



Australian National Sportfishing Association Ltd
ACN 063 293 514

COMMITTED TO CONSERVATION & INTEGRITY IN SPORTFISHING SINCE 1967

26 September 2018

NSW Marine Estate Management Authority
Locked Bag 1
Nelson Bay
NSW 2315
Email submissions@marine.nsw.gov.au.

ANSA Response to Hawkesbury Shelf Marine Bioregion Proposals

On behalf of the members of ANSA, in particular those that are residents of NSW, ANSA would like to offer the following comments in respect of the proposals for the establishment of a marine park within the Hawkesbury bioregion. These comments apply generally across all of the 25 proposed marine park sites and have been prepared in consultation with Stan Konstantaras, President of the NSW Branch of ANSA and the Recreational Fishing Alliance of NSW.

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 4000 plus individual members and their families and an extensive network of ANSA affiliated clubs in all States and Territories. Our main focus is sportfishing and we engage in that activity with a very positive conservation ethos and a sustainable code of practice.

ANSA is a founding member of the Australian Recreational Fishing Foundation (ARFF) and the Australian Recreational and Sportfishing Industry Confederation (Recfish) and holds Board positions on both of these National representative peak bodies. ANSA has representation on a wide range of Commonwealth and State fishing advisory and management committee and is regarded as a leading voice in the representation and preservation of recreational fisher interests.

ANSA has been a vocal supporter of marine parks at a Federal and State level and of the overarching objective of maintaining the health of the Nation's oceans and the marine environment and protecting marine bio diversity and eco systems for the benefit of all Australians present and future. ANSA has historically cooperated fully with all Commonwealth and State governments and agencies across all stages of the planning process for the development and eventual roll out of all State and Commonwealth marine parks and reserves including the Hawkesbury Shelf Bioregion.

ANSA Board
PO Box 328
Matraville
NSW 2036

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

Rather than making specific comment on each of the 25 proposed sites, the ANSA response will focus more generally on the principles and shortcomings with the proposed marine park process and conclusions.

Proposed use of sites as scientific reference sites

Proposed use of sites as scientific reference sites is mentioned throughout the documents, indicating that many sites will be used to “provide baseline monitoring areas (scientific reference sites)” and that fishing “would also be prohibited to provide comprehensive protection for fish assemblages and threatened and protected marine species and to maintain the value of the site as a scientific reference site”.

These statements are misleading. No baseline monitoring has occurred that could possibly determine the current impacts of recreational and commercial fishing in these areas. There is also a fundamentally-flawed belief that other low-impact activities such as snorkelling and SCUBA diving have no impacts on a true scientific reference site. This is continually being ignored by the conservation sector, contrary to the available science.

In recent discussions about marine parks and lines on maps and how even small lockouts provide sanctuary for fish, it came as a shock to recently hear Professor David Booth dismiss a very serious question on baseline data. Professor Booth is an advocate for marine parks and on ABC Radio recently he stated that “obviously with the lack of money...” we are not going to get baseline data under the Sydney Marine Park process. Recreational fishers know that the baseline data never existed, now one of the most prominent marine scientists in Australia admits it. The NSW Government and the fishers of NSW need an explanation of where is the baseline data to justify any lockout.

Since 2011, when the NSW Government commissioned an Independent Scientific Audit of Marine Parks in NSW to advise the government on future management directions for marine parks and on better management of the NSW marine environment generally, nothing has happened. The 2012 report of the Audit included recommendations for delivering more effective and evidence-based management of the entire marine estate of NSW, including the existing marine parks. The Audit concluded that information was lacking with respect to some sanctuary (no-take) zones, specifically for ocean beaches. After consideration of the Audit findings, and public consultation during and after the Audit, the NSW Government announced in March 2013 that there would be an amnesty from prosecution for recreational shore-based line fishing in certain marine park sanctuary zones on mainland open ocean beaches and headlands, except in identified areas excluded for the protection of threatened species.

The amnesty was to be in place until the threats and risks associated with this activity were assessed—not assessed by science or research, but by “principles”.

