



Plan Coordinator – Eighty Mile Beach
Department of Environment and Conservation
Marine Policy and Planning Branch
Locked Bag 104
Bentley Delivery Centre WA 6983

Dear Mr Fossey

RECFISHWEST SUBMISSION ON THE EIGHTY MILE BEACH MARINE PARK INDICATIVE MANAGEMENT PLAN

Introduction

Recfishwest is the peak body representing the interests of over 600,000 recreational fishers in Western Australia. We are formally recognised and funded by the Government to perform that role which includes undertaking extensive consultation with the recreational fishing community on issues relating to marine and freshwater ecosystem management.

The aquatic habitat in which fishing is carried out and access to those areas is particularly important to Recfishwest and we place the highest priority on preserving the future of recreational fishing and the resources on which it depends. Recfishwest has developed this submission after considering the values and future management challenges of recreational fishing in the Kimberley region and in particular, Eighty Mile Beach.

Recfishwest strongly supports appropriate management of marine areas in order to provide adequate protection of biodiversity and marine ecosystems. Recfishwest believes this management should also provide for sustainability of any resource use and equitable sharing of such resources. Recfishwest recognises that a marine park is a resource for the entire community.

However, Recfishwest does not support no-take/no-fishing/sanctuary zones where the establishment of these zones lacks sound scientific justification. No-take zones should be established with clear objectives and measurable outcomes.

General comments

Recfishwest believes marine parks can play an important role in conservation of marine ecosystems, the development of management strategies must account for equitable representation from all stakeholder groups. The marine park planning process also needs to recognise the framework already in place for the management of sustainable fisheries. Any controls developed in marine parks need to be complimentary rather than seeking to replace existing management.

With 47.4% of the population of the Kimberley being indigenous, recreational fishing is an important activity that is shared between cultures and as such is also an activity that can provide sustainable economic opportunity for remote communities through the development of charter boat tourism enterprises. Currently tourists to the region enjoy natural and cultural activities with an expressed interest in wilderness or outdoor activities. Accommodating for tourism in the area will provide great opportunity for economic participation in indigenous communities which is one of the key objectives of the Closing the Gap Policy.

There are several statements made within the proposed plan which suggest the area requires further research and study prior to the proposed sanctuary zones being implemented. These include;

“There is little known of the filter feeding communities located in the subtidal zone of Eighty Mile Beach...”

It is clear there is a severe lack of knowledge of the ecology of the Eighty Mile Beach area, it does not seem logical to implement marine sanctuary zones on areas where the full implications of these zones are not understood. These zones are being proposed in areas based on speculation and hear-say, rather than proven evidence.

“Current knowledge on the distribution, migratory habitats and regional and local importance of the proposed marine park for cetaceans is limited.”

Again, without sufficient knowledge how can the implementation of sanctuary zones be warranted, when the implications of these zones on wildlife is unknown.

“Further investigation is required to determine if localised depletion [due to recreational fishing] is significantly affecting the social values of the area...”

Of particular concern is this unsubstantiated claim of localised depletion. The statement is backed by absolutely no evidence, though has the potential to result in huge repercussions throughout the fishing community. Without any evidence of its occurrence, wild claims such as this risk damaging the Departments of Environment and Conservation's (DEC) credibility in the long term.

All management summaries state that there are; “No current management pressures.”

With no management pressures on Eighty Mile Beach, Recfishwest is lead to question the purpose of this management plan in the first place. There is no significant ongoing damage to the area as a result of tourism and recreational activities; as such there seems little point in locking up areas to 'save' them. The remote nature of Eighty Mile Beach in itself precludes any heavy recreational usage throughout much of the region. Very low visitation to a majority of the coastal areas is therefore in itself a form of 'protection' to listed species.

Comments in relation to the "Have your say" template

Reserve boundary

Please have a look at the outer reserve boundary in the zoning map in this brochure. Do you have any changes or suggestions to the proposed outer boundary?

Recfishwest does not object to the location of the outer boundary of this proposed Marine Park.

Zoning

Anna Plains Sanctuary Zone

Recfishwest does not object to the location of this sanctuary zone. Vehicle access to the beach is a unique experience for many tourists coming to the area; as such we would like to ensure it remains that way, maintaining the current level of access for future generations.

