



Australian National Sportfishing Association Ltd
ACN 063 293 514

COMMITTED TO CONSERVATION AND INTEGRITY IN SPORTFISHING SINCE
1967

13 February 2013

Department of Sustainability, Environment, Water, Population and Communities
Reply Paid 787
Canberra ACT 2601
Email: Southwest.draftplan@environment.gov.au

Dear Sir/ Madam,

RE: South West Reserve - Draft Management Plan

On behalf of the board and members of ANSA I would like to take this opportunity to comment on the South West Reserve Draft Management Plan.

By way of introduction ANSA is one of the largest and oldest recreational fishing peak bodies within Australia. ANSA has been operational since 1967 and has a national membership base of some 5000 individual members and their families and an extensive network of ANSA affiliated clubs in all states and territories. As our name implies our main focus is sportfishing with a very positive conservation ethos and sustainable fishing practice code. ANSA is a foundation member of the Australian Recreational and Sportfishing Industry Confederation (Recfish Australia) and the Australian Recreational Fishing Foundation (ARFF) and a member of the International Game Fishing Association (IGFA). ANSA is also a member of Minister Ludwig's Recreational Fishing Roundtable and has representatives on numerous Commonwealth and State fishery advisory and management committees.

ANSA has been a vocal supporter of the Government's commitment to deliver a network of marine reserves around the nation and of the overarching objective of protecting marine bio diversity and ecosystems for the benefit of future generations of Australians. In a spirit of cooperation ANSA has historically cooperated fully with the DSEWP staff and the Government in all stages of the planning process for the rollout of the new marine reserve network. Unfortunately we must now express our disappointment with the very short time frame of 30 days to make a valued assessment of the draft management plans. For an issue of such national significance with wide spread environmental, socio economic implications, a minimum 90 day public consultation period should have been granted.

ANSA's position on Commonwealth marine reserves is clear and unchanged. ANSA remains supportive of a marine reserve network that is representative, inclusive and based on sound environmental, economic and social science. ANSA does not however support the case for recreational fishers to be excluded from Marine National Park zones (IUCN 11) unless there is a sound and demonstrable scientific reason for doing so. No such scientific evidence has been forthcoming and the reality is that impact of recreational fishing activities within these marine national park zones is virtually negligible given their distance from shore and the fact that most offshore recreational fishers do engage in low impact fishing practices – capture/ tag and release. It would seem that the plan to lock recreational fishers out of these waters is more politically motivated than based on good science.

ANSA Board
PO Box 328
Matraville
NSW 2036

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

ANSA does not accept the Government and DSEWPC's interpretation of IUCN11 and the determination that recreational fishing be classified as an extractive industry. In contrast to the narrow interpretation of IUCN 11 currently being adopted by the Government and DSEWPC which is for the "highest level of protection for the ecosystems, habitats and biodiversity" the more precise international definition is "Category 11 protected areas are large natural or near natural areas set aside to protect large scale ecological processes, along with the complement of species and ecosystems characteristic of the area and which also provide a foundation for environmentally and culturally compatible spiritual, scientific, educational, **recreational and visitor opportunities**".

While ANSA endorses the proposed restrictions to be imposed under IUCN11 for commercial extractive activities such as mining and commercial fishing, it cannot understand or agree with the rationale that recreational fishing be categorised as an extractive activity when we will have negligible impact on the eco system (for reasons previously stated) while other visitor and recreational opportunities such as non extractive eco tourism will be allowed. This is blatant discrimination. What is more alarming is that the passage of commercial vessels will be allowed to continue through these designated high protection areas and there is provision for the conditional discharge of ballast and the dumping of spoil.

The Government has in the past allowed recreational fishing activities within some IUCN11 zones and it is regrettable that this level of flexibility and commonsense has come to an end for no good reason. ANSA requests that an urgent review of the interpretation of IUCN 11 be undertaken with a view of allowing sustainable and low impact recreational fishing activities in such zones and that the rationale for the categorisation of recreational fishing as an extractive activity be also reviewed.

ANSA also reiterates its previous concern that the cessation of commercial fishing over much of the proposed marine reserve will see a translocation of commercial effort to within multiple use zones which invariably will increase fishing pressure on these areas and lead to possible conflict with recreational fishers. While it is pleasing that compensation will be available for commercial fishers whose livelihood will be adversely affected by the planned fishing closures, it is inequitable that no such compensation package will be available for others affected by access restrictions including recreational fishers and those business enterprises that rely on recreational fishing.

ANSA believes that the management plan in its current format will not achieve the desired goal of optimising the level of protection to our national marine estate and in many respects is unworkable and unenforceable from a compliance perspective. It is a highly ambitious and expensive plan which will have dire consequences for recreational fishers and the economy of those businesses, particularly in regional coastal areas, that feed off the back of recreational fishing and related tourism.

Until a review of the rights of recreational fishers to sustainably access IUCN11 zones and participate in sustainable low impact fishing is undertaken ANSA recommends that the following measures be considered for implementation –

- Imaginary lines on water just don't work and there needs to be a clear and practical process for visitors to know where boundaries are. Wherever possible borders occurring around reefs should be aligned with the hard top edge of the reef and where possible the borders clearly marked out with distinguishable marker buoys.

- Establishment of a stakeholder consultative reference group to provide comprehensive and relevant input into management, codes of conduct, policy and compliance both in the establishment and operational stages of the management plan. It would be expected that recreational fishers would have an equitable presence on such a stakeholder group.
- Expansion of the compensation package to include offsets for those socio or economically affected by the marine reserves rollout. These offsets could include establishment of a recreational fishing trust to fund recfisher education, research and alternative recreational fishing avenues such as artificial reefs and FADs.
- The installation of secure environmental friendly moorings so as to minimise anchor damage and provide safe anchorage.

In conclusion, ANSA has been very supportive of the marine reserve planning process and has shared the enthusiasm of the Australian Government, DSEWPC and the broad general public for the establishment of the national marine reserve network to protect our oceans and its inhabitants for the future of all Australians. Unfortunately though this spirit of cooperation has waned in the final stage of the marine reserve process with our constructive recommendations being spurned by the Government and with the unrealistic and unnecessary rush to finalise public consultation.

ANSA will continue to actively engage in the marine reserve process and it is our sincere hope that sensible and practical outcomes 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