

Mr Andrew Hill
Senior Marine Planning Officer
Marine Conservation Branch
Department of Conservation and Land Management
47 Henry St
Fremantle WA 6160

Indicative Management Plan for the proposed Montebello/Barrow Island MCRs

Dear Andrew

Recfishwest is 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 places the highest precedence on preserving the future of recreational fishing and the resource it depends on. The habitat in which fishing is carried out and access to that habitat is of particular importance to Recfishwest. Recfishwest acknowledges that a marine park is a resource for the entire community but emphasises the importance of a strategic, state-wide perspective.

Recfishwest wishes to congratulate the proposed reserves Advisory Committee, the MPRA, and CALM for producing a well balanced indicative management plan for this very important and heavily utilised area.

Recfishwest has, as would be well known from extensive correspondence with the Department and interaction with Marine Branch and the Minister's office, a great number of concerns with the manner in which Government policy on marine reservation is carried out, as particularly manifested in the recent very biased Jurien outcomes. It is therefore very pleasing to note that largely unbiased outcomes are possible, particularly it seems when the western rock lobster industry is not a stakeholder.

Also conducive to the positive outcome here is the fact that, while the area is heavily utilised by the pearling and oil extraction industries, it is also largely unpopulated and not heavily utilised by the broad community due to its relative remoteness from population centres. This has led to, thus far, plan directions being able to be considered in a measured consultative manner with broad scale community concerns largely absent.

We note that the opposite is the case with the proposed Dampier Archipelago proposed Marine Park which is adjacent to a large and growing population centre in Karratha/Dampier. It therefore continues to be Recfishwest's strong contention that the current system of 'rolling out' marine reserves based on the Wilson model is fundamentally flawed and requires urgent revision, and that this contention is manifestly demonstrated by the very different levels of community concerns contingent on the two proposed plans.

Having noted this, Recfishwest wishes to provide only a few comments on the plan in question.

We are very supportive of the proposed recreational zones which recognize the commonsense observation that the Montebello area, while remote and not suffering extensive recreational usage, is a very important safety refuge and leisure destination for passing boats and is increasingly being utilised by the charter industry and Karratha/Dampier smaller boat owners.

Provision of recreational zones in such a location is wise, fair and farsighted and, in contrast, the lack of same was a key policy failure in the recently proclaimed Jurien Marine Park.

In principle, we are concerned with the relatively large sanctuary zones contained in the plan. Ordinarily Recfishwest would oppose such large areas. However, in this case, given the remoteness of the area and the specific locations of most of the zones, and with the exception of the Southern Montebello Sanctuary Zone (SMSZ), Recfishwest offers its support for the boundaries proposed.

With reference to the SMSZ, Recfishwest is concerned that the zone is far too large a sanctuary zone for an area which will inevitably increase in community usage. If fish protection requirements are the 'driver' behind the relatively large size then the Fisheries Management Act 1994 offers more appropriate remedies. If the 'driver' is the need for research benchmarking then the area is of luxurious dimensions. Recfishwest require assurance that research is planned for this large area.

We ask that these proposed boundaries be reconsidered to more sensible proportions. Certainly, Recfishwest will vigorously oppose such large areas where our stakeholders have a more immediate interest.

The Northern Montebello Sanctuary zone extends into deep water in the north western sector which may be used for trolling for pelagic game fish. Such fish are better conserved by other fishery management techniques than no-take zones and it is suggested that the north-western sector of this zone could be a "no-anchoring" special purpose zone in which fishing for pelagic fish is allowed

We are also very concerned with the disproportionate consideration being given to the pearling industry in respect of pearling zones K, F, E and D held by Morgan Pearls. Due to the high energy environment prevailing over these leases it is very unlikely that these leases could become commercially viable. Therefore Recfishwest requests that the lease review process as outlined in the indicative plan be expedited so that this very inappropriate allocation can be resolved back to sensible lease boundaries.

Similarly we are concerned about the size of the lease currently held by Fantome Pearls north of Parakeelya Island. That is, the lease needs to be assessed and areas of specific use to pearling identified so that the remainder can be returned as part of general use zone. Presumably this also is being held pending assessment and this process should be conducted expeditiously.

Recfishwest wishes to thank you for the opportunity to comment on this plan. Please do not hesitate to contact our office should further information or clarification be required.

Yours sincerely,

Frank Prokop
Executive Director
25th May, 2004