boating industry; impacts on marine health from dredging; impacts on recreational use, water quality and marine life resulting from aging Bay infrastructure etc. Councils would appreciate communications from DELWP regarding the relationship between the actions in this Plan and the upcoming Coastal Protection Asset Information Sessions.

## Feedback on Priority Actions (as per the Plan) and Activities (as per Supporting Document)

	PROPOSED ACTION	SUMMARY RESPONSE
<b>Priority Area: Connect and Inspire</b> <b>Strategy: improve appreciation and understanding of Bay values</b>		
1.1	<p>Work with Aboriginal groups to improve understanding of Aboriginal cultural values and interests in the Bay and support connections to Country</p> <p><b>(Supporting Document): Activities</b></p> <p>Undertake assessments of Aboriginal cultural values and interests (past and present) in Bay management across different regions. This may comprise desktop literature reviews and on-country interviews with elders.</p> <p>Support opportunities for people of the Kulin nation to strengthen connections with their cultural values. This will involve Aboriginal groups leading the delivery of this action and facilitating participation across all generations within their communities. This may involve supporting new business and employment opportunities.</p> <p>Undertake educational initiatives for government, industry and the broader community to improve understanding of Aboriginal cultural values and interests in the Bay. An example would be development of digital tools to support the communication of Aboriginal Bay values.</p>	<p>Support</p> <p>The information provided in the Supporting Document would be more valuable in the main document – to provide greater clarity on this action as it unclear as a high level description.</p>
1.2	<p>Develop and deliver programs to inspire greater appreciation of the Bay's values</p> <p><b>(Supporting Document): Activities</b></p> <p>Conduct social and economic research to better understand community values and gaps in knowledge.</p> <p>Identify and promote the type of programs that are required, including approaches for connecting to nature and inspiring environmental stewardship.</p> <p>Build on existing awareness and education programs around the Bay and its waterways to align with the goals of this Plan (e.g. I sea I care, Baykeeper, Coastcare).</p>	<p>Support</p> <p>This actions must also recognise and build on local government community engagement initiatives that improve the connection and appreciation of the Bay such as events, communications, community consultation, etc</p> <p>To understand Bay values it is also important to understand the threats to these values. Information on both values and threats to values would be useful to councils and other coastal land managers.</p> <p>The draft Plan states “environmental values are often underappreciated or not well understood”. However this is not</p>



	PROPOSED ACTION	SUMMARY RESPONSE
		<p>reflected clearly in the action – which suggests research will only focus on social and economic issues. Councils support the inclusions of research to better understand environmental values and how they can be better understood (valued) by the community.</p> <p>ABM support the needs to building on existing awareness and education programs however are concerns as to how these programs will be extended without any commitment by the State to resourcing and funding.</p>
1.3	<p>Build understanding of management responsibilities and programs for the Bay and its catchment</p> <p><b>(Supporting Document): Activities</b></p> <p>Develop a plan to communicate roles and responsibilities for key issues, gaps and overlaps that create confusion, and suggestions on how to reach target audiences (e.g. common signage).</p> <p>Provide clear information on who to contact if there's a problem via consistent signage and online information and digital tools.</p> <p>Develop catchment-based maps and other communication tools of the various programs, projects and community groups actively working within each catchment and provide communication materials to explain how they interrelate.</p> <p>Establish regular forums on Bay issues for partner agencies and local councils to meet, share advice and strategies, and consider progress in various plans and actions.</p>	<p>Support, in principle</p> <p>Activities listed against this action relate to communicating roles and responsibilities, identifying gaps and overlaps that create confusion.</p> <p>Recognising it is not the role of this Plan to address the issue of Bay management, Councils strongly advocate for a review of bay governance arrangements so as to provide greater clarity of roles and responsibilities, address the gaps and overlaps and reduce the complexity that currently exists.</p> <p>The activities described imply that an understanding of management responsibilities is required by the community. Given the complexity of current governance arrangements, this description should be expanded to build understanding for all bay stakeholders.</p> <p>In addition to building understanding of “management responsibilities and programs” for the Bay and its catchment, this action should also include building greater understanding of the catchment activities that impact on the Bay eg. Stormwater pollution, litter, etc.</p>

