



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

Fishing is an integral part of Western Australia's culture. 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 benefits. Many of these towns started as fishing communities, and fishing remains an essential part of the local identity.

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 varied fishing experiences offered by the remote beaches and offshore islands between Bremer Bay and the South Australian border.

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 most significant for fishing. We note that every proposed sanctuary zone is likely to exclude someone from their favourite fishing spot, and Recfishwest has urged all fishers to make a submission identifying all areas of concern to them.

Recreational fishing is compatible with marine parks' conservation objectives. It is an activity that 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 that fishing poses an unacceptable risk to the marine park's conservation objectives. Prohibiting current fishing activities should be avoided as a priority 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 local communities must be a key consideration when designing marine parks.

After considering the information in the four draft management plans and feedback from recreational fishers, **Recfishwest does not support the South Coast Marine Parks in their current form.**

### Recreational Fisher Concerns Around Consultation and Planning Process

When the government announced consultation for a new marine park on the south coast was underway on the 24<sup>th</sup> September 2021, the Minister for Fisheries 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 low impact recreational fishing has on conservation values within the proposed marine parks. Furthermore, the potential impacts the parks will have on the social and economic values fishing provides has not been addressed. There has also been no reasonable explanation for the proposed no-fishing sanctuary zones across large areas and no effort to offset these proposed losses through investments to improve fishing experiences in the areas of the park where fishers are not excluded.

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 to *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 while not compromising conservation values - a CALM act requirement.

### **Support for Joint Management with Traditional Owner Groups**

A positive outcome of 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. Traditional Owners have a connection to the 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 values the knowledge Traditional Owners have built up over thousands of years about the seasonal cycles of sea country and aquatic environments. This knowledge puts Traditional Owners in a strong position 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, but 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 changes to the draft plans could have had massive positive impacts on local communities while protecting all desired conservation values. We remain concerned that these draft plans have not been jointly developed with the community and all stakeholders in an open, transparent and science-led process. This submission focuses on small, reasonable, but important changes that can be made to the draft management plans so the community can continue to enjoy the benefits fishing has provided for generations.

### **Low Impact of Recreational Fishing on Conservation and Biodiversity Values**

The recreational fishing pressure at many of the proposed sanctuary zones is so low that it is unlikely that DBCA could even measure its impact on conservation values. Put simply, this means that current fishing activities should not be restricted within the proposed parks. However, given DBCA's enthusiasm for promoting no-fishing sanctuary zones across important fishing areas, this submission has focused on areas where minor changes to the proposed zoning will benefit the local fishing community most. 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 within proposed sanctuary zones located at popular shore-based fishing locations and changes to other sanctuary zones that impact important offshore fishing areas. Our recommendations will resolve a significant amount of concern and conflict arising from the draft plans, which, in many cases, propose sanctuary zones in illogical and unjustified locations. The changes Recfishwest are seeking are reasonable and modest and will greatly improve the social outcomes of the proposed marine parks.

## Summary of Recommendations:

### **For all Marine Park management Plans, Recfishwest recommends that:**

1. Traditional Owner groups are adequately and genuinely involved as joint managers of South Coast Marine Parks.
2. All sanctuary zones are set back by 200m from shore in all areas currently accessible for shore-based fishing.
3. Sanctuary zones are located well away from any recognised boat launching area (including well-established beach launching areas).
4. Due consideration be given to commercial fisheries that support the ongoing supply of local bait.
5. The Government commits to securing and enhancing access throughout the marine parks, including retaining all existing access tracks, beach driving and boat launching locations.
6. The Government commits to supporting and enhancing fishers' safety throughout the marine parks.
7. Marine park management plans allow the deployment of habitat enhancement and restoration activities such as artificial reefs.
8. The Government commits to an appropriate investment in infrastructure that supports safe, enjoyable and accessible recreational fishing experiences.

### **Recommendations specific to zoning within the Mamang Maambakoort Marine Park:**

9. 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.
10. Reduce the size of the Doubtful Islands (east) sanctuary zone to allow boat-based fishing in the western portion of this proposed zone.
11. Implement a 200m setback on Fitzgerald Beach. Upgrade infrastructure to improve access to Fitzgerald Beach and other coastal areas within the Fitzgerald National Park.
12. Implement a 200m setback to allow shore-based fishing at Gordon Inlet Nearshore Sanctuary Zone and Hopetoun East Sanctuary Zone.

