

Mr Rob Edkins
Chief Executive Officer
SCRIPT – Strategy Submission
Reply Paid 72186
444 Albany Highway
ALBANY WA 6330

The South Coast Regional Strategy for Natural Resource Management

Dear Mr Edkins

Recfishwest is the peak body representing the interests of the estimated 643,000 recreational fishers in Western Australia. We are formally recognised and funded by the Government in that role and have regular meetings with the Minister for Fisheries and with the Minister for the Environment as well as interaction with other Ministers and Government agencies on a range of topics.

The habitat in which fishing is carried out and access to those areas are particularly important to Recfishwest and we place the highest priority on preserving the future of recreational fishing and the resources it depends on.

Recfishwest wishes to respond to the South Coast Regional Strategy for Natural Resource Management (Strategy) but note that we have not been consulted on this strategy even though recreational fishers are a major stakeholder and one of the groups most impacted by the marine/estuary parts of the strategy.

Many recreational fishers feel extremely uncomfortable about the marine conservation processes employed to date and the disproportionate impact on recreational fishing interests without adequate engagement of the sector or an objective assessment of the impact. The lateness of this response is regrettable but we point out that we were only notified of the existence of the Strategy on Wednesday 4 August.

Recfishwest notes with regard to this Strategy, the Hon Geoff Gallop, Premier of Western Australia cosigned the Intergovernmental Agreement on a National Action Plan for Salinity and Water Quality that included under the heading of **“Delivery mechanism Section 16. The Parties agree that catchment / regional bodies should have: ii) Transparency and equity in decision making, and effective mechanisms for participation by all relevant stakeholder groups.”**

Recfishwest is disappointed by the exclusion of proper recreational fishing representation that would have resulted in a more pragmatic Strategy had we been actively involved in the consultative process prior to its release. The Strategy does not recognise the National Oceans Office Regional Marine Plans for all Australian waters that includes a plan for the south west of Western Australia to commence before the end of 2004. The Strategy fails also to recognise the state Government Bioregional Marine Plan for state waters.

Having noted this, Recfishwest has provided the following specific comments concerning the Strategy. With some exceptions as covered below, we are in general agreement with the broad thrusts of the strategy.

S. 1.1 Recfishwest is disappointed at the limited and sometimes negative coverage of recreational fishing throughout the *Regional Overview*. There is no mention of recreational fishing or the tourism and economic activity it generates. The recreational fishing industry is estimated to be worth over \$500 million dollars to the Western Australian economy, making it an important contributor to the overall Gross Domestic Product of this state. Similarly **S. 1.5.2** (p. 27), **S. 2.3.1** (p. 71), and **S. 2.3.3** (p. 73), regrettably fail to mention/recognise recreational fishing.

S. 1.8.3 (p. 43) regarding major stakeholders involved in Natural Resource Management noticeably excludes the two groups most affected by marine/estuarine issues. The list of Industry Groups should include Recfishwest as the peak representative group for recreational fishers and the Western Australian Fishing Industry Council (WAFIC) as the peak representative body for commercial fishers.

S. 2.5 (p 106) states “*To effectively conserve the biodiversity of the Region, a conservation reserve system needs to be comprehensive, adequate and representative (CAR)...*” Recfishwest believes that the existing marine reservation system on which this statement is based is fundamentally flawed in that it overly emphasizes area controls in the form of no take sanctuary zones at the expense of a holistic treatment of marine conservation measures.

Recfishwest is not completely against no-take zones, provided areas proposed for reservation have clear and sound reasons for the conferring of exclusive conservation status. Recfishwest recognises that there are some justifications for the creation of marine reserves and no-take zones and there will be situations in which these will outweigh the attendant consequential loss of amenity which may fall on recreational fishers.

I have attached a full copy of Recfishwest’s Policy on Marine Reservation and No Take Zones for your information and inclusion as part of these comments.

