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Commonwealth Marine Reserves Review  
C/O Department of the Environment  
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### **ANSA Submission on Commonwealth Marine Reserves Review**

On behalf of the Board and members of ANSA - Australian National Sportfishing Association Ltd we would like to offer the following comments in respect of the latest Commonwealth Marine Reserves review. These comments apply generally across all of the following reserve 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 recreational fishing peak body networks. 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 on sportfishing and we engage in that activity with a very positive conservation ethos and a sustainable fishing code of practice. ANSA is a founding member of Australian Recreational Fishing Foundation (ARFF) and the Australian Recreational and Sportfishing Industry Confederation ( Recfish Australia) and a member of the International Game Fishing Association (IGFA). ANSA holds board positions on ARFF and Recfish Australia and has representative status on IGFA. ANSA is also a member of the Commonwealth Recreational Fishing Council and has member representation on a wide range of Commonwealth and State fishing advisory and management committees.

ANSA has been a vocal supporter of the Australian government's commitment to deliver a network of marine reserves around the nation and of the overarching objective of maintaining the health of oceans and the marine environment and protecting marine bio diversity and ecosystems for the benefit of future generations of Australians. In the spirit of cooperation, ANSA has historically cooperated fully with the Department of Environment (and its predecessor DSEWP) and Australian governments of both complexions, in all stages of the planning process for the roll out of the Commonwealth marine reserve network.

ANSA's position on Commonwealth marine reserves is clear and unchanged from earlier submissions and input into the planning process. ANSA remains supportive of a marine reserve network that is representative, inclusive and based on sound environmental, economic and social science.

ANSA does not support the case for recreational fishers to be excluded from Marine National Park zones (IUCN11) unless there is sound and demonstrable peer reviewed scientific reason for doing so. No such scientific evidence has been forthcoming and the reality is that the impact of recreational fishing activities within IUCN11 zones is virtually negligible given the travelling distance from shore for most locations and the fact that most recreational fishing activity is low impact, namely capture and release or tag and release - mainly targeting pelagic species. Recreational fisher interaction with marine benthos would only very rarely occur.

ANSA does not accept the Government and the EPBC Act interpretation of IUCN11 or the determination that recreational fishing be regarded as an extractive industry as rightly should be the case for commercial fishing. The narrow interpretation of IUCN 11 currently adopted by the Government and the EPBC Act call for "the highest level of protection for ecosystems, habitats and biodiversity" and is being used as a justification for recreational fishing bans. The more universal IUCN definition of Category 11 states that "protected areas are usually 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, which also provide a foundation for environmentally and culturally compatible, spiritual, scientific, educational, recreational and visitor opportunities.

The reality is that recreational fishers would ordinarily be the largest visitor to and user of all reserves within the Commonwealth network and in doing so they do keep a watchful eye on what is happening in these often remote locations and by doing so render a vital service to both the scientific and administrative management of the reserves. By excluding recreational fishing activity from these "no fish" zones what will be the incentive to travel to these locations and who will provide a watchful eye over the reserves and the activities that are likely to go on. The issue of policing the reserves will be a major challenge for those responsible for this task and it is difficult to understand why the involvement of a caring and vigilant citizen group such as recreational fishers seems very likely to be ignored.

In our previous submissions we have strongly advocated that recreational fishing be permitted within IUCN11 zones. We do not accept the counter argument that there be no extraction activity whatsoever in IUCN 11 zones as an essential prerequisite for scientific research reference. Our preferred position is that all forms of recreational fishing be allowed in IUCN11 zones - such an outcome will diffuse most if not all of recreational fisher disillusionment with the marine reserve planning process. As a possible alternative to a total recreational fishing restriction perhaps consideration could be given to a broadening of the range of recreational fishing activity akin to that conceded for the commercial fishing sector so that negligible impact recreational fishing activities might be allowed on a select or seasonal basis within IUCN11 zones. Suggested negligible impact fishing activities might include "capture and release / tag and release and the seasonal take of certain migratory pelagic species".

Already the precedent exists whereby recreational fishing has been allowed in marine reserve areas that have an IUCN11 designation - eg Ningaloo and the Freycinet Peninsula. Our understanding is that these locations have more recently been proclaimed as recreational fishing zones but there is no reference to such a zoning in any of the consultation material made publicly available. Why when this precedent process does apparently exist, cannot it be extended to other IUCN11 locations.

ANSA would encourage the undertaking of an environmental assessment of recreational fishing activities within Commonwealth waters so that the true extent of recreational fishing impacts could be gauged. It is difficult to reconcile how the so called threats of recreational fishing can be factored into the reserve management plan without credible capture and take data for the various forms of recreational fishing activity which supposedly constitute a threat. It is acknowledged though that this task could not be undertaken within the time constraints established for final plans for management of the marine reserves are determined. However it would be desirable for such a scientific research project to be undertaken within at least the next 5 years.

ANSA is also concerned with what may have been an unintentional oversight in the public consultation material for each of the reserves. Mining, including petroleum exploration and development is a restricted activity within the Marine National Park zone (IUCN11), Sanctuary Zone (1a), Habitat protection Zone (IUCN 1V) and both Special Purpose and Recreational Use zones (IUCN V1) according to the overview statement of proposed zoning schemes. However, within the main body of the consultation material the only reference to restrictions on mining activities is confined to IUCN11 zones. This contradiction needs to be corrected so there can be no misunderstanding about mining activity. ANSA's preferred choice would be to see mining activity completely banned in all marine reserves as is the proposed case for the Coral Sea. It is also of concern that none of the zonings, in particular IUCN1a and 11, make any reference to restrictions on the dumping of spoil in these zones - surely this is an oversight.

ANSA also believes that any loss of recreational fishing access should be compensated for. Such form of compensation could be in the form of but not limited to the installation of artificial reefs and fish Aggregating Devices (FADs).

ANSA also has concerns with how marine park zones will be clearly identified by visitors such as recreational fishers. ANSA is mindful that alert services will be made available for commercial fishers but what technology aids will be forthcoming for recreational fishers. This should be factored into any stakeholder compensation package. Ideally borders occurring around reefs should be aligned with the hard top edge of the reef and where possible the borders clearly marked with distinguishable marker buoys. Consideration should also be given to the installation of environmental friendly moorings around reefs so as to minimise anchor damage and provide safe anchorage.

ANSA would also expect to see the establishment of stakeholder consultative groups for all reserve locations to provide comprehensive and relevant input into management protocols and practices, codes of conduct, policy and compliance. It would be ANSA's expectation that recreational fishers would have an equitable presence on such stakeholder groups.

In conclusion all ANSA is asking for is a degree of lateral and realistic thinking by the Reserve architects and the Australian government in terms of the reserve planning process and the recognition of the socio economic and health attributes of recreational fishing and the reality that recreational fishing will have minimal - if any - impact on fish stocks and the eco systems within the proposed marine reserves.

It is ANSA's hope and wish that a sensible and amicable outcome can be achieved which will equitably satisfy the goals and needs of all stakeholders.

Yours sincerely

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