	PROPOSED ACTION	SUMMARY RESPONSE
<b>Priority Area: Empower action (work together)</b> <b>Strategy: improve collaboration and partnerships across community, industry and government</b>		
2.1	<p>Build capacity and collaborations within community and industry networks</p> <p><b>(Supporting Document): Activities</b></p> <p>Establish region-wide and catchment-based frameworks for supporting citizen science programs and local community groups, including consideration of regional support hubs.</p> <p>Support existing community and industry capacity building programs and enhance where necessary to align with the goals and priority areas of the Plan.</p> <p>Develop innovative new tools, and expand use of existing tools, to support citizen science and on-ground community action.</p>	<p>Support in principle</p> <p>It is unclear how collaboration between industry networks will be increased in this action. There seems to be a cross over in the wording with Action 2.3?</p> <p>A shared understanding of the drivers for this action is required. What are the capacity building gaps, across which sectors? What is the intended impact of greater community and industry capacity?</p> <p>The activities described for this action appear primarily focused on capacity building for community. Councils would welcome capacity building to support access to greater technical information, training, resources and tools on best practice (as described p50 Supporting Document).</p> <p>The current gaps and desired outcomes need to be articulated. If these are not known, then it is suggested this become one of the activities in this action.</p> <p>Suggest this action focus solely on capacity building, and be extended to include support to build capacity of councils and other local committees of management – to strengthen community and industry networks that empower action.</p> <p>Councils support many coastal and catchment based community groups / hubs. There is a need for greater connection between community groups across the catchment, creating links or hubs similar to the Port Phillip EcoCentre. Individual groups typically do not have the resources to connect to the wider network and are focussed on activities and outcomes in their ‘patch’. Building greater capacity to link-connect these groups would greater connectivity of knowledge and actions across the bay and its catchment.</p>

	PROPOSED ACTION	SUMMARY RESPONSE
2.2	<p>Empower the broader community to get more actively involved in caring for the Bay</p> <p><b>(Supporting Document): Activities</b></p> <p>Identify needs and gaps in existing communication materials and strategies.</p> <p>Develop and clarify information on how to get involved in conserving the Bay, building on existing programs, campaigns and other communication initiatives.</p> <p>Communicate achievements of community actions more widely to attract interest and inspire action.</p>	<p>Concern</p> <p>Support the need to empower the community to get more involved in caring for the Bay.</p> <p>Concern that the dot points listed in the Plan and activities described in the Supporting Document do not go far enough as actions that “empower” the broader community to get involved.</p>
2.3	<p>Support stronger partnerships across community, industry and government to ensure aims and outcomes are aligned</p> <p><b>(Supporting Document): Activities</b></p> <p>Identify mechanisms for ensuring strong collaboration between community, industry and government organisations in the implementation of this Plan.</p> <p>Improve mechanisms to ensure greater representation of Aboriginal groups in the implementation of this Plan.</p> <p>Identify and invest in opportunities to improve monitoring, data sharing and reporting of activities being undertaken across community, industry and government.</p>	<p>Concern</p> <p>As above, support the need for stronger partnerships.</p> <p>Concern that the dot points listed in the Plan do not “empower” partnerships – referring to “identify” and “improve”.</p> <p>For councils to support this goal the actions need to clearly demonstrate empowerment – of communities, industry and government. The actions listed do not provide confidence that this goal can be achieved.</p>
<p><b>Priority Area: Nutrients &amp; pollutants</b></p> <p><b>Strategy: Nutrient and sediment loads do not exceed current levels and pollutant loads are reduced where practicable</b></p>		
3.1	<p>Effectively maintain existing stormwater infrastructure and programs to mitigate loads to the Bay, or secure via equivalent means</p> <p><b>(Supporting Document): Activities</b></p> <p>Undertake audit of selected stormwater management assets to assess whether they are meeting their design intent for nutrient, sediment and pollutant reduction.</p> <p>Identify other stormwater management assets within the catchment and classify their performance for nitrogen and sediment reduction – this will include large, medium and small-scale systems operated by Melbourne Water, local councils and other land</p>	<p>Support in principle</p> <p>Councils have played a significant role reducing nutrient and sediment loads to the Bay through implementation of Stormwater Management Plans and capacity building in integrated water management approaches.</p> <p>There are still significant gaps in understanding the extent and ownership of stormwater infrastructure, and ongoing issues around maintenance responsibility that need to be resolved for this action to be effective.</p>

