Recfishwest submission

Review of the State Environmental (Cockburn Sound) Policy

About Recfishwest

Recfishwest is the peak body representing the interests of recreational fishers in Western Australia.

Cockburn Sound is Western Australia's most important recreational fishing waterway and a unique environmental, social and community asset. It provides accessible fishing opportunities for people fishing from boats, kayaks and the shore and supports important habitats and fish populations, including the significant pink snapper spawning aggregation for which the Sound is well known.

Recfishwest has a long history of involvement in protecting and improving Cockburn Sound and were a founding member of the Cockburn Sound Management Council (CSMC). Recfishwest were instrumental in securing protection of spawning pink snapper more than two decades ago, and Recfishwest has subsequently supported initiatives including Snapper Guardians, seagrass restoration and investment in regenerative mussel aquaculture.

Recfishwest therefore welcomes the review of the State Environmental (Cockburn Sound) Policy (SEP).

We recognise that Cockburn Sound supports a range of important community, industrial, defence and transport uses and that significant further development is planned. Our interest in the SEP is not about preventing development. It is about ensuring that, as planned changes occur, the environmental and community values that make Cockburn Sound such an important place are protected and improved.

Our overarching view is that the revised SEP should establish a long-term vision for a healthy, productive, resilient and accessible Cockburn Sound, rather than focusing primarily on maintaining water quality and preventing further environmental decline or maintaining the Sound in its current condition given it is a recovering ecosystem.

Success should mean that future generations inherit a healthier and more productive Sound that continues to support abundant fish populations, healthy habitats and great fishing experiences.

1. Establish a long-term vision for recovery and improvement

The existing SEP has provided an important framework for managing environmental quality in Cockburn Sound. It has established environmental values and objectives, provided a framework for monitoring and reporting, and contributed to significant improvements in environmental management since the Sound's historical water-quality problems.

The next iteration of the SEP should build on that foundation.

Cockburn Sound has lost more than 80 per cent of its historical seagrass meadows. While environmental conditions have improved substantially from historical lows, preventing further deterioration from the present condition should not represent the limit of our ambition. The 2023 and 2024 Cockburn Sound environmental monitoring report has identified that seagrass health has generally decreased within the Sound since the early 2000s and is now *uncertain*.

The revised SEP provides an opportunity to establish a clear picture of what we want Cockburn Sound to look like in 2045 and to orient environmental management toward achieving it.

Recfishwest believes the revised SEP should include an explicit ambition for environmental recovery, increased ecological productivity and improved resilience, supported by measurable objectives for the restoration and enhancement of important habitats.

This is consistent with Recfishwest's broader position that impacts to Cockburn Sound should be avoided wherever possible, minimised where avoidance is not possible, effectively mitigated or restored where impacts occur, and accompanied by enhancement measures that improve the Sound's long-term health, resilience and fishing experiences.

The SEP should therefore provide a framework that encourages not only protection, but continuous environmental improvement.

2. Broaden how the health of Cockburn Sound is understood and measured

Water quality is fundamental to the health of Cockburn Sound and should remain a central component of the SEP.

However, good water quality is a means to achieving a healthy and productive ecosystem; it is not the complete measure of whether that has been achieved.

The existing approach has been particularly effective in establishing measurable environmental quality criteria for water chemistry. Equivalent attention has not always been given to whether habitats are recovering, fish populations are thriving, ecological

productivity is increasing or the environmental values experienced by the community are being maintained. This was a key concern identified by Recfishwest on 9th September 2025 during DWER's earlier consultation on the SEP review.

The revised SEP should therefore retain strong water-quality monitoring while incorporating a broader suite of indicators capable of answering a more fundamental question: is Cockburn Sound actually becoming healthier?

Depending on the availability and suitability of monitoring methods, these could include:

- the extent, condition and recovery of seagrass and other important habitats;
- biodiversity and broader measures of ecosystem productivity and resilience;
- the abundance, recruitment and spawning success of ecologically and recreationally important species;
- the condition of important fish spawning and nursery areas; and
- indicators relating to community access, amenity and recreational experience.

Pink snapper provide a useful example. Cockburn Sound supports the largest known spawning aggregation of pink snapper in the West Coast Bioregion and the success of that spawning aggregation is of enormous importance to recreational fishers.

A policy concerned with the environmental health of Cockburn Sound should be interested not only in whether the water surrounding those fish meets chemical criteria, but also whether the environmental conditions necessary to support successful spawning, recruitment and productive fish populations are being maintained or improved.

The same principle applies to seagrass, shellfish habitat and the nursery areas supporting blue swimmer crabs, squid and other species valued by the community.

This does not mean that the SEP should become a fisheries management instrument. Rather, relevant fisheries and ecological indicators can provide powerful measures of whether the environmental conditions the SEP seeks to protect are actually delivering a healthy and productive ecosystem.

3. Explicitly recognise recreational fishing, boating and community access

The environmental value of Cockburn Sound is inseparable from the ways in which Western Australians experience and enjoy it.

Recreational fishing is one of those values.

The current SEP recognises *Fishing and aquaculture* and *Recreation and aesthetics* as environmental values. Recfishwest believes the review provides an opportunity to give clearer recognition to recreational fishing and boating as distinct community values. Our previous feedback to DWER proposed separating recreational fishing and boating from the broader recreation category so their particular environmental, social and access

requirements can be properly considered. The same consideration should be given to explicitly capturing representation from Recfishwest and the Cockburn Power Boats Club in the Terms of Reference for the CSMC . Both organisations were founding members on the council and had explicit recognition in the Terms of Reference up until 2015 when they were inexplicitly bundled into a generic "recreation" category without explanation while all other members of the council retained their specific recognition.

