

22/07/09

Submission by Sunfish Queensland FRASER COAST BRANCH on the Draft DPIF Fish Habitat Area Strategy 2009-2014

This submission has been prepared by the Sunfish Fraser Coast Branch giving alternative views and additional comments to that submitted by Sunfish Qld. In general there is support for the issues and proposals from Sunfish Qld .

Extracts from Sunfish Qld's responses are shown below in *italics* and the comments from this Branch are shown in **bold type**

SUMMARY COMMENTS

In general terms the proposals from DPI&F aim to prop up their place in managing the environment when events have largely overtaken their role. It is an attempt to rationalise their continued failure to do nothing else but add to the capital under control and do nothing or almost nothing to demonstrate the need for their continued existence. The concept needs a drastic overhaul to determine whether it is relevant today to the community.

Acknowledging that the concept has been in operation for 40 years there is no content in the draft to indicate any other strategy, other than to continue with an outdated concept that in its origins was a powerful planning tool in some regards, but a complete failure in many other ways. In essence it fails completely to address the many external influences on the FHA's likely to cause major impacts on the FHA's and causes community frustration with aspects of its implementation that are not relevant to current community expectations.

Background

Sunfish Qld in their submission stated

"The major concern which Sunfish has with the draft strategy is the lack of focus on the need to protect aquatic habitats for fisheries purposes. Whilst there is mention of this in the draft strategy, the strategy seems to dwell on more general conservation issues including conservation of biological diversity. In terms of current roles, it is the responsibility for marine parks to conserve biological diversity via marine parks; the FHA's are the means of protecting fisheries and the aquatic habitats that support them. The strategy also ranks fishers low on the list of stakeholders. This is a concern as Sunfish is of the opinion that fishers, including recreational fishers are the primary beneficiaries of FHAs.

At this stage it appears that there needs to be a whole-of-Government approach as the issues are now across a range of Departments. The EPA has the role of creating and managing Marine Parks, the DNRM has title over state lands and now Local Government has a strong role in planning issues under their own legislation and well as local planning under IPA or local rules..

The proposal to now include Fresh Water Habitats takes it to the agency that now manages the fresh water resources of the state.

In addition, since the introduction of the legislation we now have in place the influence of the Conservation movement as well as the Land and Local Govt.

Court.

During the Planning process for the Great Sandy marine Park there was little public evidence available to the public on whether the QDPI had any role in the in the zonings in the Great Sandy Strait re FHA's.

As far as can be determined the practice of Beam Trawling was prohibited in the Sandy Straits but not in the Conservation Park Zones overlaying the Mary Susan FHA's. Bean trawling in the small creeks and streams of the Mary- Susan FHA's could possibly be more destructive than in the GSS. It is a habitat destructive procedure.

KEY ISSUES

Another major deficiency in the draft strategy is the lack of reference to the Queensland Fisheries Act and Regulations current provisions for FHAs. It is in this area where there needs to be a complete review to ensure the document is appropriate for today's needs. The community suffers increasing frustrations in dealing or seeking approvals under any maritime legislation. In this case the process of approvals and revocation is too complex and can take a long time to produce. An example is the construction of Boats ramps in a Fish Habitat area.

Revocation must be made simpler than the current procedure where it has to go to Cabinet and Executive Council. It must firmly rest with the CEO of the agency administering the Fisheries Act . The current process is not considered to be one of high legal priority when compared to other legislative business the Government may have under consideration ,leading to a long time for approvals for infrastructure involving revocation.

Some FHA's currently listed defy the imagination as to why they were created and what threats there were/are to them .For example the FHA of Sandy Cape encompassing the Sandy Spit and again within the GSMP. The FHA at Wathumba Creek. What are the threats when its in GSMP a World Heritage Area and there is no freehold or special lease land likely to be developed .The are freehold blocks at Moon Point adjacent to the FHA but here again they are surrounded by the National Park and WHA..The branch feels that if there was a review of the current FHA listings against the real or perceived threats to habitat many could not be sustained.

Sunfish support for FHAs. Sunfish strongly supports existing and new Fish Habitat Areas and other legislative and non-legislative mechanisms that ensure the maintenance of aquatic habitats that support recreational fisheries in coastal Queensland.

It follows that there must be a more workable set of regulations so that the community feels more ownership. The current use of the term "partnerships" in QDPI documents is jargon , solely devised by the strategists in an attempt to make an impact with the Treasury ,a front for consultation,and worse to give more control to the Commercial sector in the management of our fish resources.

BENEFITS OF FHA's

Nowhere in the document is it demonstrated the benefits of the declaration of the FHA's to the sustainability of the inshore fishery. A serious omission!. This is where most of the Recreational Fishers operate.

There is no disagreement that Freshwater FHA's should be considered but this will be complicated by other Govt. agencies with cross management plans.

