

Ms T. Shea
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Locked Bag 104 Bentley Delivery Centre WA 6983

Dear Ms Shea

Submission to Policy 18 – Recreation, Tourism and Visitor Services

Recfishwest wishes to respond to the abovementioned policy statement. We apologise for the lateness of this response but point out that the required timelines for submission were quite unrealistic.

We are the peak body representing the interests of the estimated 645,000 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.

Recfishwest is only concerned with those aspects of Policy 18 that are relevant to access to marine or freshwater resources, whether they be the aquatic environment itself or access to that environment through CALM managed lands. A broad reading of the document in relation to these key issues provides us with some concerns.

These concerns should be read in the context of very extensive interaction over the past five years between our organisation, CALM's Marine Planning Branch and the Minister for the Environment. It is not too blunt to say that we have been, and are becoming increasingly dismayed with the impact of CALM's initiatives and proposals on access to aquatic resources for recreational fishers.

Proposal after proposal is being put before us, and with each proposal, our stakeholders' interests are being systematically ignored. The establishment of the greatly flawed Jurien Marine Reserve is the most obvious example of our concerns, but similar biased outcomes are predicated for Dampier Archipelago, Capes to Capes, and Rowley Shoals to nominate just the most recent and important. We view with considerable concern the apparent inability in CALM/MPRA parks to impose zones that would impact on commercial fisheries or aquaculture, commensurate with the impacts falling on recreational fishers.

In addition the Western Australian government system (over successive governments) has completely failed to integrate the responsibilities and contributions of the two key departments, CALM and the Department of Fisheries in relation to fishing impacts in marine reserves. It seems to us, time after time, that CALM elects to take an exclusionist approach where proper application of powers under the *Fish Resources Management Act 1994* would result in a better outcome for all stakeholders including the environment.

Recfishwest believes there is an over-concentration of marine conservation effort by CALM on Marine Parks and in particular via sanctuary zoning. This should not be taken to mean that Recfishwest is opposed to marine sanctuary zoning per se. Simply that we believe that CALM has demonstrated systematic and ongoing bias. Please see below for our articulated views on this matter. Copies of our extensive correspondence with CALM will be accessible from your files.

It is in the above context that we are inclined to make only brief comment regarding Policy 18.

Given Recfishwest's very jaundiced view of CALM's bona fides, we are very sceptical about Policy clause 4.9: "*The Department will endeavour within the resources available to it to provide an appropriate level of supervision of activities on the lands and waters it manages. This is particularly important where natural and cultural values may be impaired. If this cannot be done, the activity should where practicable be restricted, relocated or eliminated*".

It is our strong view that CALM subscribes to a 'lock it up mentality', frequently without credible rationale for the exclusions it proposes, and then when proposals are implemented, utterly fails to resource the very things on which the exclusions are supposedly predicated.

Therefore we strongly object to the implication of this clause that activities should be restricted, relocated or eliminated in cases where there are concerns that natural and cultural values *may* (italics added) be impaired.

This clause as drafted is simply a license for CALM managers to take an over precautionary view in cases where as is common only a suspicion, or even worse prejudice, exists against the impacts of a particular activity such as recreational fishing.

Rather we contend that the onus must be on the manager, CALM, to justify the restriction; not simply implement such 'on suspicion'.

The policy guidelines relating to recreational fishing appear unproblematic, referring mainly to the existing legislative base - it is not the legislative base which is the problem. Rather, Recfishwest's difficulties lie with CALM's relentless inability to apply the legislative base in a fair, unbiased manner.

Recreational fishing is either the second or third most popular activity in parks where this activity is possible, yet there is never an explicit acknowledgement of the needs of this group (as opposed to the smaller distance hiking groups that are extremely well serviced) or an attempt to provide specific access or facilities.

Instead we are increasingly frustrated at attempts to portray the unacceptable activities of a tiny minority of recreational fishers as typical of the entire recreational fishing community when an increasing majority are actually at the forefront of aquatic conservation. Indeed it was recreational fishers who proactively implemented a seasonal closure for snapper in Cockburn Sound, protection for hump head Maori wrasse and are currently lobbying for total protection for lampreys, Queensland groper and the barramundi cod.

