

# AFANT



## Submission

### THE DRAFT MANAGEMENT PLANS FOR THE NORTH COMMONWEALTH MARINE RESERVE NETWORK- NORTHERN TERRITORY SECTION

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*Representing recreational fishing in the NT and ensuring the quality of our sport*

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## Introduction

The Amateur Fishermen's Association of the Northern Territory (AFANT) welcomes the opportunity to provide a submission into the Director of National Parks' proposal to prepare management plans for Commonwealth Marine Reserves. AFANT hopes that this review will deliver on the Turnbull Government's election commitment for a 'More Competitive and Sustainable Fisheries Sector' and hopes that this review will reflect genuine consultation with stakeholders reinforced by peer reviewed science.

AFANT was formed and incorporated in 1980 and is the organisation recognised by both the Northern Territory and Commonwealth Governments as the peak body representing the estimated 50,000 Northern Territory residents who frequently participate in recreational angling each year. AFANT is also a member of the Australian Recreational Fishing Foundation the peak body representing Australia's recreational fishing community at the national level.

Recreational fishing is an important social and cultural component of the Northern Territory lifestyle as well as being a major tourism drawcard and a significant contributor to the economy. Recreational fishing surveys and fishing tour operator data indicates that more than 35,000 Territory residents and 54,000 visitors participated in recreational fishing in the Territory in 2010. And it is estimated that the current figures for 2016 far exceed these with 43,000 tourists from 62 different countries participating in the 2015 NT Tourism 'Million Dollar Barra' promotion. Recreational fishing was estimated to contribute at least \$100 million directly to the Northern Territory economy during 2014.

As identified in the NT Governments Recreational Fishing Development Plan (2012-2022), seventy per cent of recreational fishing in the Territory occurs in its regional areas, where it is often the primary economic and development driver. King Ash Bay on the McArthur River, the Daly River, the Roper River and Dundee Beach are examples of communities where recreational fishing underpins development. Fishing tourism also providing impetus for regional development on Aboriginal land, such as the Tiwi Islands, Arnhem Land and Groote Eylandt

AFANT recognises that a marine park is a resource to be enjoyed by all Australians and we support marine reserves that allow multiple uses in a sustainable fashion such as; recreation, science, education, conservation and enhanced visitor experiences.

This view of marine parks allowing recreation, specifically recreational fishing has been recently demonstrated internationally with the expansion of the Papahānaumokuākea Marine Park in Hawaii by US President Barrack Obama. The Papahānaumokuākea Marine Park covers over half a million square miles of water and while it excludes destructive practices such as mining and commercial fishing, recreational fishing with a permit is still allowed. In the Atlantic Ocean the Northeast Canyons and Seamounts Marine National Monument have also allowed recreational fishing to continue within their conservation zones in recognition of its minimal environmental impacts and substantial socio-economic benefits. AFANT urges the Director of Parks Australia to strongly consider these international examples in preparing management plans for Commonwealth Marine Reserves and to allow recreational fishing inside all zones.

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## Issues of Concern

AFANT does not support the increase in Marine National Park Zones for the North CMR network. AFANT originally welcomed the previous proposed current network in which there was only one area off the Northern Territory coast where recreational fishing was to be excluded, the Marine National Park zone in the Wessel Commonwealth Marine Reserve, as this area was identified as being remote enough from major population centres as to have minimal socio-economic impacts. Unfortunately, the proposed expansion of Marine National Park Zones (IUCN II) significantly increases the socio-economic impacts of the North Commonwealth Marine Reserve especially considering that both the Limmen and Oceanic Shoals Marine National Park Zones are frequented by recreational fishermen in trailer boats traveling from major population centres such as Katherine (Limmen) and Darwin (Oceanic) including a strong charter fishing industry specialising in live aboard remote fishing trips. Unlike the previous zoning plan for the Wessel Marine National Park zone there was zero consultation at all with the recreational fishing community regarding these proposed changes during the review process including the significant socio-economic effects on the Northern Territory's fishing tourism (charter) industry.

It must also be noted that the National Park Zones (IUCN II) in the Limmen CMR borders the proposed Limmen Bight Marine Park. It is highly likely that National Park Zones (IUCN II) in both the Limmen CMR and the proposed Limmen Bight Marine Park will see considerable effort shift from both commercial and recreational fishing which would concentrate fishing effort into smaller areas negatively impacting fish stocks. This issue has been well documented in several scientific papers regarding Marine Protected Areas. Indeed, Buxton *et al* (2006) states that "for many species the use of MPAs alone would lead to areas of relatively high quality marine environment surrounded literally by a sea of overfished and depleted areas" and Haddon *et al* (2003) also states that "displaced fishing effort can harm the fishery remaining outside the reserves".

