



Australian National Sportfishing Association Ltd

ACN 063 293 514

COMMITTED TO CONSERVATION & INTEGRITY IN SPORTFISHING SINCE 1967

17 September 2017

Marine Reserve Management Planning Comments,
C/O Department of the Environment and Energy,
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ANSA Comments on Marine Reserves Management Plans

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 and draft management plans. 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 the 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 also 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 Energy (and its predecessor DSEWP) and Australian governments of all complexions, in all stages of the planning process for the roll out of the Commonwealth marine reserve network. This has included several

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face to face meetings with the joint Chairs of the Commonwealth Marine Reserve Review Panels and with Ministers responsible for the Environment and Fisheries of both major party political persuasions.

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. Recreational fishing is an activity that is generally symbiotic with the stated conservation objectives of marine reserves and it is pleasing that the latest draft management plans do at face value appear to be more balanced and cognizant of the importance of recreational fishing as a key stakeholder group and the low impact recreational fishing will have on the marine environment and eco systems across all proposed reserves.

While ANSA views the latest draft management plans as an improvement upon earlier draft plans, particularly in terms of proposed recreational fishing access to the Coral Sea and the South and North West networks, it nevertheless does not believe that the proposed changes to the management plan go far enough and there are still many locations across the entire reserve network where recreational fishing will not be allowed without any justifiable science for doing so.

ANSA stands by its longstanding position that recreational fishers should not 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 user as rightly should be the case for commercial fishing given its industrial scale of activity and environmental impacts. The narrow interpretation of IUCN11 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 Category11 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. There is no mention of recreational fishing or any inference that recreational fishing should be restricted or banned under the universal definition of IUCN11.

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 to be irresponsibly ignored.

In our previous submissions we have strongly advocated that recreational fishing be permitted within IUCN11 zones. We do not accept the prevailing argument that no recreational fishing activity whatsoever be allowed in IUCN 11 zones as an essential prerequisite for scientific research reference. We also have difficulty coming to terms with the categorisation of recreational fishing as an extractive sector user of the reserves in the same league as the commercial fishing industry and the mining sector. To put recreational fishing on par with these major extractive sectors and our capacity to place extensive pressure on fish resources and do harm to the marine environment is an over stretch of imagination. 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. ANSA does acknowledge that these high impact extractive activities are exactly what IUCN11 zone should be protecting against but it is an over reach to slot all forms of recreational fishing into the one commercial extractive basket.

As a possible alternative to a blanket recreational fishing restriction within IUCN11 zones, perhaps consideration could be given to a broadening of the range of recreational fishing activity that would be permissible within marine reserves rather than the current "one size fits all" extractive approach. Such an approach has been adopted for the commercial fishing sector. It is ANSA's contention that very low impact recreational fishing activities could be allowed on a select or seasonal basis within IUCN 11 zones under the broad umbrella of citizen science and research. Suggested very low impact recreational fishing activities might include capture and release, tag and release, citizen science activity and the seasonal take of certain migratory pelagic species. Such forms of citizen science have been successfully undertaken by ANSA members within the Great Barrier Reef Marine Park with the blessing and involvement of park management and the data collected of considerable value in measuring the effectiveness of management processes and the determination of ongoing park management policy. These options have been put before Ministers Frydenburg, Hunt and Ruston and positively received.

Previously the precedent has existed whereby recreational fishing has been allowed in marine reserve areas that have an IUCN 11 designation - eg Ningaloo and the Freycinet Peninsula - with no apparent harm to the marine biodiversity. Our belief is that these locations have more recently been proclaimed as recreational fishing zones and will be reclassified as IUCN IV thus ending the precedent.

On the international scene the case for recreational fishing activity within marine zones has been positively reinforced by the expansion of the Papahānaumokuākea Marine Park in the Hawaiian Islands by US President Obama. This park which spans over half a million square miles of water allows recreational fishing (subject to permit) across all of its conservation zones which include large tracts under IUCN 11 classification. The US Administration is to be congratulated for recognising the minimal impact of recreational impacts throughout these reserves and the extensive socio economic benefits of listening to and working with the recreational fishing sector. It is a shame a similar example cannot be adopted here in Australia.

ANSA is also disturbed by a number of the ESP (Expert Scientific Panel) findings in connection with recreational fishing impacts. It is concerning the ESP found that while recreational fishing can have significant impacts on target species of fish, these impacts and the possible indirect impacts of recreational fishing on biodiversity are not well understood or quantified, especially in Commonwealth waters – risks to biodiversity need to be better understood. Also it is stated that the estimated take of marine fin fish by recreational fishers (based on available survey data) is in the vicinity of 23000 tonne annually – mainly in near shore waters. This figure, if correct, clearly reinforces the argument that recreational fishing impacts are minimal and in the main confined to near shore waters more than likely under State control. It would appear to ANSA that an over zealous interpretation of the precautionary principle regarding recreational fishing impacts has been applied throughout the entire review process and this has jaded the objectivity of proposed management planning.

ANSA would strongly 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 would welcome the opportunity to be involved in such an assessment exercise.

Should the final plans of management continue to restrict recreational fishing in IUCN 11I zones then ANSA 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) in locations where no natural reefs currently exist. Similar outcomes have worked well in other locations where State marine parks have been established.

ANSA is also pleased that with the exception of Lord Howe Island, all forms of recreational fishing – line and spearfishing - are deemed to be mutually inclusive within the entire framework of the reserve network. ANSA is concerned though that in

the case of the proposed Lord Howe Habitat Protection zone (IUCN IV) spearfishing is not allowed, whereas other forms of recreational are free from restriction other than for State managed bag and size limits. Given the species selective nature of spearfishing, very low environmental impact, absence of bycatch and non use of bait, ANSA would like to see this discriminatory exclusion reviewed and more equitably addressed under the management plan.

ANSA also has concerns with how marine park zones will be readily 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 edge of the reef and where possible, borders clearly marked with distinguishable marker buoys. Consideration should also be given to the laying of environment friendly moorings around reefs 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 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. Based upon existing and recently established precedents there is no justification for recreational fishing to be excluded from IUCN 11 zones having regard to justifiable science or because of the very restrictive definition and interpretation of IUCN 11 adopted by Australian authorities and the debatable inclusion of recreational fishing as an extractive activity on par with commercial fishing and mining.

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. ANSA has no objection to the proposed name change from Commonwealth Marine Reserves to Marine Parks to achieve naming conformity with existing State Marine Parks.

Yours sincerely

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

John Burgess
Executive Officer/ Director
ANSA National Ltd