Unfortunately Recfishwest believes that there is a culture within CALM to continue to victimise recreational fishers and we hold out little hope that a largely cosmetic policy such as this will be able to address the more fundamental problems.

We trust that our comments will assist in the review of the Policy Guidelines for recreation, tourism and visitor services. We look forward to your advice on the outcomes.

Yours sincerely

Frank Prokop
Executive Director

19th February 2004

Recfishwest Policy

Marine Reservation and No-Take Zones

Note. This policy is to be read in conjunction with appendices 1 and 2. Appendix 1 provides a general overview to Recfishwest's concerns with regard to no-take zones being employed as the key measure used in Western Australia for marine conservation; while appendix 2 provides the arguments for abandoning the existing system of marine conservation based on the Wilson report, in favour of a more holistic approach.

Recfishwest is concerned at the potential for cumulative loss of recreational access to Western Australian waters either currently utilised by recreational fishers or for areas that may be utilised in the future.

However, Recfishwest also recognises that;

- 1.** There are some justifications for the creation of marine reserves and no-take zones and that there will be situations in which these will outweigh the attendant consequential loss of amenity which may fall on recreational fishers.
- 2.** Currently the State's marine reservation system is underpinned by the Wilson Report recommendations in relation to marine reservation (through the Department of Conservation and Land Management and the Marine parks and Reserves Authority) and the Fish Resources Management Act 1997 (through the Department of Fisheries) in relation to Fish Habitat Protection areas.

Recfishwest believes that the existing marine reservation system is fundamentally flawed in that it overly emphasises spatial control mechanisms at the expense of a holistic treatment of marine conservation measures. Recfishwest also strongly believes that this problem requires urgent resolution.

Appendix 1 of this policy provides an overview of our general views on reservation while appendix 2 provides a detailed justification for a shift away from marine reservation as the primary measure for marine conservation.

In the *interim* period in the shift to a holistic model, and in the context of the existence of the current conservation system, Recfishwest will provisionally support proposals for marine reservation and no-take zones where the following considerations are met:

- Areas proposed for reservation should have clear and sound reasons for the conferring of exclusive conservation status.
- In general, no-take areas for marine conservation (ie, not for 'general' purposes) should be located as far as possible in areas which are not subject to existing community incompatible usages.
- Decision making must be transparent and the rationale for reservation clearly articulated;
- Stakeholder consultation should be extensive and outcomes from consultation clearly result in equitable outcomes between and for existing stakeholders;

- For no-take areas created for conservation, areas to be reserved should be as large as is needed to fulfil their stated purposes, but no larger. Similarly, areas proposed for scientific reference studies should also be only as large as would meet the requirements of those purposes but Recfishwest recognises that replications of such zones may be required for benchmarking and comparative studies;
- Areas to be reserved for biodiversity purposes should add to aggregate reserved bio-diversity; that is, areas should not simply duplicate reserves with similar ecosystems already reserved elsewhere unless there are compelling reasons to do so; the areas to be reserved should be large enough to provide a broad genetic for all aquatic species;
- In areas for which reservation is proposed, but for which there is significant current recreational fisher usage, there will be an increased onus for the proposing agency to articulate the benefits to the wider community which would justify the loss of amenity to the existing recreational fishing stakeholder;
- Where possible, a loss of amenity in one or more areas of a marine park should be compensated for by the creation of recreational fishing zones in other suitable areas of the same or different parks; noting however the legitimate rights of other stakeholders;
- Increases to the conservation estate should come with new monies for management requirements, but, in any case, should not be supported from the existing budget of Fisheries WA;

Taking into account the reservations expressed above, Recfishwest will participate in the planning of marine parks and will cooperate constructively in their management.

Recfishwest looks forward to a shift to holistic marine management that would include the equitable consideration of the needs of Western Australia's 600,000 recreational fishers.

