



THE GAME FISHING ASSOCIATION of AUSTRALIA Inc.

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20th September 2017

Dear Ms Barnes,

Re: Australian Marine Parks Management Planning Comments

Thank you for the opportunity to make this submission as part of your Commonwealth Marine Reserves Management Plan evaluation. You are to be congratulated on the efforts of your Department's crafting of balanced and rational plans.

The proposed plans provide a better balance than previously, fostering the enjoyment and protection of Australia's diverse marine environments and providing world class recreation and tourism opportunities. The plans strikes a better balance to protect the interests of the country's residents, economy and long term wellbeing, while maintaining good outcomes.

GFAA, founded in 1937, is the oldest game fishing representative association in the world. Its approach to conservation is real and significant. The association finances, supports and provides practical assistance for a wide range of research activities including the latest technology satellite tagging. GFAA promotes tournament capture studies and participates in the monitoring and tracking of fish species, some 445,000 of which have been recorded in the NSW DPI database. A similar number is believed to have been recorded in other tagging programs. GFAA is clearly an advocate for responsible recreational fishing and the use of citizen science to gain better understanding of the marine environment.

GFAA has participated in the long process of consultation and review of The Commonwealth Marine Reserves Network. It has active participation with marine resource management, as a number of our members sit on Australian fisheries management and scientific committees. GFAA encourages child and youth participation through our small fry and junior programs and has a Code of Practice outlining the expectations for its members and setting the standards for all game fishing exponents.

This Association is self-funded, operated entirely by volunteers and is a member of the International Game Fish Association and the Australian Recreational Fishing Foundation. Game fishers are avid travellers and many of our affiliated members fish across all parts of Australia and indeed the world,

contributing to tourism income and to regional economies in a substantial manner.

Our assessment of the draft proposals confirms the recognition of the conservation, social and economic importance of this vital part of the Commonwealth estate, assigning significant protection where it is considered necessary. Importantly to the members of this association is that the very low impact of game fishing appears to have been acknowledged as does the fact that there are many communities and individuals dependent on the sea for their livelihoods.

GFAA still remains of the view that recreational anglers, under certain conditions, should be able to access IUCN 11 (green) zones. We are unhappy about the loss of access for our activities in a number of key reef area in the Coral Sea but are of the view that the present plan is an acceptable balance given the competing interests in these regions.

The main area that is affected is the Coral Sea Marine Park, where vast tracts of ocean are utilised by recreational fishers. This area is equally important to them and the charter operators who provide the platform for many recreational anglers to access wild fisheries and contribute to local and international tourism and local employment. It should not be overlooked that the Coral Sea is high on the list of "must visit" destinations for both experienced and aspiring game fishers and must be particularly well rated in in terms of potential social and economic value.

GFAA is generally supportive of the proposed Coral Sea Marine Park zoning in that it does not restrict access to the fishing grounds that many thousands of Australian and overseas visitors have harmlessly enjoyed over many decades. The relaxation of access rules is seen as a strong positive for game fishers.

Another much smaller area, where game fishing is significantly affected, is the Perth Canyon Marine Park in the South-west Network. Relocation of the previously proposed green zone to a more distant canyon head will significantly reduce limitations on game fishing in this historically significant area. The area is documented as having been fished by game fishers for pelagic species for close to 70 years. It is close to where FADs have been positioned for the past 40 years. The change is seen as a positive for game fishing.

The association does have unease about activities permitted in some zones, none of which affects game fishing but appear incongruous in the context of the plan's objectives. The main concern is the acceptance of uptake and disposal of ballast water and the discharge of waste water in Marine National Parks and Habitat Protection Zones. Secondly, we consider that there needs to be detailed habitat protection from anchoring operations, particularly in coral areas.

Developing widely acceptable community support for the plans is crucial to the effective implementation of their management. The level of public compliance in relation to management controls will be related directly to the level of acceptance, the understanding of the values espoused and the rationale for regulation of activities. An important strategy will be engagement with the users and development of management tools to cover the zoning, conflicts of usage and other management related issues that will surely develop.

GFAA also believes that it is critical, and may be essential, that the recreational fishing sector is engaged to further protect biodiversity and habitat. GFAA has the expertise to contribute to the National Parks' planning process through contributing to the organisation's planning and fostering goodwill between fishers, government agencies and other stakeholders. Over many years there

has been examples of pro-active collaboration and we would be willing to consider co-management arrangements.

