

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

Dear Director of National Parks

COMMENT ON CMRN DRAFT MANAGEMENT PLANS RELEASED JULY 2017

Recfishwest is the peak body representing the interests of over 750,000 recreational fishers in Western Australia. We are formally recognised and funded by the Government of Western Australia to 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. Recfishwest are first and foremost environmental advocates as recreational fishing depends on healthy aquatic environments. Our vision is “Great fishing experiences for all in the WA community forever” and we place the highest priority in securing the amenity of aquatic resources for future generations of recreational fishers.

Recreational fishing is largely compatible with the conservation objectives of marine parks and Recfishwest are pleased the draft management plans have recognised recreational fishing as a key value in both the South-west and North-west CMRN. Recreational fishing has been ranked only behind *Recreational Other* (e.g. sailing, diving) as the main purpose of visiting Commonwealth Marine Reserves. This simple truth must be remembered when finalising management plans.

Recfishwest strongly support management of marine areas that provide adequate protection of biodiversity and marine ecosystems. We are also strong supporters of adaptive management that provides for the sustainable use of marine resource and the equitable sharing of those resources. Recfishwest recognise a marine park is a resource for the entire community. It is essential the final management plans for the Commonwealth Marine Reserve Network (CMRN) are developed and implemented using simple, practical management that is risk-based, transparent and subject to regular review.

As Recfishwest represent Western Australian fishers this submission will focus on the draft management plans for the South-west and North-west CMRN released in July 2017. Absence of comments relating to the draft management plans for the North, Coral Sea and Temperate East networks should not be interpreted as either support or opposition to these draft plans.

Recfishwest have spent over a decade and considerable time, effort and resources providing input into the CMRN planning process. Over this time our submissions have contained consistent messages and as such the information contained in our previous submissions on CMRN proclamation (Sep 2012), CMRN Proposal to prepare draft management plans (Dec 2012), CMRN draft management plans (Feb 2013), CMRN Review (Mar 15) and CMRN Proposal to prepare draft management plans (Nov 2016) are still relevant and taken as read.

In previous submissions on the CMRN Recfishwest has advocated for recreational fishing to be included as a permitted activity in IUCN II zones and this remains our preferred management option. It should be noted that recreational fishing has not been identified as a threat or a source of pressure for any key ecological feature or conservation value within the South-west or North-west CMRN. Recfishwest believe that unless recreational fishing poses an identified risk to the conservations objectives of any marine reserve there is no logical rational for excluding this important user group.

Recfishwest are pleased some of our comments from previous submissions have been incorporated into the draft plans for the South-west and North-west CMRN released in July 2017. These draft management plans represent a large improvement on the previous management plans released in 2013.

It is especially pleasing to see access to large parts of Geographe Bay have been restored, as has the ability for Perth Game Fishers to continue to access pelagic fish in proximity to a long running FAD program in the vicinity of the Rottnest Trench (Perth Canyon). These sensible amendments will greatly improve recreational fishing experiences without compromising the conservation values of these reserves.

Other sensible amendments to zoning within marine reserves that will improve fishing experience without compromising conservation values contained within these draft plans can also be seen in the Dampier, Kimberley and Bremer Marine Reserves.

Although the current draft management plans represent a large improvement on the management plans released in 2013 there are still a couple of locations where the proposed zoning is likely to lead to compliance challenges. These areas fall within the Two Rocks reserve and the Abrolhos Marine Reserve.

Two Rocks

The Two Rocks Marine Reserve contains a IUCN II zone that is currently utilised by recreational Rock Lobster fishers. Preventing Lobster fishers accessing this area is likely to cause a significant compliance challenge.

There are no sustainability issues regarding Rock Lobster in Western Australia. The recreational sector has been allocated 5% of the Lobster resource and Lobster stocks have fully recovered from previous high levels of commercial exploitation and are as healthy as they have ever been.