### **Recommendations specific to zoning within the Wudjari Marine Park:**

13. Implement a 200m setback in Mason Bay and West Island sanctuary zone to allow for shore-based fishing. Reduce this zone to allow greater nearshore boat fishing access and offshore fishing access around West Island and Black Rock.
14. Implement a 200m setback in Munglinup sanctuary zone to allow for shore-based fishing.
15. Reduce the Benwenerup Wardup sanctuary zone to allow greater boat fishing access to the west of Fanny Cove.

16. Prohibit gillnets as an allowable fishing method in Stokes Inlet, within Benwenerup Wardan special purpose zone (cultural management).
17. Implement a 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 a 200m setback at the eastern end of this sanctuary zone boundary at the headland extending along the beach westward for at least 1km.
18. 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.
19. 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.
20. Reduce the Termination Island sanctuary zone to allow greater fishing access to the northern portion of the zone.
21. 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).
22. 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.
23. Relocation and/or reduce the Membinup sanctuary zone to provide greater boat-fishing access in proximity to the Duke of Orleans boat ramp.
24. 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.
25. Implement a 200m setback from the western boundary of the Cape Pasley sanctuary zone through to where the track begins to deviate from the coast inland over Cape Pasley.

**Recommendations specific to zoning within the Western Bight Marine Park:**

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

**Recommendations specific to zoning within the Mirning Marine Park:**

27. 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.
28. Implement a 200m setback in the Madura Beach to Red Rocks Point sanctuary zone to allow shore-based fishing from the eastern boundary to immediately west of the track down at Middini Beach.
29. Implement a 200m setback throughout the Eucla sanctuary zone to allow shore-based fishing. Relocate this zone to the area adjacent to the eastern boundary of the Noonaera Beach special purpose zone (cultural protection).

## Purpose

The purpose of this submission is to provide the Department of Biodiversity, Conservation and Attractions (DBCA), Wagyl Kaip Southern Noongar Aboriginal Corporation ([WKSNAAC](#)), Mirning Traditional Lands Aboriginal Corporation ([MTLAC](#)), and Esperance Tjaltjraak Native Title Aboriginal Corporation ([ETNTAC](#)) with constructive feedback on the draft management plans for the Mamang Maambakoort Marine Park, Mirning Marine Park, Western Bight Marine Park and Wudjari Marine Park (the 'South Coast Marine Parks').

We 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 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 the final management plans they are all responsible for will deliver positive outcomes for fishers, communities, and the environment.

## South Coast Marine Parks Background

Marine parks should be underpinned by peer-reviewed science and implemented using simple, practical management that is informed by science, risk-based, transparent, and subject to regular review. Recfishwest supports marine parks created for the purpose of recreation, science, education, conservation, and enhanced visitor experiences.

In February 2019, The State Government unveiled its *Plan for our Parks* initiative. This initiative aims to increase WA's conservation estates by 20 per cent through the creation of five million hectares of new national and marine parks and conservation reserves across Western Australia. As part of this initiative, a marine park for the South Coast was identified.

The intent to develop a marine park along the South Coast was announced by the Government in late 2021, and community engagement kicked off with public information sessions in major regional locations. Planning for this park was undertaken using a new approach to community engagement, which included the establishment of a Community Reference Committee (CRC), which met six times over 18 months between late 2021 and March 2023. The role of the CRC included ensuring that the views of the local community and stakeholders were considered in the planning process, as well as assisting DBCA's marine park planning team in developing the interim management plan. The views of the local community were provided to the CRC through Sector Advisory Groups (SAGs), which provided specialist, expertise-based advice. This process was completed in March of 2023.

The public consultation period for the South Coast Marine Park opened on February 16, 2024, and remained open for four months.

## Recreational Fishing on the South Coast

Fishing is an integral part of Western Australia's culture and lifestyle and vital to many regional towns' economies. Western Australians spend [\\$2.4 billion](#) on fishing every year, adding more than \$1.1 billion to WA's GDP and creating 9,680 full-time jobs. An estimated 700,000 Western Australians go fishing every year, making fishing participation comparable to cycling, jogging, or playing team sports.

The south coast of Western Australia offers a diverse array of recreational fishing opportunities, making it a prime destination for fishers of all skill levels. The region is renowned for its pristine beaches, rocky headlands, and high-quality fishing and camping experiences.