In the document *Managing the NSW Marine Estate: Purpose, Underpinning Principles and Priority Setting*, the Expert Knowledge Panel and Marine Estate Management Authority

agreed to operate in accordance with the following principles:

- 1. Effective community engagement, to identify and inform key benefits and threats*
- 2. Identification of management priorities will be based on threat and risk assessment*
- 3. To evaluate trade-offs, values will be placed on alternative uses of the marine estate*
- 4. Best available evidence will be used in trade-off decisions, but judgment will still be required*
- 5. The well-being of future generations will be considered*
- 6. Existing access rights will be respected.*
- 7. The precautionary principle will be applied*
- 8. Efficient and cost-effective management to achieve community outcomes*
- 9. Management decisions will be transparent and adjust in response to new information*
- 10. Management performance will be measured, monitored and reported and information pursued to fill critical knowledge gaps.*

Putting these principles into practice was to be achieved by following these steps:

- identifying the benefits for current and future generations
- identifying how and where these benefits are under threat
- assessing these risks so management effort focuses on the most important issues
- assessing the adequacy of current management settings
- using the least cost management regime that delivers maximum community benefit
- adapting management over time as new information arises
- measuring the delivery of benefits and report on progress.

Not one word on research or baseline data. In the absence of science, we get “principles”. This is not evidence based as promised. Principles are philosophies, ideologies, doctrines, theories, notions and assumptions.

Even after the Audit and the Ocean and Beaches Headlands process we still have no baseline data in place or any scientific reporting of these sites.

Ocean Beaches and Headlands Assessment Report Assessment of recreational fishing access on ocean beaches and headlands in NSW marine park sanctuary zones, December 2013

Dealing with limitations of knowledge Limited knowledge can introduce uncertainty into decision making on the basis of ecological risk. These include the likely impacts of shore-based fishing and spearfishing on biological diversity and fish assemblages on ocean beaches and headlands. Marine park sanctuary zones can provide important areas to monitor and understand ecological change and provide fundamental information to guide management over the medium to long term. Given these limitations, a precautionary approach would include retaining a series of sanctuary zones (or areas within zones) at sites representing the different bioregional, habitat

and ecosystem types to deal with potentially unknown impacts and to use as scientific reference sites.

This is not evidence-based, and a proposed Hawkesbury Shelf Marine Park without clear objectives of outcomes, and without reasons for which areas to lock up, and without any raw data and without any way of measuring success, will not deliver expected outcomes.

A proposed Sydney Marine Park that ignores even the most basic available science is destined to fail. University of Tasmania research of 87 marine protected areas in 40 countries showed the best marine parks had on average eight times more large fish and 14 times more sharks than fished areas. However, the research, published in *Nature*, found that 59% of the marine parks studied were “not ecologically distinguishable from fished sites”.

Researchers identified five key traits of a well-managed marine park: no fish take, well enforced, established for longer than 10 years, larger than 100 square km and isolated by deep water or sand.

Only marine parks with four or all five of these criteria were effectively boosting conservation values, the study found. Among the 26 marine areas studied in Australia, the only place with all five key traits was Middle Reef, near Lord Howe Island.

The six-year study, which utilised scientists and divers from 19 countries, concluded that while the number of marine protected areas was increasing rapidly, the benefits generated were “difficult to predict and under debate”.

“MPAs often fail to reach their full potential as a consequence of factors such as illegal harvesting, regulations that legally allow detrimental harvesting, or emigration of animals outside boundaries because of continuous habitat or inadequate size of reserve,” the paper states. “At present, coastal zoning maps are confusing, with the few conservation gems hidden amongst protected areas that are ineffective because of inadequate regulations or poor enforcement.”

All we see once again as recreational fishers is an extension of the blinkered anti fishing rationale that has persisted in the development of previous NSW marine parks. The end result is a less than objective and outcome driven marine park plan that has considerable economic and social risk for the recreational sector and no baseline data or science to support the plan.

Marine debris and pollution- just another excuse to lock recreational fishers out.

Marine debris has also recently been flagged by Professor David Booth in messages to recreational anglers. He has stated “my underwater surveys around Sydney reveal enormous quantities of fish gear wrapped around habitat, fish with horrible wounds from hooks, we

recently released a struggling tern from fishing line just the other day. We need at least a few small areas where the habitat and organisms are not disturbed”.

This is undoubtedly a problem that needs to be addressed by education, regulation and enforcement. However, it is not the only problem. No tangible evidence relating to marine debris has been presented in the site selection process. To single out recreational fishing as having a significant impact is misleading when we have a growing population and urban footprint in NSW.

This is reflected in the data supplied to us by the Boomerang Alliance:

- half of marine plastic pollution comes from land-based littering—65% is beverage containers.
- Maritime waste represents 11% of plastic pollution in Australia.
- There are no (achievable) solutions to eliminate 1/3 of all marine plastic pollution (nanoplastics when released)
- Production losses and discharges in waste and recycling are rapidly becoming a major source (at least 9%);
- While microbeads and bags only represent 2% of the total pollution they are a major threat to biodiversity.