In 2014 the Two Rocks boat ramp was upgraded and the adjacent offshore waters now cater for a much greater amount of boat traffic. This has resulted in the area within the Two Rocks reserve holding a greater social importance than previously stated. In addition, recent change to lobster management has resulted in greater abundance of Western Rock Lobster and has consequently brought about a greater level of recreational Rock Lobster activity within the reserve.

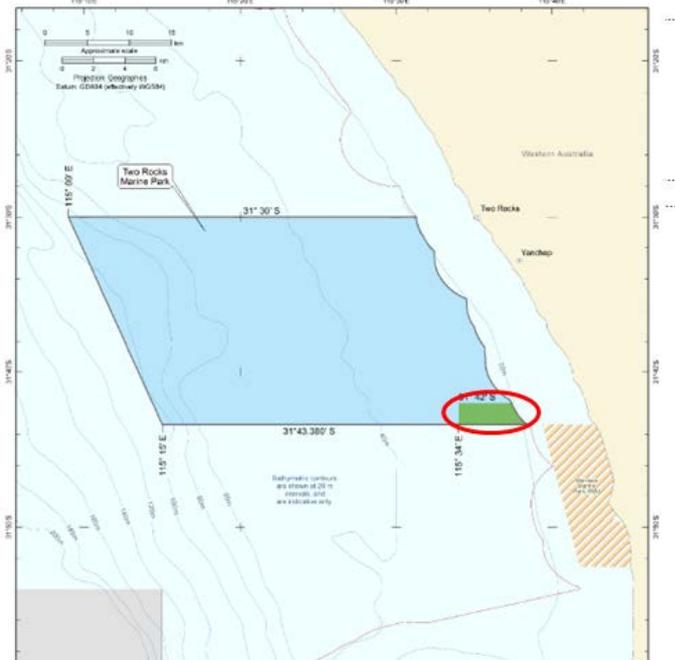
In 2016/17 there were over 55,000 recreational Rock Lobster fishing licences issued and many of these licence holders live in the Northern suburbs of Perth and fish within the Two Rocks Marine Reserve. The number of Recreational Rock Lobster licence holders has increased 56% since 2012/13 making access to currently utilised fishing areas essential.

The proposed IUCN II zone is also within close proximity to Mindarie Keys and Ocean Reef public boat ramps and restriction of recreational fishing and lobster potting will cause a high level of public dissatisfaction. The IUCN II area is relatively small in size however it will have a large impact on recreational fishers in the area.

The conservation values represented within the Two Rocks reserve include;

- *examples of ecosystems of the South-west Shelf Transition Province;*
- *migration areas for protected humpback whales;*
- *foraging areas for threatened soft-plumaged petrels and Australian sea lions,*
- *foraging areas for migratory roseate terns, bridled terns, Caspian terns, wedge-tailed shearwaters and common noddies.*

An IUCN II zone in this reserve provides no additional conservation benefit for these values.



The presence of this IUCN II zone appears to simply satisfy a small number of non-fishing divers at the expense of many recreational fishers (and divers) who use the area. Rezoning this area as IUCN IV (Habitat Protection zone) would simplify management arrangements without compromising any of the conservation values of the reserve. It would also prevent complications arising from compliance enforcement. It is worth noting this IUCN II was not discussed with recreational fishers prior to being proclaimed in 2012 and caught all sectors by surprise.