This distinction between fishing, boating and other recreational matters.

For recreational fishers, environmental quality is experienced through healthy fish populations, productive habitats, the ability to access valued fishing locations and the quality of the fishing experience itself. Locations including D9, the Pinnacles and Parmelia Bank are not simply points on a map. They are important recreational and social assets that have been used by generations of Western Australian fishers.

As industrial, defence, port and other activities in and around Cockburn Sound increase, there is a risk that access can be incrementally reduced even where individual restrictions appear relatively minor.

Recfishwest therefore recommends that the revised SEP establish the maintenance of reasonable recreational fishing and boating access, opportunity and experiences as an explicit objective.

Where proposed activities may affect recreational access or fishing experiences, Recfishwest supports an approach that seeks to:

- avoid impacts wherever possible;
- minimise impacts where avoidance is not possible;
- effectively mitigate or restore affected values;
- and identify opportunities for habitat enhancement through activities such as artificial reefs, seagrass reseeding and mussel green walling, and improved access through creation of fishing platforms, boat ramps and reducing the extent of exclusion areas.

This reflects Recfishwest's adopted position for Cockburn Sound and provides a constructive framework through which development and community use can coexist.

The SEP should also encourage monitoring of recreational and social outcomes. If recreational use is recognised as an environmental value, there should be some capacity to understand whether that value is being maintained over time.

4. Provide a framework for managing cumulative impacts

One of the most important roles of the revised SEP should be to provide a Sound-wide perspective on cumulative impacts.

Cockburn Sound is subject to multiple existing and emerging pressures. Individually, the environmental or recreational impacts associated with a particular activity may be considered manageable. Collectively, however, incremental changes to habitat, water quality, access, amenity and ecosystem resilience can produce a significantly different outcome.

A project-by-project assessment process alone cannot provide the long-term strategic perspective required to manage this risk.

Recfishwest has previously identified cumulative pressures from dredging, coastal development, shipping and climate change as an area where the existing SEP could be strengthened.

The revised SEP should therefore provide clear guidance for considering the combined and cumulative effects of activities across Cockburn Sound, including their interaction with climate-related pressures.

Importantly, this should not be limited to cumulative impacts on water quality.

Cumulative changes to habitat, ecosystem productivity and resilience should be considered, as should the cumulative effect of multiple developments or activities on recreational access and community use.

This is particularly important where impacts occur incrementally over long periods. No single decision may fundamentally alter the experience of Cockburn Sound, while the combined result of many decisions could.

A strong SEP can provide the common long-term framework against which those individual decisions are considered.

5. Make restoration, enhancement and resilience part of environmental management

Given the historical environmental degradation experienced by Cockburn Sound, restoration and enhancement should form an important part of its future.

Recfishwest believes the revised SEP should encourage government, industry, researchers and the community to look beyond conventional mitigation and identify opportunities to actively improve environmental condition and ecological productivity.

This could include restoring seagrass and shellfish habitat, enhancing important fish habitat, and other evidence-based interventions that improve ecological function and resilience.

Recreational fishers have demonstrated a willingness to participate directly in the stewardship of Cockburn Sound. Recfishwest's involvement in initiatives such as

Snapper Guardians and regenerative mussel aquaculture demonstrates that the fishing community's interest extends well beyond simply catching fish.

The revised SEP should harness this stewardship and provide a framework that encourages investment in environmental improvement.

Restoration and enhancement will also become increasingly important in building resilience to pressures that cannot simply be regulated away, particularly the effects of a changing climate.

Rather than treating restoration as an optional addition to environmental protection, the revised SEP should recognise it as an important part of the long-term management of a historically modified and heavily used marine environment.

Geographic scope of the SEP

Recfishwest also supports consideration of whether the geographic scope of the SEP remains appropriate.

Our previous feedback to DWER identified Success Bank and Parmelia Bank as areas that should, at a minimum, be considered for inclusion, particularly given the importance of their seagrass meadows and their ecological and recreational connection with Cockburn Sound.

The appropriate boundary should ultimately reflect the ecological processes and environmental values the SEP is intended to protect rather than being constrained unnecessarily by historical administrative boundaries.

If expansion of the geographic area affects existing mechanisms within the SEP, including the proportional allowance for Low Ecological Protection Areas, those mechanisms should be reviewed at the same time to ensure an expanded boundary does not inadvertently allow a corresponding increase in the area where lower levels of environmental protection are accepted.

Conclusion

Cockburn Sound demonstrates that major industry, defence activities, recreation and significant environmental values can exist within the same marine environment. The challenge for the next SEP is to ensure that coexistence remains possible as pressures on the Sound increase.

For recreational fishers, the desired outcome is straightforward: a healthy, productive and accessible Cockburn Sound that continues to support great fishing experiences for generations to come.

Achieving that outcome requires the revised SEP to build on the strengths of the existing policy while broadening its ambition.

Recfishwest recommends that the revised SEP:

- establish a long-term vision for environmental recovery, improvement and resilience;
- measure ecological health and productivity alongside water quality;
- explicitly recognise and protect recreational fishing, boating and community access;
- provide a strategic framework for understanding and managing cumulative impacts;
- encourage restoration and enhancement as part of the long-term management of the Sound; and
- ensure its geographic scope reflects the ecological and recreational values it is intended to protect.

Recfishwest recognises that Cockburn Sound will continue to change. Our objective is not to prevent that change, but to ensure it is managed in a way that protects what makes the Sound special and creates opportunities to leave it in better condition.

The measure of success for the revised SEP should not simply be whether further environmental decline has been avoided. It should be whether Cockburn Sound is healthier, more productive, more resilient and continues to be a place where Western Australians can access and enjoy great fishing.