

Rottnest Island Marine Management Strategy
Attention: Mr David Srdarov, Account Executive
Synovate
PO Box 984
WEST PERTH WA 6872

Dear Mr Srdarov

ROTTNEST ISLAND DRAFT MARINE MANAGEMENT STRATEGY

Thank you for the opportunity to comment on the Rottnest Island Draft Marine Management Strategy.

Recfishwest is the peak stakeholder 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. The habitat in which fishing is carried out and access to those areas are of particular importance to Recfishwest.

Recfishwest is extremely disappointed with the Draft Rottnest Island Marine Management Strategy (Strategy).

Recfishwest agrees that Rottnest Island is a special place that requires management; however, we question the RIA's reliance on sanctuary zones as the only marine management tool in the Strategy. Sanctuary zones, in isolation, do not provide a suitable management strategy for Rottnest Island or the wider metropolitan area. Management of fish species would be best approached in the wider context of the whole metropolitan area.

Recfishwest is surprised that the new sanctuary zones have been proposed in light of the current Labor Party policy for fisheries that states that the Labor Party will "*reaffirm its commitment not to support bans on fishing at Rottnest Island*".

Recfishwest has particular concerns with;

- The consultation process used to develop the Strategy
- What appears to be a biased feedback form
- The poor science and anecdotal information used to justify zoning
- Apparent misleading and confusing information
- The lack of assessment criteria used to develop the Strategy

Consultation process

Recfishwest was not formally informed or consulted regarding the details of the proposals or plans as they were being developed by the Marine Management Strategy Working Group (Working Group). Recfishwest had no opportunity to provide comments or suggest alternatives which are an essential part of any consultation aimed at achieving consensus.

Recfishwest believes that the Working Group was established by the RIA with a clear bias towards the objective of creating a substantial number/area of sanctuary zones within the Rottneest Island Marine Reserve.

Recfishwest Board member, Norman Halse, was a member of the Working Group, however, Mr Halse was not permitted to comment back to Recfishwest on the proposal due to confidentiality agreements. The Working Group members were not permitted to retain copies of proposals to report back to the groups they represented. This prevented Recfishwest from having any involvement in the development of the Strategy. We believe the broader views of the recreational fishing community were never respected in a genuine attempt to find a solution that was acceptable to all parties.

The Strategy lists Recfishwest as a member of the Working Group however, we were not granted involvement in the development of the Strategy. This comment is grossly misleading to readers by implying that Recfishwest, the peak representative body for recreational anglers, supports the Strategy when that is most certainly not the case.

Poor Science and Anecdotal Information

Recfishwest is of the view that the sanctuary zones proposed in the Strategy have been developed around very little creditable scientific evidence and carefully selected anecdotal reports.

Recfishwest believes that the information regarding the impact of sanctuaries on fishing is an over simplification of a complex and controversial issue. For example, the histogram representing western rock lobster density inside and outside of sanctuaries (pg. 9) has a number of possible interpretations. The data may indicate that western rock lobsters are more abundant in sanctuary zones; however, a view shared by western rock lobster scientists is that western rock lobsters within sanctuary zones contribute very little to the over-all reproductive biomass. It should be acknowledged that the author of the research used to support sanctuaries at Rottneest Island was not prepared to present this work to a Department of Fisheries committee on western rock lobster management.

Hugh Edwards has been quoted in the Strategy on the disappearance of large fish at Rottneest; but by contrast balanced papers on fish abundance prepared for the Working Group by experienced and knowledgeable fishing members have been ignored.

Barry Hutchins, Fish Scientist at the WA Museum, provided information to the Working Group on fish diversity at Rottneest, but presumably it did not suit the RIA objectives as this information has not been referred to in the Strategy.

In the frequently asked questions section of the "Draft Marine Management Strategy Have Your Say" document the statement "*Abundance and diversity of fish populations at Rottneest may already be reduced by up to 80%.*" is grossly misleading. There is no information to suggest diversity has been reduced at all. Recfishwest recalls the previous Fisheries Minister, Kim Chance advising Parliament that there is no evidence that recreational anglers have compromised marine biodiversity anywhere in WA.

Another example of bias in the Strategy is the statement "*Fisheries management does not protect marine biodiversity values:- Fisheries management focuses on targeted species, whereas recovery and restoration of habitats and targeted species together provides for the restoration of all ecologically associated species, and provides for populations of targeted species to be restored to levels that are closer to their 'natural' levels.*" This statement is at best questionable, particularly with regard to the popularly targeted pelagic, migratory

species. It is not possible that populations of these species will be restored to 'natural levels' as a result of reducing recreational fishing in small areas around Rottneest.

