

SCUBA DIVERS FEDERATION of VICTORIA

GPO BOX 1705P Melbourne 3001



To: Adrian Williams
Planning Panels Victoria,
Dept. of Sustainability and Environment,
Level 11, 80 Collins Street,
Melbourne, Victoria, 3000

A Submission in relation to the Channel Deepening EES/Project

Introduction

This is a submission from the SCUBA Divers Federation of Victoria (SDFV) in relation to the submission on Channel Deepening EES/Project.

The SDFV is an affiliation of recreational SCUBA diving clubs and the peak body representing the interests of recreational divers throughout Victoria.

As recreational SCUBA divers we all have reservations about the channel deepening project, but realize that they are mainly to do with 'short term' impact. Unfortunately the definition of 'short term' is vague and appears to be anything up to a few years.

Summary position:

The SDFV has serious concerns as to the rigour of the analyses underpinning rationale for the Channel Deepening Project.

That said, given the terms of reference for the EES, and the information provided in the EES Report, the SDFV concludes that the project is unlikely to permanently, or in the long term, cause any significant disadvantage to recreational scuba divers.

Reasons and further comments:

The SDFV as the peak body for recreational SCUBA divers recognizes that the activities of divers will be curtailed while dredging occurs, and that the marine habitat to which SCUBA diving activity pertains is very unlikely to be permanently damaged. Similarly recreational scuba divers and hopefully the marine environment, should not in the long-term suffer disadvantage because of the channel deepening project.

The SDFV as a stakeholder, has been satisfied with the EES consultation process. We were particularly encouraged by the refreshingly open and transparent procedural approach taken. However, many member clubs have expressed concerns about the risk assessment and management process. In particular, there is strong concern at the apparent difficulty in identification (in EES) of who will have overall accountability for the dredging process.

There will be, no doubt, major short-term inconvenience for recreational divers, and possibly loss of livelihood for commercial recreational SCUBA diving operators.



The ESS process and document appears to satisfy the EES terms of reference and come to the conclusion that the risks associated with the process can be managed.

Many recreational scuba divers do not believe that the EES (especially the summary brochure) provides sufficient evidence that the risk management process will prevent significant disruption to the SCUBA diving environment. The disruption referred to here is ecological damage, poor visibility and long term changes in the underwater environment.

Part of the problem is that very few people read all of the technical reports. The summary brochure mentions risk management strategies, but provides no details, no guarantees, and does not state who is responsible (and who will monitor the responsible people) for the monitoring process and most importantly the speed and method of acting and correcting detected problems

For example S8.3 of the summary brochure Tourism & Recreation mentions that turbidity issues (lack of visibility) are covered by the environmental management plan with no details – even if the summary had included a comment like 7m horizontal visibility will be one monitoring criteria that would have helped.

The SDFV does have some queries that would be nice to have clearly explained in laymans terms:

- Turbidity – The hydrodynamics report does not seem to indicate how long the turbid plumes will exist for. It appears that the data in the report shows maximum worst case turbidity after a number of days dredging, but gives no indication of how fast the visibility will improve.
- Similarly the Summary Brochure - Figure S7.4 Predicted Extent of Turbid Plumes - South of the Bay. Unfortunately it gives no time scale - how long will the plumes be visible? At what numerical value does water quality deteriorate to the point that recreational scuba diving is not feasible? (generally what would be called less than 3-5m visibility)

Unfortunately at the EES meetings there was no opportunity to raise the above questions (not due to process, just time constraints of the meetings) and until the report came out we had no way to know if they would be addressed.

One impact and mitigation seems to have been sidestepped (or perhaps we couldn't identify it in the sheer volume of reports):

Clubs and recreational divers just won't go diving in the bay while the dredging process is occurring.

Has there been any thought to compensation of regular recreational users of the bay?

The above question is raised by a comment that was passed on from a member of one of our clubs: "It would be nice if we could get a cash rebate for club diving to tow our boats elsewhere within the state - petrol money. Similarly it would be good if they financed and installed better launching facilities into Flinders & Western Port Bay as part of this project. I doubt either of these ideas would fly".

The Community Impact Assessment report (page 59): impact on recreational divers seems to concur with our instinctive feel – people will stop diving, or have to relocate activities. For club divers this means towing boats further afield than normal.

Overall, assuming the science in the EES is valid (and the public perception coming back thru SDFV member clubs is that nobody believes that they could possibly have got the ecological and specie impacts evaluated correctly and that marine biology seems to be an area that needs a lot more research) then the SDFV has to agree that the project should go ahead. Unfortunately there are concerns expressed by many about accountability and onus of responsibility for bad outcomes of the project.

The SDFV is keen to be kept informed of developments and if further comments or discussion is desired, we are more than happy to be contacted.



Thank you for the opportunity to comment.

(signed)

Daniel Grimm,
Vice President Communications,
SCUBA Divers Federation of Victoria Inc. A0025313N
www.vicnet.net.au/~sdfv
email: sdfv@vicnet.net.au

D.Grimm phone (w) 9905 2498