AFANT believes that allowing recreational fishing into Marine Parks is directly consistent with the principles of the International Union for Conservation and Nature (IUCN) categories for Marine Parks and as such excluding recreational fishing from Marine National Park Zones (IUCN II) is in violation of the principle of managing the area for recreation. Indeed, it could be argued that current allowed activities in CMR Marine National Park Zones such as Defence activities and commercial shipping should be excluded. Anchoring of large vessels can create significant ecosystem damage, as can the introduction of invasive organisms and diseases via ballast water and biofouling, while Defence activities where live ammunition and high level radar and sonar equipment are used can also cause significant changes to behaviour and health of many marine species including fish and marine mammals. These activities and the subsequent behavioural changes they produce can create an imbalance in the food web and by the definition used by IUCN – "is incompatible with ecosystem protection", and therefore should also be banned from the CMR Marine National Parks Zone.

The IUCN Principles description states:

Category ii: National Park: Protected Area managed mainly for ecosystem conservation and recreation.

Natural area of land and/or sea, designated to:

- (a) protect the ecological integrity of one or more ecosystems for this and future generations,
- (b) exclude exploitation or occupation inimical to the purposes of designation of the area, and
- (c) provide a foundation for spiritual, scientific, educational, recreational and visitor opportunities, all of which must be environmentally and culturally compatible

AFANT notes again that recently declared marine parks near Hawaii (The Papahānaumokuākea Marine National Monument) and in the Atlantic Ocean (Northeast Canyons and Seamounts Marine National Monument) have allowed recreational fishing to continue within their conservation zones in recognition of its minimal environmental impacts and substantial socio-economic benefits. Excluding recreational fishing from large areas of the CMR does not take into account adaptive management approaches such as catch & release, selective targeting, size and bag limits and restrictions on gear which can be used to minimise impacts on biological fish stocks or the marine environment. We strongly believe that the extent of National Park Zones (IUCN II) in the North CMR should be reviewed in light of these international examples with recreational fishing as an allowed activity.

AFANT would like to express concerns that mining including exploration, development and other activities, is still a permitted activity in both the Special Purpose and Multiple Use zones. There is quite extensive scientific literature regarding the alteration of existing physical, chemical or biological equilibria, subsequent to or in association with marine mining that can potentially cause a wide range of environmental problems. AFANT would once again like to draw attention to the newly declared Papahānaumokuākea Marine Park in Hawaii which excludes seabed mining in its entirety from the Marine Park. In this AFANT believes Australia should follow the United States example.

Noted in the 2012 guidelines for IUCN Protected Area Management Categories, category VI, currently Special Purpose and Multiple Use zones, defines these areas as “under low-level non-industrial sustainable natural resource management and where such use of natural resources compatible with nature conservation is seen as one of the main aims of the area”. Mining is an extractive industrial process and AFANT believes it is not compatible with the aim of this zoning or within the spirit of the marine reserves process itself.

These 2012 IUCN guidelines additionally state that “careful consideration needs to be given as to whether activities such as seabed mining and some types of commercial fishing practices (e.g. dredge trawling) should be permitted in regard to their inherent unsustainability and their consistency with the objectives of this category”. AFANT would like to acknowledge the inconsistency of removing commercial bottom trawl fishing methods while allowing mining including exploration and development in Special Purpose and Multiple Use zones.

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The Northern Territory EPA (2012) has made a strong case that there is insufficient evidence regarding the impact of seabed mining on “marine flora and fauna, water quality and marine habitats” and that work needs to “be done to identify marine organisms expected to be affected; species and ecosystems with special value to society; and species that may be threatened”. Potential acoustic and lighting impacts associated with seabed exploration and mining were also identified as needing further and in-depth research. Until sufficient peer reviewed scientific evidence has been provided AFANT cannot support this practice.

We would like to make it clear that it would also be extremely difficult for our organisation to accept any mining or exploration in these areas due to concerns with the potential impact on recreational fishing. Recreational fishing is fundamental to the lifestyle of residents in the Northern Territory and is a significant contributor to Northern Territory economy. It is important to maintain a high level of protection for our marine environments and to manage fish stocks sustainability. The possibility of one large incident, for example an oil spill or gas leak, having multiple effects on fish stocks and habitats both within the Marine Reserve and adjacent environments is an unacceptable risk.