Cape Keraudren Sanctuary Zone

Recfishwest does not support the location of the Cape Keraudren Sanctuary Zone, and would like to highlight that its placement is within the vicinity of key recreational fishing areas. Cape Keraudren is one of the only access points along this portion of the coastline which also has a well used camping ground, during the dry season it is highly visited by recreational fishers. As the proposed Cape Keraudren Sanctuary Zone is so close to shore, particularly the south-east corner, we are of the belief that its placement will prove difficult to enforce. Its proximity to public access to the coast will severely impact the activities associated with recreational fishing and decrease the overall amenity value of this highly visited location.

Pardoo Sanctuary Zone

Recfishwest does not support this sanctuary zone in its current form. One of the main reasons for its placements is to protect the seagrass communities important for dugongs, of which recreational fishers pose no risk. The marine turtles which feed on the coral reef and macroalgae communities are also at no risk from recreational fishers. Indeed, these species are far more likely to be impacted by surface water sports. If increased protection for turtles and dugongs is truly warranted then Recfishwest recommends a

speed limit over such areas for surface water sports such as jet skiing. These are currently able to travel at unregulated speeds (up to 100km/h) potentially impacting on surface-breathing species. Given the proposed Pardoo Sanctuary Zone's close proximity to public access to the beach, Recfishwest is of the belief that its placement will severely impact the activities associated with recreational fishing.

Recfishwest believes the extension of the sanctuary zone into the mudflat area behind the Pardoo Special Purpose Zone will be *extremely* confusing to visitors of the area. Visitors are essentially left with a pocket of restricted recreational activities, surrounded by sanctuary zones. The extension of the sanctuary zone into mudflats which are commonly used by cattle of the Pardoo station appears pointless.

To minimise the impact on visitors and remove the unnecessary marine park land coverage, Recfishwest recommends the area of the Pardoo Sanctuary Zone be altered to extend from 119°42'E to Red Point, and out to the boundary of State waters (see Appendix I). In addition to this it is recommended a Special Purpose Zone (Shore-based Fishing) be implemented adjacent to the sanctuary zone, to ensure that shore-based recreational fishing can continue unimpeded (Appendix I). This type zoning arrangement is consistent with that of Ningaloo Marine Park where shore based fishing is permitted adjacent to sanctuary zones. Recfishwest believes that it is important that DEC apply consistency across marine parks throughout the state. Given the proximity of the access point to Pardoo, all areas to the south of Red Point, and north of 119°42'E should be zoned General Use, and remain open to recreational activities.

Wallal Recreation Zone

Recfishwest supports the zoning of this area with particular respect to its proximity to the Eighty Mile Beach Caravan Park. It conserves the wilderness values, while still allowing public access and recreational activities to occur.

Pardoo Special purpose (Shore-based Activities Zone)

As per statements under *Pardoo Sanctuary Zone*, Recfishwest believes that this area should be a mixture of sanctuary zone and general use, as described in Appendix I. The area adjacent to the sanctuary zone should be zoned Special Purpose (Shore-based Fishing) for recreational activities. Special Purpose (Shore-based Fishing) Zones have been implemented similarly in the Ningaloo Marine Park, which allow shore-based fishing alongside sanctuary zones such as the Lighthouse, Jurabi, Osprey, Cloates, Maud, Pelican and Winderabandi Sanctuary Zones.

Mulla Mulla Special Purpose (Mangrove Protection) Zone

Recfishwest supports the land-based protection of mangrove communities, particularly as they are such important habitat and refuge for a variety of fish, sharks, rays and juvenile species. Recfishwest commends DEC for acknowledging this areas importance to recreational fisheries, and allowing boat-based fishing.

General Use Zone

Recfishwest supports the zoning of all remaining areas of Eighty Mile Beach as General Use, providing for recreational activities, including fishing.

Management arrangements

Manage human activities that may impact nesting marine turtles and hatchlings along eighty mile beach, including season beach closures to vehicles.

While Recfishwest supports vehicle seasonal access restrictions, it is believed that it will have little effect on the nesting turtles. The number of cattle that walk through the area, which trample nests needs to be restricted before it will make any sense to also limit vehicle access. Recfishwest does not however, support complete closures to vehicle access throughout the year. It is a unique experience for many tourists to be able to access the beach by vehicle, and it is in fact one of the drawcards to the area. Complete closures to vehicles will significantly impact on recreational activities and the 'wilderness' appeal of Eighty Mile Beach. Recfishwest would like to see the specific seasonal closure dates shown in the final management plan.