Areas in which we envisage potential to play a part are:

Habitat protection - there are many areas where our members are aware of potential to damage seabed habitats with anchoring, damaging commercial fishing practices and other means. We may be able to contribute mooring positioning advice and vessel size considerations.

We would propose serious consideration be given to swing moorings which are used widely in other sensitive seabed environments. The position and footprint of a mooring can be selective and insignificant compared with the potential damage created by even minimal anchor chain lengths dragging in a circular pattern. Moorings also provide an excellent locations for enhancing visitor experience and viewing of reefs. As well as protecting coral and other formations from damage, moorings can be used where an atoll or reef provides weather protection for mariners offering a non-damaging safe haven.

Examples of habitat protection by the use of moorings is the spectacular Bougainville Reef which is difficult to anchor beside due to the steep drop off of the reef platform. Mooring buoys positioned at the north end and midway along the southwesterly border of this reef would protect inner reef areas. Osprey Reef is another example of how benefit could be derived from moorings inside the northwest corner and inside the southwest corner.

Information gathering and distribution - human usage of marine parks will increase in the future. Increases in visitor numbers may require additional facilities such as moorings to be provided to protect the habitats from human disturbance. Significant value to scientific organisations can be added by the use of citizen science. There are currently many examples of informal relationships where recreational fishers provide access for marine biologists and other scientists. Management plans, setting up of reference and trial access areas to compare adjacent sanctuary and accessible zones will further develop scientific knowledge.

This is a long term Network Management Plan which creates a multitude of opportunities to improve scientific knowledge. It extends to the health of flora on sand cays, bird and turtle populations especially after cyclones and allows for a base line values to be determined. Measurement systems need to be part of the plans.

The Queensland GFA runs a logbook system whereby club anglers get credits for reporting on all fish they encounter, this could be extended considerably. Fishers generally do not embrace red tape, however they are very conservation minded and may be readily sold on the benefits of log books or apps which can contribute to data collection. With smartphone apps currently available a reporting system could be developed quickly.

Distribution of data - both historic and current, particularly tag placement and recovery which are publicly available, could be beneficial in communicating to an otherwise unaware public about the contribution citizen science is already making and how recreational fishers act responsibly to contribute to data collection. This is part of the ongoing citizen science structure.

Compliance - recreational fishers are the eyes and ears of the offshore community. Greater collaboration with compliance organisations monitoring illegal fishing activity, security and transiting vessels can enhance the protection of Australia's marine assets.

In some areas it may be desirable to license or issue permits to tour operators and charter boats to maintain sustainability in sensitive areas. Some South Pacific nations require passage permits and have reporting requirements for transiting vessels.

During our discussions with National Parks' Bianca Priest and Michelle Glover we touched on the issue of bag limits, this is simply covered by state regulations where fish are landed.

Structural Readjustment - An estimated 5 million Australian recreational anglers and countless international anglers will lose access to large areas of Commonwealth waters including a number key reef areas.

It is our view that substantial funds should be made available to recreational anglers to allow for the structural adjustment that will need to occur for present and future generations. Money for this structural re-adjustment package should be placed in a fund owned and administered by and on behalf of recreational anglers that is independent of government but has high levels of transparency, accountability and governance.

We are happy to have meetings with the department so that you may obtain our view as to the quantum of those funds and the purposes to which we believe they should be put.

Of great concern to GFAA is that if the proposed plan is not fully implemented, the access regimes may fall back into those of the Burke plan. This would be disastrous for all recreational fishing, deliver no benefit to the environment, tourism or indeed the nation.

GFAA believes that during the Commonwealth Marine Reserves Network review process, it has contributed ideas and practical solutions rather than pursued ideological arguments. The association hopes that the proposed plans are largely adopted on the basis of common sense, the benefit to the nation as a whole and the importance our waters have to the many who derive pleasure from being in or on them, or make a living from them. A reversion to earlier plans would be considered to be a step away from the harmony that can follow from engagement and collaboration, rather than polarised disagreement.

In closing, we'd just like to mention that state governments are recognising recreational fishing as an important leisure activity with health, social and economic value to the community.

Again, thank you for the opportunity to make this submission, we look forward to the possibility of discussing it and management concepts with you and the outcome of your deliberations.

Yours faithfully,



Peter Coote
Honorary Secretary

With contributions from:
Doug Sanderson – President
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