



AUSTRALIAN ANGLERS ASSOCIATION (WA Division) Inc

ABN: 88 528 806 323

President:- George Holman

PO Box 2200, Marmion WA 6020

Phone: 08 9403 7383

Email: aaawa@iinet.net.au

Web Page: www.aaawa.iinet.net.au

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Ms Liesl Jonker
Plan Coordinator, Ningaloo Marine Park Management Plan
Department of Conservation and Land Management, Marine Branch
47 Henry Street,
FREMANTLE WA 6161

Dear Liesl

Comments on Draft Management Plan for Ningaloo Marine Park and Proposed Extensions.

The following comments on the draft Management Plan have been prepared on behalf of the Australian Anglers Association by Secretary Terry Fuller.

The Association places great importance on the future of recreational fishing, the habitats and the fish resource it depends on, and equitable access to areas for fishing. These are all very high priority in the Association's objectives.

The Association fully supports and actively promotes conservation and responsible fishing, and will not argue with any changes which are proven to be really necessary and will be effective for the preservation of the environment and/or conservation of fish stocks. There is a place for sanctuary zones to protect habitat and vulnerable stocks but fish need to be managed by Fisheries regulations.

We ask that the process of deciding those changes be supported by data which shows that these are needed and will be effective, equitable and will share the effort and impact among all parties which are involved in affecting the abundance of fish or affecting the environment.

We ask for recognition that the objectives should be "sustainability" and not "no impact" and that sustainable practices may leave some observable changes. This follows one of the Strategic Objectives as set out in the framework Paper namely "*To facilitate and manage recreational activities in the Park within an equitable and ecologically sustainable framework.*"

We ask for recognition that these changes may be more noticeable in some high use areas, and that removal of these changes may involve a large social cost which the community should not be asked to pay where the current practices are sustainable.

Marine Conservation in Western Australia

The Association is dissatisfied with the current process for planning marine conservation reserves in Western Australia which lead to this Draft Plan.

The Environmental Policy Unit in the Department of the Premier and Cabinet is currently drafting a paper on Bioregional Marine Planning which states "Many people in the community agree that a more integrated, ecosystem based approach to planning and management of our marine and coastal environments is needed and there is general agreement with the need to adopt a bioregional marine planning approach."

This initiative, which we welcome, acknowledges that the current process has weaknesses. Proposals made under the current process also have weaknesses, which means no proposals

made under the current system should be implemented until the Bioregional Marine Planning approach is finalised and proposals checked against that process.

At a meeting on 25 October chaired by the Ministers for Fisheries and the Environment, there was universal agreement that the current planning process is flawed. Even the Chairman of the MPRA, Barry Wilson, stated that the current stand alone system is not viable unless embedded in "whole of coast" management. The planning process for Ningaloo was stand alone and is therefore flawed.

There was almost universal acceptance that the roles and activities of CALM and Department of Fisheries need to be coordinated much better and all data needs to be made publicly available.

It is essential that planning for marine parks include adequate involvement of recreational fishers for the parks to get community support.

Fisheries Management and Marine Parks.

A principal issue with the Draft Plan is the failure of the Western Australian government system to integrate the responsibilities and contributions of the two departments involved in Marine management, CALM and the Department of Fisheries.

CALM and MPRA have up to now steadfastly refused to acknowledge the role and the work of the Department of Fisheries in managing fish stocks as part of the management of biodiversity.

The Fisheries Department manages fish stocks and fish captures State and region wide, with additional special controls in some particular regions or areas.

Responsible recreational anglers and recreational fishing organisations and peak bodies actively promote the introduction of special fisheries management controls where these will help protect spawning and nursery areas or reduce overfishing in specific areas or at specific times.

CALM appears to wish to overlay no take zones and area controls and effectively use "the need to manage the take of fish" as a justification for these zones, when fish are already managed on a wider scale.