	PROPOSED ACTION	SUMMARY RESPONSE
	<p>managers.</p> <p>Develop and implement an investment plan for remediating those assets that are failing to meet their design intent and, where appropriate, building new infrastructure.</p> <p>Continue to characterise contaminants of emerging concern within stormwater and methods to reduce these contaminants</p>	<p>Continued support and funding is required to enable councils to embark on new approaches and embed widespread best practice across the catchment (not just bayside councils).</p> <p>In relation to Actions 3.1 – 3.3: important to outline links between these actions and the emerging policy and actions as outlined in Water for Victoria, stormwater clauses within the SEPP (Waters of Victoria), Protecting the Yarra River Discussion Paper (Yarra MAC), Victorian Floodplain Management Strategy that relate to Port Phillip Bay.</p>
3.2	<p>Prevent increases in nutrient loads from wastewater systems and where practicable reduce loads of other pollutants</p> <p><b>(Supporting Document): Activities</b></p> <p>Confirm forecast volumes of nitrogen and other pollutants discharged from wastewater treatment plants and areas with onsite wastewater systems, and assess adequacy of investment plans to address growth.</p> <p>Implement compliance programs in areas serviced by onsite wastewater systems (e.g. septic tanks) to ensure systems are operating appropriately, and their discharge has minimal impact on receiving waters. These programs will inform the need and timing of investment in offsite treatment options.</p> <p>Obtain discharge monitoring data from individual wastewater treatment plants to assess against targets and to compile cumulative annual loads to the Bay.</p> <p>Continue to characterise contaminants of emerging concern within wastewater and methods to reduce these.</p>	<p>Support in principle</p> <p>Councils support the needs for a compliance program to be undertaken in areas serviced by onsite domestic wastewater systems. However, this will require funding support, as councils in high-risk areas do not have the financial resources or capacity to undertake the additional work this program would require.</p> <p>Important that pollution generated from the boating and shipping industry is also recognised as a contributor to nutrients loads and pollutants in the Bay and not just land based activities.</p>
3.3	<p>Ensure all urban and rural land use effectively controls impacts from stormwater and runoff, and that controls are in place to manage increases in loads</p> <p><b>(Supporting Document): Activities</b></p> <p>Review performance of existing controls (planning mechanisms, regulations and standards) and identify potential improvements – includes spatial analysis to support classification of controls and prioritisation for investment.</p> <p>Work with regulatory agencies, local councils and stakeholders (includes urban and</p>	<p>Support in principle</p> <p>While we understand it might be a desirable goal, we question whether it is realistic to expect that “all urban and rural land use effectively controls impacts from stormwater”. This action is visionary rather than realistic which make it harder for councils and other potential partners to support its implementation.</p> <p>We also note that while planning system controls are important</p>

	PROPOSED ACTION	SUMMARY RESPONSE
	<p>industrial land developers) to improve understanding of requirements and to better enforce standards.</p> <p>Pilot new management approaches and evaluate their effectiveness.</p> <p>Design and implement an integrated program of management actions and planning controls.</p>	<p>mechanisms to enable fit-for-purpose stormwater infrastructure to be built into land uses, they do not, of themselves, achieve long-term maintenance regimes.</p> <p>The reviews into Clause 56 of the Victorian Planning Provisions as part of the implementation of the Victorian Floodplain Management Strategy and the Water for Victoria action 5.5 need to be referenced as well. The plan needs to avoid duplicating the actions being undertaken in other reviews.</p> <p>This said, piloting new management approaches and evaluating their effectiveness is a useful action to include in this management plan. We note in this regard the local environmentally sustainable design planning policy amendments Council Alliance for a Sustainable Built Environment (CASBE) has been facilitating, as a means of tightening controls for stormwater management at a site scale. CASBE is an association of Victorian councils committed to the creation of a sustainable built environment within and beyond their municipalities.</p> <p>Suggest this action focus on developing a consistent and defensible method for estimating pollution loads to the Bay.</p>
<b>Priority Area: Litter</b> <b>Strategy: Reduce litter loads to the Bay</b>		
4.1	<p>Establish baseline estimate of the volume of litter entering the Bay and its impact, including accumulation points</p> <p><b>(Supporting Document):</b></p> <p>No specific activities provided under this action.</p>	<p>Support</p> <p>For actions 4.1 – 4.3, additional information is requested, as to how these actions would be resourced / managed as there is insufficient information provided in the supporting document.</p>
4.2	<p>Support capability and capacity building programs that target litter prevention, including reduction of microplastics</p> <p><b>(Supporting Document):</b></p> <p>No specific activities provided under this action.</p>	<p>Support</p>

