

The Recreational Fishing Alliance of NSW

Promoting Sustainable Fishing



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Director, Aquatic Environment
NSW Department of Primary Industries (Fisheries)
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14th December 2017

Re: Draft Marine Estate Management Strategy

Dear Sarah,

The Recreational Fishing Alliance of NSW (RFA) welcomes the opportunity to comment on the draft Marine Estate Management Strategy. The comments below are based on points raised by the RFA of NSW and invited stakeholders during the meeting on 7th December 2017 at Parliament House in Sydney.

The RFA would also like to take this opportunity to thank yourself, Peter Turnell and Miranda Pade from Minister Blair's Office for organising and facilitating the meeting. Representatives at this meeting included recreational, charter and tackle industry stakeholders and included wide representation from angling and spearfishing bodies and knowledge drawn from the entire coast of NSW.

Collectively the stakeholders represented the interests of fishers in the management of the State's recreational fisheries. Collectively the stakeholders promote sustainable fishing practices, encourage the participation of children and the disabled, help secure rights to fishing access, encourage recreational fishers to become involved in the well-being of the fishery, promote consultation and communication between government and recreational fishers and promote fishing safety. The majority of stakeholders are not-for-profit, volunteer organisations supported by recreational fishing clubs, associations and individual anglers that underpin the recreational fishing industry.

Expenditure on Recreational Fishing in NSW of an estimated 773,000 adult anglers in NSW in 2012 was \$1.625bn on travel for recreational fishing trips, fishing tackle and boat-related items. This included \$186.1m of expenditure by Interstate visiting fishers. The total expenditure translated into the following impacts in the NSW economy:

- \$3.42bn of economic output;
- \$1.625bn added value;
- \$877.3m household income; and
- 14,254 full time equivalent (FTE) jobs.

The economic output for recreational fishing in all NSW was \$3.42bn with an associated employment of 14,254 equivalent full time jobs. These jobs are in the retail trade sector, hospitality, personal and other services and in the transport and storage sector. The value added was \$1.625bn, which is 0.36% of estimated gross state product in NSW. Household income from recreational fishing was \$877.3m in retail, finance and insurance, hospitality, professional and technical services and the wholesale trade sectors.

In the context of community benefits it was noted that the Draft failed to capture the well documented and positive benefits that recreational fish has to offer including health, social and educational benefits.

“Emergent areas of health benefit have been identified in: mental health, recreation for the disabled, outdoor recreation for youth, antisocial behaviour deterrents, outdoor recreation for seniors and intergenerational transfer of knowledge and skills”

It was also noted that the Draft strategy failed to recognise and include the fact that recreational fishers in NSW, through the Recreational Fishing Trust, continue to fund significant aquatic habitat protection and rehabilitation works, and are regularly involved in undertaking projects themselves to improve aquatic ecosystems. Recreational anglers continually fund recreational fishing to the value of \$15m per year in community benefit.

The stakeholders showed great concern about the emphasis placed on ‘spatial management’ and took the opportunity to show their support for using scientific evidence to identify the most appropriate forms of management rather than assuming that spatial management will deliver the most sustainable outcomes for fish stocks.

Any planned changes to access will ultimately have significant impacts to recreational fishing through loss of access for recreational fishers, loss of income to charter operators / tackle shops / boat sales, loss of jobs in the charter / tackle / boating industries, added congestion on the water and on land due to shift of effort and claims for compensation from the tackle / charter / boating industry.

It was highlighted that no tangible evidence has been presented nor a case made for further spatial closures in the Marine Estate to date and there seems to be little change in the approach taken since the time marine parks were first zoned in NSW many years ago and the emphasis was placed on ‘sanctuary zones’ to protect certain areas from fishing. “It is well recognised internationally that where good fisheries management regulations are implemented, no-take areas do not always assist with the maintenance of healthy fish stocks”

The stakeholders present provided direct, indirect and anecdotal evidence that the marine health of the NSW Marine Estate and in particular Sydney Harbour is improving despite increasing population and activity and were all in support of using scientific evidence to identify the most appropriate forms of management rather than assuming that spatial management will deliver the most sustainable outcomes for fish stocks. Within the Draft, management objectives 6.1 to 6.11 can be achieved without any lock outs and management can include spawning closures, catch and release seasonal fishing and other forms of fisheries management tools.

Recreational fishers have suffered from previous marine park lockouts that have not filled any knowledge gaps and recreational anglers will acknowledge that they need to better develop fisheries management around by-catch and litter reduction and finally embark on environmental assessment of recreational fishing and have better reviews of the rules. Spearfishers have also lost all their shallow and accessible reefs in the Marine Estate under current Marine Parks and the pending review of NSW Marine Parks must acknowledge all these points.

There was concern that the Draft does not attempt to address the significant threats represented by point-source pollution, including sewage effluent, industrial effluent and thermal pollution. These sources of pollution represent very real threats to the Marine Estate and are likely to have a greater impact on coastal ecosystems than well-managed recreational fishing.

Within the Draft, Section 5 talks about the stressors that include Climate Change, Estuary Entrance Modifications, Point Discharges (but only in estuaries) , Introduced animal and plants, Ag run-off, habitat degradation, foreshore development, Urban stormwater, modified freshwater flows, passive user and 4wd. The implied management actions on all these only include hollow and meaningless words like “improve strategic planning, strengthen partnerships, improve awareness, improve reporting, understand, establish” and fail to supply any real or tangible benefits to the Marine Estate in the short term.