Manage human activities that may impact water birds that feed and roost along Eighty Mile Beach, including season beach closures to vehicles.

As above

Manage recreational activities that may impact mangrove communities, such as restricting four-wheel driving, boat launching and access to mangroves by foot.

Recfishwest believes that the special purpose (mangrove protection) zone at Mulla Mulla will be sufficient protection for the mangrove communities of the Eighty Mile Beach area. No further restrictions need to be put in place. Mangroves are a unique habitat of which many tourists from South Western Australia are not privy to; if all are closed off to access (particularly by foot) it may deter tourism from the area.

Manage recreational and commercial fishing.

The Pilbara/Kimberley region already has sufficient management measures in place for the control of recreational fishing. It is explained clearly in the Recreational Fishing Guide for the Pilbara/Kimberley Region (2010), as published by the Department of Fisheries (DoF). Recfishwest encourages the collaboration between DEC and DoF for effective compliance and monitoring with respect to the management of fishing practices.

Management programs

Recfishwest supports all management programs, particularly;

- Education and interpretation; the public are far more likely to comply with regulations if they are aware of the reasons behind them.

- Public participation; this is integral for the effective implementation of the management plan. Public participation will improve community support and will be empowering to local communities when they see the results of their work come to fruition.

-Patrol and enforcement; it is important that there is a physical presence of enforcement in the field as often as possible. While Recfishwest understands restrictions with regards to the remoteness of the area, it is the consensus of many locals that a greater presence is required. With the potential implementation of marine sanctuary areas, this will become all the more important. Recfishwest encourages the collaboration between DEC and DoF for effective compliance monitoring and believes a more integrated approach to marine planning that encompasses all relevant Government agencies is urgently required. More specifically, the legislative responsibilities of DEC and DoF must be recognised. These agencies must work more closely together so that the most appropriate combination of management tools available to Government are used to ensure the sustainable use of natural resources throughout the whole region, while maintaining its ecological and biodiversity values. This will ensure the planning process is credible with outcomes that have understanding and acceptance among all stakeholders.

- Research; as stated in the Eighty Mile Beach Indicative Management Plan, the background information necessary for effective management is lacking and research is required to fill in the gaps. It is recommended that these studies be completed *before* the final management plan is put in place, therefore management can be designed around evidence rather than speculation.

Summary of Recommendations

- 1) Recommend that the area of the Pardoo Sanctuary Zone be altered to extend from 119°42'E to Red Point, and out to the boundary of State waters (Appendix I). All areas to the south of Red Point, and north of 119°42'E should be zoned General Use, and remain open to recreational activities.
- 2) Recommend that the Pardoo Special Purpose (Shore-based Fishing) Zone be adjusted so it runs adjacent to the sanctuary zone, to ensure that shore-based recreational fishing can continue unimpeded. We would like to see the precedent of Special Purpose (Shore-Based Fishing) Zones implemented within the Ningaloo Marine Park applied to the 80 Mile Beach Marine Park.
- 3) Remove the proposed Cape Keraudren Sanctuary Zone; this zoning will significantly impact visitors as one of the only access points along this portion of the coastline.

- 4) Complete closures to vehicles will significantly impact on recreational activities and the 'wilderness' appeal of Eighty Mile Beach. Recfishwest would like to see the specific seasonal closure dates shown in the final management plan.
- 5) As stated in the indicative management plan, the background information necessary for effective management is lacking and research is required to fill in the gaps. It is recommended that these studies be completed *before* the final management plan is put in place, therefore management can be designed around evidence rather than speculation.

Thank you for providing Recfishwest with the opportunity to comment on the proposed plan. Please feel free to contact the Recfishwest office on 9246 3366 should you require any further clarification or information pertaining to our submission.

Yours sincerely



Andrew Rowland
Acting Chief Executive Officer

18th January 2012

Appendices

Appendix I: Proposed changes to Pardoos Sanctuary Zone. Black line indicates Special Purpose Zone (Shore-based Fishing).