	PROPOSED ACTION	SUMMARY RESPONSE
4.3	<p>Identify and prioritise litter hotspots around the Bay and undertake prevention and on-ground stormwater management actions to address sources</p> <p><b>(Supporting Document):</b></p> <p>No specific activities provided under this action.</p>	Support
<p><b>Priority Area: Pathogens (human health)</b></p> <p><b>Strategy: Minimise risks to human health from pathogens</b></p>		
5.1	<p>Improve understanding of links between pathogen concentrations and human health for swimming and consumption of shellfish</p> <p><b>(Supporting Document): Activities</b></p> <p>Activities will include conducting integrated QMRAs and epidemiological studies to directly measure risk to health from swimmer-related activities in the Bay.</p> <p>These studies would be best undertaken as part of a greater research partnership/project, with part funding from national bodies because the outputs would have broad benefit across Australia.</p> <p>There may also be a need to conduct QMRAs to characterise and indirectly measure health risk from consumption of seafood such as commercially grown mussels and species of shellfish harvested from the Bay.</p>	<p>Support in principle</p> <p>Support improvements to understanding links; however the activities described in the supporting document refer to the data being used to “inform state and local government in actions to control pathogen sources”.</p> <p>Further information is required to understand the role of councils in controlling pathogen sources, due to the potential financial costs and implications of the data.</p>
5.2	<p>Adopt a risk-based approach to mitigate sources of pathogens found in the Bay</p> <p><b>(Supporting Document): Activities</b></p> <p>Investigate whether dry weather flows from drains are occurring at high-risk beaches (i.e. popular beaches) by including a short-term drain monitoring project during summer.</p> <p>Develop modelling (and supporting on-ground investigations) to: Predict what level of flow and microbial concentration from drains and waterways contributes to the increased health risk at beaches</p> <p>Predict volume of sewage (e.g. sewer leaks or spills, cross connections) and other contributions of faecal pollution in stormwater runoff for rain events and dry weather</p>	<p>Support</p> <p>Important the tool kit is developed in consultation with local government to ensure implementation can be effectively resourced and managed by the relevant organisation.</p>

	PROPOSED ACTION	SUMMARY RESPONSE
	<p>discharges/flows</p> <p>Predict risk to swimmers from local beach sources (e.g. bather shedding, sediment resuspension)</p> <p>Understand other faecal sources that may be a risk to aquaculture</p> <p>Identify locations or high risk areas for faecal sources</p> <p>Either add to existing water quality models or create new modelling tools that can support water corporations and councils in managing pathogens risks from stormwater.</p> <p>Trial and evaluate source tracking and control methods for mitigation of faecal sources (includes end-of-pipe solutions, capital infrastructure, or source control).</p> <p>Review outcomes from activities above, and ensure that water corporations and local councils have in place appropriate management plans to ensure that faecal sources are monitored and managed proactively.</p>	
5.3	<p>Improve monitoring and reporting to better detect and communicate human health risks from pathogens</p> <p><b>(Supporting Document): Activities</b></p> <p>Develop more accurate and timely forecasting of microbial water quality.</p> <p>Adopt water quality technologies, techniques and modelling approaches to better detect and communicate risks to managers and community.</p> <p>Conduct short-term drain monitoring projects to assess dry weather discharges/flows from high risk drains (i.e. at popular beaches).</p> <p>Set up citizen science programs and reporting systems for community-led communication and detection of risk factors.</p> <p>Improve Beach Report communication to increase awareness and influence behaviour change e.g. digital technology and social research.</p>	<p>Support in principle</p> <p>Councils support the action to improve monitoring and reporting for of human health risks from pathogens. This action requires supporting commentary as to ‘why’. Are current monitoring and reporting activities not working? Are they insufficient? Without such explanation there is differing information / opinion with regards to the extent and nature of the problem.</p>

	PROPOSED ACTION	SUMMARY RESPONSE
<b>Priority Area: Habitat &amp; marine life</b> <b>Strategy: Conserve and restore habitats and marine life</b>		
6.1	<p>Monitor Bay habitats at priority locations and improve habitat mapping tools</p> <p><b>(Supporting Document):</b></p> <p>No specific activities provided under this action.</p>	<p>Support in principle</p> <p>Ongoing Bay monitoring is required, which is developed with bay stakeholders to ensure data can inform management decisions and is relevant and accessible.</p> <p>The Plan describes this action as primarily involving the community through citizen science. Important that any citizen science program is developed and supported by a suitably qualified research organisation if it is to reliably contribute data to inform bay monitoring and mapping. There is concern that research organisations are listed as a potential partner and not referred to in the action description. Quality data critical.</p> <p>How are priority Bay habitats selected? Further information required re. method and rationale for prioritising sites</p>
6.2	<p>Improve understanding of ecological processes, threats and pressures</p> <p><b>(Supporting Document):</b></p> <p>No specific activities provided under this action.</p>	<p>Support in principle</p> <p>While beyond the scope of an EMP, this action needs to feed into a coastal hazard and vulnerability assessment for Port Phillip Bay.</p> <p>Councils strongly advocate for a whole-of-bay understanding of hazards to better inform management decision and planning that directly have an impact on the environmental health of the Bay.</p> <p>It is also important to recognise the impact marine infrastructure has on ecological processes, threats and pressures – maintenance and renewal. There needs to be some commentary regarding the impact of infrastructure (eg pier, jetties, etc) on the ecology – interrupting or affecting the bay environment, or in some cases, infrastructure providing habitat and protection of natural assets.</p> <p>Further discussion regarding this action needs to involve councils as the committee of management and potential asset owner.</p>



