



20<sup>th</sup> September 2017

Ms Sally Barnes  
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FISHERIES & AQUACULTURE

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Dear Ms Barnes

I write in reference to an email received on 21 July 2017 informing Primary Industries and Regions South Australia (PIRSA) that you have released five draft management plans for 44 Australian Marine Parks that are managed by Parks Australia for public comment. I note that you are also seeking comment on a proposed name change from Commonwealth Marine Reserves to marine parks.

I have been advised that the draft South-west Network Management Plan 2017 covers Commonwealth waters adjacent to South Australia, and provide the following points for your consideration:

- The South Australian fisheries effected by the proposed South-west Network Management Plan are the Northern Zone Rock Lobster Fishery, Marine Scalefish Fishery, Sardine Fishery, Giant Crab Fishery and the Charter Fishery.
- The Australian Bureau of Agricultural and Resource Economics (ABARES) report 'Potential displacement of commercial fisheries by a Commonwealth marine reserve zoning scheme: Report on draft management plan zoning' shows the financial impact of the proposed management plan for Streaky Bay and Port Lincoln is \$74 200 and \$87 200, respectively. I note that a Fisheries Adjustment Assistance Package to compensate displaced fishers will be released once the South-west Network Management Plan is finalised, and that the Commonwealth Government has stated 'a fair and reasonable assistance package to reduce any impacts on commercial fishers will be provided'. The relevant South Australian fishing industry sectors should be consulted on these changes. Please provide PIRSA further detail on the proposed assistance package to ensure any broader matters relating to South Australian fisheries can be appropriately considered.
- Should the South-west Network Management Plan be proclaimed, I note that authorisation will be required (by way of a permit, class approval or commercial activity licence) for commercial fishing activities that will be allowed within some park zones. This should not come with additional regulatory burden on South Australian commercial fishers to have to submit applications, incur other costs, or obtain duplicate authority to operate in addition to their state licence. It is suggested that a more streamlined approach should be explored to avoid this additional regulatory burden.

- The prescriptions of commercial fishing activities in the South-west Network should be, to the extent possible, consistent with the prescriptions of commercial fishing activities in South Australia's Marine Park Network.
- I note and support the requirement for fishing gear to be stowed and secured at all times (for commercial, recreational and charter vessels) when they transit or anchor in a zone in which they are not permitted to operate. However, I do not support a requirement for all commercial fishing vessels transiting or conducting fishing activities in the South-west Network to carry an operating vessel monitoring system. Not all South Australian managed fishing vessels are required to have a vessel monitoring system, and any Commonwealth requirement will add additional burden on the smaller scale fisheries, particularly the Marine Scalefish Fishery and the Charter Fishery.
- The provision to allow towing of commercial aquaculture cages in the National Park Zone II of the Western Kangaroo Island Marine Park is welcomed. This will allow the movement of Southern Bluefin Tuna cages through this area.
- I note that under section 4.2.4 Commercial aquaculture, the draft management plan describes the management of commercial aquaculture occurring under state laws. State regulation is currently limited to state waters, and does not yet extend to Commonwealth waters. This matter may need to be clarified in the plan.

Should you have any further queries in relation to the comments provided above, please contact Mr Steve Shanks on [Steve.shanks@sa.gov.au](mailto:Steve.shanks@sa.gov.au) or 842 90197.

Yours sincerely



Sean Sloan  
**A/EXECUTIVE DIRECTOR  
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