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Below is the Huskisson Woollamia Community Voice (HWCV) submission on the Draft NSW Mainland Marine Park Network Management Plan 2021-2031. The HWCV is a community consultative body representing communities living on the shores of Jervis Bay. This management plan will influence the livelihoods and day to day living by our members.

First and foremost, we express disappointment at the quality of the plan in terms of its:

- Lack of use of current scientific research,
- Its clarity of writing, and
- Lack of consultation with the communities that will be impacted by this plan.

We support the endeavour to better coordinate management of the marine parks and our preference would be for the whole of the management of marine parks be returned to the Environment Department.

We have several concerns regarding the management plan which are:

1. **No reference to assessment of current management:** It is usual practice to assess the current status, and evaluate what is currently working in terms of the goals (or in this case the primary purpose) of an endeavour. Despite a stated desire to take an adaptive management approach, and despite the Plan itself stating that this first step would be undertaken – there is NO evaluation of current management strategies.
2. **No engagement with current science:** There is little effort to draw on current research. This plan is based on ten documents which are mostly social surveys/workshop reports, the threat and risk analysis on which the plan says it is based, and one scientific report. There is no reference to research papers or to reviews requested by the Marine Estate Expert Knowledge Panel (MEEKP), for example the report “Evaluation of the performance of NSW Marine Protected Areas; biological and ecological parameters”. This is despite the plan stating that it will be evidence based.
3. **Change of focus to use rather than conservation:** One only has to compare this plan with other national and international marine park management plans to get a sense of the magnitude of a shift from conservation to maximizing use –with the draft plan’s use of phrases like ‘maximise recreationally and commercially important fish stocks’. It appears that the intent of the plan is not about protecting the ecology of the marine park, rather it is about maximising extractive use opportunities – which HWCV believes is NOT the intent of the marine parks. Ninety four percent

of NSW water is freely available to recreational fishing – maximizing fishing opportunities in marine parks is NOT a balanced approach to management of our vulnerable aquatic systems.

4. Contradictions and poor conceptualization:

-The Plan states that it will take a place based approach but it ignores the differences across regions indicated by the threat and risk analysis.

-The Plan states that it will be evidence based but ignores the threat and risk analysis which states that the threats include 'recreational fishing, recreation boating and boating infrastructure, entrance management and modification'. The Technical Paper, requested by MEEKP, further highlights the significance of use threats:

“... the highest current risks to biodiversity, ecosystem integrity and ecosystem function of the NSW Marine estate are:

Estuaries – water quality decline, development/disturbance (breakwaters and other structures, dredging, sand extraction, sedimentation etc), cumulative impacts of fishing (historic and current), climate change, and some increasing impacts from introduced pests; and

Marine – cumulative impacts of fishing (historic and current), climate change and some more localised impacts from coastal development/habitat disturbance.

... However, a number of cumulative threats were identified by the TARA as requiring priority attention and are worth highlighting in the context of the role of MPAs in managing these consequent risks. These risks are: the potential impact of fishing on fish populations, trophic structure and function; climate change, and; impact on threatened species.” P. 18.

Despite the evidence presented the Plan goes on to include actions that propose maximising these activities without any reference to their potential risk, or methods of controlling these risks.

-The Plan says that it takes an innovative approach but many of the environmental actions suggested are already taking place.

-The Plan is based on the threat and risk analysis but mixes up threats with values in the major underpinning framework (Table 2 in the Plan), which is then the basis for the objectives and then the actions. This approach is confusing, perhaps deliberately so, and seems to enable the treatment of extractive values as important as conservation values.

-Additionally, in this framework, some threats in the ecosystem theme are not considered environmental threats? This surely is an omission?!

5. Threat and risk analysis (TARA) poorly considered: Whilst the TARA is the basis for the document the Plan seems to cherry pick the contents of the TARA. As stated above it ignores the threats posed by many of the recommended actions; it ignores the stated need to consider

the cumulative risks of fishing; it ignores the hierarchy of risks indicated in the TARA and the regional differences.