Without a willingness to address these real threats to our marine biodiversity, many opponents of recreational fishing will continue to justify lockouts of recreational fishers as a way of protecting the biodiversity of the bioregion—overlooking the real threats. These threats will also be used to justify site selection and—curiously—often coincide with recognised SCUBA dive sites.

There are knowledge gaps throughout the site selection process that ignore details of the impacts of land based pollution and eutrophication, heavy metals, halogenated hydrocarbons, polycyclic aromatic hydrocarbons, pharmaceuticals, endocrine disruption, eutrophication, pathogens, acidic sulphate run-off, litter, debris and micro plastics, ocean dumping, tailings disposal, nanoparticles, noise/light/physical disturbance, thermal pollution, uv-b, radioactivity, alterations to physical habitats, terrestrial mining, ocean mining and oil and gas extraction, dredging, connectivity, flow-regime and salinity change, watershed alteration, watercourse change, coastal development, tourism, recreational use, invasions of exotic species, global climate change, temperature change, sea level rise, ocean acidification, extreme weather events, changes to ocean currents, mitigation activities (marine energy, offshore wind farms, carbon sequestration), ocean-based activities, ship-related accidents and waste and debris, bilge water, tank washing, antifoulants, ill-informed perceptions/ideologies, biased/misguided human perceptions, and social/political (misuse of evidence).

In the last 40 years there has been a quantum leap in the range of novel and synthetic compounds that are drifting, running off or being disposed of into waterways, as well as sewerage outfalls. These range from the simple birth-control pill hormones that are excreted

in minute levels to complex synthetic pesticides and herbicides that have the ability to remain toxic in the environment and are possibly having a significant sub-lethal effect on fish stocks at the egg, embryo and fingerling stage. This goes hand in glove with other chemicals such as chemo-therapeutic agents and cytotoxins that can be in such minute levels they are either largely ignored or not measured.

To reinforce the point that chemical/hormone stressors have been under-reported in the MEMA draft report I quote from correspondence with Dr Matt Landos (Landos, 2010 pers comm.) Dr Landos is a Veterinary Scientist, specialising in diseases of fish:

“Loss of embryos/larvae will lead to poor recruitment. And hence, fishermen may be blamed for overfishing the ever-declining numbers of stock. Even though, at its core, it is not the fishing per se that is driving the decline”.

Recent communications with Dr Ben Diggles, an Aquatic Animal Health Specialist, have indicated "Scientists have identified various threatening processes related to urban runoff and sewage—for example, synthetic estrogen from the pill (which is in all our sewage waste nowadays) turned all of the minnows in a lake in Canada female or intersex, resulting in a collapse of the fish population within 3 years. Research in the USA has also shown that runoff from roads is lethal to several fish species."

None of these threats are even mentioned in the MEMA documents but were raised by recreational fishers during the consultative process.

Furthermore, Dr Diggles adds "any marine park near urbanised areas should have in its management policies a sewage abatement plan (emphasising a move to reverse osmosis treatment of liquid waste so any effluent is drinking water standard and free from pharmaceuticals and endocrine disruption effects) as well as a runoff management plan (all urban runoff should be filtered through artificial wetlands to reduce its toxicity to aquatic life)".

Any marine park plan which is silent on these sorts of issues (sewage and runoff) portrays a simplistic, superficial understanding of the real marine management problems that dominate the health of waterways near urbanised areas and establishing a marine park in an urban waterway is the equivalent of establishing a terrestrial national park on a garbage dump, Dr Diggles goes on to say.

Much of the evidence presented by MEMA is questionable, outdated and does not account for new stressors. Much of the evidence is theoretical, no management actions are proposed and quantitative or qualitative data not presented in many instances.

The site selection process does not appear to view threats to the marine environment in the proper perspective. Highly-visible but relatively-benign users of the marine environment such as recreational fishers are simplistically identified as major threats, while other less visible

threats are not appropriately addressed. Unfortunately, this selective and questionable prioritisation of threats has created more than just a perception that recreational fishing is the easy low hanging fruit to target for risk containment while the far more serious and intractable problems have been glossed over either because they are too costly and complex and no political will to address.

Fisheries management isn't good enough.

This is another recent statement by Professor David Booth. Lockouts are a blunt tool that could be used if our current fisheries management tools were failing; however, this is not the case in NSW. Many lobby groups and government agencies are engaging in social and political misuse of evidence to support spurious claims of fishery collapses across the state due to overfishing.