Appendix 1

RECFISHWEST GENERAL POSITION ON MARINE PARKS and NO-TAKE ZONES

1. Framework for Creation of Marine Reserves in Western Australia

In 1994 a Marine Parks and Reserves Selection Working Group was established in Western Australia to assess and recommend appropriate areas for marine reservation. This Group's recommendations were published in what is now referred to as the Wilson report, which identified 70 prospective areas for consideration for reserve status.

In 1998, Environment Australia published a report by the Australia and New Zealand Environment and Conservation Council (ANZECC) on the Interim Marine and Coastal Regionalisation of Australia (IMCRA). This report was produced in all States and outlines the various bio-regions on a 'mid' scale within Australia including 18 for Western Australia. Environment Australia published a further ANZECC report; the Strategic Plan of Action for National Representative System of Marine Protected Areas (NRSMPA), which outlined a methodology for identifying and establishing marine protected areas at a State level.

In 1994 the previous State Government promulgated its New Horizons in Marine Management Policy which provided for a system of marine reservation in Western Australia. This policy provided for the following categories of reservation:

Marine Nature Reserves – created for conservation and scientific research; allows no other activities except low impact tourism;

Marine Parks – allow for; sanctuary (no take), recreation, general use, and special purpose zones;

Marine Management Areas – provide for areas that have a high conservation value and/or intensive multiple use.

In addition, the Fisheries Resources Management Act 1994 also makes provision for the creation of Fish Habitat Protection Areas (FHPAs) which may include sanctuary (no take) zones. FHPAs may be set aside by the Minister for Fisheries for the purposes of:

- Conservation and protection of fish, fish breeding areas, fish fossils or the aquatic ecosystem;
- Culture and propagation of fish and experimental purposes related to that culture and propagation; and
- Management of fish and activities related to the appreciation and observation of fish.

Fisheries Management Paper No 152 provides Guidelines for establishment of FHPAs.

2. Three Key Questions

Given the above framework, Recfishwest recognises that there will be ongoing proposals for marine reservation in Western Australia.

Three simple, but crucial, questions need to be put with respect to the proposal, implementation, and management of future marine reserves; particularly those that include exclusion (no-take) zones as part of the multiple use strategy. These questions are:

- 1. What is to be achieved with the establishment of the marine park?**
- 2. How big does the area have to be to meet these objectives?**
- 3. How will it be determined if these objectives have been met?**

3. Concerns about marine reservation

Recfishwest believes that there exist different kinds of justification for marine parks in contrast to those for terrestrial parks. Two important differences between marine and terrestrial systems are: -

- Movement, dispersal or migration from one area to another of biota, nutrients, pollutants and a range of other ecosystem features, is much more likely in marine

than terrestrial systems. This means that within a specific area, impacts cannot be easily isolated or identified.

- Marine areas are virtually all publicly owned and managed, in contrast to land, which is normally privately owned and managed unless there is intervention by government.

The consequences of these characteristics have a bearing on the relative need for marine parks vis a vis terrestrial parks. On land it is possible to isolate an area as a park and protect virtually the entire ecosystem which is contained within.

In the sea it is inappropriate to protect highly migratory species with straddling stocks such as tuna, for example, in a marine reserve because they are only opportunistically present and will be able to be exploited in the other 99% of the time they are moving throughout their range.

Therefore, a holistic approach to management is essential, with a resultant requirement for very clear purposes for the establishment of reserve areas.

The exclusion of fishing and other extractive activities from discrete areas consequentially requires additional management of the areas not protected. There is increasing evidence from around the world that large no-take zones, if not accommodated with significant effort reductions, can result in a net overall loss of the sustainability of some species, especially those that are only occasionally resident in the protected areas.

Generally in Western Australia, fisheries are managed sustainably and with the precautionary principle in mind. Given this the general application of prescriptive no-take zones needs to be critically examined with respect to its potential downstream negative impacts.

