

Discussion Paper: Towards a Biodiversity Conservation Strategy for WA
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Discussion Paper: Towards a Biodiversity Conservation Strategy for Western Australia

Recfishwest represents 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 on a range of matters.

Sustainability of Western Australia's aquatic environment is of paramount importance to Recfishwest and we place the highest priority on safeguarding the future of recreational fishing and the resources it depends on.

Recfishwest commends the Government on commencing this important Discussion Paper: Towards a Biodiversity Conservation Strategy for Western Australia (Strategy). We consider this Strategy essential to developing a consistent commitment to biodiversity conservation practices across all Government agencies in Western Australia; however it must be equitably implemented.

However, while we welcome this initiative and support many aspects, our concerns where described are real and carefully considered. We would be most disappointed if these concerns were ignored or undervalued with the excuse that we 'supported' the Strategy. We expect that our concerns where expressed, are given the weighting which a peak body of Recfishwest's stature deserves.

General Comments on the Strategy

Recfishwest supports a biodiversity conservation strategy for Western Australia and we expect that this Strategy will be the driver of biodiversity conservation legislation in Western Australia. The comments made hereafter will be predominantly restricted to those areas of the Strategy that relates to marine and aquatic issues.

Recfishwest acknowledges that we are losing biodiversity in the terrestrial environment, however we strongly believe that terrestrial assumptions are unlikely to apply in the marine environment.

Marine biodiversity cannot be managed successfully using terrestrial management regimes. The distribution of species in the marine environment is far less localised than the terrestrial distribution of species. Some terrestrial fauna have a distribution of several hectares while marine fauna generally have at their smallest distribution hundreds of kilometres of coastal habitat.

Status and Trends in Biodiversity

Recfishwest supports the statement made on page 17 *“in comparison to the land, marine environment is in particularly good health with threats predominantly localised and isolated”*. The examples of threatened ecosystem given, e.g. Cockburn Sound and the Swan and Canning River Estuaries, highlight areas where obvious threats to biodiversity are currently not being adequately addressed.

Recreational and commercial fishing are identified (p.17) as *“an increasing threat to marine biodiversity if not properly managed, and severe depletions of some targeted species have occurred, such as snapper in Shark Bay...”* There is no acknowledgement that the Department of Fisheries responsibly manages these fisheries and the *“severe depletion”* example of snapper in Shark Bay is in fact a good example of how management by the Department of Fisheries with the full support of the fishing sectors has resulted in a phenomenal recovery of that fishery without draconian closures that CALM and the MPRA continually prescribe for the marine environment.

Managing for Biodiversity

This document predominantly appears to describe CALM's role in conservation activities rather than a Western Australian Biodiversity Conservation Strategy. Box 7 (p.35) does little to disprove this belief, where there is no mention of the Department of Fisheries Fish and Fish Habitat Protection program or acknowledgement of the world standard work done to educate recreational fishers by the Volunteer Fisheries Liaison Officers throughout Western Australia.

The Strategy needs more rounding with respect to the part played by other agencies such as the Department of Fisheries etc. Recfishwest believes the Strategy should focus more on the real threats such as those likely to result in serious ecological collapse in the Swan and Canning estuaries and for areas like the wheat belt where it is suggested that protection is impossible due to past destruction. Restoration of an existing depleted environment should be the starting point. Freshwater resources and its associated environment has received no consideration at all.

Recfishwest believes the Strategy lacks reference to what is known about marine biodiversity in Western Australia. For example, the research carried out by various universities and research by the Department of Fisheries much of which is funded by the Fisheries Research and Development Fund needs to be more fully referenced.

A distinction needs to be made between terrestrial and marine biodiversity. Marine biodiversity conservation is not remotely as much an issue in the context of its terrestrial importance, i.e. extinctions on land verses marine environment. Since the first settlers arrived in Australia, within a very short period of time, there was a loss of terrestrial species and this continues. Anthropogenic influences such as inland salinity are also major threats to terrestrial and aquatic environments.

Framework for Action

Key Strategic Direction 1

(p.49) Under the heading “*Output targets*” a *WA Marine Biodiversity Audit* identified to be completed by 2006. It is unreasonable to suggest that such an audit could be effectively completed even by 2007 given the range of agencies and institutions that will need to be engaged to accurately complete this task.

Item 3 of *Primary actions for 25 year aspirational outcome targets* (p.50) suggests to “*Establish a state-wide marine, terrestrial and aquatic monitoring capability to determine and report on the state and trends of biodiversity and identify the causes of change...*” Recfishwest believes that finite resources preclude this action from realistically occurring. This declaration must be more selective in its statement of what really can be achieved especially in the complexity of the marine environment and reinforce the role of the community in determining priorities.

Key Strategic Direction 4

(p.55) Although “*fisheries*” is identified as an industry required to *minimise biodiversity decline through ecological sustainable industries and management of extractive industries* there is again no mention of the role of the Department of Fisheries and that agency’s work as it relates to Ecological Sustainable Development. Indeed there is no mention of integrated management of commercial and recreational fisheries in Western Australia.

Recfishwest believes that clear definition of ecological “sustainability” is required in the context of this Strategy.

