

Can you please confirm receipt of our feedback submission?

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We are a class 2B survey game fishing charter boat. As per the draft plan we are:

1. We are part of the Commercial Tourism (fishing charter operators with recreational fishermen guests on board) section
2. Commenting on the Coral Sea Marine Park
3. Topics commenting about:
  - General Use & Access
  - Commercial Fishing
  - Commercial Tourism
  - Recreational Fishing
4. Commenting on
  - PART 3 Zoning; &
  - PART 4 – Managing activities

## **Part 3 ZONING**

### **Concerned about allowing Purse Seine access to the Habitat Protection Zone.**

Why would a forward thinking management plan consider allowing access to such a non discriminatory, volume based fishing method by authorisation? So we as a game fishing charter fleet will require authorisation similar to purse seine operators? Seems so ridiculous. Volume alone with max of 4 anglers abiding by recreational bag limits though predominantly catch and release fishing versus catch and kill anything method?

### **Concerned about National Park Zoning to reefs:**

1. Osprey & Kenn where the green zone extends beyond the reef edge and will therefor prevent line trolling for marlin and other pelagic species in the transition depths where we fish. (Drop off).
2. Mellish Reef area – seems like a green zone for the sake of a green zone in an area where very few recreational & charter fishermen are able to fish.

**Why not consider making these olive zone type areas as defined in the GBRMP as seasonal closures/openings and allow our fleet access September to December as we are on the Ribbon Reefs?**

If this management plans is about impact and conservation – has there been any studies of recreational impact on these remote reef areas?

### **Concerned about Special Purpose Zone (Trawl):**

Being allowed right up to and buffering the GBRMP. A massive area.

## **Part 4 – Managing Activities**

**AUTHORISATION REQUIRED** in the coral sea marine park

According to this draft management plan and charter fishing falling under the **Commercial Tourism** sector, we will no longer be able to access and fish in the Coral Sea Marine Park **without authorisation**.

***We are not clear on the application process as defined by Section 4.4. Will Class Approvals apply to our industry although the way we operate and the period we operate can differ substantially by operation? Or will we individually as a marlin and game fishing fleet have to apply for a Permit?***

As QLD Fisheries Charter Licence holders are we automatically granted permission or do we have to apply? What will the application process be? Will applications be discriminatory (ie. Will ALL operations of the

same type be similarly allowed or denied, or favouritism applied?) For what period is permission granted? How fast is the approval process? How do we apply? Fees involved in applications?

The Coral Sea Marine Park borders the GBRMP where we typically fish. As a 2B survey operation, and according to our survey we are licensed for Offshore operations (within 200 nm from the baseline of the Australian mainland), but this draft plan will restrict us to the boundary of the GMRMP without further authorisation?? Require authorisation to fish an area that we currently are able to fish according to zoning.

Specifically our operation is set up for remote live aboard fishing for up to four guests on whole boat charters. We are predominantly catch and release fishing with sport fish and pelagic species otherwise taken for the table only. We predominately fish the GBRMP area between Cairns and Lizard Island along the edge of the Ribbon Reefs but occasionally fish wide into the coral sea when conditions allow for it making the decision to head out sometimes quite spontaneously. So you are saying without advance permission we would no longer be able to do this?

This will severely restrict our ability to operate and keep us all fishing and more concentrated in the same area.

As we have added our feedback for the previous draft management plan, the boat we operate was purpose and custom built **locally** at considerable cost to the owner (3.1million) in 2010 for remote live aboard fishing. And restricting our operations this way is restricting our business profitability (even denying profitability) when significant financially outlay has already been made. Will we be compensated if we are denied access?

In this plan we are placed into the same prescription as purse seine fishing within the Habitat Protection Zone?!?? Surely no comparison can be made between us and commercial fishing where an entire volume of fish can be deleted by a single net run? Again, we are predominantly catch and release fishing. The same plan allows that "The prescriptions in Section 4.2.7 (Recreational fishing) apply to the clients of charter fishing tours" so our clients are automatically allowed to fish there according to the provisions set by the zoning, but we can't without authorisation as charter operators? (How are they going to get there?)

#### **With regard to: 4.4.3 Activity licences & leases:**

We are already subject to most of these same conditions for our operations in the GBMRP and Queensland waters in general as defined by fisheries, AMSA etc:

Some thoughts on: 4.4.3.2

A) For the giant black marlin season we can of course pre define the periods during which the activity may be conducted. But we are trying to work as much of the year as we can and outside of marlin season (Sept to Dec) we may try to market a specific time of year appropriate to fishing conditions to our clientele for other types of recreational fishing (throwing poppers, sport fishing, record fishing, blue marlin C&R/T&R fishing). And ultimately we aren't fishing unless we are booked. Restricting us to certain pre defined times of the year is therefore difficult. So will we be able to apply for year-round access?

B) We would be no impact above normal recreational fishing and bag limits that apply and area already allowed in these zones.

C) AIS is installed and active.

D) Data for compliance and monitoring – we are used to log books for fishing in GBRMP.

E) As above data is submitted quarterly.

F) As above.

G) As we do currently.

H) As per recreational fishing zoning

I) Not appropriate.

J) Beyond charter licence fee? Similar to EMC we pay in GBRMP? Not a problem.

#### 4.4.4.1 Publication of Authorisations

I believe if this is the case in such remote areas that this is critical for self/within industry regulation that authorisations are publicly available.

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Best regards,  
Kelly & Luke Fallon  
KEKOA Sports Fishing  
[www.kekoa.com.au](http://www.kekoa.com.au)  
0428789840