



Environmental Protection Authority
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Attention: Leanne Thompson

RE Submission on Environmental Scoping Document - International Container Facility, James Point Kwinana

Summary

Recfishwest, as the peak body for recreational fishers in Western Australia, has a particular interest in Cockburn Sound because of its unique habitat of protected marine water close to the major population centre on the west coast of Western Australia. This ecologically significant area not only provides an important fishing location but also is a scientifically recognised nursery area for the juveniles of many fish species. The natural environment of Cockburn Sound has been irreparably damaged over the last 40 years by the cumulative impact of a series of industrial and commercial developments. Any further development in Cockburn Sound must be closely examined in consequence and harmful environmental impacts avoided or minimized and balanced by appropriate offsets.

Recfishwest has examined the possible impacts of the proposed development on fish habitat and believes that the investigations proposed in the ESD do not appear to sufficiently define the impact on fish populations, particularly to juvenile recruitment of important recreationally targeted fish species. Here, we have provided suggestions on such investigations as well as comments on water quality, access to the Sound along the eastern shore and potential offsets.

Introduction

One of the prime objectives of the Cockburn Sound Management Plan is to facilitate multiple use of the Sound because successive governments have always insisted that this is their policy. Recfishwest, as the peak body for recreational fishing in Western Australia is particularly interested in any possible impacts arising from this proposal which could affect recreational fishing, either in Cockburn Sound or more generally.

Recfishwest has previously commented through the Cockburn Sound Management Council and on its own behalf on the Project Environmental Reviews for the Livestock Holding Facility and James Point Port Stage 1. We have also been involved in discussions involving the Fremantle Ports proposal for an outer harbor in Cockburn Sound.

Recfishwest is confused by the current situation where a series of port proposals, some of which overlap in purpose and which interact environmentally, is being serially considered by the EPA and the government, and some approved, without any co-ordination – and so far without any actual construction. At this stage Recfishwest realizes that our only concern is to try to ensure that the ERMP for the James Point ICF proposal provides all the information needed to assess the project. However, in doing this we emphasize that we do so in the context of the recommendations of the EPA *“that the issues raised (cumulative impact) should be addressed by proponents during planning and design of their proposals and by government during the decision-making process, taking into account the interaction of each proposal with existing and planned facilities”* (Recommendation 3 of The Marine Environment of Cockburn Sound – Strategic Environmental Advice EPA Bulletin 907 1998)

7.7. Marine Fauna Species Survey

Recfishwest recognises that the scoping document proposes to collect marine fauna data, including information on selected fish species, as part of the biota monitoring survey. However, we do not believe that the proponents of the

development recognise the type of information that is required and therefore are not currently planning to collect it. In March 2001 the Department of Fisheries, in its submission to the EPA on Cockburn Cement's shell-sand dredging proposals said,

“the results of a very extensive body of work that has been undertaken in near-shore marine and estuarine habitats of south-western Australia now clearly confirms that the 0+ year classes of most economically important coastal finfish species utilise protected marine shoreline habitats and similar habitats in the lower reaches of estuaries. The greater the level of protection it seems, the more valuable the habitat.”

The importance of these near-shore shallow water habitats is as a habitat for juvenile fish. These small juvenile fish require careful sampling and are often overlooked in a general survey. Some of the studies summarized in the quotation above used seine nets with a mesh size of 6mm (Ayvazian and Hyndes, 1995). Equally important is the need to carry out sampling at several times of the year because different species breed at different times (Hyndes, Potter and Lenanton, 1996) and to sample at different depths because the juvenile fish occupy different depths at different times (Hyndes, Platell, Potter and Lenanton, 1998).

Some of the fish species which have a high value for recreational fishing include:-

- Garfish (*Hyporhamphus melanochir*)
- Herring (*Arripis georgianus*)
- King George whiting (*Sillaginodes punctata*)
- Pink snapper (*Pagrus auratus*)
- Tailor (*Pomatomus saltatrix*)
- Silver Trevally (*Pseudocaranx georgianus*)
- Whiting species other than King George

Also the very important commercial and recreational invertebrate fishery species:-

- Blue swimmer crab

Cockburn Sound is most likely the main nursery area for the highly valued metropolitan King George whiting fishery. It has also been identified as the only known breeding ground between Kalbarri and Cape Leeuwin for the important commercial, recreational and charter fishery target species, the pink snapper (Wise, St John and Lenanton 2007).