Fishing from the beach and rocks is the most popular form of fishing along the South Coast. While fishing from a boat is also very popular, it is often limited by prevailing weather patterns. The South Coast comprises unique geography and topography of bays and beaches that offer protection from all prevailing wind and weather conditions, allowing shore-based fishers to fish when boat fishers can't. Much of the coastline within the boundaries of the proposed marine park is remote, and the wilderness fishing and camping opportunities it provides are highly valued by both local and visiting fishers.

Shore-based fishers target a range of species from herring, skippy and salmon. In addition, trophy-sized mullet and pink snapper are legitimate target species along select remote beaches. Almost all species targeted on beaches are transient and migratory and spatial-based management approaches such as sanctuary zones provide little management benefit.

Boat fishing is not undertaken throughout the entirety of the park but rather is limited by safe boat launching access. Most boat fishing takes place close to the population centres of Esperance, Bremer Bay and Hopetoun and nearby to campground/caravan parks such as Masons Bay, Starvation Bay and the Orleans Bay Caravan Park. Boat fishing targets species range from nearshore species such as herring, skippy and squid to deep water demersal fish such as queen snapper, breaksea cod and red snapper. Pelagic fish such as yellowtail kingfish and southern bluefin tuna are also popular target species.

Recreational fishing is largely compatible with marine park conservation objectives, and fishing 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 marine park's conservation objectives. Access losses must be prevented where possible and offset when impacts on fishing are unavoidable.

## Recfishwest

Recfishwest is the peak body representing the interests of 700,000 recreational fishers in Western Australia and have a long-standing service level agreement with the WA Government. We are a not-for-profit organisation which strives to ensure high-quality recreational fishing experiences are maintained and enjoyed, as an integral part of the WA lifestyle.

### Recfishwest's Input into the South Coast Marine Parks

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. We undertook this work in good faith following comments made by the Minister for Fisheries when the government announced on 24<sup>th</sup> 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.*

Recfishwest's involvement in the marine park planning process began in late 2021, and included the following actions and activities:

- Recfishwest formed and chaired the Recreational Fishing Sector Advisory Group from October 2021 – March 2023;
- Attended 6 meetings of the Community Reference Committee, providing advice related to recreational fishing matters;
- Undertook a survey in which fishers could identify areas of greatest interest along the south coast marine park boundary. Recfishwest supplied DBCA and DPIRD with a heat map of important fishing areas to help inform the planning process.
- Undertook many trips to the South Coast and nearby communities, including Esperance, Ravensthorpe, Hopetoun, Bremer Bay and Kalgoorlie;
- Relocated a staff member to Esperance at appropriate times to assist fishers during the submission process;
- Created a dedicated webpage and newsletter used to inform fishers of the potential impacts of recreational fishing as well as assisting fishers in putting forward a submission to Government.

## Recfishwest's Position on the South Coast Marine Parks

After considering the information in the four draft management plans and feedback from recreational fishers, **Recfishwest does not support the South Coast Marine Parks in their current form.**

Under the proposed management plans, there would be considerable negative impacts on recreational fishing. The management plans fail to demonstrate that recreational fishing has been duly considered and impacts have been actively avoided. The following sections detail Recfishwest's comments on the proposals.

## General Comments on the South Coast Marine Parks Planning Process

### Failures of Marine Park Planning Process

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.

In wanting to ensure the government learnt lessons from the failed Buccaneer Marine Parks 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 embedded in the early planning stages for any marine park. These discussions resulted in a new planning process being adopted for the South Coast Marine Parks. 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 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 the 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. Unfortunately, recreational fishers felt this new process was largely influenced by DBCA, which seemed unwilling or unable to embrace a community-driven approach to marine park planning.

The new planning process for the South Coast marine parks has clearly failed, as evidenced by the CRC's inability to provide the joint management partners with a final report and recommendations. The Esperance community has also repeatedly held mass public demonstrations against the draft management plans.

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

### A lack of understanding around South Coast values

While undertaking consultation along the south coast, the view that the proposed park had potential to impact the South Coast 'way of life' was expressed frequently and vigorously. Fishers explained that fishing and camping were the main reasons they loved the South Coast. Many expressed that this way of life had to be experienced to fully understand the health and well-being benefits it provided. Fishers consistently highlighted the benefits of recreational fishing to their mental health, including fears of deteriorating mental health should they not be able to continue to access the same fishing experiences that they have valued for many decades.

