

The Australian Underwater Federation, "AUF" on behalf of our Spearfishing members like myself would like to submit as follows:-

1) Generally we are pleased with the draft maps & plans you have provided & although we do not agree with recreational lockouts that are not based on science we acknowledge the fact that the Coalition Government & your Department have listened & responded positively to the previous submissions & discussions put forward by us and the Recreational fishing community through our peak National body, Australian Recreational Fishing Foundation "ARFF". We thank you for taking a fairer more inclusive stance for Recreational fishing than that previously offered.

2) We have concerns with the Coral sea zoning, Qld and some areas in the Eastern Temperate, NSW as described in 4) and 5) and 6) below. Otherwise our members seem pleased with the other state/territory drafts.

3) The AUF is the Federal Government's ASC recognised peak body for underwater activities in Australia having some 4000 active members and reaching to 10's of thousand through reactive media.

Our Concerns.

4) In the Coral Sea we ask that you reconsider the complete fishing closures to Kenn and Bougainville reefs to allow limited recreational fishing including Spearfishing.

- Kenn reef is very isolated and distant from the Australian mainland and as such is visited rarely by recreational users other than Recfishers. Because of this it is open to exploitation by illegal fishing, which has been observed recently at reefs much closer to our Mainland.

Our very presence could serve as a deterrent & activities observed could be reported & acted upon.

Further the minimal amount of recreational fishing in the area poses no measurable threat.

- Bougainville reef is much closer to shore & plays a large part in the visitation by shore based recfishers & charters. The reef is not normally fished over a number of days but is included as a day/night stopover on trips to fish on several reefs. Removing effort from this reef simply puts more fishing pressure in other areas and leads to considerable inconvenience in planning safe trips offshore.

- We ask that you review access to allow recreational fishing to both these areas in full or part (such as proposed at Osprey & Marion reefs) & we are prepared to discuss more conservative size & bag limits to negate any concerns & limit further our potential fishing impacts to both reefs.

5) In the Eastern Temperate NSW draft plans we ask that you reconsider the unacceptable draft closure to Spearfishing in Commonwealth waters at Lord Howe Island and Elizabeth Reef.

- The draft closure to Spearfishing in Commonwealth waters surrounding LHI & on Elizabeth Reef whilst still allowing recreational angling is discriminatory & without any scientific basis.

- Yes the LHI population don't like tourists Spearfishing in their patch although they practice Spearfishing themselves. The NSW government of the time softened to the locals wishes and created a precedence that does not exist in any other NSW Marine Park. Common sense will prevail in the end and allow limited Spearfishing in the state controlled waters immediately surrounding LHI.

- There is no supporting science in Parks Australia's current position to extend a Spearfishing ban only into Commonwealth waters and this is despite the Coalition stating publicly on numerous occasions that there would be no bans placed on recreational fishing without a sound scientific reason for doing so. Further Senator Ruston agreed that no single sector of Recreational fishing would be banned in any areas of the CMR where Recreational fishing was permitted.

-How far do you extend a discriminatory practice of a local group of residents such as the LHI population? Should the wishes of a couple of hundred people override the previous 70% support for spearfishing by NSW respondents to the previous consultation on the NSW State MPA?

Parks Australia should not allow support for local Spearfishing bans to extend into Commonwealth waters or to Elizabeth Reef some 150klms distant. It will be the only area in all of the Australian Commonwealth marine park where Spearfishing is not allowed alongside Recreational angling.

-Not only do the LHI residents spearfish unchallenged in their waters but the local Charter/Fishing fleet goes under the radar to commercially fish and feed the locals and tourists in all of the areas where NSWMPA's banned Spearfishing.

It's inconceivable that you also propose to ban Recreational Spearfishing in our Commonwealth waters as well.

-Parks Australia will be setting a very discriminatory and unfair precedence by not allowing Spearfishing to continue alongside angling in these waters under your control. Such a precedence can only destabilise Spearfishing in the view of others and open the way for future unfair bans on those of us who simply want to enjoy our activities and take a feed in areas that are open to other members of our nation.

Let's be fair about this please?

6)In the Eastern Temperate Zone, NSW at Pimpnel Rock we request that you reopen the current no fishing area to comply with NSW Fisheries protection as applied to known Grey Nurse Aggregation sites.

-The science published by NSW dept of Industry Fisheries, rates Spearfishing as a minimal to low risk activity allowable at GNS aggregation sites and with the exception of some Closures in NSW MPA's Spearfishing is allowed and at Fish Rock, South West Rocks NSW Spearfishing is allowed for a list of pelagic species only.

-We ask you to reopen Pimpnel to Recreational Spearfishing for Pelagic species including Mulloway, Job fish, and Mangrove Jack.

We would be pleased to negotiate with Parks Australia and NSW Fisheries to agree a list of suitable species, size and bag limits far more conservative than those that currently exist.

Further we are mindful of the scuba activities at the dive site and can suggest methods where our presence is minimised whilst scuba diving is underway.

-All we ask is that you follow NSW DPI's forward thinking where they have realised and allowed controlled Spearfishing to coexist with GNS populations and visiting scuba divers.

Conclusions.

-Spearfishing is generally supported by scientists as being the most sustainable form of fishing with the least impact and virtually no by catch.

Spearfishing is based on finding the food using ones eyesight and the AUF promote the taking of only one or two of each specie where only enough fish are taken to provide healthy food for the individuals personal and family needs.

Spearfishers are extremely limited ie:- our own breath hold controlling depths dived, adverse water visibility, currents, surface conditions, ocean predators, wariness of fish, daylight available.

-The Coalition and Parks Australia have a wonderful opportunity in the creation of this CMR to have a world leading Marine Park that recognises the legitimate rights of all citizens to enjoy their recreational activities allowable because of good science that recognises genuine non threatening processes such as recreational fishing including Spearfishing.

-Finally we realise in the AUF that there are many ways to eliminate threatening processes without the necessity to blanket ban our activities and as Spearfishers we are in complete control of our impact by following the rules, either pulling the trigger or not and educating our peers in correct sustainable practices whilst Spearfishing.

With this in mind we ask that you meet with us to discuss the ways you can fairly evaluate and allow our somewhat physically challenging recreational activity that gives us adventure, relaxation and fresh food.

Regards,

Clay Melbourn

**Clay Melbourn**  
Executive Director - Head of Operations

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