



27 March 2009

The Manager
Coast and Marine Conservation Branch
Department for Environment and Heritage
GPO Box 1047
ADELAIDE SA 5001

Dear Sir/Madam,

RE: South Australian proposed marine parks

The Cruising Yacht Club of South Australia (CYCSA), Fishing Association (FA) represent the interests of over 140 boat owners and members accounting for approximately 420 plus recreational fishing enthusiasts who use the waters of Gulf St Vincent, Spencer Gulf, Kangaroo Island and West Coast, amongst other state waters. Many of our members are larger boat owners and reach more remote waters less frequently visited by smaller craft. We are therefore impacted significantly by the extent of Marine Park space allocated under the current proposal.

The CYCSA FA is fundamentally supportive of protecting our marine environment and encourages responsible fishing activity, including adherence to existing fishing regulations such as minimum fish sizes and bag limits. In fact, we discourage the use of “bag size” as a measure for competitive fishing success. We also encourage environmental consciousness including management of pollution with events such as “environmental days”, where club members collect debris and other polluting items from our local marine environment.

We acknowledge that there are a number of sites within our State waters which should be accorded a high level of protection. A number of these sites are not necessarily subject to any perceived threat, however, as these sites in many instances are already protected as sanctuary areas, it makes good sense to continue that level of protection.

We also acknowledge the importance of establishing a system of marine parks which make up a representative collection of the State’s marine biodiversity. It is most likely that such areas could be afforded an appropriate level of protection even if zoned as multiple use areas.

Current Proposal Does Not Address Key Risks:

From the fishing perspective, the major risk to the marine environment occurs through;

- Fishing methods which create physical impact, for instance trawling or dredging. By and large, such activities are very limited in South Australian waters and are heavily regulated under the Fisheries Management Act.
- Regularly identified risks to our marine parks resulting from land based activities, mostly associated with outpour of polluted waters either from natural stream flow or treated effluent disposal, generally carrying high levels of nutrients and other chemicals.

The proposal of the current Government does not seek to address such risks.

Current proposal does not address “An Environment Selection Process”:

The currently proposed Marine Park areas represent approximately 55% of South Australian coastline and associated waters. It is our belief that the process of establishing marine parks should begin with identifying risks, along with identifying iconic sites, sites where we would aim to have zero risks, to be followed by identifying those sites creating a representation of our marine biodiversity. Only then can consideration be given to establishing outer boundaries to best incorporate such sites. It is only through this approach that we can be assured of firstly minimising risk and secondly protecting those areas that would need the protection under the relevant legislation.

To argue that one would declare an outer boundary and then identify the aforementioned sites would indeed have the potential to seriously compromise the marine environment and the interests of those that use it. If the Government is genuine in its claim that only small areas will be locked away as “no take zones” and that “most people will not notice any difference”, why is it that the Marine Parks Act 2007 provides the power to lock away almost one half of our State’s waters?

Furthermore, while “Design Principals” are mentioned in the various documents provided by the department for Environment and Heritage, there is little transparency of how these principals were applied in setting the proposed Marine Park areas.

It is for these reasons that we propose a restart to the process and the establishment of a process based on rigorous science, where decisions can be backed up with scientific evidence and logic.

Current Proposal Is Fundamentally Flawed

We are also concerned about a number of factors that we are aware of that do not appear to have been considered in the allocation of the proposed Marine Parks. These points have previously been acknowledged by the Government;

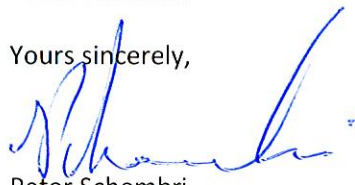
- The vast majority of our marine environment remains in pristine condition.
- Fisheries management will remain under the Primary Industries Department and will be controlled by the Fisheries Management Act.
- After seven years of activity the Government claims that it is unable to identify those areas of very high conservation value to be treated as no go/no take zones.
- After seven years the Government cannot identify zones from a representative collection of our marine biodiversity to be subjected to ongoing monitoring and active management whilst allowing for multiple uses.

South Australia needs a system of marine parks that provide a high level of protection for iconic sites combined with a collection of sites representing the range of biodiversity within our marine waters to allow ongoing study and monitoring whilst providing for multiple uses.

One final consideration is that of identification of the geographic areas covered by the various marine parks when on the water. The current proposal will require a simple means of identifying where a vessel lies in regard to a marine park in order that a skipper is able to confidently undertake the permitted activity for that area. Very few recreational fishing boats have appropriate chart plotting equipment to do this. Furthermore, electronic charts would need to be updated to provide “zoning” to enable easy determination of the proximity of a vessel within a marine park.

We look forward to your response to the issues we raise and request the opportunity to be personally represented in future endeavors to establish an appropriate and functional system of marine parks in South Australia.

Yours sincerely,



Peter Schembri

Chairman,

CYCSA, Fishing Association