Abrolhos Marine Reserve

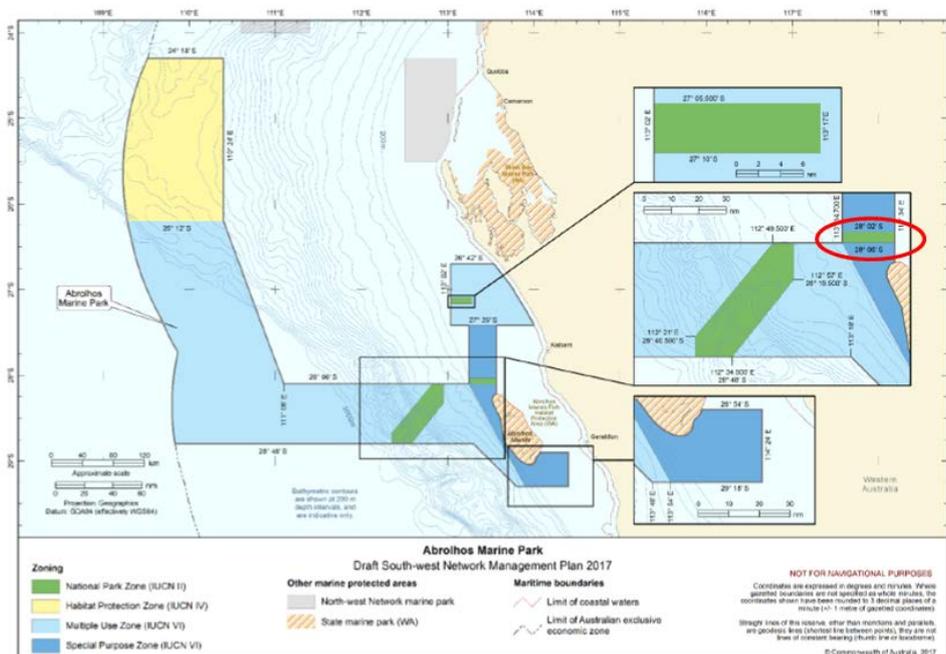
In Western Australia spearfishing whether freediving or fishing using SCUBA has always been a legal and legitimate method of recreational fishing. Historically the freediving community in Western Australia have been repeatedly and unjustly prejudiced when management plans for state and commonwealth marine parks have been developed. Freedivers are an important user group who have the same right to access the aquatic resources within the CMRN as all other recreational fishing stakeholders.

It is important to recognise management of marine protected areas (both state and commonwealth) has historically been prejudiced against spearfishing despite it being limited by visibility, daylight hours, adverse water currents, surface conditions, wariness of fish, presence of ocean predators, depth and the ability to hold one's breath (in the case of freediving). It is also important to recognise spearfishing has virtually no by-catch or post release mortality.

Recfishwest are pleased the management plans for the CMRN will ensure equitable access for all recreational fishers and will make no distinction between line fishing and spearfishing. Management within state marine reserves would benefit from following the lead of Parks Australia.

Although not mentioned previously a new issue regarding freediving within the Abrolhos Marine Reserve has been raised and should be addressed. There is a small IUCN II zone to the north of the Abrolhos Islands in an area in the vicinity of John Moresby Bank. This zone falls within a popular fishing location for freedivers. The proposed zoning would split this bank into two impractical small open and closed areas. Given the difficulties with knowing your position relative to the zones within each reserve are multiplied when drifting in the water (as occurs when freediving) this zone is likely to cause significant compliance difficulty and this area should be rezoned IUCN IV (Habitat protection).

The provincial bioregion, bathome, seafloor and key ecological features represented by this zone are replicated in other IUCN II zones within the South-west Commonwealth Marine Reserves Network. Rezoning this relatively small area to a habitat protection zone will align with the Goals and Principals for the establishment of the National Representative System of Marine Protected Areas in Commonwealth waters and prevent likely compliance difficulties.



Other Comments

A key element of the government's approach to developing the CMRN is to establish this network in a way that minimises social and economic costs (embedded in Goals and Principles). For that reason the design of the CMRN must seek to avoid restricting access to areas of significant recreational fishing interest. Any loss of access for recreational purposes must be based on evidence that such activity poses an unacceptable risk to the conservation objectives of the marine reserve and should be avoided where possible.

While it would be impractical to provide each affected recreational fisher with compensation similar to the establishment of a Fisheries Adjustment Assistance Package for commercial fishers it is not unreasonable to expect the recreational sector receives equitable compensation for any loss of access. Rather than financial compensation the installation of recreational fishing related infrastructure such as artificial reefs, fish aggregating devices (FADs) and moorings in appropriate areas could constitute adequate recompense to the community for any unavoidable loss of access. The finalised management plans should aim to ensure there is no net loss to recreational fishing amenity through the implementation of the CMRN.