The Strategy regularly quotes the 2003 study of shore-based angling by a Murdoch University student, to indicate that participation in fishing at Rottneest is relatively low and the catches are small. The study does not address or reflect the participation in boat fishing in the waters surrounding Rottneest Island or the associated catch levels.

The statement "*Recreational fishers frequently retain a high percentage of juvenile fish...*" appears to be deliberately misleading, particularly since it is not supported by the data elsewhere in the study which states "*Overall, the total number of retained undersized fish comprised 1.4% of the total catch on Rottneest.*" 1.4% of the total catch is not a "high percentage."

The statement "*Non compliance with fishing regulations*" and "*...knowledge.... is limited/ as is knowledge of relevant fisheries regulations that apply across the Island*" (survey L. Beckley, unpublished data) suggests that recreational fishers are fishing without knowledge of the regulations. The regulation which has been quoted was the minimum size limit for tailor. This regulation had been changed just prior to the survey and only a minority of fishers questioned answered correctly. However only 2% of those questioned were actually targeting tailor and further there was no proof that anyone was fishing for or catching tailor without knowing the size limits.

Fish Species at Rottneest

The strategy refers to what is described as a "knock-on" negative effect on other species from catching particular species of fish. This very general but not necessarily universal phenomenon has been invoked consistently without any data to justify its relevance to the issues in the Rottneest Marine Reserve. Recfishwest does not believe that the abundance or take of species such as Spanish mackerel, herring and salmon has any impact on benthic invertebrates at West End. A Benthic Habitat Protection Area would best serve the purpose of protecting delicate corals and rare molluscs rather than banning fishing such as trolling which would seemingly have no impact whatsoever on benthic species.

The strategy suggests that sanctuary zones may provide excess fish that will be available to be caught in other areas. Of the many marine species that occur in waters surrounding Rottneest Island recreational fishers target approximately 10 –15 species, all of which are common to the west coast fisheries bioregion. Many of these species are pelagic and highly mobile or migratory, or have life-histories which include broadcast distribution of eggs, larvae and juveniles. Examples include herring, Australian salmon, tailor, skipjack trevally, Spanish mackerel, yellowtail kingfish, tarwhine, garfish, King George and other whiting, mulloay, flathead, Samson fish and pike. Some of these species travel hundreds of kilometres as eggs, larvae or adults.

Replenishment of these species depends on the overall management of the fishery, not area closures. One of the clear outcomes at the First International Marine Protected Areas Congress held in Geelong, Victoria in October 2005 was that no clear cut benefits on the "spill-over" effects or "surrogacy" have been proven with regard to sanctuary zones. A great deal of variation in outcomes existed between studies, species and locations. Presentations at the Congress reported that the benefits to larval recruitment, distribution and connectivity are difficult to quantify and are largely unknown

A popular species at Rottneest is western rock lobster. Research clearly shows that the numbers of rock lobster in any area is strongly affected by environmental conditions,

currents and the settlement of western rock lobster larvae. It is irresponsible to suggest that the proposed sanctuary zones would have any benefit to the overall stock of western rock lobster in Western Australia.

Species which are resident bottom dwellers, such as West Australian dhufish and pink snapper etc. are significantly affected by the total fishing pressure. The abundance of these fish species at Rottnest is a reflection of the entire West Coast region. A more appropriate solution is to properly manage the total fishing pressure and the fish populations in the entire region.

If there is a problem with key demersal species, for example blue groper, then the concept of total protection for blue groper in all waters around Rottnest Island would provide far more effective protection than discrete sanctuary zones around the island. This approach could ensure that the species is managed for the purpose of conservation and observation within the whole marine reserve and not just in discrete areas.

Lack of Assessment Criteria

The strategy does not have any measurable objectives or outcomes, other than the existence of closed areas, and the opinions of people measured by possible future surveys. A more considered strategy would be to clearly define expected outcomes and research to measure the actual outcomes that were achieved. The absence of any measurable criteria appears to be a deliberate omission that effectively eliminates the responsibility for the Strategy to meet any objectives. Clear objectives and criteria would allow the design of the strategy to be assessed against the outcomes resulting from the implementation of the strategy. This appears to Recfishwest to be a deliberate omission that effectively eliminates the responsibility of the RIA to quantify the success/failure of the Strategy.

Misleading and Confusing Information

The Strategy provided to the public for comment is confusing, appears to Recfishwest to be biased and is misleading. Recfishwest believes that the strategy has been presented in an emotive way. The cover of the Strategy states "*We think our kids should have their own fish stories*", implying that the Strategy is the only way this can be achieved, when there are many other ways of achieving significant benefits for the fish and the environment.