Improving biodiversity with a network of lock out sanctuary zones within a marine park is not going to deliver needed conservation outcomes when there are so many other more threatening and substantive issues and processes that need to be undertaken and funded by the NSW and Federal Governments.

The NSW Government and its advisers will instead opt for the cheapest option—banning recreational fishing—which is the low hanging and cheapest fruit in the process. We have repeatedly challenged MEMA and the NSW Government to deliver what it promised to the state's one million plus recreational fishers when the Hawkesbury Shelf Bioregion marine park proposal was resurrected some 5 years ago.

Recreational fishers are not aware of any fisheries management failures that Professor Booth makes reference to but we do endorse the view that *“Marine reserves only benefit badly managed fisheries”* according to Buxton CD, Hartmann K, Kearney R, et al (2014) and that concentration of effort outside current sanctuary zones is more detrimental than the benefit inside the sanctuary zones; most case studies fail to acknowledge this fact. Every reputable scientific publication will acknowledge that well-managed fisheries are a key part of healthy recreational fishery.

Professor David Booth has named snapper as a species that will benefit from lockouts, however in the text below we can see that good fisheries management has demonstrably achieved biomass recovery.

“Despite the increasing importance of marine recreational fishing, recreational fisheries management is often hampered by lack of adequate data and limited effectiveness of conventional regulations. In Shark Bay, Western Australia, snapper (Pagrus auratus) in the Eastern Gulf, Denham Sound and Freycinet Estuary have been a major attraction for recreational fishers since the 1960s. Various management measures were progressively introduced from 1998 onwards to limit snapper catches, including increases in minimum length, introduction of a maximum length, reductions in daily bag limit, a moratorium in the Eastern Gulf (June 1998–March 2003), a 6-week spawning closure in the Freycinet Estuary

*and, finally, the introduction of a Total-Allowable-Catch-based system in 2003. Stock assessments in 2011 indicated that spawning biomass in the Eastern Gulf and Denham Sound had rebuilt to the management target level while biomass in the Freycinet Estuary remained below the threshold level but was continuing to slowly rebuild. This paper summarising the research and adaptive management of the snapper fishery over the last 15+ years represents an important case study that addresses a range of issues typically associated with marine recreational fisheries, including assessment of stock size and recreational catch, evaluation of management regulations and active engagement with the recreational fishing community” – Gary Jackson and Michael Moran, Recovery of inner Shark Bay snapper (*Pagrus auratus*) stocks: relevant research and adaptive recreational fisheries management in a World Heritage Property.*

Whilst the study above is from WA, even our own studies from the Solitary Island Marine Park indicate that well-managed fisheries play a significant role in restoring the biomass.

“Establishing the marine sanctuaries in this study was not the only management strategy undertaken in 2002 likely to influence snapper abundance. Additional to spatial management there was a reduction in commercial fishing effort in 2002 in the SIMP as part of the marine park re-zoning through buy-out of some commercial fishing licences. Also, in 2001 the NSW minimum size limit for snapper increased from 28 cm to 30 cm Total Length. Complementary to spatial management, these input and output controls would have benefitted the overall region, including the reefs in this study”

– Hamish A. Malcolm, Arthur L. Schultz, Patrick Sachs, Nicola Johnstone, Alan Jordan. *Decadal Changes in the Abundance and Length of Snapper (*Chrysophrys auratus*) in Subtropical Marine Sanctuaries*

In the case of Botany Bay which over the past 20 years has experienced major habitat degradation due to dredging and reclamation works associated with expansion of the airport, container port and Caltex facilities together with underwater pipelines for power the desalination and yet it has survived and has flourished as a recreational fishing haven. The only restriction on recreational fishing within Botany Bay is limited to the Towra Point Aquatic Reserve Sanctuary zone which is a restriction fully supported by most recreational fishers. This is a classic example of nature’s incredible capacity to recover from significant environmental degradation without the imposition of onerous regulatory controls restricting recreational fishing activity or the creation of a marine park.