Far larger impacts occurs from large scale extraction of finfish species in the region or nearby areas or during their migration to or around the area, and proper fisheries management everywhere has greater potential for improvement in fish abundance than banning fishing for them in some areas.

If CALM has reservations about the effectiveness of fisheries management by the Department of Fisheries, those issues need to be resolved, but not by duplication or additional closed area restrictions introduced by CALM.

Marine Conservation by No Take Closures based on targets for areas and percentages.

The Association believes there is an over concentration on No Take Zones as the principal and it appears the only method used in the marine conservation effort by CALM in Marine Parks.

The draft Management Plan seems to rely on a general area based objective for No Take Zones to justify the increase in the no take sanctuary zones in the Ningaloo Marine Park.

CALM and MPRA have high percentage targets for closed areas based on what is claimed to be necessary in other parts of the world many of which have unsustainable, damaging and destructive practices and uncontrolled fishing. There is no evidence that these requirements apply to the totally different situation in Western Australia with our excellent environmental and fisheries management.

The scientific criteria developed for the Representative Areas Program (RAP) for the Great Barrier Reef World Heritage Area of 30-50% of the total area of a bioregion as recommended by the Townsville Declaration on Coral Reef Research and Management has been used without any attempt to justify or explain if or how this translates to the Ningaloo Marine Park.

The Great Barrier Reef is subject to different pressures from the level of exploitation and use and heavy run off of silt, fertilisers, herbicides and pesticides from very large areas of intensive farming in an area of high rainfall.

Some tropical reefs in other parts of the world are subjected to massive overfishing with inappropriate and damaging fishing methods which do not occur in Western Australia, yet the needs and experience in these parts of the world are used as “justification” for large closures in the Ningaloo Marine Park.

CALM uses reports of the success of some closed no take areas in some other parts of the world to justify the need for closed areas in WA. But some of those areas were VERY heavily fished and fish stocks were in VERY serious decline and thus closing areas DID have a big effect. That experience does not necessarily translate to WA where fish stocks are generally not under such pressure.

Potential Dangers of No Take Areas.

One potential danger of closing extra areas where existing fishing is claimed to be detrimental, is that it will simply transfer and put more fishing pressure on the adjacent areas and other areas which remain open. That will cause those areas to be affected even more, (assuming local fishing is actually the major impact), which will lead for pressure to close those areas, as has already been used as justification for the proposed extra closures in Ningaloo.

CALM and MPRA have no answer to the question "if significant percentages of some areas are closed to recreational and commercial fishing, how do they propose to address the fact that the pressure on the areas which are not closed will be increased and lead to more degradation if their claim of overfishing is true?"

Failure to answer this question shows the extreme lack of science and practicality in their approach of relying on no take zones as the sole means of preserving biodiversity.

CALM are required to manage the WHOLE park, not just the closed sanctuary areas, and simply transferring the fishing effort is not a responsible action nor an effective response to a perceived problem.

Fisheries Management Options and Alternatives.

We object to proposals to close areas to fishing if fishing has nothing to do with other things which might really need to be protected or managed in those areas, or if there is no evidence that fishing is affecting biodiversity in these areas.

Control for any increased fishing pressure along the coast must be for the whole of the park and whole of the region and if that needs tighter region wide restrictions, that' s the right way to go. Sanctuary areas must not be used in an attempt to compensate for any failure in any other fisheries or environmental management.

It appears to the Association that the opinions of a limited group, including the CCPAC, have been used in lieu of good scientific information. This is particularly apparent in Section 3.9 of the Framework for the Review where it says “Whether this regional (recreational fishing rules) approach is, in itself, adequate to manage the greater pressure on targeted fish stocks in the Park, compared to other parts of the region, requires careful consideration.”

We note the MPRA position in the Framework for the Review of Ningaloo Marine Park Management Plan was that “current management arrangements for recreational fishing in NMP be reviewed, including the option of seasonal closures during spawning periods for selected species”. Despite this statement, there is no indication that this has occurred other than to push for increases in the number and sizes of no-take areas.