The Draft fails to include issues like addressing water quality around point source pollution like sewage which is incredible. “Regulation of licenced point sources has led to measurable improvements in water

quality and ecological health in the marine estate” is misleading and false when you consider seafood safety and the lack of testing of fish assemblages around sewage outfalls.

Fish have and are continuing to accumulate dangerous levels of organochlorines, benzene hexachloride, heptachlor epoxide and dieldrin that can and will impact human health. Professor Sharon Beder of the University of Wollongong has said “Industrial waste going to the sea via the sewers poses a major threat both to the marine environment and to the health of people who eat fish. Organic chemicals such as those in the organochlorine group are very stable and often persist in the environment for long periods. Fish can accumulate these compounds even when there are very low concentrations in the water. The toxins can be concentrated as each organism is in turn eaten by another”.

Testing of important recreational and commercial fish species throughout the Estate is something that has been overlooked for many years and we should all be concerned it has been once again overlooked in this Draft. Management action 1.8 once again fails to test fish.

The emerging threat of PFAS and PFOS and the historic impacts of legacy issues like anti-foul, dioxins and other chemicals already see much of the Marine Estate being managed under spatial management that impedes access to healthy fish for consumption. Dietary advice within our bays, river and estuaries limits what we can consume and with more key recreational species like Australian Salmon and Mulloway likely to be added to the warning list. Once the Draft finally concedes that we need test around our nearshore and offshore sewage outfalls almost all of our state waters and fish stocks out to 3 nautical miles could potentially be under “dietary advice” that limits our consumption. This is the biggest and most expensive form of spatial management the NSW Government will have to deal with.

Discussion also occurred around “on water” boating infrastructure and that this must be a priority under the Draft and we must consider the impacts on biodiversity that boating infrastructure has. The impacts of the following must be considered as part of this process and include the overwhelming numbers of habitat destroying boat moorings used by vessels that rarely move and the cumulative impacts they have in the shallow bays they are often situated and reducing the number of redundant and non-operational boats on moorings to decrease the overall number of moorings in an area. The impacts of existing and any new marina developments and the cumulative impacts in the shallow bays they are often situated. Shading, boat based contamination, marine debris and altered flow issues are all having impacts to Biodiversity.

Treated hardwood piles are also widely used in the marine construction industry. These piles are treated with Chromated Copper Arsenate (CCA) to prevent borers from eating them. Untreated hardwood in the marine environment has an extraordinarily short life span due to these borers. There are alternatives such as Turpentine timber which has a natural resistance to marine borers as well as man-made alternatives such as concrete, steel and plastic. There are two types of these treated piles that are used. A single treated green coloured pile and a double treated brown coloured pile. These double treated marine Koppers piles have the highest hazard rating of H6. They are treated with CCA and PEC (Pigment Emulsified Creosote).

When these piles are used there are issues with the chemicals leaching into the water and forming a slick on the surface. Observations show that even 20 year old piles leave a chemical slick when pulled from the sea bed. Yes they work well but what damage are they doing to the marine environment especially when after 20 years in the marine environment they can still be toxic enough to be untouched by borers. It has been shown that these toxins accumulate in nearby sediments and biota.

The Draft also gives no consideration for the transport corridor of ferries, the impacts of dredging and the hydrographic changes to our waterways and consequence of erosion on our coast and fails to acknowledge conflict from congestion on our waterways.

The Draft needed to address poor environmental assessments that are still occurring and affecting development decisions e.g. Walsh Bay within Sydney Harbour and the environmental assessment for

this State Significant Development was misrepresenting the impacts to fish stocks and assemblages. DPI Fisheries are locked out of environmental assessment of such developments and this has to be addressed as a priority within the Draft.

Climate change was discussed and the impacts to fish stocks, loss of habitat, displacement of migrating fish from the changes to the EAC and seasonal changes to fish availability were the main points of concern.

The cultural value recreational fishers place on their activity needed to be acknowledged to ensure an equitable assessment of cultural heritage with all stakeholders and was overlooked in the Draft. Recreational fishers have had a long history of fishing within NSW, and whilst it is not the intention to challenge the claim that Aboriginal fishing has within NSW, the history of recreational fishing needed inclusion.

Recreational fishing interactions with threatened and protected species were discussed and positive approaches to improve conservation outcomes for these species is an area that needed more work within the Draft and the stakeholders noted there is significant opportunity to promote positive contributions from recreational fishers to threatened and protected species recovery e.g. Code of Practice, citizen science via online reporting of interactions and many forms of social media that needed investigating.

The meeting that was held and the points and issues raised above represented the broad views of those engaged and reflect the most common themes throughout NSW that recreational anglers are dealing with and need addressed under the Draft.

Those in attendance were as follows:

Malcolm Poole -	RFA of NSW
Stan Konstantaras -	RFA of NSW
Steven Siarakas -	Sydney Harbour Recreational Fishing Haven Group
Damian Kerves -	Chair AFTA NSW Chapter
Adam Martin-	Eurobodalla Fishing Alliance
Matt Poulton-	USFA NSW
John Burgess-	ANSA NSW
Craig McGill-	Charter Operator

Chris Wallis from ECOfishers and Justin Duggin who is another Charter Operator were late apologies but provided valuable input into the process.

The underlying message was that recreational fishing stakeholders want to be more directly engaged in decisions affecting their fishery and to better understand the science behind the decision-making and management processes within the Marine Estate.

Regards

Stan Konstantaras



President

Recreational Fishing Alliance of NSW