

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

Dear Professor Newman,

STATE SUSTAINABILITY STRATEGY- DRAFT

We note the submissions by both the Department of Fisheries and the Pearl Producers Association (PPA) in regard to the strategy. Rather than repeat the comments in these submissions we wish to put on record our support for their contents.

We have several brief comments in regard to the draft:

1. The draft suggests that the good news around sustainability and fisheries management is due solely to a powerful regulatory system. This is not the full story. The success of commercial fisheries management in WA is as a result of the adoption of a rights based framework for fisheries management in WA. By allocating exclusive commercial rights to fish has resulted in the necessary security for investment and has encouraged the adoption of fishing practises that maintain the value of investment. The incentives under such an arrangement are to value add and to ensure that fish stocks are not overfished. The results of a secure investment climate in the major fisheries are self-evident. The success story for WA fisheries is as a result of a partnership between industry and the government. It is suggested that it is important for the State Sustainability Strategy to note this.
2. It is also worth noting that the major fisheries in WA operate under cost recovery. That is the costs of management, enforcement, compliance and research are recovered fully from the fishing industry. Thus in regard to the fishing industry being a burden on the taxpayer this is not the case.
3. We question the proposed action of provision for substantial sanctuary zones in each of the marine bioregions. This may well be a strategy in regard to marine reserves but the nature and extent of sanctuary zones will be determined as part of the planning process for individual reserves and will be determined on a case by case basis. This is the existing legislative and policy framework for implementation of marine reserves in WA. Thus asserting the need for large marine sanctuary zones is not consistent with current government approaches on marine conservation and there is no justification provided to support this need. Indeed worldwide there is much debate on the conservation value of alienating large areas of marine waters from human uses. The available evidence suggests that sanctuary areas may have value but it depends very much on the objectives of such reserves.

4. We note particularly the comments from the PPA in regard to marine planning and we specifically endorse these.

Thank you for the opportunity to comment.

Yours sincerely,

Guy Leyland
EXECUTIVE OFFICER
28 February 2003