If one part of the problem is simply that too many fish are being caught, and if that is supported by real research data, then that should be handled by catch limits, and not simply by closing areas without any other action.

We believe that targeted seasonal closures with the specific purpose of handling any seasonal issues such as protecting fish spawning aggregations would receive significant public support from recreational anglers. These need to be supported by the data which shows they are necessary, and targeted seasonal closures will be much more acceptable than complete spatial closures.

The Association accepts the possibility that the current Gascoyne recreational Fishing rules may not all be suitable for the Ningaloo Marine Park, and believes that there should be a separate Marine Park Fisheries Management group to examine and assess fishery management issues for the marine park.

Even in Section 7.2.8 where the Plan does discuss the impact of Recreational Fishing Regulations, we believe some of the discussion is flawed and deficient.

This completely ignores the large catch and release component and the significant change in attitudes by many recreational anglers, where the fishing experience is much more important than the retained catch.

Impact of Recreational Catches.

Justification for extra closed areas includes an assumption explained in "Recent research in NMP by Westera (2003) showed evidence of trophic cascades in the recreation zone adjacent to the Mandu sanctuary zone that are likely to have resulted from the removal of 'top-end' predators targeted by recreational fishermen".

Two other studies which did NOT show such evidence have been ignored, showing the selective use of data to support a preconceived outcome.

The study does not provide any evidence of "overfishing" in terms of recruitment overfishing. There is no evidence to suggest that current levels of fishing are causing adult stocks to be reduced to the extent that recruits produced are insufficient to maintain the current populations.

We note that there is no evidence offered that the catch by recreational anglers is solely responsible for this effect. We question what impact professional fishing activities including the finfish bycatch and mortality due to Prawn trawling in Exmouth Gulf has on the stocks of mature fish in the northern part of the Marine Park.

The assumption implies that recreational catches are solely responsible, since the "cure" includes increased no take zones which only or mainly affect recreational anglers. This reinforces the view that recreational fishermen are the "soft target" where "something" can be done, but not necessarily what really needs to be done to solve the problems.

Where is the action on total catches in the region, including those by professional fishermen? We submit that an alternative "cure" for the impacts seen could well be different management of fishing activities in other parts of the region including outside of the Marine Park boundaries.

Recreational anglers have had tighter catch limits imposed on them, but there have not yet been corresponding changes to the management of professional fishing. Recreational anglers want Department of Fisheries to move forward with outcomes from the wetline review and integrated management. CALM and the Committee should use its influence to push for the Department of Fisheries to implement an Integrated Fishery management that ensures an Ecologically Sustainable Managed Fishery, because we believe this has the potential for much greater improvement in fish stocks than sanctuary zones.

Impact of Removal of Pelagic Species.

The Association questions the impact of catching the common pelagic species in the numbers taken from some of these areas, compared to the total number taken in the region.

We understand that MPRA / CALM want to be able to adjust management to suit the circumstances, but these only ever seem to result in increased restrictions. We submit that flexibility needs to be a two-way process, and must include restrictions being removed or relaxed if they are later found not to be necessary.

Would we be given a guarantee in the management plan that if no research is done, or if the research can't address that issue, or if the research shows that any change in the ecosystem from removal of the pelagic species is ecologically sustainable and insufficient to justify the ban on recreational line fishing from certain areas, that those areas will be reopened to that sort of fishing in the next review in 10 years time?.

Proper management of fish can include timed closures, area closures, species bans, limits on the gear used, or combinations of these for spawning or nursery areas, areas/species under too much pressure, areas set aside for special purposes, etc. but these must all be justified by research and data which shows that these are right and necessary and will actually be effective.

Choice and Justification of Areas for No Take Zones.

A limitation in the review process which resulted in these proposals is the notable absence of scientific data as a base for any alterations to current zoning and management. The changes proposed in the draft management plan are certainly not supported by adequate, demonstrated and publicly available scientific information.