Recfishwest recommends that quantitative information be obtained that enables an estimate to be made of the impact of this port proposal on breeding and recruitment of the fish listed above and others which Western Australian Department of Fisheries or appropriate university scientists consider relevant. The impacts would be those arising from dredging to 14m for the port, turning circle and access channels, the area of shallow water lost by reclamation and any impacts from reduced water quality and sedimentation from dredging. This information would be used generally in assessing the significance for approval and specifically for assessing the magnitude and nature of offsets if the proposal proceeds.

7.3 Marine Water and Sediment Quality Review and Investigations

Earlier reports have identified wind-driven north-flowing currents along the east side of Cockburn Sound as being an important component of water exchange, particularly in summer. Presumably, the reclaiming of 70 to 100ha of the Sound at James Point would have a significant impact on this. If the James Point container facility proceeds, the James Point bulk and general facility also proceeds and the Fremantle Ports outer harbor proceeds it is possible that there would be a cumulative impact on water quality not only in the James Point water lease area but all the way along the eastern part of Cockburn Sound. As all of these developments are currently possible, and there may be others of which Recfishwest is

unaware, it would flagrantly ignore the advice of the EPA to the government in 1998 if the project ERMP did not provide the information on potential cumulative impacts on water quality for the assessment of the James Point ICF proposal.

In line with previous comments Recfishwest believes that these investigations should include modelling the possible scenario for water quality if all the currently known potential developments for Cockburn Sound proceed.

3.5.2 Recreational Values

Access to the shoreline and to water is a basic recreational value that is essential to use of the shore and water for a variety of purposes. The eastern shore is particularly important in this regard because the shelf of shallow water, which extends from James Point to Woodman Point and was originally covered in seagrass, was a prime habitat for fish and fishing. It was also originally easily accessible, although the ribbon of industrial and commercial development along the shoreline has now reduced this to a launching ramp at Woodman Point, a very short length of unstable beach at Challenger Beach and an access of doubtful legality at Barter Road beach. The overall effect of this has been that a series of individual decisions approving industrial and commercial developments has deprived the public of access to twelve kilometers of shoreline access in the middle of the Metropolitan area. The Cockburn Sound Management Council said in its Management Plan that it would investigate ways of improving community access to and use of the eastern foreshore.

The outline of coverage of recreational values in the scoping document dismisses the impact of the proposed development on recreational access by saying that both the water area and the land are currently not accessible to the public. This zoning has existed for a long time and so far as access to the shoreline is concerned it has been widely ignored. In fact its use as a horse exercise area was a controversial issue in the consideration of James Point Stage 1.

In view of the Cockburn Sound Management Council's recognition of the scarcity of recreational access along the eastern shore as a problem, Recfishwest believes that the possibility or otherwise of allowing public access to some part of the area should have been seriously discussed.

10. Environmental Mitigation - Offsets

The Cockburn Sound Management Council (Environmental Management Plan for Cockburn Sound and its Catchment 2005) addressed the issue of offsets in regard to its guidelines for developments affecting the shoreline and seabed. It suggested:-

1. Proponents should take all reasonable efforts to limit the environmental impacts resulting from the proposed development.
2. If, despite all reasonable efforts, significant impacts remain, offsets will be required which address these impacts on environmental values without trade between ecological or social values.
3. Offsets should be:-
 - Appropriately located within the affected area.
 - Enduring, either by permanently achieving no net loss or temporary with rehabilitation in a defined time.
 - Targeted so that they replace the loss of ecological or social value on a like for like basis.

Recfishwest supports the Cockburn Sound Management Council's guidelines for offsets. We believe that where a project is approved despite significant environmental or social impacts, offsets should address those impacts as closely as possible to restore the value.

Recfishwest acknowledges that the time to determine any offsets in relation to the impacts of this development is after the release of the Environmental Review and Management Program.

Should you require any further comments or clarification please do not hesitate to contact me on (08) 9246 3366.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Frank Prokop', written in a cursive style.

Frank Prokop
Executive Director

25 April 2010

References

Ayvazian, S.G. and Hyndes, G.A.(1995) Surf zone fish assemblages in south-western Australia: do adjacent near-shore habitats and the warm Leeuwin current influence the characteristics of the fish fauna? Marine Biology 122; 527-536

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Hyndes, G.A., Platell, M.E., Potter, I.C. and Lenanton, C.J. (1998) Age composition, growth, reproductive biology and recruitment of King George whiting, Sillaginodes punctata, in coastal waters of southwestern Australia

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