One of the most confusing and misleading issues is that there are two very different versions of the Strategy document headed "*Rottnest Island Draft Marine Management Strategy*" issued to the public. Both have significantly different layouts and contents. The two documents we refer to are, the hard copy (printed booklet) obtained from the RIA and the PDF document downloaded from the RIA website. Significant information is contained in the paper which is only available from the website. Without consistency of information, comments received by any public comment process cannot be considered to be properly informed comments, and any analysis of these comments is invalid.

The misleading information continues throughout the document. The Ecological Values Map of Seagrass indicates high conservation value for seagrass within the proposed Green Island sanctuary zone. However, the Ecological Values Map of Marine Habitats indicates the above mentioned area as being reef and sand. One map must therefore be incorrect. An assessment of recent GIS maps clearly outlines that the area in question is covered by reef and sand and not seagrass making the Ecological Values map of seagrass incorrect and misleading.

Again the Ecological Values maps are confusing in that there is a map for corals and molluscs and also one for invertebrates. Both corals and molluscs are invertebrates, so what does the map about invertebrates include? At no point of the document does it attempt to explain what this map is trying to indicate and it is confusing and misleading.

Recfishwest requires clarification on the RIA stance on spearfishing within the Rottneest Island Reserve. In a meeting with the RIA, the question on what changes will occur in regards to spearfishing within the Rottneest Island Reserve was posed to Ms Claire Wright, Manager of Marine and Terrestrial Environment. Ms Wrights' response mentioned that there will be no changes to current spearfishing restrictions apart from those in the proposed sanctuary zones and the existing Recreation Zone. However, the Management Strategy states that the Recreation Zone will be increased to encompass the whole Marine Reserve and the table outlining the uses permitted in each of the proposed zones indicates that spearfishing will be banned in the Recreation Zone. This indicates that spearfishing will be effectively banned from all waters of the Rottneest Island Marine Reserve. It is difficult to comment on this important issue when the document states that it will be banned and the RIA has publicly stated that it will not. Recfishwest believes there should be no further restrictions other than those currently in place for spearfishing within the Rottneest Island Marine Reserve.

Users Affected by the Strategy

The majority of restrictions proposed by the Strategy fall on recreational fishing only. The Strategy states; *"There should be minimal damage to, or loss of coral reefs, as a result of human activities"* and *"Geological features such as reefs, seabed..... should not be significantly altered as a result of human activities"*. So if the reason behind these sanctuary zones is for the protection of the delicate corals around the island, why is there no restriction on dive charters and recreational vessels dropping their anchors? This, once again, appears as though these sanctuary zones have been developed with the sole purpose of excluding recreational anglers with no consideration being given towards other threats to the benthic environment.

Fisheries Management in the West Coast Region

Recfishwest believes that management issues relating to Rottneest Island would be best served in the context of the whole metropolitan area. Recfishwest has previously written to the Minister for Fisheries indicating our support for a separate metropolitan management zone within the west coast fisheries bioregion. This separate metropolitan management approach could then include special attention to Rottneest which addresses the real threats and delivers real benefits for fish and the environment.

Biased Feedback Forms and Questions

Almost all the questions and information on the official feedback form appear to be quite emotive, would be very difficult to answer with "no", and so appear deliberately designed to achieve "yes" responses leading to a predetermined outcome from the "consultation". The answers can and will be interpreted as majority support for the entire package of proposals.

The online survey does not allow any editing or change of mind part way through the process of entering comments. Once a question is completed it is locked in and there is no way of going back. Allowing a change of comments before final submission is fundamental and mandatory in a properly constructed online survey form. This omission can only be construed as deliberate.

The question and answer section states *"Will my comments make a difference? All feedback is valuable, however respondents must consider that extensive consultation over two and a half years has already occurred between the major stakeholder groups, with concessions made on all sides."* The statement about extensive consultation is misleading and this answer is designed to discourage people from expressing an opinion because they may believe the proposals have already been agreed to by representatives of recreational anglers. This is not correct.

The statement, *"The diversity and abundance of marine animals are to be maintained at current levels or restored to 1950 conditions"* is a two part question with two very different implications for management, but only one answer is allowed. Very few thinking people would disagree with the first part, but few informed people would agree that the second part of returning to 1950 conditions would be achievable or in fact can be carried out because 1950 levels are not known.

All of this appears deliberately designed to mislead and achieve a predetermined outcome of majority support for the proposals. It is inconceivable that this could have happened without explicit direction from the RIA.

Site Specific Comments

Proposed West End Sanctuary Zone

The Strategy indicates that a primary purpose for this proposed sanctuary zone is to protect benthic fauna. The Strategy however fails to identify that the major threat to these types of fauna comes from human activity in the form of diving and anchoring, not recreational fishing.