The Ningaloo Marine Park Management Plan 1989-1999 emphasised the need for research and monitoring as a basis for proper management of the Park, yet not enough has been done.

The documentation fails to adequately establish the links between what is to be protected and the threats from the activities which are to be prohibited.

The justification for the expansion of current sanctuary zones seaward based solely on one paper by Westera & Hyndes (2001) in order to create the "potential" to protect a single genus of demersal fish by closing an area that may represent habitats "often" associated with spawning sites is weak and unscientific.

Many of the species actually caught are pelagic, and they are not residential fishes. They are transitory and inhabit a different section of the water column than Lethrinids. It is not valid to ban all recreational fishing in these areas simply to potentially protect Lethrinids, even if that was justified and necessary.

Misrepresentation about the extent of the increased areas of no take zones.

The Association objects to the selective but incomplete use of data about the extent of the increase in no take areas. The plan states that it proposes increasing the size of the sanctuary zones where fishing is banned from 10 percent to 28 percent.

The proposal does not mention is that it also increases the overall size of the park. In fact the sanctuary zones have increased from 21,875 hectares to 73,243 hectares, a total of over 330 percent. The important inner reef habitats are represented by much greater than 28 percent, disproportionately affecting those with small boats.

Activities allowed/prohibited in Zones.

It is unfair to place the majority of restrictions in Ningaloo on recreational fishers considering there is no evidence to show any threat to fish stocks or biodiversity by fishing in the marine park.

It is completely unacceptable that activities such as trolling for pelagic fish outside the reef should be banned in the sanctuary areas. There is no justification for preventing trolling because it would not have any significant impact on anything that might need to be protected in sanctuary zones.

CALM and MPRA continue to push for allowing no impact at all under the guise of "preserving biodiversity". They will not acknowledge sustainable practices but insist that areas must be closed completely.

We submit that all activities should be allowed in all zones unless those activities are proven to be incompatible with the declared purpose for the existence of the zone.

In addition, we submit that really damaging activities such as anchoring must be controlled and managed, and that this lack is a major weakness in the draft management plan for most of the proposed areas.

It is believed CALM has concerns about compliance, and has concerns about the difficulties of checking activities if some things are allowed in the sanctuary zones. We do not accept complete closures simply to make it easy for someone to check compliance, particularly in the current environment of little effective compliance checking anyway.

Shore based fishing zones should allow recreational line fishing for finfish from the shore or by wading, standing on rocks, reefs, etc. in at least a 200 metre strip from the shore line. We object to

the designation of the landward boundaries as 100 metre from the high water mark as defined in the legend on the map, because that will mean that no fishing will be possible in some shallow areas at low to mid tides.

Composition of Coral Coast Parks Advisory Committee (CCPAC).

The MPRA and CALM appear to have opted for a process in which they use local supporters of a proposed park, with strong philosophical support for the CALM process, and do not engage in general consultation on the wider issues which arise when there is formal stakeholder representation. The recreational fishing sector will be impacted upon by these proposals to the greatest extent, yet the peak recreational fishing body has been excluded from the formal process.

As previously elsewhere, it appears to the Association that the opinions of a limited group, including the CCPAC, have been used in lieu of good scientific information.

While the Association recognises the need for significant local community involvement, the Marine Park is a resource for the entire community and the importance of a strategic, State-wide outlook must not be overlooked especially when visitor interests are extremely important as at Ningaloo.

Previous Limited Public Consultation.

After reading the "Overview of Public Submissions" and the "Draft Summary of Public Submissions to the Proposed Zoning Scheme for Ningaloo Marine Park" we have serious concerns that some previous submission on this subject have been taken out of context.

In some summaries, only the parts of the submission in support of sanctuary zones were entered into the summary. The fact that some of that support was conditional on other factors was not summarised or made known to the committee.

Where this occurred, it is a gross misrepresentation, and makes this management plan suspect.

