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Rottnest Island Marine Management Strategy,
Synovate,
PO Box 984
West Perth 6872

Rottnest Island Draft Marine Management Strategy

The Australian Anglers Association represents 26 recreational fishing clubs from Esperance to Northampton. The main activities include boat based and shore based recreational line fishing.

These comments have been prepared on behalf of the clubs affiliated with the Australian Anglers Association (WA Division) Inc.

The Association places great importance on the future of responsible recreational fishing, responsible access to the resources fishing depends on in Western Australia, and maintenance of the environment for the benefit of the entire community.

Club members are responsible people who have sincere concern for fish stocks, the fishing rules and the environment and follow the Association's stringent codes of ethics (copy attached).

The Association provides a member on the Recfishwest Board. The Association supports the comments and actions of Recfishwest on the Rottnest Marine Strategy.

Answers to the Survey Questions.

The official feedback form contains the most biased set of questions our members have ever seen in any public feedback process.

Almost all the questions and information on the form are emotive, would be very difficult to answer with a "no", and make it very clear they are deliberately designed to achieve "yes" responses leading to a predetermined outcome of majority support for the majority of proposals.

We have answered the questions from the form in some detail.

Contact Details Q1) What activities do you undertake, and what interests do you have on Rottnest Island?

Answer:- The Association has a particular interest in Rottnest. Shore based fishing clubs affiliated with the Association hold fishing weekends on Rottnest each year and their members make separate individual trips to one of their favourite fishing spots.

Contact Details Q2) Do you want your submission to be treated as confidential? Answer:- No.

Contact Details Q3) Have you read the Draft Rottnest Island Marine Management strategy? Answer:- Yes, in spite of the confusing and misleading nature of the documents available to the public, the writer has an extremely good knowledge of the strategy and its failings and misrepresentations.

Marine Management Strategic Objectives Q) Do you agree with the proposed strategic objectives for the management of the Rottnest Island Marine Reserve?

Answer:- This question should not demand either a yes or a no answer. We only partly agree. The objectives 1, 2 and 4 are just different ways of saying that "no take" sanctuary zones must be used. These demonstrate bias and failure to identify a set of key outcomes and measures, assess the

risks, identify a range of alternative solutions, and pick solutions which deliver real and measurable outcomes.

Social Values Q1) The marine environment lends itself to a range of users including swimmers, divers, snorkellers, boaters, fishers and surfers. It also has a significant amenity and visual value to land-based visitors.

Answer:- This statement/question has multiple parts which should have been asked separately so that separate answers can be given. Any agreement with this statement in whole says only that there must be appropriate management, but it does not agree with or support any of the actual management proposals in the marine strategy. The linking of land based amenity and visual value to the Marine Strategy raises the question “how is this delivered by the strategy?”

Social Values Q2) The marine reserve is maintained for recreational and tourism purposes.

Answer:- Agree. However, there are some common tourism activities which might be considered benign, but in fact can have significant direct or indirect impact on the environment. An example is anchoring for divers, but there is no evidence in the strategy of any attempt to manage or restrict anything but fishing, yet anchoring on reefs or corals is not prohibited.

Social Values Q3) Experience of the marine environment should be available for current and future generations.

Answer:- Neither agree nor disagree. There is no definition or explanation of the term “experience”, which obviously has a whole range of meanings for different people. So there is no way of knowing or measuring if the proposals in the strategy actually deliver this nebulous concept. This is a biased question which implies that the restrictions in the proposed strategy are essential to give “an experience”, and is aimed at getting the maximum number of “agree” answers. We do not agree that the proposals in the strategy are necessary for or will have any significant overall positive effect on the Rottneest experience.

Ecological Values Q1) Geological features such as reefs, seabed, shoreline, beaches and coastal dunes should not be significantly altered as a result of human activities.

Answer:- Neither agree nor disagree. There is no definition or explanation of the term “significant”, so there is no way to know what amount of impact is considered acceptable or not in designing the strategy. We are concerned that any support for this question would be used to “justify” restrictions which are not essential to adequately maintain these features.

