



**AMATEUR FISHERMEN'S ASSOCIATION OF THE NT Inc**

**SUBMISSION FOR THE REVIEW OF 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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Commonwealth Marine Reserves Review  
C/o Department of the Environment  
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### **AFANT Submission on Commonwealth Marine Reserves Review**

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 represents the recreational anglers of the Northern Territory on several management advisory committees dealing with key recreational fish and crustacean species as well as a diverse group of natural resource management advisory groups, recreational fishing steering committees and the water safety advisory council in the Northern Territory. All of these provide the opportunity for the recreational fishing industry to have a say on the day to day management of fisheries, input to policy development and the forward planning of sustainable development.

AFANT welcomes the opportunity to provide comment on the review of the North Bioregion Commonwealth Marine Reserve. AFANT recognises that this review delivers on the 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 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.

We recognise and welcome the fact that the current network includes only one area off the Northern Territory coast where recreational fishing will be excluded, the Marine National Park zone in the Wessel Commonwealth Marine Reserve, and thus the Commonwealth Marine Reserve has limited impacts on recreational fishing access on a Northern Territory wide basis.

### **Issues AFANT believes need to be addressed**

While there is minimal detrimental impact on recreational fishing under current zoning within the North Commonwealth Marine Reserves Network, we are very concerned at the significant extent of the reserve network and the fact that it will concentrate commercial fishing effort into smaller areas which could impact fish stocks with flow-on to recreational fishing. 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".

We are quite concerned at the combined extent of the Special Purpose and Multiple Use zones in the Joseph Bonaparte Gulf, Oceanic Shoals, Arafura and Arnhem Reserves. In combination these reserves represent some 77,000 square kilometres of sea that will not be available for commercial trawl fishing and most forms of commercial shark fishing. Given the current levels of commercial fishing activity in these waters it is difficult to find any justification for the restriction of such large areas.

Resource conflict and overfishing would become a significant problem if these current Special Purpose and Multiple Use zones were to be modified in any way to further restrict commercial fishing. AFANT believes that due to this, calls to modify these zones by marine conservation groups should be rejected.

We strongly believe that the extent of these reserves should be reviewed in light of the objectives of the plan and that the issue of commercial fishing displacement, its consequences for fish stocks in open areas and the possible flow on effects in Northern Territory waters, be explicitly addressed.

AFANT would like to express concerns that Mining including exploration, development and other activities is 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.

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 consistence 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 these current zones.

Indeed the Northern Territory EPA (2012) 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.

## **Conclusion**

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

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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Executive Officer  
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30 March 2015

## References

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