There is increasing evidence becoming available which supports the case for the effectiveness of no-take zones as one mechanism for protecting marine species sustainability. However, an overemphasis on no-take zones as the primary reservation tool is likely to compromise the issues outlined in 2. above by not allowing some objectives of sustainability or bio-diversity to be met.

Therefore, it is essential that such zones be seen in appropriate context as but one of a number of management tools for preserving fisheries and other marine systems.

4. Justifications for marine reservation

Despite its belief that marine parks do not have the same rationale as terrestrial parks, Recfishwest recognises that there are some justifications for creation of marine reserves and no-take zones. These include:

- Genuinely unique areas and some other special areas warrant complete protection from exploitation. This can be achieved by marine nature reserve status.
- It is desirable to have some areas protected from any disturbance as far as possible for research and monitoring purposes.

(Note – see appendix 2 for an expansion of justifications)

It may be sensible to select representative areas for intensive research, monitoring and management as a preliminary step in the preparation for the proper management of all marine areas. Such areas could include general purpose zones as well as sanctuary, recreation and other special zones.

5. Management options and equity of outcomes

Inevitably, the creation of marine reserves will raise questions regarding ‘who gains’ and ‘who loses’ from the changes brought to pre-existing tenure. While in many cases it can and will be argued that the community and particular sections of the community should accept loss of previous amenity in favour of the ‘greater good’ created by reservation.

However, community support for any such (perceived or real) loss must be developed through open and transparent decision making processes with compensation mechanisms available where these can be demonstrated to be necessary and appropriate.

Recfishwest strongly supports proper management of marine areas in order to provide adequate protection of bio-diversity and marine ecosystems. Recfishwest believes this management should also provide for sustainability of any resource use and equitable sharing of such resources.

Recfishwest does not believe that optimum marine management necessarily depends on marine parks. Instead, it believes that it is important that all marine areas should be properly managed with due and full consideration of the needs of all stakeholders, including conservation interests.

Recfishwest considers it is increasingly important that, as more and more reserves are assessed for implementation, they are fully supported by ‘new’ monies. We would be very concerned if existing relevant programs, or management of the much greater marine areas outside reserves, are compromised by redirection of funds to support new reserves, without sufficient servicing or monitoring of existing reserves.

We consider this to be particularly the case if there are any compliance activities deemed to be the responsibility of Fisheries WA.

It is absolutely essential that marine planning outcomes recognise the need for all sectors to be equitably catered for in marine conservation solutions.

6. Summary

Taking into account the reservations expressed above, and those contained in both the cover policy and in appendix 2, Recfishwest will participate in the planning of marine parks and will cooperate constructively in their management.

Appendix 2

A Proposal for a New System of Marine Conservation in Western Australia.

1. A proposed new system for marine conservation in Western Australia

Recfishwest advocates Western Australian coastal marine conservation through a re-emphasis on the importance of preserving the integrity of the whole coastal marine ecosystem. This would change the current focus on conservation, via individual marine parks or reserves, to the conservation needs of coastal regions.

This re-emphasis highlights the difference between the needs of terrestrial and marine conservation. On land, we have come to recognise the value of conservation through reserves because for a while it appeared as if this was the only way nature conservation could be guaranteed. For much of Western Australia the landscape was being permanently altered by clearing for development or by pastoral grazing. To conserve representative areas we had to put them in a secure “box”.

However, our coastal seas remain in public ownership and management and are essentially in near natural condition. That is, artificial boundaries around marine areas are not necessary in order to effect proper management.

For each coastal marine region a broad process would identify threats to be managed and values to be protected. For Western Australia, the IMCRA marine and coastal regions could be the basis. Within each region a decision framework would be followed to identify management needs. The staff and resources of both CALM Marine Branch and DOF would need to be involved in the process.

One step in this process would be how to sustainably manage fishing. The decision of whether the use of protected areas would be a part of this management would be made overtly. Both CALM and DOF as well as stakeholders would participate in such a decision.