“The available evidence suggests that if fishing in Botany Bay has had a negative impact on marine systems or the long-term sustainability of fisheries resources this impact would be insignificant in comparison with that from other anthropogenic (major industrial developments within Port Botany) activities in the area. There appears little doubt that other anthropogenic activities in and around the Bay would have had more impact on fishing than fishing would have had on the well-being of the Bay and its ecosystems. It had been suggested that commercial prawn trawling and beach hauling had had a negative impact on the distribution of seagrasses and other bottom biota. While the magnitude and significance

of this impact were debatable, particularly in comparison with other obvious (development) and insidious (pollution) impacts, they are no longer of great relevance as all commercial fishing has now been banned in Botany Bay. Fishing has not been demonstrably a major or irreversible threat to Botany Bay and now that fishing in the Bay is restricted to recreational activities the threat is further constrained” – Kearney, R. & Farebrother, G. 2015. The Comparative Performance of the Management of the Individual Threats to Marine Environments and Fisheries Resources

Recreational fishers have endeavoured to mitigate the notion promoted by supporters of lockouts that recreational fishing is bad for the environment and society as a whole.

“The present degree of reliance on and belief in marine protected areas to provide marine protection is seriously questioned, as is the predominant action within them of closing areas to all fishing regardless of a lack of identification of the impacts of the many other threats and quantification of the impact from particular forms of fishing. It is suggested that enhanced and long-term monitoring and evaluation of marine systems, not only in estuaries and in-shore areas, is needed to assess the impacts of threats and monitor environmental and resource changes. Such monitoring needs to be much more comprehensive and the indicators used should be expanded from the current limited set. With regard to fishery resources there is a need to focus on the habitats and conditions needed to support the many different fish populations rather than the current emphasis on estimating time-series changes to the relative biomass of selected species”...

“The impacts of overfishing are frequently incorrectly asserted to be common to fishing more generally, even by scientific groups (for example SIMS, 2011) and government agencies (RIS, 2003). This widely promoted misinterpretation drives much public perception and is commonly at the heart of advocacy for restriction of fishing, including closing areas to all types of fishing, even in the absence of evidence of net negative impacts from fishing and regardless of which form(s) of fishing may be harmful and in need of additional management” — Kearney, R. & Farebrother, G. 2015. The Comparative Performance of the Management of the Individual Threats to Marine Environments and Fisheries Resources

The paper below shows the impacts of lockouts on recreational fishers at Jervis Bay...

“Following the 2002 implementation of the zone plan, effort generally declined, so much so that in February 2009 fishing effort was 88% less than was observed in February 2000...and the pragmatically designed zoning plan, which predicted only 18.5% of fishing effort would be displaced...”.

We want a fixed-term moratorium on more marine parks.

ANSA in conjunction with the RFA of NSW supports a moratorium on declaring any new marine parks for 10 years. Whilst in principle multi-use marine protected areas appear to be a good idea, once in place the "use" can be changed with the stroke of a pen by regulators without going through the legislative process. Because of our past experience we have a lack of faith and trust in how that misuse of the regulatory process could affect public fishing

rights. Marine protected areas have existed in this state for several decades yet we have seen little in the way of measurable outcomes particularly concerning water quality, abundance in biodiversity, biomass or research. As a priority, we need to improve the outcomes and performance of the managers of these areas, before establishing more areas or marine parks.

Marine Parks Act.

There was also subtle but important change to marine parks legislation when the *Marine Parks Act* was repealed and legislation introduced for the Marine Estate: the purpose of marine parks was set out in the *Marine Parks Act* to be primarily for conservation but secondarily for recreation and, importantly, there is explicit reference to recreational fishing. By contrast, the Marine Estate has a larger mandate to encompass broader issues. In its general objectives it does reference recreation but it is not specific. Importantly, part 5 that refers to the specific purpose of marine parks has omitted the previous explicit reference to recreational fishing and generally refers more to passive uses and general enjoyment.

As recreational fishers we were optimistic about what the original Act and marine parks movement meant for conservation, as it seemed to recognise us as an important stakeholder. However, as we were dealt blow after blow over many years as marine parks were announced, there was widespread consternation. This led to the roll back of the zoning update, the moratorium on shore fishing in some sanctuaries and the independent review into marine parks which led to the marine estate. When we pointed out at the independent review that the roll outs leading to lockouts was not in keeping with the provision in the *Marine Parks Act* for sustainable recreational fishing, instead of changing the marine parks in line with the intention in the original act, the government went ahead and repealed the whole Act and replaced it with an Act with a new purpose statement—one that does not explicitly reference recreational fishing.

To remedy this, the NSW government needs to reintroduce the references into part 5 of the *Marine Estate Management Act* for sustainable uses such as recreational fishing as a secondary but important purpose of marine parks. This is justifiable, as every declaration of a marine park introduced under the former legislation was successful with that provision—every community consultation that occurred for the introduction of a marine park in NSW had this provision in the legislation at the time. There was no government mandate to change and remove this provision.