This sentiment is supported by a national survey of recreational fishing published in 2023, which indicates that recreational fishers have higher levels of well-being than non-fishers on average. The survey goes on to demonstrate how recreational fishing supports positive pathways of social connections, relaxation, restoration, and connection with nature and that the benefits derived from fishing cannot be replaced by undertaking a different activity.

Fishers were often critical of marine park planning taking place in Perth, where planners did not have the connection to the South Coast that would enable them to make informed decisions. Local fishers reiterated that the proposed parks 'were not something we wanted' and felt like these proposals were being forced upon them by decision-makers in Perth with little to no understanding of south coast values.

### A lack of socioeconomic 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 for 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.*

The government's [Better Regulation Program](#) guides the development, design and implementation of regulatory proposals (such as marine parks). A central feature of the Better Regulation Program is for government departments and agencies to undertake their own initial assessments of any proposal's economic and social impact. Proposals that are found to have economically significant impacts are then required to undertake a Regulatory Impact Statement (RIS). This RIS can then assist the government in considering a range of options in a transparent manner, facilitating stakeholder input and confidence in the government's regulatory decision-making.

There is no evidence that DBCA ever undertook its own initial assessment on the economic impact of the proposed marine park. If this assessment had taken place, it is inconceivable that it would not have necessitated a formal RIS assessment process. There is no excuse for DBCA failing to undertake a formal assessment of social and economic impacts in accordance with the Better Regulation Guidelines and community expectations. This failure means the draft plans cannot claim to deliver the maximum net benefits to the community.

## General Comments Applicable to all Draft Management Plans

Recfishwest makes the following comments which are applicable to all four management plans for the South Coast Marine Parks.

### Support for Joint Management with Traditional Owner Groups

A positive outcome of 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. 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 sea 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 with an opportunity to formalise their cultural practices of caring for country into the government's 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 values the knowledge Traditional Owners have built up over thousands of years about the seasonal cycles of sea country and aquatic environments. This knowledge puts Traditional Owners in a strong position to develop management approaches that integrate their knowledge on how to best protect and manage sea country and healthy fish populations.

#### **Recommendation:**

1. Traditional owner groups are adequately and genuinely involved as joint managers of South Coast Marine Parks.

### Lack of explanation for proposed restrictions on recreational fishing

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 with high social and economic benefits.

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.

Recreational fishing is currently managed under the *Fish Resources Management Act 1994* and subsidiary legislation using a suite of tools such as bag limits and size limits. Only 0.7% of the total statewide boat-based recreational fishing catch in 2020/21 came from the Esperance zone. The shore-based catch 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 that 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 need to be quantified.

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”.*

For DBCA to repeatedly claim that the South Coast has no protection or imply that 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.

One of the draft management plans' most disappointing parts is the failure to acknowledge that prevailing weather patterns significantly limit recreational fishing activities. While each management plan acknowledges that weather impacts recreational activity patterns, 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 has pursued an agenda of strong sanctuary zone representation in the draft plans.

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 the ongoing social benefits for ocean users, DBCA must resist all restrictions in proximity to access points such as boat ramps, and this needs to be seriously considered in the final management plans.

Marine parks should allow recreational fishing activity consistent with conservation values. Any restrictions on recreational fishing should demonstrate why these activities are incompatible with conservation values. The final management plans must acknowledge the value of existing fisheries management and consider this management when designing appropriate zoning schemes and permitted uses within these zones.

**Recommendation:**

2. All sanctuary zones are set back by 200m from shore in all areas currently accessible for shore-based fishing.
3. Sanctuary zones are located well away from any recognised boat launching area (including well-established beach launching areas).

## Existing Protections for Conservation and Biodiversity Assets

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 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 stated 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, macroalgae, and seagrass communities. The act of fishing has no relevance or impact to these justifications and final management plans should remove these proposed restrictions or better explain how fishing has been determined to adversely affect these conservation values.

### Securing Local Bait Supply

During Recfishwest's time engaging the community on the South Coast Marine Park, recreational fishers consistently highlighted the need for secure access to local bait supply. Local bait, mostly in the form of pilchards or mulies, is the bait of choice for most south coast fishers, who made their desire for the ongoing commercial pilchard fishery to remain unimpacted very clear to Recfishwest.

#### **Recommendation:**

4. Due consideration be given to commercial fisheries that support the ongoing supply of local bait.

### Securing Existing Access

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 the intent to prohibit fishing activities within sanctuary zones is clear, 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. The lack of assurance from regulators and the government that these activities will remain available to the community is resulting in community members assuming they will no longer be able to enjoy their existing activities.