It is unacceptable that the group evaluating submissions (CCPAC) were given only a summary of submissions and were not given access to the full submissions which would give the correct view of the opinions expressed.

Without this transparency, we and many other recreational fishermen do not have any confidence that existing CALM management and MPRA are able to carry out Marine Planning to the point where citizens understand and endorse the outcomes as necessary, equitable, fair and reasonable.

Reviews of Submissions.

A particular concern follows from this 3 month public submission period. We are concerned at what is missing in this process, based on the experience with the equivalent part of the consultation process over the Jurien Bay Marine Park which was misrepresented to many people.

The review of the public submissions is closed and within CALM / MPRA and therefore liable to claims of bias and selective interpretation of the submissions. We do not believe this process delivers what it appears to promise. Without the process being open, it is not acceptable to many people.

The Indicative management plan can be changed considerably and offered to the Ministers without any opportunity for the public to know if or how their submissions were used. It is claimed that a summary of submissions is also made available to the public. We agree this should happen, but it has still not been completed for Jurien Bay even though the Park was dedicated nearly 14 months ago.

The process needs to be changed to require the release of the final proposed version for public information before any version is locked in by gazettal.

We expect that the residents of W.A. will know what is proposed before it is submitted to Parliament and applied. That is real transparency, and it is as expressed in CALM's Public Participation Policy http://www.calm.wa.gov.au/calm_public_participation.html , which says:-

4. *The participatory process will be objective, open, fair and carried out in a responsible and accountable manner.*

5. *Public participation processes will emphasise the sharing of information, joint learning and understanding.*
6. *Data and information used in the decision making process will be available to stakeholders, and*
10. *Participants will be informed as to how their involvement affected the Department's or Government's decisions.*

Littering.

Section 7.2.8 mentions “associated impacts on ecological values through littering...”

The Association does not agree that littering is any justification or supporting reasons for sanctuary zones. Some litter may be the result of accidentally dropping items while fishing, and some may be due to wind blowing items into the water.

Recreational anglers are not the only source of litter, although it is obvious and agreed they are likely to be the main source of litter at places where they are the main users. Littering is a social problem whenever some people do not respect the environment and do not follow common courtesy of respecting community property.

The fact that there will always be some small percentage of people who will litter, despite all the publicity and education and laws, should never be used as an excuse to limit use and access by the majority of people who will act responsibly, and who will treat the environment very well.

Banning an activity as a means of controlling a social problem is taking the easy way out, but is not equitable and is not always effective.

The Association believes a combination of education and enforcement of existing laws should be used so that those that do litter and are caught will pay a price, preferably high enough so that it makes them do the right thing in future.

Responses to Suggested General Questions about the Draft Management Plan.

The Association agrees in principle with the vision statement for the future of the Ningaloo area .

We disagree with the apparent belief that the creation of sanctuary zones is necessary and sufficient and is the best way to achieve these objectives.

Recreational fishing is a major attraction to Ningaloo and CALM's own statistics have shown that 84% of visitors go to the area to go fishing. Placing the majority of the restrictions on recreational anglers is not going to help areas of the reef that suffer from anchor damage or damage from divers. Recreational fishing in Ningaloo has had tighter restrictions than anywhere else in the state.

There is no evidence that any fish stocks are under threat. The only research done on finfish (Westera & Hyndes) did nothing to prove that sanctuary zones can help in the protection of fish stocks. We believe that CALM should concentrate their efforts in the protection of habitat and leave the protection and management of marine fauna to the Department of Fisheries. With a suite of management tools they are better placed to ensure marine biodiversity throughout the State.

For the Marine park to be considered to be an important ecological and social asset by the local, national and international community, CALM must take notice of the community's views and ensure that they are given full consideration in the final management plan.