In fact, the independent inquiry gave the opposite mandate. It should have been maintained in the new legislation. Changes are needed to change the planning and zoning to fit the legislative provision. We need to get the original provision back and perhaps make it stronger and clear to the marine estate management that they are to work to what is expected by the legislation.

Better consultation is needed in the future.

Clearly the MEMA model is not delivering desired or workable outcomes, especially in terms of consultation. The conflict was predictable. It has led to a mixed media debate and confrontation from all sides and is not the most appropriate way to debate such an important issue.

At the very least, analysis of submissions from the current consultation process should separate out responses from representative bodies, NSW residents, Australian residents, and international respondents. Someone living in Queensland should not carry the same weight as someone who resides in Sydney or Terrigal for example.

There are two particular issues well understood by recreational fishing researchers that we do not think the Expert Panel has considered or understood. The first is the geographical science concept of “people and place”. It is a psychological/emotional attachment to place. In the fisheries context it is not always linked to something as basic as catch rates. Recreational fishers often feel attachment to the fishing locations fished as children for example. The second is the substitutability of the recreational fishing experience. That is, can you gain the same level of satisfaction at another location involving similar travelling distance. Arguably for many recreational fishers from Metropolitan Sydney the answer is no. This will especially be the case for those on lower incomes or with limited mobility. Additionally there is also the safety risk associated with fishing at new and unknown locations and overcrowding due to the lock outs at many preferred and popular locations.

We need a better consultative model for NSW, rather than the reliance on skewed community feedback and the Expert Knowledge Panel, which has failed to deliver a new vision for the marine estate. Recreational fishers were part of a very good process under the Commonwealth Marine Reserve process. That process delivered a very good consultative mechanism that is lacking in NSW, where stakeholders were divided and excluded from serious engagement. All the comments were filtered—mostly ignored we feel. We never had the opportunity to converse directly with the Expert Knowledge Panel which in reality is totally absurd. The absence of quality peer reviewed science was overlooked, replaced largely by MEMA’s principles.

This urgently needs to be fixed—the current process in the Hawkesbury Bioregion is flawed but the same model is probably being used in Batemans Bay right now as the review committee is currently meeting. The no lockout message from recreational fishers is clear and the lack of baseline data, quality science, measurable outcomes and seeming unwillingness to tackle the real and substantive serious environmental threats will not sit well with recreational fishers. More marine parks without measurable objectives and outcomes are illogical. It is also disturbing that there will be only 3 types of zone spanning the entire 25 sites. Seemingly there are no longer any zones such as the previous “Habitat Protection Zones” which did offer protection against oil / gas exploration and mining. We see no HPZ in this current process—an amazing oversight.

A new management model is needed.

A new approach is needed for delivering enhanced fisheries management and marine conservation with spatial zoning, recognising that the region is highly urbanised. To start with, the baseline habitats need to be assessed properly, as does the fauna across all seasons. A management plan needs to be risk-based with risks mitigated. An entity could be created run by recreational fishers which collects relevant information against specific objectives. The data and process could be subjected to auditing once every two or three years to check for veracity—a third party auditing fine-scale citizen science. Research should cover not just fish populations but also seagrass, oyster reefs and all other habitat.

Conclusion.

The shortcomings of the current marine park review process need to be addressed, particularly its reliance on the MEMA model. The principles and values of that model fail to deliver acceptable and effective management outcomes for recreational fishing in NSW and the preservation and protection of marine biodiversity.

It is pleasing that the NSW government has responded positively to the concerns of recreational fishers and has given the commitment that there will be no recreational fisher lock outs in the proposed Hawkesbury Shelf Marine bioregion marine park network.

MEMA must focus on the bigger issues such as water quality, pollution and habitat degradation and to reach an accord with all marine estate stakeholders to ensure that our unique and marvellous marine environment is given the right and deserving level of enduring protection and preservation – not just for the citizens of NSW, present and future but for the paramount protection and preservation of the marine estate habitat itself and interdependent marine biota.

ANSA would in conjunction with other recreational fishing peak bodies such as the RFA of NSW welcome the opportunity to have further meaningful dialogue with MEMA in a bid to resolve our current differences and to develop a planning model for the Hawkesbury Shelf marine bio region that will equitably and scientifically deliver the right suite of outcomes and protective measures that are needed for this unique section of the NSW Coast and the inherent marine environment.

Yours sincerely,



John Burgess

Executive Officer/ Director. ANSA – Australian National Sportfishing Association Ltd
Vice President. ANSA NSW Branch