

Feedback on the Draft NSW Mainland Marine Park Network Management Plan 2021-2031

This document has been put together by a few of our Sea Shelter volunteers who have managed to navigate the Draft management plan and make sense of such important plan for the future of our environment. It has proven to be impossible for individuals to complete it alone and seems to be a marketing project rather than a management plan. The nature of the questions is biased towards certain goals with clever wording all through the plan and will surely result in the people completing the survey accidentally agreeing to ideals they would not support if it was written plainly. As a result, we have compiled this replica of the survey for members to upload if they are struggling to comprehend the complete plan.

Our main concern is that the marine sanctuary zones currently protecting 17.3% of Port Stephens waters will NOT be rolled back or released for fishing and other purposes. We ask that any changes made to Port Stephens marine sanctuaries zoning will not reduce the area that is protected and may only change location if there is evidence that another location would be better suited to support habitat protection & maintain biodiversity than the previous location.

1) Are you giving feedback on behalf of an organisation or as a private citizen?

This document has been created by the organisation Sea Shelter however the individuals using it to help assist them with their submissions are private citizens

1. Private Citizen

2) Would you like to upload your own submission or supporting document?

1. Yes

3)

4) Is your submission or supporting document confidential?

1. No

5) Would you like to review and answer the survey questions?

1. Yes and
2. No depending on the individual

Comments on the overview video here

<https://www.youtube.com/watch?v=nC4NfSxPDe0&feature=youtu.be>

- It sounds positive, great to see some focus it, however it seems to be very vague when it comes to conservation of the ocean.

- The key threats need to be weighted towards environmental conservation, by dividing the threats like that it does not give enough weight to what the sole purpose of the sanctuary area should be. The economic and social values do not deserve equal value when it comes to managing threats, it needs to be approached as a conservation area, not a tourist attraction.
- “More than zoning alone” It’s great if you are adding support without reducing zoning rules or area. If it is a trade off one for the other this is not ok
- The coordinated approach will only work if conservation is put first across NSW, otherwise you are just sharing out the marine sanctuary to so many stakeholders it may as well not be protected at all.
- The details of the zoning should be the most important focus and it is missing during the time we get to have our say. We expect to be able to contest any zoning changes at a later date considering proposals are not publicised during this time we get to have our say.
- Happy to hear we will have 2 months to do so
- Happy to hear there will be a three-year implementation not an action instantly after the decision is made as was done last year in Batemans Bay sanctuary.
- The advisory bodies don’t seem to be even or weighted toward the environment- if you list them all it is mostly industry advising. We believe marine sanctuaries are imperative in ocean conservation far into the future and the advisors should therefore be focused on that area rather than human benefits.
- The trade off is very concerning. As it is only 7% of NSW waters have any protections, Costs and benefits for trading away the tiny sanctuary areas is very worrying for the ocean’s future. If Australia with our vast area and tiny number of citizens can’t even keep from using the last 7% protected, then the world is in big trouble.
- Great to see some research will be implemented as the ocean has barely been sighted. It is hoped that the research will be carried out carefully by scientists as it is on land rather than collecting hearsay catch reports from vessels or industry.
- As fisheries will be managing the marine parks it will be interesting to see how you can differentiate between marine parks management and fisheries management
- Who are the key stakeholders- industry? The key stake holders should be fish, algae, sea sponges, sea turtles etc
- The 6 Key goals seem great! Except one- The improve access and opportunity for enhanced social, cultural and economic benefits. This does not belong in a sanctuary area. There 93% area to do that in in NSW and 82.7% to do that in our area. We need to protect the ocean over the needs of humans having fun and making money. If we can’t do it now the ocean is in huge trouble in years to come and without a balanced ocean there is no life on earth.
- Opportunities in the plan- again weighted very poorly. Seems that the needs of industry take up half of the opportunities and outcomes of the plan. How can this be, this should be a conservation management plan which is the purpose of a sanctuary area.

6) Have you read the [Draft Marine Park Network Management Plan?](#) (draft management plan)?

