

6th January 2003

Professor Peter Newman
State Sustainability Policy Unit
Department Premier and Cabinet
197 St George's Tce
Perth, WA, 6000

Dear Professor Newman,

State Sustainability Strategy - Consultation Draft.

The Pearl Producers Association (PPA) is the peak industry representative body for the commercial pearling quota holders in Western Australia and is a member of the Western Australian Fishing Industry Council (WAFIC).

PPA representatives have met with your group through the Department of Fisheries ESD Working Group and we have attended the series of public consultation workshops held in late 2002 on both Broome and Perth.

Our comments on the draft strategy are limited to the Section 5 –Sustainable Use of Natural Resources with emphasis on ‘coastal management’ and ‘fisheries and aquaculture’.

Natural Resource Management Council.

Our initial comments revolve around the Natural Resource Management Council chaired by Mr Rex Edmondson. This NRM Council appears to deal only with land based sustainability at this stage and the membership is extremely ‘light on’ with any marine resource management expertise.

At the workshops in November we were advised by Mr Edmondson in his response to a question that the NRM Council had to have marine resource management added to it's terms of reference and that once this takes place there will be additions to the membership of the Board including the automatic inclusion of the Executive Director of the Department of Fisheries.

We would appreciate the opportunity to nominate a person/s for inclusion on the Board of the NRM Council.

Regional Councils

Throughout the document there has been reference to ‘regional councils’ (eg p94) and that these councils will form the basis for the regional planning interaction process with the community on resource sustainability issues. This position appeared to be strongly supported by the conservation members of the workshop sessions attended by our representatives. Further investigation reveals that these councils are again land based in their emphasis with no marine focus or expertise.

The proposed actions section (p224) goes as far to recommend developing regional sustainability strategies through a regional council process but not proposing how the regional consultative process should be established first!

We would strongly recommend that any consideration of using a similar regional council mechanism (as suggested on p124) for marine based consultation will require specific regional councils with suitable marine expertise.

Fisheries Management.

Quite correctly the draft strategy sets out that *‘Fisheries management and sustainability is one of the good news stories in Western Australia’* (p103). So good is the story that the management approach applied to all fisheries in WA and reflected in the management of the Western Rock Lobster fishery was recognised with when awarded the ‘world’s first sustainable managed fishery’ under the international and independent third party audit criteria of the Marine Stewardship Council.

Again the draft strategy rightly notes (p103) that the success of the WA fisheries management approach *‘...is due to the powerful regulatory system and technology and resources for monitoring and reporting’*. The PPA would add that the success is also due to the commitment of industry and government to work closely together to maximise the outcomes for the environment, the target resource and the industry/community through strong consultative processes.

Management in WA also promotes incentives for the industry to take a long term view in their investment and be rewarded for that approach with long term secure access rights.

It becomes obvious that the fisheries management approach in Western Australia has ensured that fish stocks are in a healthy condition and although fully exploited are producing catches at a sustainable level. From work recently completed in relation to the fishery risk assessment process required by Environment Australia for approval to export, all major WA export fisheries have indicated adequate levels in meeting the ESD criteria.

There is little need to change what is done in WA in relation to sustainable fisheries management. Application of continuous improvement is a cornerstone of the MSC certification of the rock lobster fishery and this will continue to be applied in management of all WA fisheries by government and industry alike over the years to come.

Marine Park Management.

Marine Park planning under the recommendations of the Wilson report is an opportunity to develop the necessary consultative mechanisms required for proper management of multiple use marine resource areas. The process recently introduced for consideration of the management arrangements for Jurien, Monte Bello/Barrow Islands and the Dampier Archipelago/Cape Preston regions has been strongly supported by the commercial fishing and aquaculture industries and recommendations have resulted in the multiple use principle being responsibly applied against the objectives based on ESD. Where an activity has been assessed as being in line with the outcomes required from the objectives it has been supported. This is a far more progressive approach with workable outcomes than the comparison of the 'lock it up and do not touch' approach promoted in many marine parks in the past.

Against the demonstrated progress made in the marine park planning process the draft strategy seems biased when it promotes continued implementation of the Wilson report but emphasises "...with provision for substantial and well-designed sanctuary zones..."(p107, 3.13). The PPA questions this emphasis when the balance of the draft strategy talks about encompassing ESD and all its components - environmental, social and economic. PPA seeks explanation as to why sanctuary zones deserve special emphasis above other management measures? What research has been used to determine the benefits of a 'substantial' sanctuary zone compared to a well constructed, multiple use management plan set against ESD principles with smaller no-take areas as representative of the bioregion?

The draft strategy goes on to say that *"To offer the best chance of preserving all components of ...marine biodiversity in perpetuity....need comprehensive....secure marine protected areas. In the interim areas of high conservation significance must be identified and protected from threatening activities"* (p123). There is no mention of how to identify 'all' components of marine biodiversity, how to protect it and how to measure the effectiveness of the protection.

Similarly there is a proposed action (p107, 3.14) to establish fish habitat protection areas to complement the marine park and reserve system but there is no explanation as to why or how this will be done.

Target indicators (p107) seem to be focused on the number of 'locked up' marine reserve areas rather than the effectiveness of the management plan measured against the conservation objectives of that regions management objectives which may be able to be achieved under a multiple use regime without no take/no touch areas.

Coastal and Marine Environments.

The draft strategy rightly recognises that marine planning is an important requirement in relation to the sustainable use of the resources off our coast (p105). There is no current legislative framework for planning in the marine environment but we note the reference to the Ministerial Taskforce concerning Structural Arrangements for Coast Planning and Management in Western Australia (p123).

We also refer to the recent move taken by the Minister for Fisheries to engage in initial discussions with his colleagues and through his Departmental head to program an approach to the development of a workable marine planning system, including the ever growing marine eco-tourism industry and rapidly increasing recreational fishing/boating population. We would hope that these processes are not duplicated with the work of the Taskforce and would suggest that the latter process pick up the outcomes from the Taskforce as their initial work programme.

We also support the Department of Fisheries position (p105) that application of land based planning strategies must integrate the use of the adjoining marine environment to avoid the marine resource being the end of the line for poor upstream land management practices.

We also support as a priority proposed action 3.5 p126 to *“Develop a State Coastal and a State Marine Planning Strategy with appropriate consultation”* including peak industry bodies such as ourselves and the WA Fishing Industry Council. However these strategies should clearly incorporate existing fisheries management approaches with responsibility for implementation through the Department of Fisheries under the guiding principles of the strategies.

Sustainability Assessment.

The Department of Fisheries is leading the nation in the development of an ESD reporting framework for fisheries management which has been strongly supported by industry.

Conclusion.

The PPA supports the implementation of the ESD principles in the management of the marine resources in Western Australia.

The PPA emphasises the record of the Department of Fisheries in their successful management of the state’s fish and aquaculture resources. The success of their management approach lies within the incorporation of long term incentives for industry (such as secure access rights to fish resources) and a strong consultative process that allows industry and government to take a perspective to improve on their ESD investment with the comfort of receiving the benefits of their efforts *‘down the track’* both in economic and biodiversity terms.

PPA sees incorporation of the State Sustainability Strategy into the successful management system of the state’s fish resources as the method of ensuring continuous improvement rather than establishing a new system altogether. The State Sustainability Strategy should be established to clearly outline the linkages between the various management systems and what are the requirements of those systems in relation to the adopted government policy incorporating the ESD principles.

PPA thanks you for the opportunity to make comment on the draft strategy and we remain available at any time to progress with you any matters raised in this submission.

Yours sincerely,
Brett McCallum, Executive Officer