Specific responses to proposed zoning changes and additions

Proposed Sunday Island Conservation Area. The Association strongly objects to the proposed Sunday Island Conservation Area. This area is used by local and visiting recreational anglers. This practice has been going on for many years and there is no indication that fishing in the immediate area has suffered. It is also noted that other extractive activities are permitted whilst again targeting recreational fishers.

Proposed North Muiron Conservation Area. The Association strongly objects to the proposed North Muiron Conservation Area. This area is used by local and visiting recreational anglers. This practice has been going on for many years and there is no indication that fishing in the immediate

area has suffered. It is also noted that other extractive activities are permitted whilst again targeting recreational fishers.

Proposed South Muiron Conservation Area. The Association disagrees with the proposed South Muiron Conservation Area and believes that the existing marine protection area on the north western shore of South Muiron Island is adequate. A no anchoring policy must be included in this area and moorings put in place to protect fragile corals.

Bundegi. The Association supports a small extension. To further protect this sanctuary, no anchoring should be allowed in this area and an adequate mooring system should be installed for commercial operators and recreational boaters to allow minimal impact to reef systems. New boundaries must be designated in a manner easily identified by users.

Point Murat. Protection of filter feeding communities is claimed as the main purpose of this proposed sanctuary area, so the actions should involve the banning of all anchoring in this area and should not include a ban on recreational fishing for pelagic species in the area outside the Naval exclusion zone.

Lighthouse Bay. The proposal to establish a sanctuary zone of the size proposed in Lighthouse Bay is strongly opposed. This would have a high social cost as there are a variety of users of this area. It is popular for shore-based fishing due to the proximity to a major caravan park patronised by many Western Australian, interstate and overseas visitors. It also provides a safe fishing area for small boats during the frequent periods of strong winds. The sanctuary zone locks up a large percentage of the good boat fishing areas within Lighthouse Bay, because the western half of the bay is quite different.

The Association would support a smaller zone with the western boundary moved to the east, so that the zone boundaries were the same distance each side of North West Cape.

If this sanctuary zone is confirmed, a no anchoring policy would benefit this area and must include moorings put in place to protect fragile corals in this area. With numerous dive and fishing charters using this area and anchoring daily, frequent damage is occurring to fragile corals.

Jurabi. This proposal is opposed. It is an area of the park which is close to visitor accommodation and a boat ramp and has high amenity value for recreational fishers.

Tantabiddi. The Association is opposed to this proposal. It is extremely close to the boat ramp at which quite small boats are launched to fish in the safe area near the boat ramp. There does not seem to be any logic in proposing this area as a sanctuary zone, particularly in the absence of any scientific justification, indeed it only appears to be a reservation for nature appreciation, recreation and nature-based tourism.

Proposed Extension to Mangrove Bay Sanctuary Zone. The Association disagrees with the proposed extension of Mangrove Bay. A limited extension may be supported with the condition that the boundary of the extension is only to the eastern edge of the reef platform and not into deeper water. The westward side of the Ningaloo reef in this area is a highly prized recreational fishing ground for boats which do not anchor but approach the reef and fish the reef edge. A no anchoring policy may benefit this area.

Proposed Extension to Mandu Sanctuary Zone. The Association disagrees with the proposed extension of Mandu. There is a lack of evidence to suggest that such an extension to this sanctuary zone is required. The seaward area adjacent to the Mandu region makes up part of a prime sport and game fishing area that is frequented not only by local recreational anglers, but fishers from all over Australia that come to the region to experience the world class fishing the area has to offer. In particular the abundant pelagic species are often targeted on a catch and release basis only. See our earlier comments,

Proposed Extension to Osprey Sanctuary Zone. The Association disagrees with the proposed extension of Osprey. There is no evidence presented to suggest that such an extension seaward is required and the same argument applies as per the proposed extension to Mandu Sanctuary Zone.

