

Ms Elizabeth Eaton
Chair
NACC Draft Regional NRM Strategy
Public Comment Submission
Reply Paid 95
PERENJORI WA 6620

Draft Regional Natural Resource Management Strategy for Northern Agricultural Region of Western Australia

Dear Ms Eaton

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 Draft Regional Natural Resource Management Strategy; Northern Agricultural Region of Western Australia (the Strategy) by the Northern Agricultural Catchments Council (NACC), but note that we have not been consulted in the preparation of this strategy.

Recfishwest only became aware of the existence of the NACC and the proposed Strategy indirectly in late July. To say we are disappointed at our exclusion from formal consultation is an understatement.

The Community Engagement Plan (page 10) is purported to summarise the NACC approach to consultation of the many interested parties. Recfishwest is disappointed that there was no effort to engage the recreational fishing sector. Recfishwest should have been included as the peak representative group for recreational fishers in Western Australia, a marine stakeholder most affected by marine and estuarine issues.

Recfishwest notes with regard to the Strategy, the Hon Geoff Gallop, Premier of Western Australia co-signed 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 sees considerable value in the development of regional strategies that are designed to integrate natural resource management. Having noted this, Recfishwest has provided the following specific comments concerning the Strategy.

We are in general agreement with the coverage of fishing and marine environmental topics covered in the draft strategy, and with the thrusts of the strategy. Some comments on specific sections are:-

S. 5, Assets, Marine Biodiversity (Page 40)

There needs to be more focus on current threats and responses by declaring what actual impacts are occurring. Focusing on potential threats rather than real threats encourages ambit claims by less informed groups.

(Page 41, Table 12)

The “*Current Responses*” list demonstrates a common, but in our opinion incorrect, impression that the existence of Marine Parks alone is necessary and sufficient to counter the perceived threats to marine biodiversity.

Recfishwest believes that the existing marine reservation system 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. Sound fisheries management is required where sanctuary zones are justified to ensure fishing effort is not re-directed and places increased pressure onto those areas flanking no-take zones.

Recfishwest believes that marine biodiversity requires an integrated and “whole of region” approach. Recent action has been taken by the Department of Premier and Cabinet to develop a framework for Bioregional Marine Planning. A draft paper titled “*Bioregional Marine Planning in Western Australia:- Integrated Multi-Sectoral Planning and Management of the Marine Environment*” has involved wide stakeholder consultation, and more public consultation will be required as the draft is refined. See the details at <http://www.dpi.wa.gov.au/planning/bioregmarine.html>

Recfishwest is not completely against no-takes zones, provided areas proposed for reservation have clear and sound reasons for the conferring of exclusive conservation status and should be based on adequate scientific evidence to support the requirement for additional protection of some value. 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 our comments.

Recfishwest considers 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. We regard this as a fundamental objective, and we believe this is best managed primarily through Fisheries management.

S. 5, Assets, Coastal and Marine, Beaches and Shoreline Coastal-scapes (Page 56)

Commencing *“The issue of direct vehicle access on to beaches must be addressed...”*

Recfishwest believes that this section reflects the personal opinion of its author and is not an impartial assessment. Consideration must be taken on a case by case basis relating to the extent of the problem.

Recfishwest has a policy “Vehicular Beach Access”, a copy of which is attached for your information. This policy requires that alternatives to closures must be considered, and states *“In general, Recfishwest will oppose attempts at closure of access unless significant over-riding concerns apply. Such concerns might include issues of public safety, environmental degradation, or increasing pressure from competing uses. Again, however, the onus is on those proposing change to: firstly, demonstrate that the concerns are valid, and secondly, demonstrate that no alternative remedies are available.”*

The Draft NRM Strategy has no mention of the very significant changes to recreational fishing limits for the West Coast Region introduced on 1 October 2003. Changes introduced were aimed at limiting the recreational catch of finfish, by introducing a state wide possession limit for recreational anglers along with reductions in daily bag limits by up to 50% of previous limits as well as increasing minimum legal size limits for species. There has been a tremendous increase in release ethic in recent years to ensure fish that are undersize or not required are released and have an increased chance of survival. Ongoing education regarding fish handling has also complemented this change in attitude. Refer to the Department of Fisheries web site for information on:
<http://www.fish.wa.gov.au/rec/broc/westcoast/index.html>.

S. 6 Opportunities and Links with NRM, Fishing and Aquaculture, (Page 76)

mentions tuna aquaculture in the Abrolhos, and that an Environmental assessment is underway for a trial.

Even if aquaculture proposals are environmentally acceptable in the proposed location, there are serious concerns that such aquaculture can have significant environmental effects through its demand for very large quantities of fish meal food each year for farmed fish.

The use of large quantities of wild caught bait fish has an environmental impact through its flow on effects in the food chain no matter where it is caught. Imported fish has the potential for the introduction of devastating exotic diseases.

S. 6 Opportunities and Links with NRM, Tourism, (Page 77) regrettably does not mention or even recognise recreational fishing as an important source of tourism in the region. Recreational anglers require accommodation goods and services, and contribute substantially to the local economy of the area visited. Promotion of quality recreational fishing opportunities is a very effective means of attracting people to an area, with all the attendant tourism and economic benefits.

Target Tables for Marine Sea Bottom, Marine Biodiversity and Marine Water (Pages 104 and 105) Although the tables appear to adequately cover and balance the requirements for fisheries and environmental management, Recfishwest has apprehension in regard to the approach taken to develop these tables. It is quite obvious that the tables

were prepared through community workshops that have omitted appropriate recreational fishing representation. The composition of the community group should be published to enable the public to gauge whether the resultant information represents all stakeholders.

There is a little explanation of the threats that relate to the indicators. What threats are not sustainably managed? The absence of this information makes it rather difficult to comment.

The lack of acknowledgement that various “indicators” to monitor progress toward target under “Marine Biodiversity” have either been addressed or are being addressed through other initiatives is disconcerting. Proper engagement of Recfishwest, the Department of Fisheries and other peak bodies representing commercial fishing interests would have lead to a far more accurate assessment.

CM.R9.M5 the target states “*By 2008, support community and government-driven actions to create new marine protected areas*” strong motherhood statements like this do little to acknowledge the role of fisheries management and is evidence of strong support for further marine protected areas.

Conclusion

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. Appropriate and integrated fisheries management over all regions is essential for the long term conservation of fish, rather than closing areas to fishing. Many recreational fishers feel extremely uncomfortable about the disproportionate impact on recreational fishing interests without adequate engagement of the sector or an objective assessment of the impact.

Recreational fisheries management, coupled with changing community attitudes has made enormous strides in implementing a more conservative approach to aquatic natural resource management.

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

Yours sincerely

Mark Pagano
A/-Executive Director

14 September, 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.
Derek Carew-Hopkins, Executive Director, Department of Environment.
Doug Bathgate, Chair, Recreational Fishing Advisory Committee.