We are concerned that unnecessary restrictions might be imposed for ideological or convenience reasons rather than to manage any real risks. We cannot see that allowing recreational line fishing from the shore or from boats for pelagic species poses any significant threat to these features if carried out under existing fishing regulations.

Ecological Values Q2) The high quality of water and sediments at Rottneest Island are to be maintained throughout the Marine Reserve.

Answer:- Neither agree nor disagree. This question should have been combined with Q3. Although this is a valid objective which we support in principle, this should not be used to “justify” restrictions which are not essential to maintain water quality. There is no evidence that responsible recreational line fishing from the shore or from boats for any fish species poses any significant threat to water and sediment quality. Any issues with rubbish or discharges are social issues which should be handled by education, existing littering laws and penalties, and by a recreational fishing code of ethics.

Ecological Values Q3) Seawater quality is to meet human health standards at all times.

Answer:- Neither agree nor disagree. This is just another way of asking the previous question 2. This is an example where a topic is given two separate questions, yet really important questions which deserve separate answers are combined into one question or not asked at all. This appears to be bias aimed at getting the maximum number of “agreed” questions which can be aggregated as majority support for the majority of questions about the proposals. There is no evidence that any responsible recreational fishing poses any threat at all to seawater meeting human health standards. Appropriate rules should apply for human wastes and emissions from boats, and

Association members would comply, but this is not justification for any restrictions on recreational fishing.

Ecological Values Q4) There should be minimal damage to, or loss of coral reefs, as a result of human activities.

Answer:- Neither agree nor disagree. This is just another way of asking the previous question Q1. This is another example where a topic is given 2 separate questions to manipulate the outcome. This appears to be bias aimed at getting the maximum number of “agreed” questions which can be aggregated as majority support for the majority of questions about the proposals.

There is no definition or explanation of the term “minimal”, so there is no way to know what amount of impact is considered acceptable or not in designing the strategy. We are concerned that any support for this question could be used to “justify” restrictions which are not essential to maintain coral reefs. We are concerned that unnecessary restrictions might be imposed for ideological or convenience reasons rather than to manage the real risks.

There is no evidence that responsible recreational line fishing from the shore or from boats for pelagic species poses any threat to these coral reefs. The strategy does not prohibit one real obvious risk – anchoring on corals or reefs. This omission demonstrates poor planning and a misplaced ideological preference for no take, sanctuary areas while ignoring real risks. Despite this, responsible boat anglers are well aware of the need to avoid any damage caused by anchors.

Ecological Values Q5) The diversity and abundance of marine animals are to be maintained at current levels or restored to 1950 conditions.

Answer:- Strongly disagree. This question has multiple parts which should have been asked separately so that separate answers can be given. “Maintained at current levels” and “restored to 1950 conditions” are two very different objectives which would require very different management. This is a biased question which is aimed at getting a majority of “agree” answers from people who do not realise the implications.

We expect that the majority of respondents will be seduced by this question. We demand that any analysis of the negative responses include the qualifying comments and not be portrayed as objections which show that “recreational anglers are part of the problem.”

We are extremely concerned that any support for maintaining current levels, which is a valid and commendable objective, would be used to “justify” quite severe and unnecessary restrictions in a vain attempt to restore 1950 conditions. Restoring to 1950 conditions cannot possibly be achieved solely by any conceivable actions at Rottnest, and would instead require drastic changes and restrictions to all human activities in the entire metropolitan marine area and large parts of the West Coast region.

Changes in fish abundance for many of the pelagic species caught by recreational line fishing from the shore or from boats are due to abundance changes in the entire West Coast and/or seasonal environmental conditions such as the Leeuwin and Capes Currents and are not due to fishing pressure at Rottnest. Closures of areas at Rottnest cannot possibly have any effect on the abundance of most of these pelagic species which breed and grow elsewhere, some species as far away as South Australia.