IT MUST BE POINTED OUT THAT THERE ARE FAR MORE SERIOUS IMPACTS ON FHAs BY THE DAMMING OF RIVERS FOR IRRIGATION OR WATER STORAGE. THE TRAVESTON CROSSING DAM WILL IMPACT ON A HUGE AREAS OF FHAs IN THE MARY RIVER AND GSS. ITS FAR MORE A DANGER TO FHA's THAN AN EXCISION FOR A BOAT RAMP OR ANY OTHER PUBLIC INFRASTRUCTURE OR THE CONSTRUCTION OF A REVETMENT WALL TO PREVENT EROSION OF PUBLIC ASSETS.

The comments on the preservation of FHAs is a joke in the face of Government policy. Again Traveston Crossing Dam - it is very clear that prime agricultural Land has to be preserved for future food and fibre production in Government Policy and in the Planning Laws yet the loss of 7500 ha with water close to a large city is ignored .

Fishing permitted in FHAs.

Sunfish notes that legal fishing is a permitted activity in FHAs unless fishing is restricted in such areas under the fisheries legislation. Sunfish in the past has strongly supported new FHAs on the basis that they offer protection to aquatic habitats from things such as beam trawling but also very importantly allow fishing to continue.

This is a sensitive area but it defies imagination that beam trawling is still permitted in FHAs. Sunfish Fraser Coast believes this despicable practice should be prohibited FHA's. It is habitat destructive no matter what .

MARINE PARK GREEN ZONES OVER EXISTING FHA's.

Sunfish is confused and concerned that areas of existing FHA's where fishing was allowed and sustainably managed have had superimposed on them MP green zones which stop fishing for non-fisheries purposes?. Examples of this are many and include Hays Inlet/Kippa-ring FHAs, Moreton Banks FHA, Myora/Amity FHA, Peel Is FHA, Pumicestone FHA. Sunfish is strongly of the opinion that MP green zones should not be declared over existing.

As far as this branch is concerned if the current Conservation Park Zones and the Marine National Park Zones in GIMP were given their true values under the Marine Parks Act there would be no need for any FHA's in the GSMP. Legislative priority must be established.

Status of Sunfish regarding FHAs. *On the issue of FHAs, Sunfish and recreational fishers are not merely "stakeholders", but should be regarded as the primary beneficiaries of FHAs which provide for maintaining the sustainability of this popular pastime*

If fishing did not exist there would be no need for FHAs. Another view is that with a whole of Government approach we may not need FHA's at all with the current planning and other legislative processes in place

ECONOMIC IMPORTANCE OF FHA's

Some 750,000 Queensland residents engage in recreational fishing each year. about 75% of recreational fishing occurs in the inshore areas where FHA's have been established. many businesses, small and medium sized, have been established to support recreational fishing. access to a wide range of coastal fishing grounds offering high quality natural

habitats and good/sustainable fish stocks is an important foundation for recreational fishing use and indirectly to the creation of jobs in the supporting industries along the whole coastline.

There has been no demonstrated data supporting the benefits of FHAs to the sustainability of fish stocks. It appears that we are perpetuating a myth created 40 years ago that has no relevance to the fishing communities today with current legislative processes in place. Like wise the Green Movement is far more articulate than when this legalisation was introduced.

Netting practices in some FHA's has resulted in habitat destruction and the resulting decline in some species e.g. gar fish

COMMUNICATIONS.

Sunfish and recreational fishers generally must have a high priority in the communication strategy for FHAs as they are key beneficiaries of these areas.

What is there to communicate to Recreation Fishers on an ongoing basis about FHAs. The average Rec. Fisherman is totally oblivious to their existence and has displayed little interest in their being.

Funding Support.

Significant funding support is provided annually from the recreational fishing sector to the FHAs programme. This is done via allocations from the private pleasure vessel levy to support recreational fishing activities within QDPIF. Sunfish supports this allocation. Details of funding of the FHA programme are not given in the draft strategy or how other stakeholders support the process.

The funding of FHAs and their administration is core business and should not come from the PPV Sources. After all the FHA's survived long before the PPV came along. There is no problem with the funding of support for recreational fishing activities with the FHAs.

Degradation of FHAs

Sunfish is concerned about the degradation of FHAs and other aquatic habitats as a result of land development, run-off and other adverse impacts.

We should be concerned with the impact of activities like land development and urbanisation which are above the HWM and can severely impact but have no consideration under this legalisation.

These issues are largely about water quality, not the responsibility of the QDPI. Local and Queensland Government agencies must be held accountable for such adverse impacts on the aquatic environments and on the quality and extent of fisheries resources. This paper does not address these issues.

This submission is valid until 17th January 2010 . Sunfish Fraser Coast also reserves the right to amend any statements in this document should circumstances change or new information is forthcoming