There have been multiple breaches of environmental regulations from mining companies on land in the Northern Territory with these mining companies not reporting incidences until much later, if at all. There has been consistent failure of tailings management at numerous Northern Territory sites, and the environmental bonds (held by government) are generally far under the real cost of environmental mitigation and sufficient rehabilitation works. Currently, there are no audit facilities by the EPA or other independent or technically competent companies and the Government system of self-regulation has had numerous failures.

It is abundantly clear from the available information including international scientific papers, the WA Department of Industry and Resources Petroleum Guidelines - Minimizing Acoustic Disturbance to Marine Fauna, NT Fisheries information and past experience in the Tiwi Box fishery that exploration methods by mining corporations especially seismic surveys can and do have an impact on fisheries.

The Northern Territory Fisheries information clearly indicates in the Tiwi Box fishery, commercial catch rates dropped off significantly for an extended period after seismic surveys were conducted in that area. We have particular concerns with the potential impact on key recreational species already identified as under pressure including Black Jewfish, and Golden Snapper.

Based on the unacceptable risk posed by a large scale incident from offshore mining, the lack of science regarding the impacts of seabed mining and the well-established ill effects of exploration methods used in the industry as well as the inconsistencies in allowing mining exploration and development in Special Purpose and Multiple Use zones, it is extremely difficult for AFANT to approve of these activities within the Commonwealth Marine Reserves and strongly insists that the Director of National Parks removes seabed mining and exploration as permitted activities.

In addition to AFANT’s concerns regarding seabed mining within Special Purpose and Multiple Use zones we must strongly question the wisdom of allowing Demersal Trawling in the Special Purpose Zone (a) of the Oceanic Shoals CMR. Currently a trial trawl fishery exists

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in this section of the Oceanic Shoals known as the Timor Box, this trial trawl fishery is categorised as semi-demersal. The Timor reef area is managed separately to other NT fishing areas due to high ecological values and has traditionally been maintained as a trap and line fishery in order to provide some measure of protection to the coral reef habitat.

AFANT notes considerable anecdotal evidence of damage to hard and soft coral and sponge reefs and other benthic habitats caused by demersal trawling. There is also a lack of available data and scientific studies available to inform management in this fishery including the setting of total allowable catch, a lack of fishery independent data regarding the status of populations of both target and non-target species captured in this fishery and a lack of proper independent assessment of the seafloor habitat within the trawl fishery areas and the potential impacts of trawling on that habitat. Allowing demersal trawling in the Oceanic Shoals Special Purpose Zone is inconsistent with the 2012 guidelines for IUCN Protected Area Management Categories, category VI, currently Special Purpose and Multiple Use zones, defines these areas as “under low-level non-industrial sustainable natural resource management and where such use of natural resources compatible with nature conservation is seen as one of the main aims of the area”. Due to the destructive nature of demersal trawling and the risk of significant habitat damage AFANT believes it should be removed as a permitted activity from the Oceanic Shoals Special Purpose Zone.

## **Conclusion**

This submission highlights a number of concerns that AFANT believes will impact recreational fishing in the North Commonwealth Marine Reserves Network.

AFANT believes that allowing recreational fishing into Marine Parks is directly consistent with the principles of the International Union for Conservation and Nature (IUCN) categories for Marine Parks and strongly urges the Director of Parks Australia’s to consider the international example of the recently declared marine parks near Hawaii (The Papahānaumokuākea Marine National Monument) and in the Atlantic Ocean (Northeast Canyons and Seamounts Marine National Monument) that have allowed recreational fishing to continue within their conservation zones in recognition of its minimal environmental impacts and substantial socio-economic benefits.

Recreational fishermen represent the most significant user group within the Commonwealth Marine Reserves. AFANT believes that continuous engagement with recreational fishermen is vital as they provide much needed information to authorities through ‘eyes on the water’. Recreational fishermen are often very aware of short and long term changes in fish diversity and abundance. In addition recreational fishermen often can provide real time spatial information that can aid management and enforcement on issues such as habitat damage, pollution, zoning violations and illegal fishing activities.

Recreational anglers often view themselves as custodians of the marine environment and effectively engaging this user group to collect meaningful and useful information would promote a greater understanding of the Commonwealth Marine Reserves and ensure continuous support from the recreational fishing community.

As a whole recreational fishermen are often very keen to participate in citizen science projects to further the goals of the Commonwealth Marine Reserves such as catch/effort log books, fish tagging programs, DNA collection and partnerships with education or research institutes. AFANT believes the Commonwealth Government should provide a comprehensive engagement plan for management and inclusion of recreational fishermen within the Marine Reserves.

I hope you have found this submission helpful and should you require any further information in this regard, please do not hesitate to contact me.

Yours sincerely



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## References

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