In Western Australia fishery management is by systems of catch and effort control, together with temporal and spatial restrictions; but current research may identify situations where a mosaic of no-take areas provide a useful supplement or efficient alternative.

2. Problems with the current Western Australian marine conservation program

Currently, the emphasis on marine conservation in Western Australia is largely directed to the protection of specific areas, under either the Marine Parks system or the Fish Habitat Protection Area system. Marine Parks (including marine nature reserves, marine parks and marine protected areas) are established through Parliament under the Acts Amendment (Marine Reserves) Act 1997 and vested in the Marine Parks and Reserves Authority (MPRA). They are managed by the Department of Conservation and Land Management (CALM).

The Minister for Fisheries, under the Fish Resources Management Act 1997, can establish Fish Habitat Protection Areas and vest them in a body corporate. They are managed by the Department of Fisheries (DOF). In both cases zones or the whole area can be proclaimed as no-take areas, as sanctuaries or marine nature reserves, or areas can be protected from nominated activities.

Marine Parks take precedence to the extent that a Fish Habitat Protection Area cannot exist in a Marine Park. However, the agreement of the Minister for Fisheries as well as the Minister for Mines is sought before a Marine Park is established.

There is no joint planning process for marine conservation either in respect to marine protected areas or generally between CALM and DOF. The major function of DOF is to ensure that exploitation of fish resources is sustainable and to this extent they have a large fish conservation activity separate from the Fish Habitat Protection program. On the other hand CALM, which has a broad responsibility for nature conservation, is only involved in marine conservation in respect to marine protected areas and marine mammals and reptiles. Recfishwest believes that this distribution of functions leads to marine protected areas receiving excessive emphasis as a tool to manage marine conservation.

Recfishwest is concerned about the emphasis that is being given to marine protected areas compared to appropriate protection of the whole marine environment.

3. Differences between conservation management of marine and terrestrial areas

There are undoubtedly many differences in management for conservation of marine and terrestrial areas but four are of particular significance to the argument of this document.

- Coastal areas below high water are in public ownership in Australia. In contrast, a large proportion of the land is held in private freehold ownership or in private long-term crown lease.
- Coastal waters are managed by public agencies in Australia. The division of responsibilities between agencies may be according to particular areas vested in them, or it may be an overall responsibility for a particular function. Land, on the other hand, is generally managed by the private owner or leasee unless it is crown land reserved for a particular purpose and vested for that purpose.
- Because humans have evolved in a terrestrial environment their exploitation of land has been much more intensive than marine exploitation. The present situation is that a high proportion of terrestrial areas have had their natural habitat completely changed by agricultural or urban development or grazing. To stem the loss of biodiversity it is essential to preserve as much as possible of the little remaining original habitat. Most of the marine area still retains a substantially unaltered habitat even though fishing may have greatly changed species abundance, composition, and community structures.
- Although birds and plants with wind dispersed seeds travel freely over large distances, most terrestrial species are restricted by distance and by natural or man-made barriers such as roads or cleared land. In contrast most marine

organisms have remote dispersal mechanisms (spores, eggs or planktonic larvae) which move freely with currents in an environment that has a considerable degree of uniformity.

It is suggested that these four differences should have a considerable impact on marine conservation management compared to conservation management of terrestrial areas. It is necessary to establish a terrestrial park as a special area vested for conservation purposes to bring it under appropriate public management. On the other hand all marine areas in Australia are publicly owned and can be managed appropriately for conservation within the limits of other agreed uses.

The boundaries of terrestrial conservation reserves have real meaning because the surrounding land is usually under different ownership and management and has a vastly altered habitat. In contrast, marine reserve boundaries are much less distinct and the reserves and their surrounding areas clearly belong to a single system.

It does not seem logical to give almost the whole emphasis in marine conservation to reserves (protected areas), just because publicly owned reserves have to be the core of the conservation system on land. A sensible alternative is surely to manage the whole area of coastal seas in an appropriate way to achieve conservation objectives.