Ecological Values Q6) Target fish species in the Marine Reserve are to only be harvested at levels that maintain marine biodiversity.

Answer:- Strongly Disagree, because of the implication that recreational catch of common pelagic fish species from the shore or from boats has an impact on biodiversity at Rottnest. There is no evidence that line fishing from the shore has any impact on the species mentioned in the Strategy as at risk. There is no measure of the current status of marine biodiversity at Rottnest, and there is no knowledge about any impact of captures of the pelagic fish species on biodiversity. See also the answer to Q5.

The Association does support adaptive management for any species and for any places where fishing pressures are affecting fish stocks or biodiversity, in response to a clearly identified risk.

Protection of Blue Groper, a species used as justification for closed areas at Rottnest, is better approached as a Rottnest wide issue to promote stewardship of special species. The juvenile Blue Groper at Rottnest are already protected by a minimum size limit. Blue Groper is an iconic species and further protection will increase community stewardship for Rottnest as a whole, but only if groups such as recreational anglers feel that they can be part of the solution.

We believe that there are better mechanisms to ensure future quality fishing at Rottnest, using the approach of the cooperative management arrangements which have been developed in the recently completed and widely supported West Coast Recreational fishing review.

The closures proposed in the Rottnest strategy can not possibly improve the stocks of pelagic species such as herring, tailor, salmon, silver trevally, spanish mackerel, etc which are not resident and whose juveniles use nursery areas elsewhere.

The stocks of demersal fish at Rottnest follow the status of stocks in nearby areas of the West Coast region. Action at Rottnest alone can have only minimal impact on the stocks of demersal fish. However the benefits would be greatly increased if they were properly integrated into much wider and effective management of the real threats in the entire West Coast region, and could then deliver real benefits for both the fish and the environment.

Management Strategy. The Draft Marine Management Strategy recommends that the use of sanctuary zones is the most efficient and effective way to manage marine biodiversity. Do you agree with this recommendation?

Answer:- Strongly disagree. This is a biased question, aimed at getting maximum support for the proposals. Sanctuary zones are appropriate where there are destructive fishing practices, overfishing, recognised breeding, aggregation or nursery areas, or special places where some human activities are simply not compatible with the physical characteristics of the area or the living creatures present.

There is no evidence presented that any of these risks apply to the areas proposed for sanctuary zones at Rottnest. This reliance on sanctuary zones as the only tool, instead of being just one tool in a whole suite, shows an ideology that sanctuary zones work in some places and therefore they must work and they must be essential and there are no alternatives in other places.

The documentation of the strategy is blatantly misleading where it talks of using a suite of tools when in fact the only tool used is sanctuary zones and the only group of recreational users affected are recreational fishermen.

Sanctuary Zones Q1) Do you agree that sanctuary zones should be increased in size to protect marine biodiversity for future generations of Western Australians and visitors to Rottnest Island?

Answer:- Neither agree nor disagree. We do not disagree with sanctuary zones in the right places and for the right reasons, however we are not convinced of the “justifications” used for the proposed zones. We disagree with the need to increase the size of sanctuary zones to protect the specific ecological values which have been listed in the strategy. See also the previous answer.

Sanctuary Zones Q2) Do you agree that sanctuary zones should be increased in number to protect marine biodiversity for future generations of Western Australians and visitors to Rottnest Island?

Answer:- Neither agree nor disagree. See also the answer to Q1.

Sanctuary Zones Q3) Do you agree/disagree with the amended Sanctuary Zone 1 – Kingston Reef.

Answer:- Agree.

Sanctuary Zones Q4) Do you agree/disagree with the amended Sanctuary Zone 2 – Parker Point.

Answer:- Neither agree nor disagree. The wording in the strategy about this zone is misleading. It says “this 1994 working group considered the special protection through zoning was both ‘necessary and urgent’” However that paper also actually says (Part IV page 18) that these areas “should be managed for the purposes of scientific research and education”. Note the word

“managed’ and that it does **NOT** say that the area needs to be closed completely or for biodiversity conservation.

