



Australian National Sportfishing Association Ltd
ACN 063 293 514

COMMITTED TO CONSERVATION AND INTEGRITY IN SPORTFISHING SINCE
1967

8 September 2012

Commonwealth Marine Reserves Proclamations Comments
Department of Sustainability, Environment, Water, Population and Communities
Email address : proclamationcomments@environment.gov.au

Dear Sir/ Madam,

On behalf of the Board and members of ANSA – Australian National Sportfishing Association Ltd we would like to make the following comments in respect of the proposed network of marine reserves for the following locations –

Coral Sea Reserve
Temperate East Network
South West Network
North West Network
North Network

By way of background ANSA is one of the nation's oldest and largest peak body networks. ANSA has branches operating in all Australian states and a club network exceeding 100 clubs and a national membership base of close to 5000. ANSA is a foundation member of the Australian Recreational and Sportfishing Industry Confederation (Recfish Australia) and the Australian Recreational Fishing Foundation (ARFF) and sits on the Commonwealth Recreational Fishing Roundtable.

ANSA's position in respect of the marine reserve network proposal has been privately conveyed to Ministers Burke and Ludwig and a number of senior staff of DSEWPC. ANSA is appreciative of the endeavours made by Minister Burke and the staff of DSEWPC to consult with ANSA (and other peak bodies) in a bid to reach a mutually agreeable outcome with the recreational fishing sector for the location and zoning of the 5 new marine reserves.

ANSA has been a vocal supporter of the Government's commitment to deliver a network of marine parks around the nation and of the overarching objective of protecting marine bio diversity and ecosystems for future generations.

However, marine protected areas must by necessity be based upon credible and robust science. By Minister Burkes own admission this was not the case in determining the locations of the marine reserves or the zonings that are scheduled for implementation.

ANSA is very concerned that recreational fishing access will not be allowed over substantive tracts of Australian ocean for no apparent good scientific basis or reason. Admittedly most of the locations designated as marine park zones (and categorised as IUCN II) where recreational fishing will not be allowed are a considerable distance off shore and not readily accessible by the ordinary recreational fisher. Nevertheless there are some dedicated recreational fishers who do take the opportunity to enjoy a once in a lifetime opportunity to fish these remote locations and when doing so their impact on fish stocks and footprint on the

ANSA Board
PO Box 328
Matraville
NSW 2036

Enquiries to: John Burgess
Telephone: 02 93113200
Mobile: 0408609586
Email: abtrap@yahoo.com.au

eco system is virtually zero. By contrast,whales on their seasonal migratory run up and down the coast would in all likelihood have a more dire impact on fish and other marine life with an estimated daily consumption of 2000kg per whale.

Surely there is some degree of flexibility in terms what is allowable under IUCN II categorisation. In contrast to the narrow interpretation of IUCN II currently being adopted by the Australian government which is for “highest level of protection for the ecosystems, habitats and biodiversity”, the more precise international definition is “to define national parks as protected areas managed mainly for ecosystem and recreation”. While ANSA is in agreement with the restrictions to be imposed under IUCN II for commercial activities, mining operations and extractive activities such as commercial fishing, we can see no logic for this restriction to also extend to extractive recreational activities (ie recreational fishing) which will have virtually zero impact and yet passage of vessels and non extractive tourism will be allowed.

A precedent was established some time ago in respect of the categorisation of Ningaloo Reef as IUCN II and yet recreational fishing was allowed in some of the areas of the reef. Why cannot this precedent be allowed to apply for the latest network of marine reserves, particularly in respect of the various Coral Sea reefs and several in shore locations within the South West network which will be off limits to recreational fishing. Surely the Minister has the power to exercise discretionary power to address these shortcomings with the plan. Our preference though would be for recreational fishing to be allowed in all areas categorised as IUCN II or for some consideration to be given to catch and release recreational fishery for these locations. A blanket ban on recreational fishing is not justifiable under any circumstances and cannot be accepted.

ANSA also reiterates concerns expressed in its earlier submissions that the cessation of commercial fishing activity over much of the proposed marine network will see a translocation of commercial effort to within multiple use /general use zones which invariably will place considerable pressure on these fisheries and lead to possible conflict with recreational fishers. This is particularly relevant in the Coral Sea Reserve where some 80% of the reserve will be off limits to commercial fishing.

In terms of the individual marine reserve locations we offer the following comments –

Coral Sea Reserve. Reefs within this network including the Marion Reef, Kenn Reef, Bougainville Reef, Vema Reef, Shark Reef and Osprey Reef should not be off limits to recreational fishing. Our comments re IUCN II categorisation apply to all locations designated as marine park zones within the network. It is also hard to reconcile why an area of some 502000 square km has been designated as Marine Park IUCN II which is just over 50% of the proposed Coral Sea Reserve.

Temperate East Network. Generally speaking ANSA has no problems with the proposed bio regional locations within the network or the zoning. Our comments re IUCN II categorisation apply to all locations designated as marine park zones within the network.

South West Network. Iconic inshore recreational fishing locations such as Geographe Bay which offer sheltered waters for family fishing in small boats should not be off limits to recreational fishing. Likewise the Rottnest Trench which offers high quality game fishing adjacent to the fishing public of Perth should not be off limits to fishing. Our comments re IUCN II categorisation apply to all locations designated as marine park zones within the network.

North West Network. Dampier is one of WA's most iconic recreational fishing locations with one of the highest level of recreational boat ownership and where recreational fishing is a major socio economic contributor. This area should not be off limits to recreational fishing. Our comments re IUCN II categorisation apply to all locations designated as marine park zones within the network.

North Network. Generally speaking ANSA has no problems with the proposed bio regional locations within the network or the zoning. Our comments re IUCN II categorisation apply to all locations designated as marine park zones within the network.

By and large ANSA is in agreement with most of the final marine reserve proposals and would like to be able to give unqualified support for the Australian government's proposals but cannot do so while ever the unjustified and unacceptable threat to recreational fishing access over such a large component of our oceans exists. It would take very little in terms of management practice to come up with an arrangement that would suit the needs of all recreational fishers and yet preserve the commendable overarching objective of protecting marine bio diversity and ecosystems for future generations.

All ANSA is asking for is a bit of lateral and realistic thinking on behalf of the Australian Government in terms of the marine reserve planning process and recognition of the socio economic and health attributes of recreational fishing and the fact that recreational fishing will have almost zero impact on fish stocks or the eco systems within the locations proposed as marine parks (IUCN II zones) if recreational fishing was to be allowed in such locations.

Hopefully a sensible and practical outcome can be achieved which will equitably fulfil the goals, objectives and needs of all stakeholders.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Burgess', written in a cursive style.

John Burgess
Executive Officer/ Director
ANSA – Australian National Sportfishing Association Ltd