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 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.

#### **Recommendation:**

5. The Government commit to securing and enhancing access throughout the marine parks, including retaining all existing access points.

## 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 this service would be supported within any DBCA estate including the proposed South Coast Marine Parks.

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, little effort has been made 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.

### **Recommendation:**

6. The Government commit to supporting and enhancing visitor safety throughout the marine parks.

## Infrastructure to Support Enhanced Fishing Experiences

The South Coast Marine Parks represent a significant investment of taxpayer money, which the government claims will benefit all user groups. Therefore, appropriate levels of investment are expected in areas that will support various user groups receiving these benefits. These benefits may include boat ramp upgrades, fish cleaning facilities, land-based fishing platforms, moorings, and artificial reefs.

In many locations around WA, recreational fishing is supported by the deployment of infrastructure such as artificial reefs or habitat restoration activities. Although these activities may be considered in some zones, they are not considered acceptable in the draft management plans. It's important that these types of opportunities are not automatically denied in future under the Marine Park's management framework.

The installation of Cooper Reef in 2019, saw an increase in the number of species observed around and interacting with the reef structure, including 41 different species of fish, rays and sea dragons compared to baseline observations of 15 species before the reef was deployed. This reflects patterns seen at similar artificial reef sites around the country and serves to question why reefs and habitat restoration activities are not seen as appropriate within the proposed marine park despite the positive effects on biodiversity and overall abundance these structures have.

### **Recommendations:**

7. Marine park management plans allow the deployment of habitat enhancement and restoration activities such as artificial reefs.
8. The Government commits to an appropriate investment in infrastructure that supports safe, enjoyable and accessible recreational fishing experiences.

## Specific Comments on the Proposed Zoning within 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 Wheatbelt 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.

#### **Recommendation:**

9. 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.
10. Reduce the size of the Doubtful Islands (east) sanctuary zone to allow boat-based fishing in the western portion of this proposed zone.

### Point Charles to Red Island Sanctuary Zone

Many of the areas within the Point Charles to Red Island Sanctuary Zone have limited access – in part due to management arrangements of the Fitzgerald River National Park. Access to Fitzgerald Beach is still an area of significant contention with fishers from Hopetoun and the surrounding areas. It is well regarded as a surf fishing beach; however, removal of vehicle access has severely limited the ability for fishers to access this beach.

It is a reasonable expectation that there is an investment in infrastructure and services, such as track maintenance, to allow community to utilise areas within the marine parks. Historic restriction of access due to poor management of terrestrial reserves should not be used as justification for further loss of fishing access.

#### **Recommendation:**

11. Implement a 200m setback on Fitzgerald Beach to allow shore-based fishing. Upgraded infrastructure to improve access to Fitzgerald Beach and other coastal areas within the Fitzgerald National Park.

### Gordon Inlet Nearshore Sanctuary Zone

This beach 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 entering via Gordon Inlet Road. 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 proposed 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.

### **Recommendation:**

12. Implement a 200m setback to allow shore-based fishing at Gordon Inlet Nearshore Sanctuary Zone and Hopetoun East Sanctuary Zone.

## Comments on the Proposed Zoning within 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 proposed sanctuary zone important and regularly utilised for both nearshore and offshore fishing.

### **Recommendation:**

13. Implement 200m setback in Mason Bay and West Island sanctuary zone to allow for shore-based fishing. Reduce this zone to allow greater nearshore fishing access and offshore fishing access around West Island and Black Rock.

### Munglinup Sanctuary Zone

This is one of the few accessible beaches to the west Esperance for targeting mulloway. Proximity to Munglinup campgrounds makes this a popular camping/fishing location, and it is readily accessed by the farming community around Munglinup.

### **Recommendation:**

14. Implement a 200m setback in Munglinup sanctuary zone to allow for shore-based fishing.

### Benwenerup Wardan 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, and

we are pleased to see the value has been recognised and accounted for within the setback of this proposed sanctuary zone. Dunster Castle Beach is also fished, though access in recent times can be limited.

**Recommendation:**

15. Reduce the Benwenerup Wardup sanctuary zone to allow greater boat fishing access to the west of Fanny Cove.

### Benwenerup Wardan special purpose zone (cultural management)

The Benwenerup Wardan special purpose zone (cultural management) 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. Stokes Inlet is often 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 wilderness fishing and camping experiences. Removal of gillnets from this estuary would support improved fishing for black bream and other popular estuarine species.

