

Adelaide Dolphin Sanctuary
Draft Management Plan 2024
Response by Friends of Port River (FPR)

Response to the draft 2024 Plan

After reviewing the draft 2024 Management Plan, it's regrettable that the draft Plan is totally inadequate in its proposed response to the *Adelaide Dolphin Sanctuary Act 2005*.

This draft Plan, if adopted, suggests that the SA Government has not and will not commit to actions that adequately and continuously respond to the objectives of the Act, including sustaining the dolphin population; maintaining, protecting and restoring key habitat features; improving water quality; promoting ecologically sustainable development.

Much of the ambition of the Act and the 2008 Management Plan have been watered down in the draft 2024 Plan, raising questions as to whether the ADS Act now has any meaning.

Pp2 indicates that

the Plan recognises that achieving these objectives (of the 2005 Act) and strategies will require a long-term, strategic, and coordinated effort.

However, the Plan fails to identify how that *long-term, strategic, and coordinated effort* will be achieved and how other agencies will actively contribute to realising the Act's objectives. The implementation of the Plan seems to fall overwhelming to an understaffed NP&WS.

Given the Plan's limitations, and the lack of rationale for this timeframe, it is further concerning that this is a proposed seven-year plan.

Challenges

The Challenges on pp5 of the Plan make no mention of the cluster of dolphin deaths and that the number of resident dolphins has reduced from est 30 or more (2008 Plan) to 20 now. Surely that is a challenge for the ADS.

A further challenge is community perceptions of the Government's management of the ADS. The cluster of dolphin deaths prompted great concern across Adelaide as to the cause(s) and led to lots of local speculation and criticism that the EPA was allowing the Estuary to be polluted e.g. reports from RSAYS, and that NP&WS staff weren't adequately caring for the dolphins.

A general lack of confidence in the Government's protection of the dolphins, and in Government's safeguarding of the health of the Port River, are significant challenges and need to be acknowledged; the ADS is being managed (or not) in a context of strongly held community perceptions.

A Select Committee was convened in June 2022 to investigate the dolphin deaths and the SA Government has not yet released its response to the Committee's [interim report](#). The Minister advised a Port Adelaide Environment Forum in July 2023, that the Select Committee's recommendations would not necessarily protect the dolphins, making it even more urgent to understand what the Government is going to do.

Pressures and threats

Figure 2: Conceptual diagram of pressure and threats to dolphins in the 2024 draft Plan highlights

- Potential diseases and toxicants from stormwater
- Discharge of treated effluent from Bolivar
- Industrial pollutants such as heavy metals, PCBs, PFAS and hydrocarbons from current and historic inputs.
- Large amounts of pollutants from more frequent heavy rainfall events
- Waterborne diseases resulting from water quality issues
- Airborne viruses
- Dredging
- Increased boating and shipping

So the obvious question is what is the Government, and which agencies specifically, are addressing, and/or are going to address, these issues? Where is that reflected in this Plan? What are the proposed deliverables and in what time frames?

It's notable that Theme 1: *Protecting dolphins from threats* has been limited in the Objective and Strategies to protecting dolphins *from direct physical harm*. Figure 3: *Potential pathway to mortality for a dolphin* seems to suggest stressors that go well beyond *direct physical harm*.

Protection of the Environment

Pp4 of the 2008 Management Plan advises that

The Adelaide Dolphin Sanctuary is about much more than protecting dolphins, because we cannot protect them without protecting the environment where they live....

Historically one of the main barriers to integrating environmental management in the Port area has been the lack of coordination across government agencies. The many diverse activities in this small area ... are not necessarily managed in consideration of each other, or in consideration of the cumulative environmental impacts of the activities.

There is currently no established process to collectively assess a range of diverse activities to determine their combined, long-term environmental impact....

The ADS Act provides a mechanism for integrated management of activities by defining specific environmental outcomesby requiring decision makers administering other legislation to have consideration of the ADS objects and objectives.