Yes and No. We have spent more than a month reading it, still, we feel as though we have not read it as it is very difficult to read through the shiny language to ascertain exactly what is being proposed and what outcomes are expected to result. Individuals uploading this document may or may not have read it, even if they have read it, we believe the marketing and non-specific nature of the draft plan would result in them still not comprehending it. In short, we believe you can put down the answer “no” even those who have read it a number of times.

7) To what extent do you agree the implementation of the [draft management plan](#) will improve the management of NSW marine parks?

1. Strongly disagree

8) If you would like to provide any information in support of your answer, please comment below:

Sadly no. This draft plan as it is now is likely to result in rolling back of sanctuary areas to be “traded off” with industry outcomes. The threats and many parts of the plan is already building for outcomes that we do not wish to take place.

It seems to be wasting a lot of time and money focusing on making money rather than a small amount of time and money on actually conserving the ecosystems and biodiversity. Some of the ideas in the plan seem like they would cost a fortune to implement or would not be feasible at all. This draft plan should include a budget and costings of the ideals to be properly assessed

This plan does not base around the Ecologically Sustainable Development Goals internationally recognised to be the base approach globally, Australia has already been reprimanded from various countries for our lack of conservation efforts, yet we continue not to follow global standard.

It is recommended more sanctuary areas are needed around the country are needed, let alone these one being watered down when they are still in their infancy. Seeing the vast areas unprotected between the marine parks should not this be a plan on how to enhance the parks and create more protected areas up the coast for pelagic fish.

As it has not been effectively studied prior to this plans release shouldn't the review of the marine parks be a scientific study of them as compared to other non-protected equal areas? A study of biodiversity and a study of extinction rates as we are losing species every day, some species having only just been discovered. Sea Shelter volunteers snorkelling/diving inside and outside of marine parks could help with this study. It is blatantly obvious that the sanctuary areas work in one day of diving one spot vs another in Port Stephens. We would like to know how well they work and the species that are being saved from extinction as a result.

Any opening up of sanctuary areas to light fishing practices completely defeats the purpose. The recreational fishery cannot be governed boat by boat, there is nobody watching onboard or in every bucket, there has never before been reviews of that “fishery” as it is

impossible to gather real information from thousands of people simultaneously. The people who do the right things would be the ones to make effective reports, the results would be skewed and those doing the wrong thing would not even report, or they would lie. Sanctuaries work because everybody must not be there fishing- it is a line on the water, and we have tossed people out of them ourselves time and time again. How can the common citizen or volunteer help protect our parks if we are to allow fishing of catch and release inside- who is checking the boats? What about all the animals that don't survive the release. It will not work- the sanctuary will be over.

Comments on the overview video here

<https://www.youtube.com/watch?v=pU4Sma12JdQ&feature=youtu.be>

- Values should include everything that is important to us about the actions of the marine park not about the area within a marine park. We know the stuff in the marine part is important, that is why the park is there. We need to know what is valuable about the marine park itself to better understand the best plan for the park moving forward
- By values starting with conservation of or regeneration of you would quickly weed out the secondary purposes that are not consistent with the primary purpose.
- The intrinsic value is very important to us- it is what keeps us going from day to day and prevents solastalgia from affecting us too much. People who devote their life to ocean conservation find it very hard to stomach a lot of the horrible things they have to endure as the environment is torn away in front of their eyes. We are very glad this one is in there
- As above we are very happy to see the bequest value listed as this is one of the highest purposes of a marine park- to maintain nature as it is (or better) for many years to come and many future generations

9) To what extent do you agree that the values presented within the draft management plan capture what you value most about NSW marine parks?

1. Agree AND
2. Strongly disagree

10) If you would like to provide any information in support of your answer, please comment below:

These values are of what is within the parks rather than the value of the parks themselves. Listing the different habitats that are valued is irrelevant, e.g. It should state "value of Conserving the Estuarine & Coastal Waters" not "value of the Estuarine & Coastal Waters" It is the value of the marine park itself that is being reviewed not the value of the water inside it and what that water is worth to key partners. By wording all the values in this way, it is taking the conservation purpose of the parks completely off the table, it is extremely clever and opens the doors to anything goes.