Managing for biodiversity

Key Strategic Direction 6:

(p.59) The key strategic direction is to *Establish a protected area network for biodiversity*, the *Objective* is stated “*to accelerate the establishment of a network of protected areas both terrestrial and marine....*” again this is an overly simplistic, pigeon-holing of the marine environment with the terrestrial environment. The statement (p.17) that “*in comparison to land, marine environment is in particularly good health...*” highlights the difference between terrestrial and marine management requirements. The speed at which development of current and proposed marine parks is occurring is repeatedly identified not only by marine stakeholder groups but also by the Department of Fisheries as grossly problematic.

(p.59) The *Outcome* proposal is that legislative protection should *meet IUCN Management Categories I or II or IV*. Recfishwest agrees that legislative protection should meet IUCN Management Categories and we believe that there is an urgent requirement to identify the threats to biodiversity and manage those threats accordingly. Recfishwest believes the legislation should also include management category VI; Managed Resource Protected Areas, a category which was established to manage for sustainable use of natural ecosystems. We believe CALM has not made a concerted effort to date to equitably manage marine protected areas under IUCN Management Categories.

Recfishwest has little faith that the needs of recreational fishers have, are or will be considered by CALM even though impacts of marine parks have fallen almost exclusively on that group.

(p.60) *25 Year aspirational output and outcome targets.* To state that all ecosystems require a minimum of a prescriptive percentage (15%) to be under legislative protection as the outcome/output target is reckless and fails to recognise the diversity of various marine ecosystems.

Recfishwest strongly believes that *Primary action* number three (p.60) must be removed. There is no requirement under IUCN Management Categories, that sanctuary zoning must be used to obtain biodiversity conservation. Sanctuary zones are only one of the plethora of management tools that are available and which can be employed relative to threats posed to biodiversity in each case.

As per footnote 19, there is a need to contrast the specific proposals for marine protected areas with general and incomplete proposals for terrestrial protected areas.

Recfishwest believes that a vast array of marine natural resource management processes that are available are being systematically ignored under the current marine parks process, instead focusing principally on sanctuary zoning in marine parks. Management options other than sanctuary zoning, many of which have been suggested by Recfishwest but ignored, can lead to outcomes more acceptable to the community than the use of sanctuary zones as the primary or sole management tool.

Increasing knowledge of marine systems indicates that marine habitats are complex and diverse, and that marine species exhibit a wide range of life histories and habitats. The idea that sanctuary zoning is the main requirement to effectively manage biodiversity conservation is overly simplistic and dangerous.

An example of the inability of sanctuary zones to effectively manage threats is the Maud Sanctuary Zone in Coral Bay, Ningaloo Marine Park. This sanctuary zone has been in existence for over fifteen years, but it arguably represents the most degraded section of coral reef in the entire Ningaloo reef area. Inaction by CALM to address the real threats to Coral Bay, as well as natural phenomena, has resulted in the current degraded state. Other management tools could have been utilised over the past fifteen years that would have more effectively addressed the threats to Bills Bay.

Recfishwest acknowledges that we are losing biodiversity in the terrestrial environment, however we strongly believe that marine biodiversity can not be managed successfully using terrestrial management regimes.

Key strategic direction 9

(p.64) *Key strategic direction 9 Manage landscapes and ecosystems (integrating off-reserve and on-reserve conservation, including abatement of landscape scale threatening processes)*

Recfishwest believes that this is an important strategic direction and could be effectively provided via increased cooperative action between CALM and the Department of Fisheries with regard to on and off reserve management of the marine environment.

Conclusion

Recfishwest questions the level of consultation that was used to compile the key strategic directions list. If derived from the Natural Resource Management (NRM) process, then the marine section of this discussion paper was commissioned by community groups, not experts in the field. If this is the case, it is questionable what value would rest in an inexperienced person's view of marine biodiversity conservation. In the NRM process anyone's view is taken on board regardless of the validity of that view or information and frequently supported if it fits a prescriptive sanctuary zoning philosophy. With reference to the marine environment, objective, scientific, factual information is lacking.

Recfishwest strongly believes that marine biodiversity should not be managed using terrestrial management systems. We recognize that we are losing terrestrial biodiversity in Western Australia, and we also believe that the Strategy should be concentrating on dealing with terrestrial based threats to the receiving aquatic environments. The depletion of aquatic species such as the western minnow and marron and the threats to south west estuaries and rivers from terrestrial based threats should take far higher priority than accelerating a network of marine protected areas that do nothing to address the threats to these species and the aquatic and marine environment.

There is an urgent need to address management of terrestrially based point source pollution of the receiving aquatic and marine environment. The Strategy must direct primary management actions to effectively address the principal terrestrial based threats to biodiversity conservation in rivers, estuaries such as inland salinity, local development and pollution issues.

Recfishwest believes this document predominantly appears to describe CALM's role in conservation activities rather than being a Western Australian biodiversity conservation strategy acknowledging the roles and responsibilities of Department of Fisheries, the Department of Environment etc.

Recfishwest is pleased to provide input to the development of the Towards a Biodiversity Conservation Strategy for WA. If you have any queries regarding this submission, please feel free to contact me directly on 9387 7864.

Yours sincerely,

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18th April 2005

c.c. Hon Jon Ford, Minister for Fisheries
Mr Peter Rogers, Executive Director, Department of Fisheries
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