6. **Inadequate emphasis on climate change:** Climate change is presented in the TARA as one of those issues that presents a cumulative and highly significant threat across all values, especially the primary purpose of the marine parks. Whilst research needs to be undertaken here, it is disappointing that in 2022 our State is still at research stage and unable to offer some strategies. The response to climate change needs to be increased.
7. **Actions:** HWCV disagrees with the wording and intent of many of the actions. Specifically
 - **Action 1.1. Support planning and development to conserve marine park values**
This is back to front. The intent of protecting habitats and ecosystem from inappropriate development policies and actions should be clear. The current version prioritises development rather than conservation of marine park values.
 - **Action 1.3 Manage beaches and foreshore to conserve marine park values.**
Similarly this action is back to front. We recommend it be written as **conserve marine park values through appropriate beach and foreshore management.**
 - **Action 1.3a Maximise community access and environmental values**
This puts community access first (as mentioned earlier). Again, this is despite the threat analysis clearly indicating that use (active and passive) is a threat to the marine park ecology.
 - **Action 1.5 Enhance marine habitat.**
This is a most worrying action. Enhancing is NOT protecting. Enhancing is something that is done to expand and modify so that it is bigger/better according to a particular value. The TARA has clearly indicated that physical disturbance, which is implicit in this action is a threat. We recommend that habitats may be remediated but not enhanced. Action 1.5b Supports the use of innovative structures which clearly prioritises a recreational fishing outcome not a biodiversity outcome. The stakeholders listed for Action 1.5 reinforces this interpretation which includes recreational fishers, NSW shellfish committee, Professional Fishermen’s Association, Transport for NSW. We do not support this action as it further threatens species and habitats of the Jervis Bay Marine Park.
8. **Stakeholders:** We are extremely disappointed that a conservation management plan lists 135 stakeholders partners in the proposed actions where 120 of these stakeholders represent activities which are recognized as threats to marine ecology according to the TARA, and only 15 partnerships are with conservation groups.
9. **Objective 5 To improve access and opportunity for enhanced social, cultural and economic values from marine parks.** We disagree totally with this objective and its subsequent actions. The objective ignores the fact that access and recreation use of marine parks, for example in

Jervis Bay, has been increasing dramatically and continues to increase. Jervis Bay for example has 6 formal boat ramps and most of its coast line accommodates beach fishing. What level of use is sustainable? Constant increased use cannot be sustained and still maintain the environmental, social and economic values. The better objective would be to assess the impact of use, review management strategies to ensure use levels are not compromising the environmental values. If the environmental values (for example fish populations) are not maintained many of these social (there will be no fish to catch), cultural and economic (the dolphin boats may have no dolphins to view as the dolphin population depends on healthy fish populations) values will collapse. Additionally, there is NO evidence that the social, cultural or economic values of the marine park, especially in Jervis Bay, are under threat. A more likely case could be put that these values are under threat from inadequate care of the marine ecosystem.

10. Reject the proposal to use Jervis Bay as a Cruise ship port: HWCV reject the proposal to use Jervis Bay as a Cruise ship port due to the lack of published research around cost/benefits of cruise ships

HWCV is aware that no permits have been given to cruise companies to use Jervis Bay as a port, however Clean Cruising lists Jervis Bay as one of their ports, and lists the following itineraries currently on sale.

