

Lori-Ann Shibish
Community Engagement and Information Officer
Department of Biodiversity, Conservation and Attractions

By email: PSCMP@dbca.wa.gov.au

Dear Lori-Ann,

Thank you for your email of 18 January 2022 requesting the Recreational Fishing Sector Advisory Group's ('RFSAG') input on a boundary discussion paper for the proposed South Coast Marine Park ('SCMP').

Recfishwest as Chair of the RFSAG represents 750,000 Western Australians who directly inject \$2.4 billion into the Western Australian economy every year through their fishing activities. We are committed to protecting, promoting and creating sustainable, accessible, enjoyable and safe fishing for the benefit of the community.

As one of WA's great recreational fishing landscapes, the south coast is hugely important for tens of thousands of recreational fishers, providing spectacular fishing opportunities from both shore and boat.

Fishing opportunities extend to land-based fishing from beaches, rocks, estuary shorelines and jetties to offshore fishing in boats and kayaks targeting an array of species. From catching mulloway or salmon on pristine beaches to jigging for nannygai or harlequin fish in the boat, tens of thousands of fishers enjoy wetting a line along the south coast each year.

It is the diversity of both the fishing experiences on offer, as well as the ability to explore landscapes in an open and free manner, which makes the south coast such a unique fishing experience.

The following advice is provided by Recfishwest as the Chair on behalf of the *Recreational Fishing Sector Advisory Group*.

When considering an appropriate outer boundary for the SCMP, the RFSAG has considered the following:

1. Interests of the recreational fishing community
2. Marine park design principles guiding outer boundary coordinates; and
3. ANZECC Guidelines for Establishing the National Representative System of Marine Protected Areas ('NRSMPA').

The RFSAG's recommendation for the outer boundary of the marine park is as follows:

- The western boundary of the marine park should be located at 119° 40.800'E
- The eastern boundary of the marine park should be located at the WA/SA border

The RFSAG's recommendations will allow for a level of recreational and commercial activity which is consistent with the proper conservation of the natural environment, the protection of flora and fauna and the preservation of any feature of archaeological, historic or scientific interest.

For clarity on the proposed western boundary, a map is included as an appendix to this correspondence.

Interests of the recreational fishing community

Quality recreational fishing experiences rely on healthy habitats and abundant fish stocks. Recreational fishers have a demonstrated history of protecting the very biodiversity that supports WA's fantastic fishing experiences. Be it advocating for protection of pink snapper during spawning periods in Cockburn Sound and Shark Bay, or supporting bag limit reductions for important nearshore species such as Australian herring that addressed sustainability concerns, recreational fishers support measures that sustain quality fishing experiences.

When considering the interests of recreational fishers who fish along the south coast, the RFSAG believes our proposed outer boundary demonstrates the right balance between achieving biodiversity conservation targets and opportunity for recreational fishers to maintain quality fishing experiences.

Significantly, our proposed western boundary would align with the adjacent Commonwealth Marine Park, making on-water compliance much easier for fishers and allow for cross-shelf connectivity of marine protected areas.

Marine Park Design Principles and ANZECC Guidelines for Establishing the National Representative System of Marine Protected Areas (NRSMPA)

The ANZECC guidelines assist Government agencies in the development of the NRSMPA and assist stakeholders in the understanding of this process. These guidelines provide a mechanism that assists with Australia's fulfilment of international obligations and targets under the Convention on Biological Diversity (UNEP 1994). Within the ANZECC guidelines a number of principles are used for the development of the NRSMPA that are reflected in the design principles guiding the outer boundary coordinates within the discussion paper. We believe that our proposed boundary can effectively uphold these principles as well as support recreational fishing interests.

Regional Framework and CAR Principles

Reefishwest recognises that there are two *Interim Marine and Coastal Regionalisation for Australia* ('IMCRA') bioregions that are within the study area of the proposed SCMP – the WA South Coast ('WSC') and Eucla bioregions.

Comprehensiveness Principle

Noting that the SCMP is limited to State waters, our proposed SCMP boundary covers more than 50% of the State-based WSC bioregion and 100% of the State-based Eucla bioregion (within Western Australia's jurisdiction). Based on these figures, we believe that the full range of ecosystems will be recognised at an appropriate scale within and across each bioregion, thus satisfying the comprehensiveness principle. Reservation in line with the RFSAG recommendation will provide one of the highest levels of bioregion representation in any of Western Australia's marine protected areas.

Adequacy Principle

The adequacy principle addresses the question of what level of reservation will ensure viability and integrity of populations, species and communities. This principle can only be thoroughly addressed through zoning discussions once the outer boundary of the MPA has been.

Representativeness Principle

This principle is designed to ensure that the diversity within each marine ecosystem is sampled within the NRSMPA. It should be noted while many species may be well represented in several bioregions and in line with the Strategic Plan of Action for the National Representative System of Marine Protected Areas, it may not be necessary to distort reserve boundaries to ensure that they are reserved in each ecosystem occurrence.

While some marine species, particularly marine fauna, have habitats that cover large areas that may not be closely related to ecosystem boundaries we believe the extensive area covered in our proposed boundary will adequately account for distribution ranges of individual species.

