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Response to River Red Gum Parks Draft Management Plan

I am writing on behalf of VRFish, the peak body representing Victoria's 838,000 recreational fishers. Camping and fishing in Victoria's River Red Gum Parks is a unique experience cherished by all generations of anglers. We believe Victorians have the right to enjoy camping beside a warm campfire, to cook a camp oven meal and enjoy the tranquil surrounds of the mighty Murray River catchment while having a fish.

Our vision has synergies with the *Healthy Parks, Healthy People* philosophy of Parks Victoria. VRFish also wants to see more Victorians experience the outdoor environment and connect with nature through fishing and camping in River Red Gum Parks.

The draft plan contains many statements and strategies that are ambiguous leading to misinterpretation and some confusion. It is pertinent to note that VRFish did not have the opportunity to provide stakeholder input to Park Victoria during the preparation of the plan. We propose involving stakeholders in the planning process through a partnership approach will avoid these issues in the future.

Considering the length, detail, ambiguous language and 15-year lifespan of the plan more effort should have been placed in delivering a comprehensive community engagement plan that promoted the plan to users of the parks, offered community meetings and generated supplementary documentation such as fact sheets and Frequently Asked Questions (FAQs). Our members have expressed their disappointment at having to pay \$10 for a hardcopy of the plan.

We thank Parks Victoria for the opportunity to discuss our concerns surrounding the draft plan, providing further detail, initiating open-house meetings and extending the submission date. Below are our responses based on the following aspects of the plan and clarification provided by Parks Victoria.

Dispersed Camping

Recreational fishers seek a specific experience when camping in River Red Gum Parks. Dispersed camping allows fishers to choose sites based on the camping with friends, family, number of people, duration of stay, time of year, whether they are fishing from boats and the desired type of fishing experience. Fishers understand the level of demand for these locations and often have a suite of preferred campsites in mind. Overall, our preference is to retain the Park's underdeveloped characteristics and dispersed camping experience.

We have not been presented with evidence in the plan to substantiate 'community expectations for high-quality facilities' nor a supporting business case or cost-benefit analysis for construction and ongoing maintenance. The River Red Gum Community Engagement Panel Report (2008) is referred to in the plan which "*recognises the importance of dispersed camping and campfires to regional tourism and supports the existing camping arrangements continuing into the future*". Using this report may over substantiate a perceived need and expectation to provide high-quality facilities. The report goes on to say the panel "*support further development and promotion of the Murray River region for tourism purposes*" and "*improved resources for eco toilets, wood lots and campfire safety*". However, the report merely noted the priorities in the *Draft Regional Tourism Action Plan 2008-2011* and the panel was 'aware' of goals established within the *Victorian Nature-Based Tourism Strategy 2008-2012*.

We accept that some areas may require some work to better define dispersed camping areas over the 15 years of this plan's lifespan. Therefore, it is our expectation that before any changes take place the local community is engaged and consulted with through the regional planning process and options presented. We understand this would be enacted through annual operational park plans. Parks Victoria should communicate what criteria will be used to determine if and when natural or cultural values are being adversely affected and what mitigation strategies will be employed before management action is introduced. Considering camping areas already exist across the River Red Gum Parks we believe that community education and adequate management options can be employed to maintain a suitable the balance. We do not support the closing of any campsites or a net loss of camping areas. We support opportunities where they exist to extend camping areas to adjacent State Forrest and government land.

We understand that Parks Victoria does not have the power to move on long term campers suspecting of establishing semi-permanent camps. We ask Parks Victoria to consider amending legislation to enabling their officers to move people on and we support the approach to work in partnership with social services agencies.

Bookable Campsites

Bookable campsites are not supported. The adverse impact of this management approach is fishers will no longer have the flexibility to enjoy a community resource without planning months in advance at peak times. Fishers monitor a range of environmental cues such as

water temperature and flows to plan fishing activities. Fishers respond to recent fishing reports to increase their catchability and target fish when they are on the 'bite'.

If touring campers desire to have the convenience and guarantee of accommodation at specific dates and locations, existing infrastructure already exists across the region. We would argue offering bookable campsites in the River Red Gum Park will deprive important economic benefit away from nearby regional towns who have caravan park and hotel/motel accommodation. A cost-benefit analysis has also not been provided on the merits of bookable campsites. It is unclear what is the cost for the provision of infrastructure and ongoing maintenance of bookable campsites.

Campfires

After clarification, we welcome Parks Victoria's commitment for Victorians to continue enjoying campfires in accordance with Victorian fire regulations. Firewood collection should be continued to be permitted as currently managed with provision for firewood collection at high visitation sites, subject to stakeholder consultation.