While moorings are more suited to areas within the Coral Sea Reserve it is pleasing to see the draft plans for the North-West and South-West are open to the idea of infrastructure such as artificial reefs and (FADs). These structures can be used as management tools to help achieve management goals as they have the ability to change fishing behaviour. It is especially pleasing to see the Draft management plans allow for the placement of artificial reefs in IUCN II areas.

In the state based Ngari Capes marine park in Western Australia the two areas of highest biodiversity include the HMAS Swan shipwreck and the Busselton Jetty (both artificial reefs). In recognising artificial reefs can play a role in habitat enhancement and restoration and are not restricted to recreational fishing amenity demonstrates a willingness to adopt positive and progressive management strategies.

Another example where the finalised management plans could adopt positive and progressive management as well as provide equity between sectors is through a recreational fishing alert service. An alert service for commercial fishing vessels operating in reserves where active management currently apply is available at no cost to the industry and is available to all commonwealth commercial fishers. A comparable program for recreational fishers could include a free phone app that can alert fishers to their position on the water in relation to IUCN1a & II areas.

Creating a service such as this will provide fishers with confidence they are abiding by the management plans. An alternate option could be to provide funding to organisations that already have phone applications to allow for this sort of service thereby negating the need to “re-invent the wheel” by creating an app from scratch. Recfishwest has a free phone application that has been downloaded over 40,000 times and we find communication through our app to be very efficient and extremely effective.

Recreational fishers represent the largest users of all reserves within the CMRN and ongoing engagement with recreational fishers is vital to ensuring the objectives of the CMRN are met. With hundreds of thousands of ‘eyes on the water’ recreational fishers are aware of changes in fish diversity and abundance a long time before researchers or managers become aware of problems. Recreational fishers also cover a larger area than managers/researchers and can provide the opportunity to collect real time spatial and catch information that can aid management. As such it is pleasing to see the Director of Parks Australia intends to establish advisory committees for the networks that comprise the CMRN. As the recognised peak body in Western Australia for the largest users of the reserves Recfishwest request having a representative on the South-west and North-west the advisory committees as we believe we can add value to decisions and recommendations made by these committees.

Engaging recreational fishers to collect meaningful and useful information will also engender a greater level of stewardship and understanding of the CMRN as well as ensuring lasting and ongoing support from the recreational fishing community. This information will also allow more adaptive management and dissemination of information.

Options to conduct broad scale type of citizen science are varied and could include logbooks, phone apps, linkages with research intuitions/managers/peak bodies, collection of DNA samples ect. An example of the type of good citizen science program using recreational fishers that could be extended into the management plans for the CMRN would be Recfishwest's Reef Vision program. I have included a few links about this program as it is worth consideration.

http://frdc.com.au/stories/Pages/10-11_Lets-keep-an-eye-on-the-reef.aspx

<http://recfishwest.org.au/reef-vision-showing-up-more-and-more-fish/>

Conclusion

There is no doubt the draft management plans for the South-west and North-west Commonwealth Marine Reserve Networks are a vast improvement on the previous plans. While Recfishwest still believe recreational fishing is compatible with IUCN II areas we can see that our comments from previous submissions have been taken on board and we are pleased the draft plans have resolved previous zoning issues within the Perth Canyon, Geographe Bay, Kimberly, Dampier and Bremer Marine reserves.

While the draft plans have resolves many areas of contention there are a few remaining areas including within the Two Rocks and Abrolhos reserves that are still likely to cause compliance issues which could be easily resolved by rezoning a small area within each reserve.

The ongoing collaboration with recreational fishers is vital to ensuring the management plans are a success and Recfishwest are happy to be a part of ongoing management of these reserves. I hope you have found these comments helpful and should you require any further information in this regard, please do not hesitate to contact me on 9246 3366.

Yours sincerely



Leyland Campbell
Principal Policy Officer
20 September 2017