4. Marine conservation must be appropriate to the capacity of the government and community

A lot of the scientific literature which emphasises the use of marine protected areas for marine conservation has arisen from the experience of scientists from developed countries who are working in developing countries. In many of these situations the pressure on marine resources are extreme. Fishing may be a subsistence activity and destructive fishing methods like explosives are common.

In these situations, levels of communication between central government and the community are low and funding of fishery management is totally inadequate. In such a situation working with a local community to establish a marine protected area is probably the best and may be the only way to achieve marine conservation objectives.

Whether it is possible to manage the whole area of coastal seas to achieve conservation objectives will depend on the political and socio-economic circumstances of the country. In order to try and manage the whole area properly the country would require the following characteristics:

- Effective government
- Adequate public scientific and financial resources
- Good communication between government and an educated population
- Preferably the absence of a subsistence fishery. Such a fishery puts almost unbearable social pressure on a management system and contains enormous latent effort if technology improves.

In some developing countries with a high population it is probably not practical to aim at overall management. However, the above criteria do apply in Australia. In such circumstances it should be possible to apply an overall management system in Western Australia. This does not exclude no-take areas; but it is suggested that marine conservation should be an overall system, not just limited to marine parks.

5. The suggested procedure for planning conservation management of a marine coastal region

It is suggested that a parallel process to that used by CALM for consideration of management of proposed marine reserves could be used; but the spatial unit under consideration would be a Western Australian IMCRA region rather than a proposed marine park. While the marine conservation management functions remain divided between CALM and DOF, both these agencies would have to share the government responsibilities; but stakeholders and independent expertise would assist the committees/working groups charged with the task.

The process could start with the expert/community/stakeholder consultation group who would assemble information on the region and determine the values and threats in the region. As a consequence of this assessment they would develop a management proposal that would aim to preserve the marine ecosystems. A part of this management proposal would undoubtedly involve the management of fish exploitation by the DOF; but which would be integrated into the overall plan. Another part of this plan would involve a consideration of the need for no-take areas (see next section).

When the consultation group had completed a draft management proposal it would be promulgated for a formal public consultation process. This could be followed by a formal approval by appropriate Ministers of the government. Because the regional conservation management plan would cover a wide spectrum of responsibilities as well as a large area it could not be given the status of a "set in concrete" plan. Provisions would have to be made to incorporate the many adaptive management decisions, which would have to be made progressively. Depending on the significance of the decisions these would require consultation with or advice to relevant agencies and stakeholders.

It must be a decision for the Government to determine the legislative and agency framework within which this system would work. At this stage Recfishwest does not want to commit itself to any particular model. A wide range of possibilities exist. Some of these would need little or no legislative change while others would involve specific new legislation. A common feature is that there would have to be some system for ensuring cooperation between and coordination of all government officers working in the broad area of marine conservation

6. Reasons for having no-take areas

Even if traditional fishery management systems are usually adopted, there may be a need in most regions for the establishment of some no take areas. Some of the reasons for such areas are:-

1. Preservation of biodiversity

This is an overriding requirement for both terrestrial and marine management. However, threats to biodiversity in terms of extinctions are not common in marine environments. If there really is a known threat of extinction to a marine species that can be prevented by a no-take reserve then an appropriate reserve should be established

- **Snorkelling and dive viewing**

Many people are interested in underwater swimming or diving to look at special marine environments and the value of this experience is enhanced by the presence of charismatic marine fauna. Limited no-take areas can provide appropriate sites for snorkel and dive viewing.

- **Managing fish resources for sustainability**

The most common ways of managing fisheries for sustainable yield are to limit catch directly by quotas or by limiting effort. An alternative way that has been proposed for managing a fishery is by no-take areas.

- **Ecosystem protection**

Natural ecosystems can be disturbed by physical or chemical impacts on the marine environment or by fishing activities that cause major changes in marine community structures. It can be argued that as well as preserving biodiversity in terms of individual species, ecosystems should be protected from human interference to preserve natural interactions between species.