We have no objection to proper management where the real risks are assessed and managed appropriately. However there is no evidence offered that responsible recreational line fishing from the shore or from boats for pelagic species in this area poses any threat to the ecological values (corals) or biodiversity values identified in the area, and therefore there is no justification for banning recreational line fishing from the shore or fishing for pelagic species from boats.

Tropical fish are aliens to this area and stocks are replenished from the tropics as a result of favourable ocean currents. They have no biodiversity conservation value, even though they might be nice to see for divers. These species are not targeted by fishermen and only small numbers of these are ever caught. Their presence does not justify fishing exclusion zones.

Sanctuary Zones Q5) Do you agree/disagree with the new Sanctuary Zone 3 – Green Island.

Answer:- Neither agree nor disagree. The proposed area where fishing is allowed from the jetty is badly defined and illogical. The result would be that a person standing on the jetty could fish into some areas, but a person standing on the shore could not fish in exactly the same area of water.

Shore based or boat based line fishermen do not catch or damage seagrass meadows, juvenile Western Rock Lobster (which are protected by Fisheries legislation anyway,) or macroalgae and rodoliths which are the species claimed to need protection in the area. Shore based line fishing and trolling or drifting for pelagic species should be allowed in this zone because there is no valid reason to ban it to protect the named species.

Sanctuary Zones Q6) Do you agree/disagree with the new Sanctuary Zone 4 – West End.

Answer:- Strongly disagree. Tropical fish are aliens to this area and stocks are replenished from the tropics when favourable ocean currents exist. They have no biodiversity conservation value, even though they might be nice to see for divers. These species are not targeted by fishermen and only small numbers of these are ever caught. Their presence does not justify fishing exclusion zones.

Shore based and boat based fishermen try to catch pelagic species which travel from and breed elsewhere. Shore based fishermen have negligible impact on bottom dwelling fish compared to the potential impact of bottom fishing from boats. Shore based or boat based line fishermen fishing for pelagic species also do not catch or damage molluscs, invertebrates, coral or algae which are the species claimed to need protection in the area.

There are only a few shore access points, and the recreational fishing survey showed only a small percentage of fishermen fish from the shore in this area and only in favourable conditions, so any impact they might have is very small.

Shore based recreational line fishing and trolling for pelagic species from boats should be allowed because there is no valid reason to ban it.

There is nothing to be gained from taking away the opportunity for a unique fishing experience in this area. Taking away this opportunity is a failure to deliver the promises raised in Social Values Q1 and Q2.

Sanctuary Zones Q7) Do you agree/disagree with the new Sanctuary Zone 5 – Armstrong / North Point.

Answer:- Neither agree nor disagree. The wording in the strategy about this zone is misleading. It says “this 1994 working group considered the special protection through zoning of the areas identified by the EPA System 6 Report was both ‘necessary and urgent’. None of the additional areas which included Armstrong Point to Parakeet Bay....” However that paper actually quotes (Part IV page 18) EPA recommendation C45.2 which mentions Eagle Bay to Fish Hook Bay and from Salmon Point to Parker Point, but does not mention Armstrong Point.

Sanctuary Zones Q8) Do you agree/disagree with the new Recreation Zone.

Answer:- We agree with the concept of a recreation zone. We disagree with the proposal because it still allows some commercial fishing and this conflicts with the concept of a recreation zone. If commercial fishing is allowed then by definition it is a General Use zone.

Sanctuary Zones Q9) Do you have any further comments about the proposed zones?

Answer:- Neither recreational fishers nor the Department of Fisheries were properly involved in the process of deciding these zones or considering alternatives. We object to the quality and misrepresentation of findings of the shorebased fishing survey, and the application of those findings to restrict boat based fishing which was never properly surveyed. There is no risk assessment, there are no details of identified threats, no defined and measurable desired outcomes, no alternatives are offered, and the overwhelming impression is "trust us, we know what we are doing" and that is not acceptable as science.