Some values that should have been listed if the parks values were approached from the correct angle:

- Increased fish stocks in the area
- Increased breeding grounds for xyz species
- The spill over effect
- Habitat protection
- Xyz species recovery from extinction
- Xyz successful eco-tourism businesses
- Xyz scientific studies enabled
- Xyz recreational activities enabled
- Recovery of salt marsh
- Recovery of oyster reefs
- Recovery of large fish (breeding females)
- Conserving habitat for sea birds
- Available prey and marine plants for wildlife outside the sanctuary
- The enablement of conservation and education programs
- Maintain biodiversity for our grandchildren to see
- Etc etc etc

Unfortunately, not the draft management plan does not capture what we value most about the marine parks. The plan seems to be a main focus on making money and increasing profit margins rather than focusing on the real issue at hand conservation and preservation of marine ecosystems and biodiversity.

The values of this proposal should be based on threats to the environment and the Ecologically Sustainable Development Goals, it should not be based on the things “we value” but on the “value of the sanctuary areas and marine parks”

However, it is agreed that local aboriginal knowledge and expertise of land and sea management will add significant value to the management of the marine parks and agreed that it is essential to conserve Aboriginal cultural values. It is also agreed that this knowledge can be passed on through education in the next generation.

Would like to see Trade-offs be removed from the management plan. They require identifying equity values with which to trade which inevitably are highly subjective and have no place in a marine park management plan. They will create polarising adversarial positions in the communities with no beneficial outcomes.

Viability of business

The ability of marine industries such as commercial fishing, aquaculture, recreational fishing, tourism, boating and maritime to operate, be profitable, employ people and contribute to local economies.

This statement shows that the value is monetisation of what is within the park not the value of the park by conserving and protecting ecosystems and biodiversity for many years to come.

The plan does recognise the six clear threat themes

1. Ecosystems, habitats and species (as values at risk from multiple threats)

2. Water quality
3. Climate change
4. Community access and opportunity
5. Community engagement and governance
6. Aboriginal culture

In recognizing these threats, at least two to three values are jeopardizing the environmental impact values, also being the most common values affected.

Comments on the overview video here

<https://www.youtube.com/watch?v=Y4jzwIRsNko&feature=youtu.be>

- Threats to marine parks should not be based on the things “we value” they should be based on threats to the environment or threats to the actual park itself.
- Video is great up until 44 seconds
- It seems the activities that are “threats AND values in their own right” is the loophole that will be used to water down the sanctuary area

11) To what extent do you agree that the plan recognises threats to marine parks values that are of most concern to you (either generally or to a specific marine park)?

1. Strongly agree AND
2. Strongly disagree

12) If you would like to provide any information in support of your answer, please comment below:

This seems to be a bit of a trick question as it absolutely recognises many of the threats that are of most concern to us. However, it also does the opposite and the table [Table 2 – Priority threats to environmental, social, cultural and economic values for the NSW mainland marine park network](#) should have a green environmental values icon in every listed threat. Out of 50 activities or threats only 30 of them are threats to the environmental values

If the values are not divided like this and are instead divided purple vs green out of the 50 threats 30 are threats to the environmental conservation and 72 are threats to human activities and values- this is not a fair balance for the plan. It is meant to be the primary & secondary the other way round.

Is not the primary purpose of marine parks ‘to conserve biological diversity and maintain ecological integrity’? Please let’s not instead base it on financial gain, industry and politics.

The legislation:

[Marine Estate Management Act 2014. Part 5 Marine Parks and Aquatic Reserves, Division 1 Marine Parks, s22 purposes of marine parks states:](#)

(1) The **primary purpose** of a marine park is to conserve the biological diversity, and maintain ecosystem integrity and ecosystem function, of bioregions in the marine estate.

