

1 July 2022

Ms Caitlin English  
Deputy State Coroner  
Coroners Court of Victoria  
65 Kavanagh Street  
SOUTHBANK VIC 3006

Dear Ms English

Parks Victoria is writing in response to the recently released Coronial investigation into the deaths of Ross and Andrew Powell, Court Reference: COR 2019 2001 and COR 2019 2002.

Parks Victoria acknowledges your findings in the matter and relevant recommendations and provides the following responses.

*"I recommend Parks Victoria work with Life Saving Victoria to develop adequate signage warning of risks of swimming along the Port Campbell coastline. Particular consideration should be paid to size, location, audience, and the provision of information in languages other than English. Signs should also provide unique emergency location markers or codes to quote to emergency services in the event emergency services are required".*

Prior to 2010, the Parks Victoria Signage Manual was drafted to be consistent with The National Aquatic and Recreational Signage Style Manual (NARSSM – authored by Lifesaving Victoria).

The NARSSM was superseded by AS/NZS 2416 (Parts 1 – 3), the Australian Standard specific to water safety signs and beach safety flags after 2010. The Parks Victoria Signage Manual has since been maintained consistent with this standard that provides consideration for placement, size, height, legibility of the sign, proximity to the hazard.

It is Parks Victoria's understanding that AS/NZS 2416 is a locally contextualised version of the International Standard (ISO 20712). The Australian version is essentially the same standard, except for changes to suit the Australian context. This includes increased flexibility in terms of design, positioning, sizing and number and type of signs (primary, secondary etc.). Underpinning all applicative considerations is the need to use a risk assessment approach (AS/NZS 2416.3 Clause 4.1).

Parks Victoria did use a risk assessment approach to design and site water safety signs at the two Sherbrook River public beach entry points within Port Campbell National Park. The assessment approach was based on the International Risk Management Standard (ISO 31000). Signage at this location is consistent with i) the applicative context of the Water Safety Standard, and ii) the Parks Victoria adopted risk assessment process. Signage specific to this event location, and nearby locations are reviewed. This is consistent with ISO 31000 promoting the need for iterative monitor and review processes.

Language considerations are outlined in Clause 7.2.6. of the AS/NZS 2416 Water Safety Signage Standard. However, overriding any language consideration, is the need for signage content to be instantly recognisable using symbols as a primary communication mechanism. Symbols are not only preferred to counteract language barriers, but also factor life stage communication considerations for younger, older and illiterate visitors.

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It is Parks Victoria's understanding that in the Australian water safety context, there is little evidentiary support for multi-lingual site-specific signage. It would be prudent to examine the likely effectiveness of this approach against baseline recognition and recall rates prior to adopting any implementation program. Evaluating the effectiveness of the approach would include expert subject matter bodies, such as Life Saving Victoria.

Emergency Marker use is another consideration to be factored into the water safety signage review process. The program sponsored by ESTA, is another program that requires the land manager to make decisions based on risk assessment outcomes (Emergency Marker Signage Guidelines p.7)<sup>1</sup>. When, where and how Emergency Markers are used is incorporated into the risk assessment review process undertaken by Parks Victoria.

Any executable actions, resulting from the risk assessment review will need to i) show prudence in terms of being an effective risk control mechanism increasing the overall safety of visitors, and ii) be pragmatic in terms of Parks Victoria's resourcing capacity and capability.

*"I recommend Parks Victoria consider providing rescue/ flotation aids along non-patrolled areas of the Port Campbell coastline so that they can be deployed while patients await the assistance of a Marine Search and Rescue service".*


Parks Victoria manages approximately 70% of Victoria's coastline, and it is not normal practice to provide rescue / flotation aids (life buoys) at beach access points. One example of where life buoys are provided by Parks Victoria are along the city reaches of the Yarra River outside of city bars and restaurants, which were inherited from a previous land manager and are in a very different park context to coastal locations. The experience of Parks Victoria is that life buoys in unstaffed locations are frequently stolen or vandalised making access to them in an emergency unreliable, potentially provide a false sense of security and that drownings unfortunately occur in their vicinity regardless.

The successful use of life buoys is contingent on several factors which, to date, Parks Victoria has considered too variable to ensure their effective use beyond these legacy locations. These include that the life buoy must be present and intact in the specific location required, not missing due to vandalism and theft, a person must be present and capable of deploying the device, the person in the water must be capable of using the device, and the weather conditions must be suitable for the use of the device.

Parks Victoria is currently working with Lifesaving Victoria to trial and evaluate the use of lifesaving devices at a high-risk location. This will inform future decisions and risk management processes to assess the suitability of life buoys as a safety device in public areas.

Should you require further advice on this matter please contact Margaret Gillespie, Executive Director, People, Safety and Risk and Chief Legal Counsel on 8427 2950.

Yours sincerely



Matthew Jackson  
Chief Executive Officer

<sup>1</sup> [https://www.esta.vic.gov.au/file/2057/download?token=aPU9oM\\_e](https://www.esta.vic.gov.au/file/2057/download?token=aPU9oM_e)