The RFSAG believes that our proposed boundary will result in a marine park containing areas of broad physical/geomorphic/oceanographic features, benthic habitats and coastline characteristics that reasonably reflect the biotic diversity of the marine ecosystems from which they derive. Our recommended outer boundary provides adequate opportunity to provide adequate reservation to ensure viability and integrity of populations, species and communities found within both the WSC and Eucla bioregions(in accordance with the ANZECC Guidelines).

Broadly, these are:

- within the Fitzgerald Biosphere Reserve, a mixed sandy bottom and sloping rocky bottoms;
- around the Stokes Inlet region, mostly mixed sandy bottom, interspersed with sloping rocky bottoms around headlands, sandy lagoons and small patches of rocky platform;
- within the Recherche Archipelago, exposed rocky granite headlands, steep rocky slopes and quartzose sandy beaches at the ocean interface, and submerged limestone reefs and carbonate sands; and Around the Twilight Cove region, a combination of mixed sandy bottom, rocky platform and hard rocky reef.

Ecological Importance, Vulnerability and Resilience

With reference to the Carrijoa Report, Recfishwest's proposed boundary contains the following features:

- 13 Australian sea lion breeding sites at Red Islet (1), West Island (1), Investigator (Rocky) Island (1) and the Recherche Archipelago (10);
 - A Biologically Important Area ('BIA') sits within the islands and rocky outcrops of the Recherche Archipelago;
- Four known little penguin breeding sites at:
 - Red Islet;
 - Stokes Inlet (BIA);
 - the Recherche Archipelago; and
 - Twilight Cove;
- Seven seabird breeding areas, including a BIA in WA Mirning sea-country;
 - Red Islet;
 - Fitzgerald Biosphere Reserve (BIA);

- Culham and Gordon Inlets;
- Stokes Inlet (BIA);
- Recherche Archipelago (Key Biodiversity Area); and
- Twilight Cove (BIA);
- Eight southern right whale calving areas:
 - From the proposed western boundary to Red Islet (calving occurs in high numbers);
 - West of Hopetoun (seasonal calving);
 - Masons Bay (seasonal calving);
 - From near the Lake Shaster Nature Reserve, through Munglinup Beach to west of Margaret Cove (seasonal calving);
 - From west of Quagi Beach to Shelley Beach (seasonal calving);
 - At Israelite Bay (calving occurs in high numbers);
 - From west of Esperance Bay to east of Point Culver (seasonal calving); and
 - At Twilight Cove (seasonal calving occurs over a significant portion of the coast);
- Four BIAs for white sharks at;
 - Fitzgerald Biosphere Reserve;
 - Stokes Inlet;
 - Recherche Archipelago; and
 - Twilight Cove;
- Internationally recognised important marine mammal areas along the entire proposed boundary; and
- A number of habitats within the Recherche Archipelago for threatened (EPBC Act listed) syngathid species.

Furthermore, all biodiversity hotspots are accounted for and habitats that have been identified as vulnerable are also present in the remainder of our proposed boundary. These include:

- Seagrass beds of sparse, medium and dense coverage:
 - East of Red Islet;
 - Along 12 Mile Beach;
 - From east of Munglinup Beach, throughout the Recherche Archipelago to west of Point Culver; and to the east of Twilight Cove;
- Estuarine ecosystems within the Esperance Nyungar sea-country; and
- Rhodolith beds along the stretch of coastline from the Recherche Archipelago to Twilight Cove, encompassing Israelite Bay

Within the design guidelines, it is recommended that “as well as being representative, including examples of all habitat types, aim to include examples of all biologically and ecologically important areas.” Recfishwest considers that there are examples of all habitat types and ecologically important areas within our proposed boundary.

Connectivity

This is not an issue as the proposed boundary remains continuous. Recfishwest does not recommend that the SCMP is split up into sections as this can cause confusion among recreational fishers with respect to compliance.

Additionally, where appropriate, zoning that aligns with the adjacent Commonwealth Marine Park should be considered.

Consultation, Aboriginal and Torres Strait Islander (ATSI) Involvement and Decision Making

With regard to principles within the ANZECC Guidelines, Recfishwest and the SAG are supportive of marine parks that are created with appropriate consultation with key stakeholders, Aboriginal and Torres Strait Islander involvement and sound decision-making.

It is expected that effective and high-quality public consultation with appropriate stakeholders will continue throughout the SCMP process, including with Traditional Owners. Recfishwest and the SAG value the interests and rights of Traditional Owners and believes that recreational fishing interests align with those interests, as they do with many other users of the South Coast.

Of particular note is the principle around decision making, where:

”decision-making processes should effectively integrate both long-term and short-term environmental, economic, social and equity considerations.”

When comparing this principle with one of the aims of the Convention on Biological Diversity “the fair and equitable sharing of the benefits arising out of the utilisation of genetic resources” the SAG believes that equity is a key factor in biodiversity conservation from the international level right down to the local level.

We thank you for the opportunity to provide input into the boundary of the proposed SCMP from a recreational fishing perspective and look forward to working with you to create an equitable marine park that also conserves biodiversity and provides for sustainable use.

Sincerely



Matthew Gillett
Chair
Recreational Fishing Sector Advisory Group
10 February 2022

Appendix 1:

RFSAG Proposed Western Boundary:

