



Submission on the draft
management plans for the Mamang
Maambakoort, Wudjari, Western
Bight and Mirning marine parks on
the South coast of Western
Australia.

Recfishwest

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Executive summary

The proposal to create marine parks along the south coast of Western Australia has been met with fear, anxiety and in many cases, opposition from recreational fishers who value the wilderness fishing offered by the remote beaches and offshore islands between Bremer Bay and the South Australian border.

Fishing is an integral part of Western Australia's culture and WA fishers spend \$2.4 billion on their fishing every year, adding more than \$1.1 billion to WA's GDP and creating 9,680 full time jobs. Fishing is vital to many south coast towns' economies and provides huge social and economic benefits. Many of these towns started as fishing communities and fishing remains an essential part of the coast's lifestyle.

The failure of the consultation process to adequately consider fishing values has resulted in flawed draft management plans containing many examples of proposed sanctuary zones that are illogical and unjustifiable. History has shown that final management plans do not significantly change from draft plans put out for public consultation, so it is vitally important to ensure each change made to the draft plans can provide the greatest benefit to the greatest number of fishers.

For this reason, Recfishwest has focused our recommendations on the areas of most significance for fishing. We note every sanctuary zone is likely to exclude someone from their favourite fishing spot and Recfishwest has urged all fishers to put in a submission identifying all areas of concern to them.

Recreational fishing is largely compatible with marine parks' conservation objectives and must be recognised as a key value when developing management plans. Marine parks should aim to improve recreational fishing experiences with no net loss of amenity. Any lost access must be based on evidence fishing poses an unacceptable risk to the marine park's conservation objectives. Lost access should be avoided where possible and explained and offset in instances where such a loss is unavoidable.

Marine parks represent an investment of taxpayers' money in conserving biodiversity and promoting sustainable use of our publicly owned natural resources. Increasing opportunities and liveability for members of the community needs to be a key consideration when designing marine parks.

Recreational Fisher Concerns Around Consultation Process

When the government announced consultation for a new marine park on the south coast was underway on the 24th September 2021, the Minister for Fisheries publicly stated;

"Genuine engagement with our aquaculture, commercial, recreational and charter fishing sectors is planned through an extensive engagement process, and the State Government is committed to undertaking meaningful consultation with Traditional Owners, the fishing sectors and other stakeholders."

To date, recreational fishers feel there has been no genuine effort to understand the impact recreational fishing has on conservation values within the proposed marine parks, or the impact the parks will have on the social and economic values fishing provides. There has also been no reasonable explanation for the proposed fishing access loss across large areas and no effort to offset these proposed losses through investments in improving fishing experiences in the areas of the park fishers are not excluded from.

When the four [draft plans](#) for the proposed south coast marine parks were released for public comment in February 2024, it was clear DBCA had not fulfilled the government's commitment for *genuine engagement* and *meaningful consultation*, evidenced by the number of illogical and unjustifiable

sanctuary zones that would unnecessarily impact upon recreational fishing. Over the last few years, Recfishwest has put substantial resources into providing input into the marine parks planning process.

The promised new transparent and community-driven planning process ended with the recreational fishing public believing DBCA to have driven a conservation-based agenda with little regard for impacts such as prevailing weather conditions on the South Coast and current fisheries management arrangements, contributing to the low level of recreational fishing pressure. There was also little-to-no effort to understand recreational activity not compromising conservation values - a CALM act requirement.

Support for Joint Management with Traditional Owner Groups

A positive outcome from the Government's Plan for our Parks initiative is the joint vesting of marine parks with local Traditional Owner groups.

Recfishwest recognises the strength, resilience and capacity of Traditional Owners to manage and care for the land and sea. Recfishwest recognises Traditional Owners have a connection to country that is central to their culture and we understand that Traditional Owners have an important responsibility to look after the country so future generations can share the same experience as their elders and ancestors.

Recfishwest places a high value on the knowledge Traditional Owners have built up over thousands of years about seasonal cycles of sea country and aquatic environments. This knowledge places Traditional Owners in a strong position to be able to develop management approaches that integrate their knowledge on how to best protect and manage sea country and healthy fish populations.

Lack of Understanding Around the Social and Economic Benefits of Recreational Fishing

The draft management plans fail to adequately understand the area's social and economic values. The State Government had promised to deliver an independent socio-economic assessment to assist planning and instead a vague desktop study of little relevance was delivered once the planning process was largely completed.

Had the area's social values been better understood, even small tweaks to the draft plans could have had massive positive impacts for local communities while retaining all desired conservation values. While our preference is for new draft plans to be jointly developed with the community and all stakeholders in an open, transparent and science-led process, government reluctance to publicly acknowledge the planning process's significant failures means this is unlikely. Therefore, this submission focuses on small, reasonable but important changes that can be made to the draft management plans.

Low Impact of Recreational Fishing on Conservation and Biodiversity Values

The recreational fishing pressure at many sanctuary zones in the draft plans is so low it is unlikely its impact on conservation values could even be measured. This means fishing should not be restricted within the proposed park. However, given the enthusiasm DBCA has for promoting no-fishing sanctuary zones this submission has focused on areas where minor changes to the proposed zoning will have the greatest benefit to the local fishing community. This submission should in no way be interpreted as support for the draft management plans which were developed without appropriate consideration of all stakeholder views or appropriate regard for the social or economic values fishing provides.

To improve shore-based fishing experiences, Recfishwest recommends implementing 200-metre setbacks at popular shore-based fishing locations and minor changes to other sanctuary zones where habitat is already represented in other nearby sanctuary zones. Our recommendations will resolve a significant

amount of concern and conflict arising from the draft plans which in many cases are proposing sanctuary zones that are illogical and unjustified. The changes Recfishwest are seeking are reasonable and modest. The ecological impact these changes would have on aquatic ecosystems is so low it could not be measured. However, the social impact of these changes is immense and will flow through to local communities, improving acceptance of the marine park and stewardship of the marine environment.

Recommendations

Mamang Maambakoort draft management plan

1. Remove the Point Hood sanctuary zone (given the duplication of habitat covered in the nearby Doubtful islands) to allow boat-based and shore-based fishing in this area.
2. Implement a 200m setback to allow shore-based fishing at Gordon Inlet sanctuary zone and Hopetoun East sanctuary zone.
3. Reduce the size of the Doubtful Islands (east) sanctuary zone to allow boat-based fishing in the western portion of this proposed zone.

Wudjari draft management plan

4. Implement 200m setback in Mason Bay and West Island sanctuary zone to allow for shore-based fishing. Further reduce this zone to allow greater nearshore fishing access and offshore fishing access around West Island and Black Rock.
5. Implement a 200m setback in Munglinup sanctuary zone
6. Reduce the Benwenerup Wardup sanctuary zone to allow greater boat fishing access to the west of Fanny Cove
7. Prohibit gillnets as an allowable fishing method in Stokes Inlet, within the Quagi special purpose zone (cultural management)
8. Implement 200m setback on the western end of the Barker Inlet to Munroe Point Beach Sanctuary Zone to allow shore-based fishing from the mouth of the inlet to the tip of the headland. Implement 200m setback at the eastern end of this sanctuary zone boundary at the headland extending along the beach westward for at least 1km.
9. Reduce the West Group Islands sanctuary zone to allow greater boat fishing access to the northern side of Figure of Eight, and islets/rocks in between Figure of Eight and Boxer Island.
10. Reduce or remove the Kepa Kurl sanctuary zone to allow fishing on the northern side of Woody Island (including Shearwater Bay and Skinny Dip Bay), and Thomas and Gunton Islands
11. Reduce the Termination Island sanctuary zone to allow greater fishing access to the northern side of the zone.
12. Implement a 200m setback within Cape Le Grande sanctuary zone covering the beaches and rocks within an accessible walking distance from the carparks at Thistle Cove and Hellfire Bay. Reduce the Cape Le Grande sanctuary zone to allow greater fishing access to the inshore portion of this area, particularly around New Island Bay, Ram Island and Hope Island (note: cumulative impact with West Group Islands Sanctuary Zone and Kepa Kurl Sanctuary Zone).
13. Implement a 200m setback in the Victoria Harbour Beach to Hammer Head sanctuary zone. Reduction this zone to allow boat-based fishing, particularly towards the east around Hammer Head, near Wharton Bay (including Station Island and Cornwall Island) and out from Victoria Harbour.
14. Relocation and/or reduce the Membinup sanctuary zone to provide greater boat-fishing access in proximity to the Duke of Orleans.

15. Implement a 200m setback in the Kennedy Beach and Offshore sanctuary zone and reduce the zone to allow greater boat-fishing access to the islets east of North Twin Peaks Island.
16. Implement a 200m setback from the western boundary of the Cape Pasely sanctuary zone through to where the track begins to deviate from the coast inland over Cape Pasley.

Western Bight draft management plan

17. Implement a 200m setback to allow shore-based fishing in the Israelite Bay South, Bilbunya Beach (Central) and Bulbunya Dunes sanctuary zones:

Mirning draft management plan

18. Implement a 200m setback in the Twilight Cove sanctuary zone to allow shore-based fishing from the eastern boundary of the zone through to the junction of the beach and the high cliffs.
19. Implement a 200m setback in the Madura Beach to Red Rocks Point sanctuary zone from the eastern boundary to immediately west of the track down at Middini Beach.
20. Implement a 200m setback throughout and Eucla sanctuary zone.

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Purpose

The purpose of this submission is to provide the Wagyl Kaip Southern Noongar Aboriginal Corporation ([WKSNAAC](#)), Mirning Traditional Lands Aboriginal Corporation ([MTLAC](#)), Ngadju Native Title Aboriginal Corporation ([NNTAC](#)), Esperance Tjaltjraak Native Title Aboriginal Corporation ([ETNTAC](#)) and the Department of Biodiversity Conservation and Attractions (BDCA) with constructive feedback on the draft management plans for the Maambakoort, Mirning, Western Bight and Wudjari marine parks.

It is our hope this submission can inform the development of final management plans for these marine parks that better acknowledge and reflect recreational fishing values. Small changes to the draft management plans can result in significant social and economic improvements for south coast communities east of Bremer Bay while maintaining all desired conservation outcomes.

Better recognition of fishing values in the final management plan should provide the Ministers for the Environment, Fisheries and Mines with confidence that final management plans which they are all responsible for endorsing will deliver positive outcomes for fishers, communities, and the environment.

About Recfishwest

[Recfishwest](#) is the peak body for recreational fishing in Western Australia, recognised by government to provide advice on recreational fishing related issues. An estimated 700,000 Western Australians go fishing every year making participation in fishing comparable to cycling, jogging or playing team sports.

Fishing is an integral part of Western Australia's culture and lifestyle and is vital to the economies of many regional towns. Western Australians spend [\\$2.4 billion](#) on their fishing every year adding more than [\\$1.1 billion](#) to WA's GDP and creating 9,680 full time jobs.

As the voice of recreational fishing, Recfishwest is a leader in aquatic conservation. Marine parks should be underpinned by peer-reviewed science and must be implemented using simple, practical management that is informed by science, risk-based, transparent and subject to regular review. Recfishwest support marine parks created for the purpose of recreation, science, education, conservation and enhanced visitor experiences.

Recfishwest works tirelessly to improve the health of our aquatic environments ensuring abundant and resilient fish stocks. We strive to ensure our fisheries and environments are healthy and fishers are provided reasonable opportunities to access WA's excellent fishing experiences. We support management of our fisheries and marine environments that is designed to optimise the social and economic value derived from the sustainable use of Western Australia's publicly owned fish stocks.

Recreational fishing is largely compatible with the conservation objectives of marine parks, and our fishing is an activity that must be recognised as a key value when formulating marine park management plans. Management plans should aim to improve recreational fishing experiences with no net loss of amenity. Any loss of access must be based on evidence that fishing poses an unacceptable risk to the conservation objectives of the marine park. Access losses must be prevented where possible and offset when impacts on fishing are unavoidable.

Background to the new planning process for the south coast marine park

Planning for the south coast marine park began following the release of the government's *Plan for our Parks* initiative in February 2019. This initiative aims to increase WA's conservation estates by 20 per cent and it promised a new consultative and cooperative approach to marine park planning in Western Australia.

The first new marine parks developed under the government's Plan for our Parks initiative were in the Buccaneer Archipelago in WA's Kimberley region. Recreational fishers were excluded from the development of draft management plans for these parks resulting in [significant community anger](#) and frustration when draft plans were released for public comment.

Recfishwest tempered much of the heated discourse arising from the release of these draft plans and we assisted in enabling meaningful engagement between recreational fishers, DBCA and Traditional Owners. Recfishwest also undertook substantial consultation at our own cost with recreational fishers in the Kimberley region. This engagement and consultation enabled final management plans that achieved a more balanced outcome for local fishers.

In wanting to ensure the government learnt lessons from the failed Buccaneer marine park planning process, Recfishwest, in partnership with other marine park stakeholders, strongly lobbied DBCA for a new approach to marine park planning. We insisted the local community needed to be imbedded in the early planning stages for any marine park. These discussions resulted in a new planning process being adopted for the south coast marine park. This new process included the Department of Primary Industries and Regional Development (DPIRD) as a planning partner, the formation of Sector Advisory Groups (SAGs) that could talk directly to a Community Reference Committee (CRC) who were supposed to provide local knowledge, community input and advice to both DBCA and joint management partners to inform management arrangements.

This new process was intended to facilitate development of a marine park that better reflected community values leading to improved stewardship and broader community support for marine parks. For the new planning process to work DBCA needed to listen to local communities and key stakeholders and incorporate everyone's values into the planning process. Unfortunately, recreational fishers felt this new process was largely influenced by DBCA who seemed unwilling or unable to embrace a community driven approach to marine park planning.

The failures in the planning process resulted in the CRC being unable to provide the joint management partners with a final report and recommendations. There have also been repeated mass public demonstrations by the Esperance community against the draft management plans and multiple petitions against the proposed plans are intended to be tabled in parliament in the near future. The new planning process for the south coast marine parks has clearly failed.

With an expansion of the Marmion Marine Park and another marine park planned for the Exmouth Gulf, increasing the ability of DBCA to work in a coordinated, collegiate, and strategic way needs to be a priority for the agency if WA is to get marine parks the entire community can champion and support.

Support for Joint Management with Traditional Owner Groups

A positive outcome from the Government's Plan for our Parks initiative is the joint vesting of marine parks with local Traditional Owner groups. Recfishwest believes management of WA's aquatic resources must incorporate the rights, interests, aspirations and culture of all stakeholders including Traditional Owners and we have [publicly called for Traditional Owners to be given a greater leadership role in fisheries management](#).

As the first people to understand the relationship between the health of country, and that of fish, Traditional Owners must be given a greater opportunity to take a leadership role in the management of WA's aquatic habitats and fisheries and be provided an opportunity to formalise their cultural practices caring for country into the governments management frameworks.

Recreational fishers share many of the same values as Traditional Owners in that we all want a healthy environment with abundant fish stocks and we want to enjoy fishing with our families and friends. Recfishwest recognises the strength, resilience and capacity of Traditional Owners to manage and care for the land and sea. Recfishwest recognises Traditional Owners have a connection to country that is central to their culture and we understand that Traditional Owners have an important responsibility to look after the country so future generations can share the same experience as their elders and ancestors.

Recfishwest places a high value on the knowledge Traditional Owners have built up over thousands of years about seasonal cycles of sea country and aquatic environments. This knowledge places Traditional Owners in a strong position to be able to develop management approaches that integrate their knowledge on how to best protect and manage sea country and healthy fish populations.

Recfishwest fully supports the rights, knowledge, interests, aspirations, and culture of Traditional Owners being better incorporated in the management of WA's aquatic resources. The incorporation of Traditional Owner knowledge in the management of the State's aquatic resources must go beyond management tokenism and it must place Traditional Owners on a level equal to the Conservation and Parks Commission as intended by the 2020 changes to the CALM Act.

Recfishwest Actions in Relation to the South Coast Marine Parks

In addition to advocating for a new marine park planning process, Recfishwest has undertaken a large volume of work over the last few years gathering information to inform the development of management plans for the proposed south coast marine parks that could be supported by the fishing community. We undertook this work in good faith following comments made by the Minister for Fisheries when the government announced on 24th September 2021 that consultation had begun on a new marine park for the South Coast. The Minister said:

Only by supporting the coexistence of valuable commercial fisheries with protected marine ecosystems can we ensure the long-term sustainability of both recreational and commercial fishing experiences into the future.

And

Genuine engagement with our aquaculture, commercial, recreational and charter fishing sectors is planned through an extensive engagement process, and the State Government is committed to undertaking meaningful consultation with Traditional Owners, the fishing sectors and other stakeholders.

Given the government's stated intention to adequately consult with fishers and protect existing fishing experiences, Recfishwest formed a recreational fishing SAG and attended meetings of the CRC providing advice related to recreational fishing. The objectives of the recreational fishing SAG were:

- Ensure the south coast marine park planning team are provided clear, consistent and professional information in relation to what matters most to recreational fishers on the south coast;
- To allow a marine park to be designed in a way that is mindful of recreational fishing values and aspirations.
- Provide opportunity for the recreational fishing community to have input into the marine park planning process.
- Highlight issues of importance to recreational fishing to the marine park planning team.

In October 2022, our SAG provided advice on the outer boundary of the marine park. This advice supported a large area with the rationale that a large area would allow marine park planners greater opportunity to design a park in a way that minimises impacts on recreational fishers.

In providing this advice we noted that it was 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. With 1,000 kilometres of coastline and very few access spots planning a marine park that complemented existed users seemed a reasonable and relatively simple task.

In mid-2022 Recfishwest undertook a survey in which fishers could identify areas of greatest interest along the south coast marine park boundary. This survey elicited 427 responses from both shore and boat-based fishers. Recfishwest supplied DBCA and DPIRD with a heat map of important fishing areas to help inform the planning process.

Recfishwest also undertook several trips to the south coast and relocated a staff member to Esperance at appropriate times to assist fishers during the submission process. We also travelled to Kalgoorlie to consult with a local fishing club.

In addition, Recfishwest created a page on our website dedicated to the south coast marine park and extensively covered the issue through our media channels. We created a newsletter dedicated to the south coast marine park and took out a full-page ad in the West Australian to raise awareness of the draft management plans. Recfishwest has strongly encouraged people to make submissions and have provided advice and tips on how to make these submissions meaningful.

Recfishwest has written to and met with the Environment and Fisheries ministers. Recfishwest also wrote to the Premier outlining our concerns about the planning process and DBCA's actions.

About fishing on the South Coast of Western Australia

Fishing is an integral part of Western Australia's culture and WA fishers spend \$2.4 billion on their fishing every year. This expenditure adds more than \$1.1 billion to WA's GDP and creates 9,680 full time jobs. Fishing is vital to the economies of many regional towns on the south coast and recreational fishing remains a lifeblood for these towns providing huge social and economic benefits. Many of these towns started as fishing communities and fishing remains an essential part of the lifestyle on the south coast.

While there can be great fishing on the south coast year-round, autumn is commonly regarded as the best time. Autumn is prime time for south coast anglers, with still, warmer days and clear skies that showcase the south coast's stunning coastline. When it all comes together on the south coast there truly is nowhere else like it on the planet. The favourable weather in autumn sees giant salmon schools passing through on their annual migration, and southern bluefin tuna and bonito not far behind. The conditions are at their best for offshore fishing for species including pink, red and queen snapper, bight redfish, dhufish, Samson fish and yellowtail kingfish.

There's an absolute wealth of fishing options along the south coast – if you truly want to get away from it all, fishing east of Israelite Bay along the Nullarbor to Point Culver and the Baxter Cliffs is a great option. For boaties, fishing around the archipelago islands around Esperance can be sensational at times when the conditions allow and then closer to town four-wheel driving and fishing off the beaches around Esperance, Hopetoun and Bremer Bay produce classic fishing for species like salmon, skippy, mulloway and sharks.

Autumn is also a great time to fish the countless south coast estuaries and rivers for thumping black bream, juvenile salmon, herring, King George whiting, pink snapper and blue swimmer crabs, not to

mention the odd surprise like mulloway. The salmon come through in huge numbers in late summer/early autumn and spots like Alexander Bay, Kennedy and Tagon Beaches, Poison Creek and Thomas River all offer superb beach driving and fishing experiences. Some of the biggest skippy in WA are caught along the south coast. Some of the more popular fishing locations on the south coast include:

Esperance

Esperance is rightly famed for its incredible beaches, which offer fantastic fishing. However, there is much more to the popular holiday destination than just fishing from the dazzling white sand that stretches along the coast on either side of the town.

Being as isolated as it is, the fishing pressure around Esperance is relatively light and ensures fish stocks of all the popular south coast species remain healthy. Excitingly for visitors and locals the range of fishing options covers just about all preferences, with excellent shore, estuary, inshore and offshore fishing opportunities starting from right in the heart of Esperance itself.

For the visiting angler just looking to wet a line from the shore without too much effort, the jetty is a reliable spot to catch the bread-and-butter species such as herring, King George whiting, squid, skippy and garfish.

The Bandy Creek Boat Harbour is another productive spot offering similar species, with King George whiting among the popular species targeted by fishers. The boat harbour and town beach both have boat launching ramps which provide access to the Recherche Archipelago and an extensive range of species which can be caught in and around the many islands. For inshore boaters the species include herring, sand whiting, King George whiting, squid, snook, skippy and garfish. Such is the importance of fishing to Esperance that the town also has its own artificial reef, only 5km from the Bandy Creek Boat Ramp.

Fishing a bit further into the Archipelago can provide yellowtail kingfish, Samson fish, harlequin fish, queen snapper, redfish, sweep, and breaksea cod. Southern bluefin tuna are also a regular catch offshore at certain times of the year.

Many fishers drive along Esperance's beaches looking for salmon. There are endless opportunities either side of town for beach fishers, especially if you have a four-wheel-drive.

The scenic drive west of town along Twilight Beach Road takes you past a series of spots that can offer good fishing, especially when the salmon schools are moving around town and can be spotted while driving. Other common catches in this stretch including herring, flathead and skippy. Favourite fishing spots include Stockyards and 14 Mile Beach, while farther west of town, Roses is a noted salmon hotspot.

Wylie Bay east of Esperance is a lovely spot to soak a bait for herring and King George whiting and is accessible with a two-wheel drive vehicle. The Cape Le Grande National Park offers rock bolts for safe rock fishing and fantastic beach fishing. For those with a four-wheel-drive, Thomas River, Tagon Beach and Alexander Bay are also great spots to catch salmon, herring, flathead, tailor, mulloway and skippy.

The rocky headlands around Esperance can produce many of the shore caught species, along with some thumping skippy. There's also the possibility of a Samson fish or southern bluefin tuna, and maybe even a blue groper. Farther east again is the legendary Poison Creek, which is renowned for offering huge numbers of salmon at times, as well as lots of sharks shadowing them.

For estuary fishers, Esperance has some good bream stocks in its lakes and fish measuring more than 40cm are regularly caught. The lakes in town don't look all that productive but do actually fish well, including Lake Qualliup, west of town. Stokes Inlet is also renowned for producing lots of small bream,

although bigger fish are in there however these bigger are generally caught in gill nets and removed from the system.

Like anywhere on the south coast, the weather is not always conducive to fishing, but when it does, Esperance truly is a scenic place to wet a line in WA.

Duke of Orleans Bay

Located east of Esperance, the Duke is a great place to access the beautiful coastline in this area. There are plenty of campsites through Cape Arid, but the caravan park at Duke of Orleans makes a perfect base for a fishing trip.

The Duke provides great inshore fishing for small boat anglers with a relatively easy beach launch. The vast seagrass meadows nearby provide great fishing for squid and a short trip around the cove off Whartons beach provides red snapper, harlequin fish, Samson fish, pink snapper and yellowtail kingfish, among many others. There are numerous easily accessible beaches either side of the Duke which offer superb surf fishing for a range of species including salmon, mulloway, herring and skippy.

Hopetoun

Located 190km west of Esperance is Hopetoun which offers beach, estuary and offshore fishing opportunities. Hopetoun used to have a long jetty that was great for fishing. It currently has a rock groyne with a couple of small jetties and a boat ramp, for easy access to inshore and offshore fishing for the usual range of inshore species.

The beaches east of Hopetoun are stunning and offer superb fishing opportunities, with numerous reef ledges especially towards 12-Mile. A gravel road follows the coast east and offers opportunities for those with two wheel drive vehicles to park close to fishing spots, while beach access for four wheel drives is available in some locations. There are good spots all through here as you head towards Masons Bay and Starvation Bay which has well-established campsites with good facilities. Beach launching also provides access to great fishing directly out from these campsites.

The estuary fishing around Hopetoun can be great too with the Jerdacuttup River holding good numbers of quality black bream.

Bremer Bay

While the doubtful islands host fantastic boat fishing the beaches around Bremer Bay are fantastic with Trigelow, Peppermint, Bremer, Dylan, Fosters and Reef Beach all providing jaw-dropping land-based fishing spots. To the east of Bremer Bay there are a range of beaches facing south, west and east, meaning there is usually always a spot to casting with ease with the wind in your back. These beaches host great camping spots and there are plenty of areas to explore for deep gutters to soak baits or flick out lures for a wide range of great species. There are numerous sheltered areas along this stretch of coast which host big schools of salmon hold at times making for exciting sight fishing.

General Comments Applicable to all Draft Management Plans

The legislative purpose of a marine park is to **allow** recreational activity consistent with the proper preservation of the conservation values of the park. Therefore, any restrictions on a recreational activity should be accompanied by an explanation of how fishing has been deemed incompatible with conservation values. Recreational fishing should be embraced within marine parks as a low-impact activity that has high social, and economic benefits.

There are many issues related to the south coast marine parks that have never been adequately explained such as the rationale for the marine parks, impacts of weather conditions, socio-economic impacts and fishing pressure. The failure of the draft plans to address these issues has caused significant concern within the fishing community.

Given DBCA's legislative responsibility increases every time a marine park is created it is essential they clearly document the rationale for any new marine parks. This rationale must go beyond the simplistic throw-away lines about *protecting biodiversity* and being *comprehensive, adequate, and representative*. A failure to adequately explain the reasons for a marine park and proposed zoning invariably leads to conclusions DBCA are simply pursuing more marine parks to simply grow their department and receive more government funding. Final management plans need to do a better job to address the following issues.

Impartiality

The Public Sector Commission's [code of conduct](#) and [code of ethics](#) both recognise the need for government departments to be impartial, act honestly and uphold the trust placed in them by the community. Acting impartial when implementing government priorities, policies and decisions is a non-negotiable however DBCA is not impartial when it comes to the implementation of sanctuary zones.

DBCA has been quick to cite scientific studies supporting the implementation sanctuary zones while failing to reconcile or reference studies that question the value of these zones. DBCA has also largely failed to acknowledge the value of existing management arrangements repeatedly citing a *lack of protection* on the south coast as a rationale for the proposed marine parks.

Historically, final marine park management plans have not changed much from draft management plans. Given Recfishwest cannot see where our input into the planning process to date has been meaningfully incorporated into the draft plans, the final management plans for the proposed south coast marine parks must be significantly different or commonly accepted views about DBCA's impartially only be re-enforced.

The South Coast is Protected

Throughout the planning process DBCA has repeatedly cited a lack of protection on the South Coast as justification for the marine park. On ABC radio on 13.04.23 the Minister for the Environment even said

"In terms of the state waters about 1% of that state water area is currently protected on the South Coast."

And

"Fishers have been operating in an area where they've been able to go anywhere, and there's been no regulations in terms of sanctuary zones".

Fisheries regulations provide a significant amount of protection for fish stocks on the south coast. DPIRD estimate 98% of the south coast is not affected by demersal fishing activities and trawl fishing is only permitted in 1% of shelf waters on the south coast. There are substantial sea lion protection areas along the south coast where gill nets are prohibited and gear controls for rock lobster pots further protect sea lions. There are limits on the type and amount of fishing gear that can be used, size limits, bag limits, and possession limits ensure the sustainability of fish stocks and habitats on the south coast are protected.

For DBCA to repeatedly claim the south coast has no protection or imply sanctuary zones are the only adequate form of protection is disingenuous and disrespectful to the state's fisheries management credentials which are regarded as amongst the best in the world. The *unprotected south coast* claim is a line used by conservation groups to promote at least 30% sanctuary zones and for DBCA to adopt this

misleading mantra rather than calling out this misinformation raises serious questions about the impartiality of the agency.

The final management plans must acknowledge the value of existing fisheries management and take this management into account when designing appropriate zoning schemes and permitted uses within these zones.

A lack of socio- economic consideration

The draft management plans all acknowledge *recreational fishing is of great importance to the Western Australian community as well as the residents of and visitors to the South Coast, and generates significant economic activity in regional centres*. Despite this recognition all draft plans have failed to adequately consider the economic or social values of recreational fishing. The draft plans appear not to understand recent economic studies on recreational fishing confusing total expenditure and gross state product. In addition, there is no indication social or wellbeing values have influenced the proposed zoning scheme.

In parliament on 22 February 2023 a government representative implied economic and social assessments had been undertaken for each of the communities affected by the proposed marine park however, there is no record of such assessments ever taking place or being used to inform the development of draft management plans.

Recfishwest is not alone in calling for social and economic values to be considered with the Shire of Esperance publicly calling and being promised a robust social and economic assessment. The use of a hastily constructed study on a marine park in another state that was used to justify social and economic considerations was [labelled](#) by the shire of Esperance as *a pitiful report, a vague desktop document, giving ambiguous Key Findings, an insult and a disgrace, an affront to local fishing families and an indication of the low value the State Government places on our regional small businesses*. In their [submission on the draft management plans](#) the Shire of Esperance has stated their belief

the current draft of the South Coast Marine Park plan and associated zoning fails to adhere to Councils expectation of a balanced approach to planning, and does not reflect the well-balanced Marine Park the Government has been promising.

This is primarily due to the absence of vital triple bottom line information; scientific data analysis that underpins the reason for proposed sanctuary zoning size and placement, and a thorough socio-economic analysis. Without this information, the magnitude of impacts on the commercial and recreational fishing sectors, associated businesses and the social values of the community is unknown, which has led to some very divisive opinions and mental health issues within the Esperance community.

Developing marine parks without adequate consideration of social or economic values is unfortunately common amongst DBCA's marine park planners despite the planning process spanning several years.

The government's [Better Regulation Program](#) guides the development, design and implementation of regulatory proposals (such as marine parks). This program is the Cabinet-approved replacement for the Regulatory Impact Assessment program. The Better Regulation Program involves three broad steps for agencies developing and seeking approval for regulatory proposals such as marine parks.

Step 1: Apply the Better Regulation Principles to the policy problem and potential options;

Step 2: Determine if the regulatory proposal has economically significant impacts; and

Step 3: If the regulatory options have economically significant impacts, engage with the Better Regulation Unit and undertake formal consultation and assessment.

A central feature of the Better Regulation Program is for agencies to undertake their own initial assessments and economically significant regulatory proposals will then require formal consultation and assessment. It remains unclear if DBCA ever undertook their own initial assessment. If this assessment took place it is inconceivable it would not have necessitated a formal consultation and assessment process.

Under the Better Regulation Program any proposal found to have economically significant impacts, should be formalised using a Regulatory Impact Statement (RIS). This RIS can then assist government to consider a range of options in a transparent manner, assisting stakeholder input and confidence in government's regulatory decision making.

Consistent with the Better Regulation Principles, regulations should be designed to:

1. support policy objectives and **deliver maximum net benefits to the community;**
2. allow for risk based regulatory assessments and decision making focused on outcomes;
3. provide clarity and certainty for affected parties, recognising that different groups may be affected differently;
4. avoid duplication or conflict with other existing or proposed regulations; and
5. allow for well-considered, efficient and effective administration and enforcement arrangements.

There is no excuse for DBCA failing to undertake a formal assessment of social and economic impacts in line with the Better Regulation Guidelines and this failure means the draft plans cannot lay claim to delivering the maximum net benefits to the community.

The South Coast is not Ningaloo

One of the most disappointing parts of the draft management plans is the failure to acknowledge the weather provides more protection for fish stocks than any management action ever could. While each management plan acknowledged the weather impacts patterns of recreational activity none of the plans appeared to have accounted for this in the proposed zoning. Natural weather patterns restrict fishing access to the extent that there is likely no need for sanctuary zones however all management have pursued an agenda of strong sanctuary zone representation in the draft plans.

Furthermore, the draft plans recognise *the remote nature of the marine park, combined with extreme weather conditions (e.g., strong wind, large swell and storms) can pose a risk to visitors and other marine park users.* Despite this recognition there has been little effort to locate sanctuary zones away from access points even though there are a limited number of access points to launch boats on the south coast. This has the effect of pushing fishers further offshore than they may otherwise have travelled.

The final management plans must acknowledge the impact weather has on restricting fishing access as well as weather related safety implications and take this into account when designing appropriate zoning schemes. To protect ocean users resisting any access restrictions in proximity to access points such as boat ramps needs to be seriously considered in the final management plans.

In comparing the proposed south coast marine park to the Ningaloo marine DBCA have repeatedly referenced a 2018-2019 study by Deloitte which found tourism at Ningaloo added \$100 million to the WA economy despite a general use restriction on this report stating

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upon by anyone else and we accept no duty of care to any other person or entity. The report has been prepared for the purpose of set out in our engagement letter dated 1 October 2019. You should not refer to or use our name or the advice for any other purpose.

The south coast is very different to Ningaloo. The weather on the south coast doesn't allow tourists to flock to the south coast for six months of the year and the colder waters on the south coast will never see it ranked as a favoured swimming and snorkelling destination. To even compare the south coast marine park to Ningaloo demonstrates a fundamental failure to understand the south coast or south coast communities.

Minimal Fishing Pressure

Only 0.7% of the total statewide boat based recreational fishing catch in 2020/21 came from the Esperance zone. The shore-based catch in within the proposed marine park mainly consists of bread-and-butter species such as herring, whiting, skippy, squid and salmon all of which have healthy abundant fish stocks.

For boat-based fishers in the Esperance area DPIRD research has shown that since 2011/12 the number of boat days has dropped by 42%, the number of fishing events has fallen by 41% and the number of hours fished has fallen by 27%. Fishing effort is so low it poses zero risk to conservation values.

The draft management plans all claim *sanctuary zones can help to increase ecosystem health by reducing pressures on the ecosystems protected, thereby increasing resilience to external pressures such as climate change*. For this claim to hold any currency the pressures posed by fishing needs to be quantified.

The recreational fishing pressure on the south coast is so low it is unlikely its impact on fish stocks could even be quantified. As the legislative purpose of marine parks is to allow that level of recreational activity that doesn't impact on conservation values it is hard to see any rationale to prevent the community from enjoying the simple pleasure of wetting a line.

The low level of recreational fishing pressure and the negligible impact this fishing has on conservation values needs to be better recognised in the final management plans.

Existing Protections

The justifications for several of the proposed sanctuary zones refers to the need to provide protection for a range of species such as white sharks, sea dragons, sea lions, penguins, seals, whales and migratory birds. All of these species are already afforded protection in all WA waters. Therefore, these proposed sanctuary zones add zero additional protection for these animals and only serve to restrict fishing.

While it is suspected some sanctuary zones contain areas important for spawning, calving or foraging these zones continue to allow diving, snorkelling, boating, wildlife watching, swimming and surfing while excluding fishing which makes little sense. The final management plans need to better explain why a minimally extractive activity such as fishing is considered to pose a threat to spawning, breeding or calving activities while other activities involving the same level of interaction with breeding, spawning or calving animals do not.

Other justifications for sanctuary zones in the draft plans include protection of areas likely to be a genetic transfer barrier, and soft sediment, filter feeding, macroalge, and seagrass communities. The act of fishing has no relevance or impact to these justifications and final management plans remove these proposed restrictions or better explain how fishing has been determined to adversely affect these conservation values.

Securing Existing Access and Uses

Much of the opposition to the current marine park plans is driven by the uncertainty that existing uses and activities undertaken within the extent of the proposed marine parks will be secured. While it is clear that fishing activities will be prohibited within sanctuary zones, much of the south coast is revered for its wilderness camping and four-wheel-driving experiences, which are highly valued by locals and visitors alike, and the lack of assurance from regulators and the government that these activities will remain under a marine park plan is forcing community members to assume that they will not.

Given that the CALM act allows for changes to both zone types and permitted activities during the life of the marine park plan, community members are justifiably fearful that the impact on their highly valued lifestyle will be significant.

It is therefore incumbent on the regulator to provide assurances to the community that current arrangements supporting access to beaches and activities including four-wheel-driving and camping will be maintained and actively managed under a marine park regime. This should include track maintenance, safe vehicle access to beaches and provision for camping both in managed camping areas, as well as off-grid camping experiences.

Visitor safety

As the agency responsible for the safety of visitors to the marine parks, it is an expectation of recreational fishers that they be able to undertake their fishing practices in a safe manner. This includes the provision of rock fishing safety signage and infrastructure such as rock bolts (where appropriate) as well as a level of mobile phone coverage that provides access to emergency services if required. Recfishwest has a long and successful history of working with partner agencies, including DBCA, around the provision of rock fishing safety infrastructure and we would expect that this service would be supported within any DBCA estate including the proposed south coast marine parks.

Specific Comments on the Mamang Maambakoort Draft Management Plan

Point Hood Sanctuary Zone and Doubtful Islands (east) Sanctuary Zone

Point Hood and the Doubtful Islands are of high importance to recreational fishers, particularly those in the Bremer Bay region (including Whealtbelt visitors). There are multiple camping locations around the peninsula, which are heavily utilised during the holiday periods. Shore-based fishing occurs along the Point Hood coastline. Small boats can be launched from the protected beaches on the northern side of the peninsula (including House Beach, Peppermint Beach and the corner of Trigelow / Tooregullup beach). This area is also accessible for medium-sized vessels launching from Bremer Bay. Both line fishing and spearfishing are undertaken from boats in the waters around the islands and peninsula.

Gordon Inlet Nearshore Sanctuary Zone

This area is highly valued for shore-based fishing, particularly for Bremer Bay locals and visiting fishers. Trigelow / Tooregullup beach is one of only few large easterly-facing beaches, which are generally associated with good salmon fishing during the annual migration. The area in front of the Gordon Inlet is a natural attraction point for fishers – it is the main access point to this beach from Bremer Bay, has numerous camping spots near the mouth of the inlet, and the beach in front of the inlet (particularly when it breaks through to the ocean) has structures associated with fish activity such as holes, gutters

and rips. This is also generally a main access point for fishers heading south to Point Hood, or North along Trigelow towards Point Ann.

Hopetoun East Sanctuary Zone

The stretch of coast from 12 Mile to 13 Mile is popular with Hopetoun fishers. There are numerous access tracks to the beach within this sanctuary zone. The breaks in the reef are well regarded as productive locations during the salmon run, while the nearshore reef is popular for abalone fishing.

Recfishwest Recommendations for the Mamang Maambakoort Marine Park:

21. Remove the Point Hood sanctuary zone (given the duplication of habitat covered in the nearby Doubtful islands) to allow boat-based and shore-based fishing in this area.
22. Implement a 200m setback to allow shore-based fishing at Gordon Inlet sanctuary zone and Hopetoun East sanctuary zone.
23. Reduce the size of the Doubtful Islands (east) sanctuary zone to allow boat-based fishing in the western portion of this proposed zone.

[Specific comments on the Wudjari draft management plan](#)

Mason Bay and West Island Offshore Sanctuary Zone

Mason Bay (as well as nearby Starvation Bay) is a popular camping and fishing location. The area is utilised by Hopetoun locals, as well as visitors from Esperance and surrounding regions. Mason Bay has beach access suitable for launching small to medium-sized vessels, while Starvation Bay has a boat ramp which is regularly used by larger vessels. The inshore areas off Mason Bay are fished by small boats (including tinnys) and kayaks, while offshore areas around West Island and Black Rock are a natural attraction point for fishers with larger vessels. West Island and Black Rock are also relatively accessible from Hopetoun's town boat ramp. A lack of islands along this part of the coastline, as well as limited boat launching areas, makes the areas within this sanctuary zone important and regularly utilised for both nearshore and offshore fishing.

Munglinup Sanctuary Zone

Moderate value to shore-based recreational fishing. Anecdotally one of the few beaches to the west for targeting mulloway. Proximity to Munglinup campgrounds makes this a popular camping/fishing location and is readily accessed by the farming community around Munglinup.

The area around Munglinup and the Oldfield Estuary is accessed by small boats launching from near Munglinup and Starvation Bay. This zone would have minor impacts to boat-based fishing; however, the exclusion of the nearshore reef system and the Oldfield Estuary alleviates some impact to fishers from small boats and kayaks.

Benwenerup Warden Sanctuary Zone

Fanny Cove is one of very few areas between Esperance and Hopetoun suitable for launching medium to larger vessels. Noting the existing South West Corner Marine Park (Commonwealth) National Park Zone, the proposed zone further limits fishing opportunities for fishers launching from Fanny Cove. Shore-based fishing along this stretch of coastline is predominately focussed around Shoal Cape and Stokes Inlet, at which we are pleased to see the value has been recognised and accounted for with a setback of sanctuary zone. Dunster Castle Beach is also fished, though access in recent times can be limited. This zone would have minor impacts to shore-based fishing

Quagi Special Purpose Zone

The Quagi special purpose zone includes the extremely popular recreational fishing destination of Stokes Inlet. Stokes is popular as a safe estuarine fishing location for families to target species such as black bream, flathead and skippy. At times, Stokes Inlet has been valued as a trophy black bream fishery. Currently, recreational and commercial gillnets are an allowable fishing method within Stokes Inlet. Recfishwest does not believe that this fishing method is compatible with community values around a wilderness fishing and camping experiences. Removal of gillnets from this estuary would support improved fishing for trophy sized black bream and other popular estuarine species.

