

ESPERANCE PROFESSIONAL FISHERMEN'S ASSOCIATION

P.O. BOX 1637, Esperance W.A. 6450 espprofishermen@hotmail.com

Australian Marine Parks Management Planning Comments
Department of the Environment and Energy
Reply Paid 787
Canberra ACT 2601

E: managementplanning.marine@environment.gov.au

CC: Western Australian Fishing Industry Council (WAFIC), Att: Guy Leyland

CC: Rick Wilson MP

28/08/2017

RE: South-west Marine Reserves Comment

I am writing on behalf of the Esperance Professional Fishermen's Association to express our concerns over the proposed Commonwealth Marine Reserves.

The association stands to represent the fishing community working from Albany to the Eucla border. We include members of the demersal gill net, lobster, pot and purse seining fisheries involved in shark, octopus, southern rock lobster, pilchard and finfish harvest for domestic and export markets.

The marine zoning will directly impact our livelihood and our community. Of particular concern are proposed green zones (National Park Zone IUCN II areas) within the Southwest Marine Reserve area, including those within Eastern Recherche and Twilight zones. We ask for changes to the draft management plan to resolve issues that arise from the proposed green zones. These include specific zoning changes. The reasons for these changes – and how vital they are – are outlined below.

The cumulative effect of the sea lion exclusion zone, sea lion exclusion devices (SLEDs) and the Marine Reserve will have an immense impact on the economic viability of our fishing operations. Recent decisions by the Commonwealth Dept. of Environment will see the forcible loss of **80 %** of our fishing grounds for the protection of the Australian Sea Lion.

Within the Demersal Gill net (shark) industry, the numerous islands within the Recherche Archipelago stand to have a network of 20km shark fishing exclusion zones around them. This itself could close 'up to a third of state waters in the Southern Shark Fishery' (Rogers, 2017, p. 47 quoting Francis, 2017). With the introduction of these exclusion zones in the Recherche Archipelago for the shark fishery, fishermen will be forced to work further east towards the bight, due to the reduction in fishing ground. Rogers (2017, p.47) believes the economic impact could be two to three times greater than ABARE projects, with at least one in three

land based businesses in both Albany and Esperance likely to close due to these restrictions, as well as a significantly diminished fishing fleet.

Take into consideration that the Southern shark fishery contributed a GVP of over 3.4 million dollars in 2014/15, which multiplies in a gross domestic value for Australia of over 23.3 million dollars. As per Rogers, (2017) this is a sizable economic contribution, particularly to the regional areas where these industries operate.

Further, the current draft green zones compounds losses by taking more ground on top of what the fishery stands to lose from the sealion exclusion areas. This also contributes to a future concentration of effort elsewhere.

Therefore, we request the two-special purpose zones (IUCN VI) allowing commercial fishing within Twilight Reserve, be extended all the way to Latitude 34S. This would lessen compounded impact from sealion/green zones, allow fishing to approximately the shelf line (which is generally the maximum depth fished for shark fishery) and create ease of crossing zones by simplifying zone boundaries as well as making enforcement of zoning easier to achieve. We cannot stress enough the importance of this change is for the survival of the Esperance shark fishery, contributing almost four million dollars annually of final sale return of GVP (Rogers, 2017).

The Southern Rock Lobster (SRL) industry faces similar restrictions and loss of grounds, due to protection of the Australian Sea Lion by Commonwealth Department of Environment stipulations. Southern Rock Lobster Fishermen are disallowed from setting pots in productive areas inshore around islands or areas with Sea Lion colonies without the fitting of Sea Lion Exclusion Devices into each pot that enters the water which is argued to reduce catch rates. Once again, these regulations and (80% inshore) fishing ground losses will be compounded by the National Park Zones in the Eastern Recherche and Twilight Marine Reserves.

Previous draft plans for the South-west Reserves detailed a smaller Eastern Recherche reserve which did not include Daw Island. The latest zoning plan for the South-west detailed the inclusion of Daw Island into the reserve, within a new green block (National Park Zone IUCNII), attached to the eastern side of the reserve. It appears that the island has been swapped into the reserve, in return for the exclusion of the South-east Islands. ***We request the National Park area around Daw Island (the eastern IUCN II zone in the Eastern Recherche Reserve; Coords: 33'36"S to 34'12"S by 124'00"E to 124'18"E) be changed to a special purpose zone allowing commercial fishing.*** This is important to the economic survival of the SRL industry as well as associated wet line and gill net fisheries.

It needs to be considered that SRL are not a pelagic species and are only found in a limited area of southern WA waters. Any loss of ground to the Marine reserve cannot be recovered by fishing elsewhere. Although fishermen had previously considered being able to recover some of the lost SRL catch by increasing wet line (scale fish) catch, wet line fishery access will greatly diminish once the W.A. Fisheries south coast wet line review is complete. Although the wet line species and fishery is considered environmentally sound, Fisheries WA consolidation efforts will mean that many vessels currently able to wet line fish, will lose access to this form of fishing, thus losing another income source, on top of any loss to marine reserves.

Since the Bremer Bay reserve has seen most of its Special Purpose Zone changed to National Park Zone, we would ask that the percentage of special purpose zone that was taken from Bremer Bay, be allocated to the Twilight and Eastern Recherche Parks.

Further to the above specific requests, please see further concerns we hold as below. These were first raised in 2012 and some remain unresolved.

The unquantified cost associated with these marine parks and enforcement of them in the future. The current economic status of our industry dictates that we will not be supporting any further costs levied on ourselves in relation to the reserves. We financially cannot absorb more expense. It seems unlikely that Commonwealth or state resources, including that of the navy and aerial protection could enforce reserves properly. As such, the enforcement of the parks may involve fishermen having to install tracking aids vessels. This is not viable.

Economically there will be a direct and continual effect on our livelihood. Loss of commercial grounds will affect those working in various fisheries, particularly the gill net (shark) and Lobster fisheries near the Twilight and Eastern Recherche reserves. The increase in fees, possible decrease of catch and restriction of workable areas will decrease license values, assets such as vessels and gear, and properties utilised for fishing bases. Fishing businesses would lose overall saleable value. The expenses would ultimately kill off small business and industries, yet make way for large companies and industry such as oil and gas, who have the funds to access these zones and navigate permits and processes easily. The Rogers report (2017) clearly indicates this.

The already underutilized Bandy Creek Fishing Boat Harbour a capital asset owned by State, would be negatively affected. The harbour is currently struggling to be economically viable. With further pressure from reserves and their flow on effect, it would be detrimental to the harbour income and valuation, home of the commercial fleet and a capital asset of the government.

The socio-economic effect in community. This includes loss of revenue through sales to other associated marine retailers, culminating in the loss of community business and members. The fishing industry supports a broad cross section of businesses and areas of local community. These businesses will bear the cost in lost income, causing job loss. In small regions, this will manifest in the loss of families, as individuals are forced to move elsewhere for work.

The local area between Albany and Eucla is underutilized and the commercial industry should be promoted as viable and sustainable, not locked out of this area. The region should be a sustainable asset to the southwest and Western Australian economy. The region is already well managed, due to the areas isolation, inclement weather affecting accessibility and regulation by Fisheries Department.

The continuing lack of information on any compensation alternatives to any individuals or groups before implementation.

The Esperance fisheries feel strongly that their point of view has not been properly considered and hope that they can be heard in this final draft stage. The shark and Southern Rock Lobster fisheries in particular will be detrimentally affected by drafted green zones in the Esperance, Eastern Recherche and Twilight zones of the South-west marine parks network. A final note of consideration, is those of fact. The estimated final sale return of GVP from 21 south coast

fisheries was recently stated as being 72.5 million dollars annually. This does not include a basic GVP from the abalone industry of 8 million dollars (Rogers, 2017). Surely this contribution to the nation is not one to be dismissed lightly.

Regards,

A handwritten signature in black ink that reads "N Mansted". The letters are cursive and somewhat stylized.

Neville Mansted

President, E.P.F.A.

REFERENCES

Rogers.P, 2017 *'The case for establishing the Southern Seafood Producers Association; A synoptic summary of the case, issues and future challenges'*, Western Australian Fishing Industry Council, Fremantle