**Recommendation:**

16. Prohibit gillnets as an allowable fishing method in Stokes Inlet, within Benwenerup Wardan special purpose zone (cultural management)

### 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 the accessible locations within this proposed zone more valuable.

**Recommendation:**

17. Implement a 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.

### West Group Islands Sanctuary Zone

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.

**Recommendation:**

18. 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.

## 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 important locations for smaller boats heading out into the archipelago. The northern side of these islands provide sheltered fishing when in the inner archipelago or on the return trip 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 focused on the jetty near the resort (which has a 50m exclusion of the proposed sanctuary zone), though fishers also utilise the adjacent shoreline.

### **Recommendation:**

19. 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

## 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 its surrounds are 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.

### **Recommendation:**

20. Reduce the Termination Island sanctuary zone to allow greater fishing access to the northern portion of the zone.

## 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.

**Recommendation:**

21. 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).

### 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 that 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 can be launched from Orleans Bay, providing boat-based fishers with access to fish the nearshore islands. Smaller boats are commonly launched at Nares Island Beach, Little Wharton, Wharton Beach, and Victoria Harbour. Dunn Rocks Beach is also popular for beach fishing, being one of the first 'true' surf fishing beaches to the east of Esperance.

**Recommendation:**

22. 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.

### Membinup Beach Offshore Sanctuary Zone

This proposed 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 boat fishing experiences in proximity to existing infrastructure and amenities.

**Recommendation:**

23. Relocation and/or reduce the Membinup sanctuary zone to provide greater boat-fishing access in proximity to the Duke of Orleans boat ramp.

### 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.

**Recommendation:**

24. 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.

## Cape Pasley Sanctuary Zone

Poison Creek is one of the more well-regarded surf fishing beaches around Esperance. The formation of beach structures such as holes and gutters becomes 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 amenities to fishers doing overnight or extended fishing trips. The quality fishing and relatively secluded nature of this area are a large part of the appeal. Pasley Island and the surrounding grounds are occasionally accessed by fishers launching from Seal Creek and Poison Creek.

### **Recommendation:**

25. Implement a 200m setback from the western boundary of the Cape Pasley sanctuary zone through to where the track begins to deviate from the coast inland over Cape Pasley.

## Specific Comments on the Proposed Zoning within 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 sharks, 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 for extended fishing trips during holidays. Israelite Back Beach is the most popular beach for fishers staying at Israelite. Space for fishing along this part of the coast is important due to often 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 proposed 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 proposed 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, particularly for mulloway and gummy sharks. Due to the changing beach structure, accumulation of seagrass wrack, and wilderness fishing values, ample space for flexible fishing options along this stretch is important.

**Recommendation:**

26. 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 Proposed Zoning within 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 recommends fishing as the only activity on its '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 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, the accumulation of seagrass wrack makes it important to have space for fishing to work with changing beach conditions.

## Eucla Sanctuary Zone

This sanctuary zone is directly in front of Eucla via a short four-wheel-drive track and is situated on a beach important to locals and visitors to Eucla. This is the closest beach to a population centre and the Eyre Highway for Nullarbor fishing in WA. It is a naturally attractive spot for shore-based fishers, with the cliffs to the east providing unique structure. Small boats can also be launched from the beach in front of town, particularly for nearshore fishing for species such as whiting.

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 fishing access in front of the town.

### **Recommendations:**

27. 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.
28. 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.
29. Implement a 200m setback throughout the Eucla sanctuary zone. Relocate this zone to the area adjacent to the eastern boundary of the Noonaera Beach special purpose zone (cultural protection)

## Closing Statements

Recfishwest does not support the draft management plans in their current form.

Recfishwest has spent several years and expended considerable effort to provide input into the planning process for these marine parks and we hope the information contained in this submission assists DBCA, the Wagyl Kaip Southern Noongar Aboriginal Corporation, Mirning Traditional Lands Aboriginal Corporation, and Esperance Tjaltjraak Native Title Aboriginal Corporation in designing final management plans that better reflect fishing values. As discussed throughout this submission, it would take only a relatively minor change to zoning to address the vast majority of recreational fisher concerns and be left with management plans and zoning which are much more likely to be supported by fishers.

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  
17 June 2024