Q10) Are there any further comments you would like to make regarding the draft strategy?
Answers:-

Misleading and confusing information. The information about the strategy provided to the public so that they can comment on the proposals is confusing, biased, emotive and misleading. There are two very different versions of the document headed "Rottnest Island Draft Marine Management Strategy" issued to the public which are completely different in layout and contents and words and details.

Emotive Presentation. The strategy has been presented in an emotive way which implies it is the only way our kids can have their own fish stories. There are other ways of achieving significant benefits for the fish and the environment, but the Strategy does not consider these.

Development of the Strategy. The Marine Management Strategy Working Group had a clear bias towards creating a substantial number and area of "no-take" zones, areas closed to all fishing. This is using only one tool, where a whole set of tools should be used.

Consultation during development of strategy. Recfishwest, the peak recreational fishing body, was never formally consulted about the details of the proposals or plans as they were being developed, and had no opportunity to provide comments back or suggest alternatives which is an essential part of any consultation to achieve consensus. Despite this, the strategy talks of "extensive consultation," which is deliberately misleading. A proper outcome and true consensus was not and could never have been achieved.

Reliance on sanctuary (no take) Zones. "Catch and release" fishing or catching free roaming, non resident pelagic species is not allowed. There is a place for sanctuary zones as part of a total package of different measures to achieve environmental and fisheries management objectives. Sanctuary zones by themselves do not provide a suitable fish management strategy for Rottnest.

Fish Species at Rottnest. The strategy does not distinguish between free swimming migratory fish and resident bottom dwelling fish, and other creatures or features which have very different protection requirements.

Measurement of Success or Failure of strategy. The strategy does not have any measurable objectives or outcomes which can be measured in the future to see if the strategy has achieved any objectives. It should have clearly defined success and failure criteria, expressed in terms of "if this outcome is achieved, then the strategy is a success" and "if this outcome is NOT achieved, then the strategy is a failure."

Poor science and anecdotal information. The science used has been selected to support sanctuary zones, or has alternative meanings. Some selective anecdotal information has been used in place of real science.

Users affected by the Strategy. Restrictions imposed by the Strategy fall on recreational fishing and on little else. Some obvious risks are not managed.

Reallocation of areas to other users. Sanctuary zones are a re-allocation of some areas to underwater diving and sightseeing rather than fishing. Recreational anglers would not have any objection to the reservation of some areas for other users, but any reallocation should be negotiated openly and honestly, and not be misrepresented.

Distinguish between shore and boat fishing. Shore based fishing and boat based fishing are very different and can target different species, but the "science" used and the strategy does not recognise this.

Misleading claims of impact on and benefits for anglers. There is nothing in the strategy which can deliver better fishing at Rottnest. The strategy suggests that sanctuary areas may provide excess fish available to be caught in other areas, but this cannot happen for pelagic species commonly caught from shore and boats. Action at Rottnest alone can have only minimal impact on the stocks of demersal fish.

Fisheries management in the greater metro area. Management of fishing needs to change in the entire metro area. These changes should include special attention to Rottnest which should be properly integrated into much wider and effective management of the real threats and delivers real benefits for both the fish and the environment.

Summary

The entire strategy, from its preparation, "consultation", information, "science" and every other aspect is flawed and biased and misrepresented, with a clear aim of getting a predetermined outcome of majority support for the majority of proposals which use only one tool when a whole suite of tools should be used. These can only be either deliberate, or negligent and incompetent. In either case they should be condemned.

The Strategy should be reviewed and done properly this time with proper consultation with recreational fishermen and other affected groups to ensure that proper attention and management is given to the real risks to marine fish, organisms, structures and the environment of Rottnest, and properly integrated into similar action in the wider West Coast region.

Yours sincerely

Secretary,
Australian Anglers Association (WA Division) Inc.