The Victorian Recreational Fishing Code of Conduct respects Aboriginal culture, heritage and values. We do not believe it is necessary to include the qualifier that campfires will be not permitted or only permitted in fireplaces in each and every VEA strategy if cultural heritage has been infringed. These statements have created confusion. Instead, managing for, and respecting cultural heritage should be an umbrella strategy and enacted when protection is required.

Road Access and Tracks

We support Parks Victoria's commitment to work with the community and Park users in the management of roads and tracks. Our fishers must continue to have access to their favourite camping areas and fishing spots. It is our understanding that annual operation plans for each Park would provide detail on specific actions or project not this draft plan. For example, in the Kulkyn-Liparoo VEA section on page 82 it states, "*for example, remove road access to Emmerts Bend, Britts Bend, Station Bend and Deep Bend.*" We consider these statements outline very specific actions and the wording raises confusion if these road closures are merely a suggestion, have already been predetermined or if they have already been identified by previous community consultation.

Boating Infrastructure

Recreational fishers through VRFish and local fishing clubs look forward to the opportunity to work in partnership with Park Victoria, Boating Industry Victoria and other industry stakeholders to support the management of boating access and infrastructure and deliver much needed upgrades. Given the large fluctuations of water levels of our rivers boat ramps must to be well designed to cope with changes in water levels, has resilience against flooding events, suitable access and supported by an appropriate maintenance program. Throughout the plan, the language does indicate that an assessment of boat ramps could lead to a rationalisation or closure of boat ramps which concerns us greatly. Parks Victoria must acknowledge that launching facilities are could be classed and informal and formal boat ramps. As such, some informal boat ramps may provide an excellent service while not

meeting Australian standards. VRFish would like to see a net increase in boat ramps in response to tremendous efforts being undertaken in Victoria and across the Murray-Darling Basin to recover our native fish populations, develop high-class recreational fisheries and to keep in line with the Victorian Government's *Target One Million* policy. Closing informal boat ramps would not be supported without necessary community consultation.

Table 7.4 on page 121 must be amended and not appear as it currently stands in the final report. The table shows a red 'N' against **Boating: motorised craft** all but two VEAs. This has caused much angst in the fishing community as the table can easily be misrepresented to fishers that boating will not be permitted in these areas. Parks Victoria have clarified with VRFish there will be no change to boating.

The statement in the Warby-Ovens VEA section that states motorised boats are not suitable in the VEA must be clarified and explained. Through communication with Parks Victoria we are led to believe this statement only relates to the potential need to manage erosion in the area due to boat wake and in no way restricts fishing. The final plan must clearly articulate that fishing from boats will not be impacted in the Warby-Ovens VEA.

Litter

VRFish is also concerned about the dumping of household and commercial waste in our River Red Gum Parks. Our advice to fishers is to always take out what you bring in and remove rubbish from around the campsite. A combination of education and enforcement is required.

Bait Collection

The plan needs to clarify that the prohibition of collecting live bait in the park does not relate to catching yabbies' and fish from waterways in accordance with Fisheries regulations.

Code of Conduct

VRFish has developed a code of conduct for fishers accessing River Red Gum Parks to promote responsible behaviours and attitudes that lead to continued access, and our right to fish and camp and respect for conservation values.

VRFish supports and promotes the following:

- **Take out what you bring in**
 - Remove all of your rubbish when you leave. Don't leave items such as bottles and cans in campfires and around camping areas.
- **Firewood collection**
 - The tradition of harvesting firewood for a campfire must continue. Therefore only take firewood from designated collection areas.
- **Our right to access and camp**
 - The tradition of dispersed camping within our river red gum parks must be allowed to continue for future generations. Ensuring you stick to marked roads will allow us to continue to enjoy this traditional right.
- **Respect cultural heritage sites**

- Do not disturb or damage Aboriginal heritage sites. Scar trees, shell middens and other indigenous heritage sites are sacred to traditional owners and an important part of our history that must be preserved.
- **Responsible use of campfires**
 - Our right to light and enjoy a campfire under Victorian regulations all year round, for the purposes of comfort and cooking, must remain within our river red gum parks. Ensure you follow and abide by current Victorian Fire regulations at all times.
- **Protect native vegetation and habitat**
 - River red gum forests are home to an incredible array of native flora and fauna, and are some of the most biodiverse places in Australia. Help keep it that way by conserving vegetation and habitat that supports our native fish and wildlife.

VRFish has a role to play in educating and involving fishers through the promotion of codes of conduct, supporting voluntary compliance, alerting fishers to safety information and benefits of environmental water. VRFish welcomes the opportunity to become a key partner in communicating to fishers and promoting greater stewardship of River Red Gum Parks.

VRFish looks forward to viewing the final draft plan for further comment before it is endorsed and final version released.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rob Loats', with a stylized flourish at the end.

Mr. Robert Loats
Chair
Victorian Recreational Fishing Peak Body

13 October 2017