CRUISES VISITING JERVIS BAY									
		16 DEC 2022	7 NIGHTS	Treasures Of The South Australian Coast And Tasmania Ship: Le Laperouse Departs: Sydney Returns: Hobart	INSIDE Sold out	BALCONY \$5,840	DELUXE SUITE \$10,060	PRIVILEGE SUITE \$15,080	VIEW >
		28 DEC 2023	16 NIGHTS	Auckland to Sydney Ship: Silver Whisper Departs: Auckland Returns: Sydney	OCEANVIEW SUITE \$13,200	VERANDAH SUITE \$16,000	PREMIUM SUITE \$24,200	GRAND SUITE \$41,200	VIEW >
		04 JAN 2024	14 NIGHTS	Auckland to Sydney Ship: Silver Muse Departs: Auckland Returns: Sydney	OCEANVIEW SUITE \$12,900	VERANDAH SUITE \$15,400	PREMIUM SUITE \$24,000	GRAND SUITE \$41,300	VIEW >
		13 JAN 2024	16 NIGHTS	Sydney to Auckland Ship: Silver Whisper Departs: Sydney Returns: Auckland	OCEANVIEW SUITE \$12,700	VERANDAH SUITE \$15,200	PREMIUM SUITE \$22,900	GRAND SUITE \$38,900	VIEW >
		18 JAN 2024	14 NIGHTS	Sydney to Auckland Ship: Silver Muse Departs: Sydney Returns: Auckland	OCEANVIEW SUITE \$12,900	VERANDAH SUITE \$15,400	PREMIUM SUITE \$24,000	GRAND SUITE \$41,300	VIEW >
VIEW ALL CRUISES VISITING JERVIS BAY >									

HWCV is deeply suspicious of the process that is being undertaken here. It appears that cruise companies are under the impression that permission will be granted for cruise ship visitation into Jervis Bay in the not-too-distant future. This is despite community consultation having only just commenced, but more importantly it is without environmental studies or cost/benefit analysis being undertaken or made public.

It is like approving infrastructure development without doing the costing, or social and environmental analysis of the impact and thorough assessment of the benefits or alternatives.

11. Inadequate quality, clarity and focus on conservation purposes

The quality of this management plan is sadly lacking in terms of clarity, evidence and focus on purpose. Comparing the NSW draft management plan with the table of contents of the following documents. The documents below are clearly ordered, some acknowledge international categories and purposes, but all indicate a clear focus on **conservation purposes**. That is lacking in the NSW draft Plan.

Parks Australia – excerpt from a marine park management plan

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Parks Canada – excerpt from table of contents

Policy objectives for the management of NMCAs

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3. Ensure that marine uses in NMCAs are ecologically sustainable	16
4. Conserve cultural heritage of NMCAs.	18
5. Recognize Indigenous peoples' responsibilities as stewards of NMCAs	19
6. Support the social, cultural and economic well-being of Indigenous peoples and coastal communities adjacent to NMCAs.	20
7. Foster visitor experiences that build strong connections to and enjoyment of NMCAs	21
8. Promote awareness, understanding and appreciation of the natural and cultural heritage of NMCAs	22
9. Advance knowledge and understanding of marine environments in NMCAs	23

Additionally, this Western Australia plan clearly supports recreational fishing, but within the context of marine park purpose and acknowledges that without maintenance of critical habitats there will be NO recreational fishing.

Summary of management arrangements for recreational fishing

Requirements	<ul style="list-style-type: none"> • High water quality. • Maintenance of critical habitats for recreationally targeted fish species. • Maintenance of recreationally targeted fish stocks. • Equitable access to fishing areas within the marine park. 		
Management objectives	<ol style="list-style-type: none"> 1. To maintain the ecological values of the marine park that support recreational fishing. 2. To ensure that recreational fishing in the marine park is managed in a manner consistent with maintaining the marine park's values. 		
Specific management strategies	<ol style="list-style-type: none"> 1. Ensure recreational fishers are aware of the zoning scheme and any restrictions that may apply to their activities in the marine park [DoF] (H-KMS). 2. Undertake research to identify recreationally targeted species and to investigate whether there are localised depletions of recreationally targeted species, or risk of depletions in the marine park, and address identified issues as appropriate [DoF] (H). 3. Monitor recreational fishing catch and effort within the marine park and report the results to Parks and Wildlife and the MPRA for the annual and periodic reviews of the implementation of the management plan [DoF, MPRA] (H). 4. As part of the education and interpretation program, communicate and promote traditional seasonal calendars for recreational fishing within the marine park [DoF] (M). 		
Performance measures	<ol style="list-style-type: none"> 1. Site-based use (%). 2. Visitor satisfaction (e.g. expectations, experience). 	Reporting	To be developed.
Targets	<ol style="list-style-type: none"> 1. Implementation of management strategies within agreed timeframes. 2. Targets for the performance measures above to be developed. 		