

Submission by Sunfish Queensland on the Regulatory Impact Statement Cooloola Recreation Area

Background to this submission

This submission has been prepared by Sunfish Queensland on behalf of its membership and recreational fishers generally. In Queensland there are some 45,000 persons who are affiliated with Sunfish through their membership of fishing clubs and fish stocking groups. Prior to submission to the Department of Environment and Resource Management, the draft was sent to all Sunfish contacts for comment and input. The draft was also posted on the Sunfish website and comments sought.

Preliminary issues

The Strategic Directions Paper on which this RIS document was based was only available for public comment for 3 weeks. A significantly insufficient period for community consultative and scientifically considered responses. Neither of the two working groups purported to represent key stakeholders included delegates from Sunfish.

The RIS only gives cursory consideration to the first 3 options and extensive consideration to the fourth most extreme choice.

Response

As previously reported in our response to the Strategic Directions Paper, Sunfish Qld has major concerns regarding the basis for determining that a declared recreation area under an amendment to the RAMS Regulation 2007 is required. As Sunfish Qld has previously worked successfully in collaboration with the Department we request an urgent meeting with the Minister to discuss the ramifications of this RIS, noting in particular that as the peak recreational fishing body we have not previously been consulted in earlier discussions.

Issues of concern

The items listed under regulatory and management issues are currently already under the management regimes of other authorities (just not DERM). Surely under a whole of government approach it would be of greater benefit to the Qld population to determine where these authorities may need enhancing. This would then ensure that all of Queensland and

not just the Teewah-Cooloola area are better managed. Unless of course one of the policy objectives inferred but not stated is to provide funding for the better management of this area.

There are currently no impediments in reducing the speed limit on this section of the beach, prohibiting unleashed domestic pets on the beach (this already happens in other metropolitan areas), limiting the camping permits and rotating areas used.

The policy objectives and legislative intent appear to focus more on disbursement of funds than on any positive ecological outcomes for the area.

“Recreation areas declared for similar reasons and with similar management arrangements have been in place at Fraser Island, Moreton Island, Bribie Island, Inskip Point and Green Island.” This statement raises concern as Fraser island still has by far the greatest number of 4wd beach accidents and is already under the new level of proposed management for Cooloola.

Moreton Island is also the same level of management proposed and yet was reported by the independent review on the oil spill disaster to have the following management issues:

- Need better staff familiarisation with and adherence to existing contingency plans and response procedures, including lines of communication.**
- Need a more cooperative and less combative atmosphere amongst response agencies.**
- Need greater staff continuity on response teams.**
- Need to adopt a project management than an emergency response approach**

Bribie Island is also the same level of management proposed and yet during the Moreton Bay oil disaster was quickly cleaned up and managed more effectively by the Sunshine Coast Regional Council and Moreton Bay Regional Council.

Therefore the areas currently under the proposed new level of management for Cooloola do not appear to have any improved level of management even though usage fees are currently collected.

Comments

The cost benefit assessment goes to great length to table costs and potential benefits. The only 2 groups to not incur costs are the traditional owners and the conservation groups. The conservation groups incur no costs and yet “will be involved during management planning preparations”

surely those groups who will be impacted should be involved during the planning preparations.

“Conservation groups have had a long history of lobbying.....the activities of government and private agencies.” This appears to be another proposal where the power of lobbying holds greater weight than the interests of stakeholder groups.

SUNFISH QUEENSLAND has no objection to reduced speed limits or restricted camping as long as any restrictions must apply to all users.

Our Members have listed the major issues as

- speeding vehicles
- inappropriate vehicle behaviour & vehicle types
- excessive camping periods
- large tourist vehicles in a hurry

Non intrusive low cost solutions

Allow councils to continue beach control from Teewah south

Access fees should be only for overnight users - Day trippers do not need costly services

Camping should not exceed 2 nights

- reduces rubbish build up
- stops dune damage through continuous access to one site
- allows more people to access the area
- off beach camping areas are available at Noosa & Rainbow Beach

Speed limits should be reduced to

- 60kms on the open beach
- 40kms within 100 metres of stationary vehicles or people.

Finally thank you for seeking the views of Sunfish and its membership on this very important Regulatory Impact Statement. We trust our comments and criticisms will be taken positively and seriously, and the proposed changes can be modified for the benefit of the recreational fishing sector and the industries that support it.

This submission is valid until 31 December 2010 . Sunfish also reserves the right to amend any statements in this document should circumstances change or new information be forthcoming.