S. 2.5 (p 107). *“There is a large recreational boating sector along the south coast that consists predominantly of vessels under 10 metres that can be towed on trailers and launched at boat ramps due to the dangerous sea conditions and a difficult coastline”.*

The meaning of the above statement is as absurd as it is unclear. Quantification of what is considered to be *“a large recreational boating sector”* would lead to a less emotive statement. Boating statistics are available and we suggest they are used to justify comments. We also point out that the *“recreational boating sector”* does not *“consist predominantly of vessels under 10 metres”* but rather and more accurately vessels less than 6.5 metres. Only 11% of total boat registrations for 2004 were for vessels greater than 6.5 metres, 89% were less than 6.5 metres.

If the statement is attempting to give the impression that recreational boats are large enough to safely traverse the *“dangerous sea conditions and a difficult coastline”* it is another example of bias and an attempt to portray ease of access to the coastal marine environment. More accurately the majority of recreational boats are restricted in their ability to access much of the 900km of coastline due not only to *“dangerous sea conditions and a difficult coast line”* but also to the very limited number of access points.

Background Paper Six, Marine Biodiversity Conservation of the South Coast Marine Bioregion.

This paper claims *“to provide an overview of statutory and non-statutory marine biodiversity conservation approaches, information on threatened species and species considered at risk, threats affecting those species and potential management directions. It discusses marine-based activities and the impacts of those activities on economics, society and environment.”*

Recfishwest is concerned that the background information made available to the public for comment is lacking in both quality and quantity. The background paper lacks sufficient detail to support the above claim and makes many statements which are not accurate, are emotive in tone, are not necessarily relevant to the area under discussion or are not supported by any facts or references. Recfishwest strongly advocates that the background paper is rewritten. Discussion with the Department of Fisheries has revealed that the Department advised SCRIPT of their concerns regarding the accuracy of the background paper and requested it be removed from the Strategy, yet the Department is listed as a contributor, giving the impression that it supports the document.

For example; **S. 2.0** *“It is **expected** that the high level of endemism throughout the south coast terrestrial area will also occur in the sea Essentially, this **endemism can only be expected as there has been little research undertaken** in the south coast marine bioregion and that which has **can only be considered provocatively indicative**. ... While very little is known about marine biodiversity of the south coast marine bioregion it is **expected** that endemism will be high ...”*

S. 2.3 “*No protected breeding habitat sites for reef dwelling and resident species*” is listed as a primary threat, with no data on the need for these, no mention of the vast areas which are already protected by their location and their isolation, seemingly with the intention of justifying the need for no take areas. Also listed as a primary threat is the “*limited management of commercial and recreational fishing pressures*”, there is no mention of the nature of, or the impact of this claimed threat on the marine biodiversity and there is no acknowledgement of the actual and proposed management arrangements for recreational fishing including **Fisheries Management Paper No. 182; A Quality Future for Recreational Fishing in the South Coast - A Five Year Strategy for Managing the Recreational Component of the Catch** (FMP 182) and proposals for **Integrated Fisheries Management (IFM)**.

S. 2.3 Matrix 1 contains undefined terms, such as “*Vulnerable Species*” “*Priority 1-3 Species*” or broad combinations such as “*marine pelagic fish species*” which implies that all species in that group have the same threat and value. As such the matrix has limited value in defining the topic.

S. 3.0 Mentions that “*Two Peoples Bay area to be given consideration sooner than later due to increasing pressures on what appears to be a highly diverse and unique marine area,*” with similar comments for Fitzgerald River area, but without giving any information in support of these claims.

S. 4.3 States “*there are significant environmental costs associated ...*” without quantifying these in any way, and includes “*Conflict with commercial fishers*” as an example of an environmental cost, which it clearly is not. There are existing processes in place to deal with conflict between user groups that are not discussed or acknowledged in the Strategy. The previously mentioned IFM process will deal with specific allocation issues between recreational, commercial, conservation and indigenous groups. Furthermore under Guidelines for Voluntary Resource Sharing, the Department of Fisheries mediates resolution of conflict over fishery resources and catch share disputes.

