

Planning Coordinator
Shark Bay Terrestrial Reserves Management Plan
Department of Environment and Conservation
Locked Bag 104, Bentley Delivery Centre
BENTLEY WA 6983

Dear Sir/Madam

Re: Shark Bay Terrestrial Reserves and Proposed Reserve Additions – Draft Management Plan 2007

Thank you for the opportunity to provide comments on the Draft Management Plan for Shark Bay Terrestrial Reserves and Proposed Reserves Additions.

Recfishwest is the peak body representing the estimated 643,000 recreational fishers in Western Australia. We have an enviable record of proactive species and marine environmental management. Recfishwest promotes and supports responsible recreational use of all of the environment. Recfishwest also supports a risk based approach to management of activities to balance environmental needs with reasonable access by the owners who are the public of Western Australia, with particular emphasis on responsible access and use for recreational fishing.

These comments have included input from some clubs and individuals who have many years' experience with access to, camping and fishing in the Steep Point/False Entrance and other areas of Shark Bay that are important to recreational fishers.

General Comments

The coastline from Steep Point south and the west coast of Dirk Hartog Island provides some unique land based fishing opportunities for anglers from all over Australia. The special characteristic of these locations are that anglers have the unusual opportunity to catch large demersal and pelagic fish from shore. This type of fishing is not only highly prized by shore anglers, but it provides opportunities in which proper management can enable a sustainable level of quality fishing in natural or even wilderness surroundings.

The draft plan is very comprehensive and includes many of the topics of interest to recreational fishermen in the area.

In general, but with some specific exceptions as covered later, Recfishwest supports the intention of these plans to manage these areas for sustainable use and for future generations. However, we would like greater accountability for the generally agreed intentions as set out in the draft plan. For this reason, Recfishwest would like to see the provision for the establishment of an ongoing stakeholder

advisory group that would be used to review and advise on the detailed plans where recreational development is to be a part of the management. Fishing is a major activity (about 400,000 fishing days in 1998/99) and more than half of the fishing effort is shore based. Nearly all of the fishers are visitors to the region, most of them from the Perth metropolitan region. There is thus a need to include visiting recreational fishing experience on the stakeholder advisory committee.

Although Recfishwest has highlighted the importance to fishers of the Steep Point /Rest Bay area and Dirk Hartog Island, other areas are also of interest in relation to access and camping opportunities for recreational fishers and Peron Peninsular is certainly one such area.

Fishing Safety

Fishing safety is always an important consideration for recreational fishers, however this is always the responsibility of the individual fisher and fishing party considering their abilities, experience, judgment, equipment and the weather and swell conditions at the time.

Over many years innovative and resourceful recreational anglers have come up with fishing equipment and methods which have allowed many difficult areas to be fished safely and effectively in the right weather conditions.

Recfishwest believes this has been demonstrated by the low level of incidents in this currently remote and difficult area.

Rock fishing has its inherent risks, however rock fishing can be carried out safely by people who are aware of these risks, so no other body should make decisions about restricting access based mainly or solely on any perceived “safe fishing” criteria, or the lack of ability to provide extras such as rock anchor points, which may be desirable but are not essential.

Camping

The sections on camping do not give full details of the proposed number of camp sites, the overall and individual size(s) of these which determines how many people, tents, vehicles, trailers etc can use them, the separation of sites for generator use, noise, disturbance and property security, the possibility for some camp sites closer to other specific fishing spots, any time or occupancy limits, facilities to be provided specifically for fishermen, a major group of users, and similar important questions of detail which will determine the success of the implementation.

Advice from users is that the current management of the Steep Point/Rest Bay camping area by Ranger Paul and his wife Pam has been of a very high standard. Their commonsense approach to acceptable visitor activities and booking system is working well to manage the number of campers and the environment in these areas. Recfishwest believes that this should provide a model for supervised camping in other areas.

Involvement with implementation planning

As proposed under our *General Comments*, strong representation and involvement from the recreational fishing sector on the management committee that is charged with actually implementing the detail of the changes to the Shark Bay area is vital to resolve these questions of detail which are not in the Draft Management Plan, or have not been foreseen. It is essential that such a committee hears from and takes notice of this sector of the community that is presently and will continue to be a major user of this area.

Managing visitor use

Recfishwest supports rationalising and managing vehicle access tracks, however such rationalisation must maintain reasonable access to areas which have been used by recreational fishermen for many years to fish in many locations.

Although “walk-in” access is suitable for tourists, nature appreciation and some other sorts of recreation, these uses are usually of much shorter duration or by people who are suitably equipped for such extended walking activities. Recreational fishing requires reasonable vehicle access to such areas to enable essential communications, safety and fishing equipment, shade, food and water, etc to be accessible during the many hours of fishing.

In particular, Recfishwest cannot support the closure of the area between False Entrance and the Blowholes, which would remove access to several excellent fishing and swimming locations including Crayfish Bay. Recfishwest’s view is that a 4WD track should be provided to maintain the access to these highly valued recreational fishing locations, and that some camping sites should be provided.

In addition Recfishwest is greatly concerned that it is proposed to construct a 2WD access road to False Entrance. In the past this area has been protected by the requirement for 4WD vehicles, so anglers and others who are aware and prepared for the prevailing conditions are therefore suitably equipped. To open this area up for general 2WD access would allow an uncontrolled number of inexperienced visitors to venture into what can be very dangerous circumstances, and a long way from help.

Recfishwest recommends that DEC provide only 4WD access to False Entrance and the area from Steep Point south along the coast, including Crayfish Bay and adjacent locations.

General comments on terrestrial planning

The *Invitation to Comment* page of this draft plan is very prescriptive on the conditions under which the content of the plan will be reviewed. Of particular concern are the sections “*plan will not be amended if a submission:*” “*makes statements.... were considered during the plan preparation*” or “*....strategies of the plan are still considered the best option.*” Such statements do not give confidence that good, reasoned and rational comments will be considered on their merits.

Although there has been some prior opportunity to comment, considerable extra detail is now included for the first time in this draft, but the above indicates that changes may be difficult. Also the plan can

be amended by DEC or the Government without further consultation or any further opportunity to comment on those new changes. This is a significant flaw in DEC's terrestrial planning process. Recfishwest is aware this is in accordance with the CALM Act.

Identical concerns that have arisen in the past in relation to marine park planning, which subsequently have seen the creation of a representative stakeholder reference group which includes a recreational representative.

It would seem logical that a stakeholder reference group should be established for the terrestrial park planning process, along similar lines to the marine planning group, in order to avoid some of the problems experienced in the past and which are still present.

Recfishwest would be pleased to provide further information on this submission. Please feel free to contact the office on (08) 9246 3366.

Yours sincerely

Kane Moyle
Acting Executive Director

4 July 2008

CC Doug Bathgate, Chair RFAC