- **Scientific reference sites**

Representative scientific reference sites are required if we are to make progress in our knowledge of marine management. Monitoring of such sites provides datum points with which we can compare the results of our management systems. Making long-term provision for monitoring must be an integral part of the establishment of these no-take areas.

- **Considerations relevant to the need for no-take areas**

1. Has a threat of extinction been identified in the area? If so, can the threat be best countered by habitat protection, from trawling or industrial activity for example? If the answer is yes a habitat protection area should be established. If this requires the establishment of a fishing no-take area then such an area should be established. However, the protection should be relevant to the threat. It is not sensible to ban line fishing to protect rare gastropods or leafy sea-dragons.
2. Is there a demand for dive viewing sites because of eco-tourism activities, population centres, or coastal resorts? Are there suitable sites where high densities of interesting fish may be seen? If community consultation identifies such sites then appropriate small areas should be established as no-take areas for this purpose.
3. Has it been scientifically validated that area protection is likely to be the most appropriate technique for managing all fishing in this region or a significant

proportion of the targeted species? If so, then the agreed parts of the area should be protected from all fishing or particular kinds of fishing (if the area protection is temporary or for part of each year this would be regarded as conventional fishery management). The size and number of no-take areas will be influenced by the need to adequately buffer the area from fishing on the edges yet to have adequate migration of targeted fish from protected to fished areas.

If area protection has been adopted as the fish management system for the region, then it is likely that the area fully protected for this purpose will be sufficient to meet the needs of ecosystem protection and scientific reference sites so the process is complete. If, however, the overall fish management system is to remain, as it is currently in most of Australia, a mixture of catch and effort limits with some spatial and temporal closures, then one more step is needed.

4. Areas should be set aside with habitat and no-take protection to meet the needs of ecosystem protection and scientific reference sites. Obviously such areas must include representation of the range of habitats in the region. They should be fairly large to reduce edge effect problems. These areas should be located as far as possible away from areas of high human use to minimise social impact and therefore improve the likelihood of their implementation.

7. Need for more intense management of particular areas

Undoubtedly there are some marine areas along the coast of Western Australia which have special needs for more intense management. However, it is not sensible to make them marine parks and then try to establish all the usual zones including no-take areas. For example the Dampier Archipelago is obviously in need of special management consideration. It contains the biggest port in Australia, a lot of giant industry, it is the most intensively used recreational fishing area on the Pilbara coast and has striking natural features.

Recfishwest contends that it should have special management arrangements but it may not be an appropriate location in which to locate the highest level of ecosystem protection. This can be done up or down the coast where competitive pressures are less. Perhaps the most obvious example is Cockburn Sound. With the concentration of population and industry sitting on a virtually unique habitat it has to have special management arrangements; but no one would select it as a site for highest levels of ecosystem protection.

Recfishwest suggests that the need for more intense management of some areas along our coast should be uncoupled from the marine park process. We favour recognising the natural values of our whole coastal sea and trying to conserve it. In doing this, some areas will be identified as no-take, no-disturbance areas for highest ecosystem protection.

We are fortunate in Western Australia that we will usually be able to do this in areas that are protected from heavy pressures by their relative remoteness. The special areas that are already highly valued by many sectors of the community can be given special management by bodies like the Cockburn Sound Management Council to enable the community to get the maximum possible use from these areas with the minimum environmental harm and minimising levels of competition.

8. Benefits of the proposed system compared to the present arrangements

- *The proposal would deploy the resources the government/community allocates to marine conservation in a balanced way along the coast looking at all the values and all the needs rather than selecting some icon sites which then use up most of the available resources.*
- *Marine conservation should benefit because larger areas can be set aside for the highest level of protection. This would be possible because we would not be trying to combine marine conservation with tourism and recreation sites where competitive pressures are highest.*
- *Although it would not be easy to integrate the efforts of CALM and DOF, together with input from the Department of Planning and Infrastructure, the proposed system would make it essential. Scientific research and community preferences should determine our marine conservation policy. The government agencies must then work together to implement this policy.*