	PROPOSED ACTION	SUMMARY RESPONSE
6.3	<p>Improve overall extent and condition of the Bay's natural ecosystems</p> <p><b>(Supporting Document):</b></p> <p>No specific activities provided under this action.</p>	<p>Support in principle</p> <p>While not listed as a potential partner, Councils play a significant role in managing the foreshore and coastal environment beyond high tide directly adjacent to highly valued marine environments (reefs, habitats, etc).</p> <p>Improvements to extent and condition of these natural ecosystems requires engagement with Councils as the local Committee of Management and with regard to stormwater and drainage management (under 60ha)</p>
<p><b>Priority Area: Marine biosecurity</b></p> <p><b>Strategy: Manage risks from marine pests</b></p>		
7.1	<p>Prevent introduction and dispersal of marine pests</p> <p><b>(Supporting Document):</b></p> <p>No specific activities provided under this action.</p>	Support
7.2	<p>Monitor priority locations for early detection of marine pest introductions</p> <p><b>(Supporting Document):</b></p> <p>No specific activities provided under this action.</p>	Support
7.3	<p>Respond rapidly to new introductions of marine pests</p> <p><b>(Supporting Document):</b></p> <p>No specific activities provided under this action.</p>	Support

## **Summary of core issue for local government**

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ABM member councils have highlighted a number of issues relating to the environmental management of the Bay and their role as described in the Plan.

### **Management responsibility**

14 out of the 21 proposed actions / activities reference councils as a proposed partner for implementation. This presents significant implications for local government as the resourcing and financing of these actions / activities has not been articulated in the draft Plan.

The draft Plan proposes that “following public consultation the final Plan will include a more detailed list of sub-actions, with clearly identified lead organisations”.

Councils request direct consultation prior to publication of the final Plan regarding any actions that nominate local government as the lead or support organisation.

### **Actions vs activities**

There is a lack of clarity regarding the relationship between the actions described in the plan and the activities described in the supporting document.

### **Governance**

There is confusion within the community, and sometimes between agencies, about respective roles and responsibilities for environmental management of the Bay and adjacent foreshores. Ultimately, as the ‘touch point’ for most community members, complaints come to councils.

While not within the scope of the Plan, it is imperative that whole-of-bay environmental management includes clear and effective governance arrangements.

### **Involving the community**

Many of the actions and activities described in the Plan and Supporting Document focuses on information, capacity building, and engagement of the community. Councils have management responsibility along the coast and in the catchment that directly impact on the health of the Bay. It is equally important that the State continue to support and grow capacity building for local government aligned to the goals in this Plan including stormwater management, coastal infrastructure maintenance and renewal, community engagement, coastal climate adaptation

The Government considers community involvement as critical to improving the environmental management of Port Phillip Bay. Councils understand the very high value the community place on the Bay and coastal environment. Councils are seasoned performers in involving their communities in the development of coastal management plans and decision making.

### **Scientific rigour**

There is some concern about the reliance on the community, through citizen science, to generate data and information to inform environmental management activities. It is critical that a clear reputable science program is articulated in this Plan to ensure planning and management decisions are informed by reliable science, supported by community data and information.

### **Improving knowledge of the condition of marine and coastal areas**

Developing knowledge of the marine and coastal environment is an area that could benefit from substantially more time, attention and resourcing. Councils see a need for there to be a centralised data repository that enables the collection of data at a local or regional scale and development of a state-wide 'picture' of the marine and coastal environment.

The MAV and ABM strongly support the use of local knowledge and understanding, and local enthusiasm for action. However, local decision-making must be supported by technical expertise from the State and funds to undertake research and works, where necessary.

### **Enquiries**

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