Trolling for pelagic species such as Spanish mackerel, shark mackerel and yellowtail kingfish is popular off the West End. Both species of mackerel are migratory and are only in the area in late summer and autumn. Anecdotal evidence suggests that West End is one of the few locations where these species occur in numbers.

Recfishwest does not believe that the take of species such as Spanish mackerel, tailor and salmon has any impact on benthic invertebrates at West End. We also believe that there is no sustainability basis for the closure of this area that covers prime fishing grounds. Recfishwest believes a benthic habitat protection area would best serve the purpose of protecting delicate corals and rare molluscs rather than banning fishing such as trolling which would seemingly have no impact whatsoever on benthic species.

We also believe that shore-based fishing should be permitted within the proposed zone. Shore based line fishers do not target or damage molluscs, invertebrates or coral. The protection of these species has been identified as the fundamental reason for the proposed sanctuary zone, therefore, the allowance of shore-based fishing would not in any way compromise this objective. The Strategy identifies West End as not being intensively fished by shore-based fishers however, the small number of people that do fish this area are dedicated and experienced anglers that largely target pelagic species such as salmon, tailor and Spanish mackerel.

Proposed Salmon - Parker Point Sanctuary Zone

Recfishwest believes there is potential for conflict between commercial and recreational rock-lobster fishing at the proposed southern boundary. We recommended a 400 metre buffer between the proposed southern sanctuary boundary and the Marine Reserve boundary. Bringing the proposed southern sanctuary boundary in by 400m still allows for the areas recognised as high ecological value for corals and tropical fish to be protected whilst not impacting on an area highly valued by recreational fishers for rock lobster fishing and trolling for pelagic species. This proposed southern sanctuary boundary could alternatively be defined by benthic characteristics e.g. reef edge (drop-off to allow potting and fishing in deeper water).

Shore-based fishing should be permitted within the proposed sanctuary zone under the same premise of reasons identified for the proposed West End sanctuary zone.

Proposed Armstrong – North Point Sanctuary Zone

The proposed sanctuary zone at Armstrong-North Point is a key recreational rock lobster fishing area for families staying at Longreach and Geordie Bays. It is in easy and safe access for dinghy fishers from those bays. Recfishwest believes that the creation of this sanctuary zone is likely to push families that currently fish in these areas into surrounding areas, significantly increasing pressure on those areas. The safety of these possibly inexperienced family fishers could be seriously compromised by them being forced to fish outside of this safe and popular area. Conflict between commercial and recreational rock lobster fishers may arise. This is currently not an issue due to the restrictions placed on commercial rock lobster fishers not to fish within 800 metres of the island. Recfishwest believes the proposed sanctuary may force recreational rock lobster fishers to compete in the area where commercial rock lobster fishers currently fish. Recfishwest believes this area should be zoned special purpose, allowing rock lobster potting.

Proposed Green Island Sanctuary Zone

Recfishwest believes that shore-based fishing should be permitted in this zone. We also consider that anchoring on sea-grass beds should be prohibited with moorings only at Green Island. Moorings should be made available to allow recreational access to reduce damage to benthic habitat. As per our comments regarding the Proposed Salmon-Parker Point sanctuary zone there is a potential conflict on the south boundary between commercial and recreational rock lobster fishing. Recfishwest recommends bringing in the southern boundary by 400 metres. Again, as is the case with the Parker Point recommendation, bringing the southern boundary in by 400m still allows for the areas recognised as high ecological value for corals and tropical fish to still be protected.

Proposed Thompson Bay Sanctuary Zone

Recfishwest agrees with the proposed extension.

Conclusion

Recfishwest insists that the RIA strongly considers the concerns we have raised and that the realistic alternatives we have provided will be given the due consideration.

Recfishwest was willing to work with the RIA to develop a marine management plan that could have attracted wider community support with real benefits to the Rottnest Island marine environment. It is unfortunate that the RIA chose not to involve Recfishwest in the development of the Strategy.

We would like our submission to be given the credibility and importance which our status as the peak body representing Western Australian anglers warrants. Please do not hesitate to contact our office on 9246 3366 should further information or clarification be required on any part of this submission.

Yours sincerely

Des Wood
Chairman

14th July 2006

CC Premier, Hon Alan Carpenter
Minister for Fisheries, Hon Jon Ford
Minister for the Environment, Hon Mark McGowan
Minister for Tourism, Hon Shelia McHale
Leader of the Opposition, Hon Paul Omodei
Shadow Minister for Tourism, Katie Hodson-Thomas
Chairman, Rottnest Island Authority, Laurie O'Meara
Chairman, Recreational Fishing Advisory Committee, Douglas Bathgate