

The Recreational Fishing Alliance of NSW

“Promoting Sustainable Fishing”

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8th September 2017

Commonwealth Marine Reserves CMR – Have Your Say

To whom it may concern,

The Recreational Fishing Alliance of NSW RFA in its capacity as New South Wales Recreational Fishing representational and advocacy body welcomes yet another opportunity to be engaged in and provide a response towards the future management and protection of our Commonwealth Marine Estate.

The Alliance is part of a wider recreational fishing network and engages regularly with such organisations like the; Australian Recreational Fishing Foundation (ARFF), and the Recreational and Sportfishing Industry Confederation (Recfish Australia).

RFA also supports the many other CMR views from other recreational fishing organisations, such as RecFishwest, RecfishSA, AFANT, SunFish, GFAA, IGFA, VRFish, TarFish, ANSA National and ANSA NSW, the BIAA etc. to name just a few of the bodies we are continually in contact with.

The Alliance has been involved in such discussions over the past decade on establishing a comprehensive and representative network of protections for Australia’s Commonwealth waters within the identified Marine Reserves Network.

We have been very supportive to establish a level of marine reserve protection that follows the comprehensive and representative model, which must be based on sound science and research, environmental and conservation standards, whilst considering the other key factors based around economics, social science and delivering a range of experiences and use of such areas.

This Government has since reviewed the status of the CMR Network and further refined the draft Management Plans for the following areas.

Our following comments generally apply to all the following marine reserve locations where public comment has been sought -

- Coral Sea
- Temperate East
- South West
- North West
- North

The South East was the only Reserve that successfully was completed under the CMR process under the previous government, thus it is already operating under its Plan of Management.

Generally RFA is pleased with the draft Management Plans and Maps that have been finally provided, as the result from all the positive discussions and Government listening that has occurred and lead to the continual refinement over time of our concerns.

The Alliance is still not fully convinced that it is necessary to only remove some recreational activities which has not been solely based on any sound science, and leave others to access sanctuary zones.

The RFA certainly supports that the recreational fishing community are a much needed asset that can provide structured citizen science project reporting and monitoring, along with much needed additional compliance and enforcement reporting support across many isolated rarely visited locations, which will now be left wide open to much more illegal fishing in some areas where recreational is banned.

Recreational Fishing Rules and Regulations

It must be made clear that the Commonwealth has delegated the States and Territories under various Commonwealth legislative instruments the powers to fully manage Recreational Fishing across Australia.

At this current stage these various Fisheries Departments have been successfully managing recreational fishing for decades, and the estimated 5 million fishers that participate in recreational fishing as a sport or leisure activity utilising a range of both input and output controls.

Each state or territory should only have one set of recreational fishing rules and regulations, thus reducing any possibility of miss understanding such due to additional layers of more and more complex rules and regulations.

It is relatively clear that fishers who use/fish the Great Barrier Reef, Ningaloo Reef and other areas of Commonwealth waters like Jervis Bay etc., remain somewhat confused by the additional layer of regulatory burden.

Recommendation – that all existing commonwealth recreational fishing regulations should be reviewed and gradually removed from Commonwealth legislative instruments and transferred to each state/territories recreational fishing rules and regulations, removing the need for duplication and any opportunities that result in confusion due to overly complex regulatory controls by applying several layers of recreational fishing restrictions, as in many cases the fish actually live in the same marine environments.

That all Draft Management Plans do not add any additional recreational fishing rules or regulations, should the Commonwealth believe that additional recreational fishing management controls are necessary then these should be consulted with these agencies and then the broader fishing community utilising the existing State and Territories means of reviewing such changes and then consulting with recreational fishers using their established methods and networks.

The Alliance has some concerns with the Temperate East and South west - Abrolhos Islands as note in general below. Overall those who follow RFA's social media feeds have shown general signs of great support for the Temperate East and wish that whole process is finally wrapped up soon.

Temperate East

Our spearfishing membership have raised concerns to reconsider the unacceptable draft closures related to spearfishing whilst still allowing recreational line fishing to occur in Commonwealth waters, at Lord Howe Island LHI and the Elizabeth Reef ER areas.

It appears that the Commonwealth have followed the somewhat flawed LHI State Government Marine Parks process which resulted in the discriminatory banning of spearfishing too.

The Alliance believes there is no supporting scientific research studies, that indicates spearfishing should be banned, in Commonwealth waters, and spearfishers have continually raised questions with little positive results indicating any sound support for such.

Pimpnel Rock – spearfishers have request that the area be reopened to spearfishing, utilising the current improved NSW Fisheries Spearfishing rules used at Fish Rock which supports the protection as a Grey Nurse Aggregation sites.

If this was considered as a change, then NSW Fisheries would discuss with Parks Australia and a list of suitable species, based around Pimpernel such as all Pelagic species and maybe including Demersal species such as Mulloway, Job fish, and Mangrove Jack.

South west

The Abrolhos Islands - an area proposed for closure just north of the island straddling John Moresby Bank, the Alliance requests the reconsideration of this zoning area allowing Recreational Fishing which includes Spearfishing.

Conclusion

In conclusion RFA is always seeking to reduce the complexities that additional marine protection or fisheries management may inflict on the recreational fishing community. The discussions to date have been considerate and adopted a modified more realistic approach to managing and protecting our marine ecosystems, however the reality remains that our recreational fishing practices if properly managed results in a minimal impact overall.

The Alliances position remains unchanged where recreational has been restricted without the supporting science. There is no justification for it to be banned from IUCN 11 zones, as there is no sound science or because restrictive definition interpretation of IUCN 11 that has been adopted by the Australian Government.

Overall the RFA looks forward to finally seeing this process completed so we may concentrate on the many other issues that our fishing community needs to be involved in.

Should there be a need to clarify any of the comments or positions within this submission as noted then please contact the undersigned.

Kind regards



Malcolm Poole
Committee Member
Recreational Fishing Alliance of NSW

Appendix A – Terms of Reference

Have Your Say on draft plans



Have your say on draft plans

The Director of National Parks is inviting feedback on draft management plans detailing our approach to managing 44 Australian Marine Parks around the country over the next ten years. These draft plans seek to balance the need to protect the marine environment with supporting people’s livelihoods and the Australian lifestyle.

The Director of National Parks is also proposing a name change from Commonwealth Marine Reserves to Marine Parks to help build public awareness of these special places.

For more information on how to have your say on draft management plans and renaming of marine parks go to: [Have your say](#) (link is external).

To subscribe for updates on management of marine parks go to: [Subscribe](#).