While it will be difficult to assess the impacts of all activities, the unification of purpose is the first step in achieving the capacity and will also give a means of assessment over time.

It is not at all apparent that there is a unity of purpose by agencies administering other legislation, nor from the many diverse stakeholders in the Estuary.

The need to plan and effectively manage the Estuary was highlighted by BIPEC in 2000, by the 2008 ADS Management Plan, in the interim 2022 report of the Select Committee on Dolphins (and submissions to the Committee) and recently in the Estuary Care Foundation's [Future Vision](#).

To date the SA Government does not have a coherent response to how the Estuary will be managed while sea level rise, land subsidence, storm surges are growing threats and the Estuary is under growing development pressures including growth by Flinders Ports and transport infrastructure, in defence facilities, renewable energy projects on Torrens Island, residential population etc.

Healthy Estuary

Theme 2 is *Maintaining and enhancing the quality of dolphin habitats*; a highly commendable objective. Pp10 identifies *several threats that impact ecosystems in the sanctuary* and later says *we can develop a comprehensive plan to mitigate the negative impacts on the dolphins and their habitat*.

It's not at all clear who is going to implement the Strategies under Theme 2 e.g. who will lead the *work with relevant researchers and agencies to monitor the health status of the Sanctuary's ecosystem, identify threats and develop adaptive measures* and who will be responsible for implementing the adaptive measures? Which agencies and how will they *ensure any threats associated with development, recreation, tourism and industry are minimised to protect seagrass, mangrove and samphire habitats and supporting species*.

Pp2 of the draft 2024 Plan indicates that

The Sanctuary is also protected through a catchment-wide approach guided by regional landscape plans which are prepared under the Landscape South Australia Act 2019.

This protection could be made real by the ADS 2024 Management Plan including a commitment (by Green Adelaide) to the development of a long term conservation and restoration plan for the Estuary.

One of the four key objectives of the Estuary Care Foundation's [Future Vision](#) is a Healthy Estuary and the Vision outlines strategies to minimise risks and harms, undertake conservation and restoration and mobilise support. Underpinning actions towards a Healthy Estuary would be a long term conservation and restoration plan for the Estuary.

Conversations about the development of such a plan have occurred at a workshop convened by Flinders University in late 2023 and at the June 11th *Barker Inlet Port River Forum Agenda* convened by Green Adelaide's Coast and Seas team which attracted over 50 participants from industry, government, universities and community groups.

Environmentally sustainable development (ESD)

The 2008 Plan was much more specific about proposed strategies to achieve ESD in the Estuary e.g. investigating establishment of an industry stewardship program (pp18 and 21). In the last 10+ years FPR cannot recall public mention of Government working with local industry on such a program, except through the EPA's regulation of companies that pollute.

FPR is aware that new developments may be referred to the NP&WS, the CPB, the EPA for comment, however such responses do not overcome the persistent difficulty identified in the 2008 Plan that *there is currently no established process to collectively assess a range of diverse activities to determine their combined, long-term environmental impact.*

Role of NPWS

This submission is in no way a criticism of NP&WS staff working in the Estuary, rather it reflects FPR's dismay that the nature and level of the responses proposed in the 2024 Plan are in danger of setting NP&WS staff up to fail.

Accountability

The 2008 ADS Management Plan indicated that

This is the first time the Government of South Australia has attempted management of a complex marine environment by legislating requirements across government. The government is committed to ensuring that that existing and future economic, social and recreational activities are ecologically sustainable. Pp6

Pp5 promised An Annual Implementation Program .. which will set specific annual targets and tasks for the coming year to achieve the actions established by the Management Plan and assess the achievement of the previous year's program.

While it's understood that a short report on the ADS is included in DEW's Annual Report, there is no public evidence of *An Annual Implementation Program .. which will set specific annual targets and tasks.*

While SA Governments take credit for legislated protection of our iconic dolphins, legislation on its own won't ensure that the Objectives of the Act are met. This draft Plan suggests that the aspirations of the Act are not backed by Government commitment.