Barker Inlet to Munroe Point Beach Sanctuary Zone

This area is highly valued for shore-based line fishing. Munroes, Warrenup, and Barkers Inlet beach/headland are all heavily utilised, particularly by locals fishing west of Esperance. Warrenup offers protected fishing during prevailing summer easterly winds. Proximity to Esperance makes these locations very accessible for day trips, and camp spots provide amenity for overnight stays. There is essentially no access between Warrenup and Barkers Inlet, as well as between Barkers Inlet headland and the western end of Quagi – making accessible locations within this zone more valuable.

West Group Islands Sanctuary Zone

Concentration of the Recherche Archipelago to the ocean south and east of the Esperance townsite limits boat fishing areas to the west. Accordingly, Figure of Eight, Boxer Island and the numerous islets/rocks in between are important fishing locations when fishing to the west of town. This is particularly the case during periods of afternoon westerly seabreezes where conditions for returning from fishing locations east of town are less suitable. Figure of Eight offers multiple aspects which provide sheltered fishing locations in a range of metocean conditions. This area is also important for local fishing charter operators.

Kepa Kurl Sanctuary Zone

The Woody Island Group, including Woody, Thomas, Canard and Gunton islands, is popular for fishing. These islands are readily accessible from numerous access points, including Bandy Creek, the Esplanade boat ramp, or via beach launching from the corner of Cape Le Grand, making them accessible for smaller boats heading out into the archipelago. The northern side of these islands provide sheltered fishing when fishing the inner archipelago or on the way back from further offshore fishing locations when the sea breeze comes in. This sanctuary zone covers some of the closest islands to the Esperance townsite within the marine park boundary. Some shore-based fishing occurs at Woody Island. This is predominantly focussed of the jetty near the resort (which has a 50m exclusion of sanctuary zone), though fishers also utilise the adjacent shoreline. This sanctuary zone would have minor impacts to shore-based fishing.

Termination Island Sanctuary Zone

This area is valued by recreational fishers fishing further offshore areas. Of the few outer archipelago islands (e.g. Twin Rocks, Middle Rock), Termination Island and surrounds has the highest recfishing value. Proximity of Termination Island to the continental shelf/slope makes it a natural attraction point, providing a safe anchorage and fishing option when fishing offshore (including deep dropping). The various reefs and rocks to the north of Termination Island (Brown Reef, Humilaria Reef) are also important when fishing this area. Termination Island and surrounds is also important for charter fishing, with one of the charter operators restructuring their business in order to provide Termination Island fishing charters as a service.

Cape Le Grand Sanctuary Zone

This area is highly valued by visiting recreational fishers, particularly beaches such as Lucky Bay, Hellfire and Thistle Cove for shore-based line fishing. This area also contains some of the more popular rock fishing spots, such as the corner of Cape Le Grand, Hellfire, Thistle Cove, and the corner(s) of Lucky Bay. Various bays (notably Thistle Cove) are popular for abalone fishing. The campgrounds at Lucky Bay and Cape Le

Grand beach, two-wheel-drive access throughout this section of the national park, and its proximity to Esperance all contribute to the popularity and importance of this zone.

In addition to shore-based fishing importance, the area offshore from Cape le Grand is popular for boat-based fishing. Small vessels are launched from the corner of Cape le Grand Beach, Lucky Bay and Mississippi Beach (Rossiter beach/bay). This area is also readily accessible from the boat ramps in Esperance. New Island Bay and O'Briens are utilised for mooring/anchorage. Inshore fishing occurs around the headlands and nearshore islands, including New Island Bay, Ram Island and Hope Island. Fishing also occurs around Mondrain Island, particularly towards the west of the island. Adjacent areas to the east of Mississippi Point are utilised considerably less for boat-based fishing compared to the areas within this sanctuary zone.

Victoria Harbour Beach to Hammer Head Offshore Sanctuary Zone

This area is of high importance to recreational fishers. The Duke of Orleans Caravan Park is a large caravan park which is immensely popular with Esperance-Goldfields residents during the holiday periods, as well as visiting tourists. Various beaches around this area are also popular for beach camping and day/extended trips. Large boats are able to be launched from Orleans Bay, providing access for boat-based fishers to fish the nearshore islands. Smaller boats are also commonly launched at Nares Island beach, Little Wharton, Wharton Beach, and Victoria Harbour.

This area is of high importance to recreational fishers. The Orleans Bay Caravan Park nearby is a large caravan park which is immensely popular with Esperance-Goldfields residents during the holiday periods, as well as visiting tourists. The numerous beaches in proximity to the Caravan Park, including Wharton Bay, Little Wharton, Victoria Harbour, and Hammer Head, are popular fishing spots for people staying at the caravan park. Dunn Rocks Beach is also popular for beach fishing, being one of the first 'true' surf fishing beaches to the east of Esperance.

Membinup Beach Offshore Sanctuary Zone

This zone is less than 3.5km from the boat ramp at Orleans Bay, which is the last recognised boat ramp to the east of Esperance before entering South Australia, and on the doorstep of a popular caravan park and holiday spot for recreational fishers. This zone impacts on safe nearshore fishing experiences in proximity to existing infrastructure and amenities.

Kennedy Beach and Offshore Sanctuary Zone

Kennedy Beach is a well-known fishing beach east of Esperance. It is one of the main locations used by the former Esperance Surfcasters Club, and there is still a fishing shack at the entrance to this beach. Kennedys is popular with Esperance locals for camping and beach fishing. Areas offshore from Kennedy Beach are utilised by recreational fishers launching from Alexander Bay, Orleans Bay and Thomas River (Yokinup Bay). Impacts from this zone predominately relate to areas adjacent to Twin Peak Islands.

Cape Pasley Sanctuary Zone

Poison Creek is one of the more well-regarded surf fishing beaches around Esperance. Formation of beach structures such as holes and gutters become increasingly strong in an eastward direction, meaning that the eastern end of the beach is the most valuable section for fishing. The campgrounds at Jorndee Creek, Seal Creek and Poison Creek provide amenity to fishers doing overnight or extended fishing trips. The quality fishing and relatively secluded nature of this area is a large part of the appeal.

Pasley Island and the surrounding ground is occasionally accessed by fishers launching from Seal Creek and Poison Creek. This zone would have some impact to boat-based fishing.

Recfishwest Recommendations for the Wudjari Marine Park:

24. Implement 200m setback in Mason Bay and West Island sanctuary zone to allow for shore-based fishing. Further reduce this zone to allow greater nearshore fishing access and offshore fishing access around West Island and Black Rock.
25. Implement a 200m setback in Munglinup sanctuary zone
26. Reduce the Benwenerup Wardup sanctuary zone to allow greater boat fishing access to the west of Fanny Cove
27. Prohibit gillnets as an allowable fishing method in Stokes Inlet, within the Quagi special purpose zone (cultural management)
28. Implement 200m setback on the western end of the Barker Inlet to Munroe Point Beach Sanctuary Zone to allow shore-based fishing from the mouth of the inlet to the tip of the headland. Implement 200m setback at the eastern end of this sanctuary zone boundary at the headland extending along the beach westward for at least 1km.
29. Reduce the West Group Islands sanctuary zone to allow greater boat fishing access to the northern side of Figure of Eight, and islets/rocks in between Figure of Eight and Boxer Island.
30. Reduce or remove the Kepa Kurl sanctuary zone to allow fishing on the northern side of Woody Island (including Shearwater Bay and Skinny Dip Bay), and Thomas and Gunton Islands
31. Reduce the Termination Island sanctuary zone to allow greater fishing access to the northern side of the zone.
32. Implement a 200m setback within Cape Le Grande sanctuary zone covering the beaches and rocks within an accessible walking distance from the carparks at Thistle Cove and Hellfire Bay. Reduce the Cape Le Grande sanctuary zone to allow greater fishing access to the inshore portion of this area, particularly around New Island Bay, Ram Island and Hope Island (note: cumulative impact with West Group Islands Sanctuary Zone and Kepa Kurl Sanctuary Zone).
33. Implement a 200m setback in the Victoria Harbour Beach to Hammer Head sanctuary zone. Reduction this zone to allow boat-based fishing, particularly towards the east around Hammer Head, near Wharton Bay (including Station Island and Cornwall Island) and out from Victoria Harbour.
34. Relocation and/or reduce the Membinup sanctuary zone to provide greater boat-fishing access in proximity to the Duke of Orleans.
35. Implement a 200m setback in the Kennedy Beach and Offshore sanctuary zone and reduce the zone to allow greater boat-fishing access to the islets east of North Twin Peaks Island.
36. Implement a 200m setback from the western boundary of the Cape Pasely sanctuary zone through to where the track begins to deviate from the coast inland over Cape Pasley.

[Specific comments on the Western Bight draft management plan](#)

Israelite Bay South Sanctuary Zone

Israelite Bay and surrounds provide exceptional wilderness fishing experiences. This is a high value area for recreational shore-based fishing, particularly for mulloway and gummy shark, due mainly to its remote beach fishing and camping aspects. Nearby campgrounds exist at Israelite Beach and other popular beach camping locations (e.g. Point Malcolm, Bellinger Beach) are utilised by fishers accessing this area. The Israelite Bay area is particularly popular during holiday periods for extended fishing trips. Israelite Back Beach is the most popular beach for fishers staying at Israelite. Space to fish along this part of the coast is important due to remote fishing values and large accumulation of seagrass wrack, rendering some areas un-fishable.

Bilbunya Beach (Central) Sanctuary Zone

The area around Bilbunya Dunes Sanctuary Zone is important for shore-based recreational fishing. Bilbunya Beach (generally referred collectively as 'The Cliffs' or Point Culver) is a popular wilderness fishing destination. This sanctuary zone is located directly in front of the main access point of Wattle Camp.

Bilbunya Dunes Sanctuary Zone

The Bilbunya Dunes area is of high value to shore-based recreational fishing. This sanctuary zone is located at the most popular part of the beach, near where the cliffs join with the beach. This is a natural attraction point for recreational fishers, due both to the aesthetic value and the improved beach structure. There is also one of few access points at this location, which is popular for fishers from the Goldfields as well as an alternative to travelling from Israelite Bay after poor weather (due to track conditions/closures). This stretch of coast is renowned for high quality shore-based fishing experiences, particularly for mulloway and gummy sharks. Due to changing beach structure, accumulation of seagrass wrack, and wilderness fishing values, ample space for fishing along this stretch is important.

Recfishwest Recommendation for the Western Bight marine park:

37. Implement a 200m setback to allow shore-based fishing in each of the following sanctuary zones:
 - Israelite Bay South
 - Bilbunya Beach (Central)
 - Bulbunya Dunes

[Specific comments on the Mirning draft management plan](#)

Twilight Cove Sanctuary Zone


Twilight Cove is the most highly valued fishing location between Point Culver and the WA/SA border. Twilight Cove is well-regarded for its remote fishing and wilderness experiences and is a 'bucket list' destination for many South Coast fishers. This area is also highly valued by Goldfields and Nullarbor residents. This area is utilised on extended fishing and camping trips and is popular during holiday periods. It is renowned for high-quality shore-based fishing experiences particularly for mulloway and gummy sharks.

This area is so important to fishing, that DBCA reference fishing as the only recommended activity on their 'Explore Parks' website.

Twilight Cove

We recognise and acknowledge Aboriginal people as the traditional owners of Nuytsland Nature Reserve.

Twilight Cove is a spectacular coastal location at the eastern end of the Baxter Cliffs.

 No dogs

About this place

Twilight Cove is a stunning fishing spot with magnificent 70m high cliffs and a broad, sweeping beach where the white sand crunches underfoot. At this point on the southern coastline, the Baxter Cliffs turn inland in a north-eastward arc and become the escarpment that separates the Hampton Tablelands from the coastal Roe Plains.

The cove was named after the ship 'Twilight', which was wrecked here in 1877 during construction of the Intercolonial Telegraph Line. Weathered wooden poles and rusted wire lie beside the coastal tracks that follow the route of the old telegraph line. Towards the western end of the dunes behind Twilight Cove beach are the remains of Carlisle's Hut. Carlisle and his family of eleven children lived in this remote location during the mid part of the 20th century.

Activities

 Fishing

Madura Beach to Red Rocks Point Sanctuary Zone

Red Rocks is one of the better-known fishing locations along this stretch of the WA Nullarbor, along with Twilight Cove, Kanidal (Eyre Bird) and Eucla. The area to the west of Red Rocks Point, referred to as Red Rocks 'back beach', is popular for fishers in this area, particularly for trophy-sized mulloway. Due to the remote nature of this coastline and limited access tracks, beaches directly adjacent to access points are particularly important for shore-based fishing. As with other beaches along this stretch of coastline, accumulation of seagrass wrack makes it important to have space for fishing to work with changing beach conditions.

Eucla Sanctuary Zone

This beach is directly in front of Eucla via a short four-wheel-drive track and is therefore important to locals and visitors to Eucla. Increased regional development and population numbers indicate that this area will become more frequented by the local community for fishing. It is reasonable to expect that the community will want shore-based fishing access. This is the closest beach to a population centre and the highway for Nullarbor fishing in WA and is a naturally attractive spot for shore-based fishers, with the cliffs to the east providing unique structure.

Recfishwest Recommendations for the Mirning marine park:

38. Implement a 200m setback in the Twilight Cove sanctuary zone to allow shore-based fishing from the eastern boundary of the zone through to the junction of the beach and the high cliffs.
39. Implement a 200m setback in the Madura Beach to Red Rocks Point sanctuary zone from the eastern boundary to immediately west of the track down at Middini Beach.
40. Implement a 200m setback throughout and Eucla sanctuary zone.

Thank you for the opportunity to provide comment on the draft management plans for the Maambakoort, Mirning, Western Bight and Wudjari marine parks. Recfishwest has spent several years and expended considerable resources to provide input into the planning process for these marine parks and I hope the information contained in this submission assists the Wagyl Kaip Southern Noongar Aboriginal Corporation (WKSNAAC), Mirning Traditional Lands Aboriginal Corporation (MTLAC), Ngadju Native Title Aboriginal Corporation (NNTAC), Esperance Tjaltjraak Native Title Aboriginal Corporation (ETNTAC) and the Department of Biodiversity Conservation and Attractions (BDCA) design final management plans that better reflect fishing values.

Should you require any further information about anything contained in this submission, please do not hesitate to contact me on 9246 3366.

Yours sincerely



Dr Andrew Rowland
Chief Executive Officer
11 June 2024