



To: SFM Environmental Solutions Pty Ltd
From: Launceston Environment Centre
Date: February 8, 2007

Re: Comments on Draft Tamar Estuary Management Plan

Introduction

The Launceston Environment Centre (LEC) is pleased to present comments on the draft TEMP. In general, we support the endeavour; however, significant amendments are required to turn the plan into a functioning strategic plan with actionable outcomes.

The LEC is particularly concerned that the document will not deliver key on-ground outcomes as it presently stands. In particular there are:

- no identified indicators for monitoring or evaluating the state of assets and the effects of management actions outlined in the plan;
- no identified funding arrangements for recommended actions;
- no recommendations for upper catchment management issues;
- no linkages with other values such as socio-economic and Aboriginal;
- no specific time-lines or recommended budgets for conducting water quality monitoring and evaluation;
- no recommendation to change the non-statutory status of the plan.

General Comments:

The plan seeks to fill the role of 'an overarching planning document' for the Tamar Estuary by building on previous work. However, the document seems to cover much old-ground instead of building on previous work. For example, the long discussion describing the various values of the Tamar Estuary is unnecessary and references to the abundant literature describing those values would have sufficed.

The isolated status of the TEMP is a significant problem. It is impossible to deliver effective management outcomes without linking the plan to other management objectives. For example, the plan could recommend a trigger to address and incorporate community or Aboriginal aspirations and interests. It is far better to produce a holistic document now, thus limiting the danger of the TEMP becoming just another reference tool.

The LEC believes a priority recommendation in the TEMP should be for the plan to become policy, and implemented under the terms of the *State Policies and Projects Act 1993 (Tas.)*. If this was to occur then the following objectives from the Act will come into play:

- (a) promote the sustainable development of natural and physical resources and the maintenance of ecological processes and genetic diversity;
- (b) provide for the fair, orderly and sustainable use and development of air, land and water;
- (c) encourage public involvement in resource management and planning;
- (d) facilitate economic development in accordance with objectives (a),(b) and (c); and
- (e) promote the sharing of responsibility for resource management and planning between the different spheres of government, the community and industry in Tasmania.

The last thing the Tamar needs is another non-binding plan.

The draft document does not include indicators for monitoring and evaluating the state of assets and the effects of management actions outlined in the Plan. Instead, the draft makes a recommendation to develop these indicators for monitoring at a later date. This deferral presents



a risk that the plan will become just another of the many documents currently existing that make recommendations for management in the Tamar Estuary.

An example of the likely outcome described above is the *Tamar Estuary and Foreshore Management Plan* (Watchorn, 2000), which provided a number of recommendations, few of which have been implemented to date. There is a risk that the TEMP may suffer a similar fate as the *Tamar Estuary and Foreshore Management Plan* with worthy recommendations that fail to be implemented.

The process of monitoring and evaluation will generate actions that have to be resourced as part of overall management of the Tamar Estuary and should be dealt with in the TEMP, not as another bureaucratic planning process at a later date. Why delay?

The timeframes and priorities for actions seem unrealistic and inconsistent. A very large number of actions are listed, often with the same priority status, but it is unlikely there will be sufficient available resources to implement them. Therefore, further prioritization is required to ensure that sophisticated, informed decisions can be made as to how best to spend any resources that may be allocated to implement the TEMP.

Some of the low priorities have a shorter time frame for implementation than high priority actions, despite a similar or lesser amount of resources being required to implement them. Therefore, the priorities should be allocated appropriate resources and time-lines, consistent with how much of a priority they are.

A large number of the actions, as well as other parts of the Plan, relate to the Tamar Estuary Program (TEP), with little or no information as to the specific make up, role, funding and institutional arrangements for its establishment. These details should be outlined in the Plan.

The Plan suggests that TEP will be a partnership between NRM North, DTAE and local government (p.101), but neglects the involvement of the community, which is identified as an integral part of any future management of the Tamar Estuary. As the organisation delivering the Northern Water Monitoring Program, the Launceston Environment Centre should be identified at this point.

While the Plan has a separate section on climate change, actions addressing climate change issues are limited and very generalized. As climate change is the most serious long-term threat to environmental values in Australia, much more work should be done to identify its impacts on the Tamar Estuary and its natural and human values. This should be considered a high priority outcome for the TEMP.

A significant oversight in the draft management plan is a failure to consider up-stream and up-catchment issues. For example, there is no discussion on management issues in the Meander or South Esk rivers. For the plan to be effective, these issues must be considered.

Specific Comments:

Page No.	Issue	Comment
p.36 & p.39		WWTPs; No mention of the four WWTPs operated by Meander Valley Council which discharge into the Meander River. This is a crucial oversight as up-catchment issues such as these do impact upon the Tamar Estuary. This could also be said for the WWTPs that discharge into the South Esk that are managed by Break O'day and Northern Midlands Councils.
39	Water quality monitoring	Suggest the second last paragraph acknowledge the role of the Launceston Environment Centre (LEC) as we are delivering the Northern Tasmanian Water Quality Monitoring project.
45	Table 3.3 E3	Launceston Environment Centre (LEC) should be acknowledged as a "lead organisation & partner" as we are contracted to deliver the Northern Water Quality Monitoring project. (N.B. Other areas where LEC might be incorporated as partners in community extension roles include actions outlined in Table 3.3 codes E18, E19 and E27)
p.55; Figure 4.1		This map should be amended, as currently it is impossible to distinguish between the different vegetation types.
62	Fauna – description of the asset	Suggest that the disease threat to Tasmania's platypus (see http://www.dpiw.tas.gov.au/inter.nsf/WebPages/LJEM-6SC9AW?open) be outlined here. It has been recorded in the Supply River.
63	Fauna – description of the asset	Chytrid disease should be added to the list of threats to amphibians. Chytrid fungus is a significant threat to frog species in the area. The disease can be spread by people and their equipment such as fishing gear moving between water bodies. Chytrid fungus disease, the platypus disease, <i>Gambusia</i> and rice grass are key community education projects for the TEMP to take on. Each of these issues are identified in the Tamar and are a threat to the ecology of the TE.
p.70; Table 4.3		Change willow scientific name to <i>Salix spp.</i> as there are many different willow taxa on the Tamar, all of which are weeds of national significance
p.76		Add Launceston Environment Centre to the list of organisations involved in the management of <i>Gambusia</i> as it has been integral to the management of this pest in Northern Tasmania.
79	Managing Biodiversity – Threats and Priority Issues	Threats to estuarine environments from climate change should also include an increase in severe weather events, such as storms. This could be particularly problematic for the Tamar due to the presence of heavy metal pollution in the sediments which can be disturbed during severe storms.

86	Table 4.4 B8	Launceston Environment Centre (LEC) would be a useful partner for this action. For example, several years ago we published Beneath the Waves which examines the marine environment at Low Head.
90	Table 4.4 B37	It is unclear as to why you would promote the State Climate Change Strategy as it is misleading and delivers no tangible on-ground outcomes of reducing emissions of greenhouse gas.
91	Table 4.4 B38	The Launceston Environment Centre (LEC) could be a partner in this action, and provide services to carry it out, as we have experience in managing biodiversity programs.
97	Management Actions for People and Management	There is a strong case for recommending a single management authority that covers the whole estuary. This would be consistent with current political thought on managing water resources in Australia.
p.106;		Second dot point: add care and community groups to list of stakeholders



Conclusion

As discussed above, the LEC supports the endeavour of preparing and implementing a TEMP. However, the draft covers much old-ground. The long discussion describing the values of the region is unnecessary. References to the abundant literature describing those values would have sufficed.

The priorities for action requires significant work and a clear indication of budget requirements and likely funding sources will help inform effective/realistic decision making on the ground.

The stand alone nature of the TEMP is a critical flaw. Failing to integrate the science and the social sciences in the TEMP will result in conflict between competing uses as the myriad of different issues associated with the social sciences have been excluded from the plan.

There is a need to include specifics relating to monitoring and particularly setting indicators for evaluation.

A recommendation should be included to have the plan implemented as policy under the terms of the *State Policies and Projects Act 1993 (Tas.)*.

If you have any questions regarding our submission do not hesitate to contact Rob Palmer, LEC Coordinator on 6331 8406.

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