S. 4.4 One illegal incident is pointed out as an example of the inability of regulators to monitor collection in a coastline of over 900 kilometres, including large tracts of wilderness. This inability is self evident and justification for getting broad community support for proposals so that the community will help with monitoring and reporting illegal activities. Recreational anglers are an important part of this monitoring and reporting network through their activities and widespread presence throughout the Region. Proposals and allegations which unfairly affect recreational anglers may reduce the willingness of people to assist.

S. 5.1 We disagree with the term “*Recovery*” because that term implies that the situation has become worse than acceptable. *The community* need to be pragmatic about some issues and accept that there may well be noticeable effects in areas of high use, because it may not be possible to remove the noticeable effect without the social cost being more than the community is prepared to bear.

We agree with the need for management and enforcement of fishing quotas, but not under the heading of “*recovery.*” This is a normal ongoing requirement and is managed by the Department of Fisheries. There is no acknowledgement of the Department of Fisheries recently released FMP182.

We disagree with the item “*Marine Conservation Reserves with no take zones*” in this section. Any introduction of marine conservation reserves and no take areas should be based on adequate scientific evidence to support the requirement for additional protection of resident reef-dwelling species. FMP 182 includes increasing the minimum legal length for western blue groper to 600mm and developing spear fishing exclusion zones or a total spear fishing prohibition for the take of this species which currently carries an allowable bag limit of one fish. Sound fisheries management is required to ensure that fishing effort is not re-directed effectively increasing pressure on those areas bordering no-take zones.

S. 5.2 Recfishwest agrees that marine-based commercial and recreational fishing needs to be conducted within a framework which ensures that there is increased certainty and long term security for the resource and the fisheries. However we disagree with the statements using blue groper and queen snapper as examples of heavy recreational fishing pressures with the implication this occurs over significant parts of the South Coast region. As previously mentioned, the South Coast has very large areas that recreational boats are not able to reach or to operate in safety except in rare calm periods. These areas provide large natural sanctuary areas in which there is no significant recreational fish catches.

We agree that commercial and recreational fishing needs to be conducted within a framework which ensures that there is increased certainty and long term security for the resource and the fisheries. This is a fundamental Recfishwest objective, and we believe is best managed primarily through fisheries management, not the overlay of large closed no take areas.

Conclusion

It is extremely unfortunate that this Strategy has been released for comment without vital information on the key management initiatives of fish resources. Such an omission detracts from the credibility of the paper and also belittles the considerable efforts of both the recreational fishers and the Department of Fisheries. The lack of recognition of the various state and federal marine planning initiatives is also absolutely unacceptable.

Recfishwest maintains that appropriate fisheries management has a far greater potential for the long term conservation of fish, than simply closing areas to fishing. There is an obligation to be considerably more prescriptive regarding the risks that threaten the marine biodiversity of a particular area. Recfishwest is extremely uncomfortable about the disproportionate impact on recreational fishing interests without adequate engagement of the sector or an objective assessment of supposed impacts.

Recreational fisheries management, coupled with changing community attitudes has made enormous strides in implementing a more conservative approach to aquatic natural resource management. Recreational fishers have instigated seasonal closures for pink snapper in the metropolitan region and total protection for species such as the hump-headed Maori wrasse. However, the Strategy as presented does not recognise any current fisheries management and the role it might play in helping to protect marine biodiversity.

While Recfishwest is not opposed to the regional NRM approach and can see considerable benefits in engendering community support in the protection of natural resources we also recognise that the marine environment is a resource for the entire community and the importance of a strategic, state-wide outlook must not be overlooked.

Please do not hesitate to contact our office should further information or clarification be required.

Yours sincerely

Mark Pagano
A/-Executive Director

16 August, 2004

CC Hon Dr Judy Edwards, Minister for the Environment.
Hon Kim Chance, Minister for Agriculture, Forestry and Fisheries.
Peter Rogers, Executive Director, Department of Fisheries.
David Borthwick, Secretary, Department of Environment and Heritage.
Doug Bathgate, Chair, Recreational Fishing Advisory Committee.