Proposed Extension to Cloates Sanctuary Zone. The Association disagrees with the proposed extension of Cloates. There is no evidence presented to suggest that such an extension seaward

is required and the same argument applies as for the proposed extension to Mandu Sanctuary Zone. The extension of the sanctuary zone inside the reef to the eastern side of the reef platform is considered acceptable. We do not support the extension of the sanctuary south to Point Cloates as acceptable. The beach fishing zoning as suggested is supported.

Proposed Extension to Dugong Sanctuary Zone. The Association disagrees. There is no evidence presented to suggest that such an extension seaward is required and the same argument applies as for the proposed extension to Mandu Sanctuary Zone.

Proposed Bateman Sanctuary Zone. The Association disagrees. We are concerned about the bland statement that the *“Proposed Bateman Sanctuary Zone is proposed to protect a representative example of lagoonal Porites coral communities and areas close to the shore that are popular for snorkelling”*.

Again the only basis for this sanctuary zone is to prohibit recreational fishing. There is no evidence to show that recreational fishing is detrimental to biodiversity in this area.

Southward Extension of the Marine Park. The Association is in favour of the southern extension to Ningaloo Marine Park but see no benefit in the establishment of the proposed sanctuary zones in this area. We believe that these zones would transfer and increase the pressure on to areas outside the new Park and Zone boundaries, and particularly south of Red Bluff.

The fact that CALM has no scientific evidence that sanctuary zones provide any benefit only reinforces this view. If CALM are serious about biodiversity they should have been conducting ongoing research along Ningaloo Reef since the inception of the Marine Park years ago.

Proposed Pelican, Cape Farquhar, 3 Mile, and Turtles Sanctuary Zones. The Association disagrees with the proposal for these four sanctuary zones, as outlined above.

Overview of Association’s response to the proposed plan.

- The CALM planning process continues to ignore fisheries management as the correct tool to maintain ecological sustainability of fish catches.
- There is a critical need to establish an understanding and active cooperation between the Department of Fisheries and CALM regarding marine parks in general and Ningaloo in particular.
- It is imperative that fisheries management be involved as an important component in the planning and management process for Marine Parks.
- The Townsville Declaration on Coral Reef Research and Management must be put into context as being largely concerned with addressing problems associated with subsistence fishing in underdeveloped islands of the Indo/Pacific region that are predominantly void of any realistic recreational and/or commercial fishery management, and may not apply to Ningaloo Marine Park.
- Zoning by itself is not the solution. There is a need to recognise that zoning is only one of the management tools available for natural resource management and that other fisheries management tools have been successful and strongly supported by recreational anglers where there has been meaningful input into their development.
- Zone changes have been proposed in the absence of scientific data to support those extensions. Information from the few scientific papers referred to have largely been taken out of context and in particular do not justify the seaward extensions of sanctuary zones into deeper waters.
- Even fourteen years after the establishment of the Park, a precautionary approach has been adopted without any significant use of the experience gained over that period.
- There is urgent need for strategically planned and ongoing scientific evaluation to become part of the process.
- CALM and MPRA must understand the importance of developing a zoning scheme that is appropriate, practically feasible and socially acceptable to users of area and supported by the

wider community. This follows one of the Strategic Objectives as set out in the framework Paper namely "To facilitate and manage recreational activities in the Park within an equitable and ecologically sustainable framework."

Conclusion.

The Association is not satisfied with the planning process which has excluded adequate recreational fishing representation, has ignored and misrepresented some previous submissions and has not adequately justified the proposals, but instead relied on a target of a high percentage of No Take areas.

This review of Ningaloo Marine Park appears to have ignored the proper role of fisheries management to the objectives of the Park. Although current fisheries management may not be all it should be, closing more areas is not the solution.

It is essential that CALM and the Department of Fisheries must cooperate to come up with an integrated marine management plan based on the principles currently being developed for Bioregional Marine planning.

The Association believes the Government must ensure that such an integrated approach is used.

Please contact me for any further information or clarification about these comments.

Yours sincerely



Terry Fuller

Secretary

Australian Anglers Association (WA Division) Inc.