(2) The **secondary purposes** of a marine park are, **where consistent** with the primary purpose:

(a) to provide for the management and use of resources in the marine park in a manner that is consistent with the **principles of ecologically sustainable development**, and

(b) to enable the marine park to be used for scientific research and education, and

(c) to provide opportunities for public appreciation and enjoyment of the marine park, and

(d) to support Aboriginal cultural uses of the marine park.

Given the above legislation should it not be that the threats must first be recognised threats to the primary purpose first and foremost. The secondary purposes must first be considered consistent with the primary purpose. So how can the threats effects listed be weighted 72 secondary to 30 primary. How can we practice marine conservation when this is the value it is given in the only protected areas in the state?

Separately by dividing the other vales up as has been done with the purple colour scheme vs green creates more weight against the environment. The economic cultural and social values do many times align with the environmental ones, but not in every case which is stipulates in the legislation above in each threat however they are listed in a manor to create a separation to the viewers – a notion that you can't have both and if you are on the side of the social or cultural you therefor need to choose to be against the environment.

This is simply not the case; when discussed with our local fishermen, the overwhelming consensus is they do not wish our sanctuaries to be opened up to recreational fishing, the understand the importance of the spill over effect and they like that they can fish the line knowing there is a line to be fished. They understand what our area would look like in 10 years without sanctuary areas as they are out there seeing the huge influx of fishermen on the school holidays with their own eyes. We are a huge fishing tourist area and when they all fish at once over Christmas and Easter it effects the stock levels available to fish overall. Imagine that with less protection year in year out.

We need more protection however we are happy to fight for equal protection- keeping the current sanctuaries that are working and still only in their infancy in place

Comments on the overview video here

<https://www.youtube.com/watch?v=gh6r6CENxwE&feature=youtu.be>

- Very short just like the list of objectives itself. The list of values and threats was much more extensive & would like to see more of those addressed then just these 6

13) To what extent do you agree that the management objectives in the draft plan reflect the areas you would like marine parks to focus on?

1. Strongly disagree

14) If you would like to provide any information in support of your answer, please comment below:

We believe it would have been wonderful if the ecologically sustainable development goals had been the management objectives or at least addressed when looking at each of the objectives or actions

The legislation refers to *'the management and use of resources in the marine park in a manner that is consistent with the **principles of ecologically sustainable development** (ESDGs).*

Ecologically sustainable development goals (Details Appendix 1) are underpinned by 4 principles. These are:

(a) precautionary principle

(b) inter-generational equity (referred to as bequest in the DMP)

(c) conservation of biological diversity and ecological integrity

(d) improved valuation, pricing and incentive mechanisms

These principles are the fundamental premise for the sustainable management of marine parks and the marine estate and should be enshrined throughout the draft management plan and the implementation/operational phases (Actions) of the plan. Unfortunately, they are only given token reference in the DMP (DMP p 11).

The primary purpose of the marine park should be focused on a little more e.g., Ecosystems, habitats and species should not be all one objective.

The actions within the objectives are not balanced, some objectives are 5 or 6 times the size of the others which signifies they were divided poorly

It would have been great to see the objectives divided into primary and secondary (the vast majority primary, with all the secondary purposes listed being consistent with the primary purpose as is required) goals, milestones, KPI's, budget and a timeline for each one. Instead, this plan seems to be marketing predetermined outcomes through some very fancy and in-depth wording which is very hard for the common person to navigate.

Or alternatively focused on the UN internationally renowned sustainable development goals – number 14 – life below water – great targets found here: <https://www.globalgoals.org/14-life-below-water>

Comments on the overview video here

<https://www.youtube.com/watch?v=NKd2CVbScWE&feature=youtu.be>

- Budget? How much money is there, how is it being focused on the primary purposes
- This was meant to be a marine sanctuary review; zoning should be front and centre and with the entire plan based around the sanctuaries. Every step of the way seems

to be trying to prepare us to give up the sanctuaries through spatial management trade-offs.

- Why is it always to conserve values and manage threats? Is it because if you have enough values and treats the will cancel each other out paving the way for the predetermined outcomes?

Protect and enhance species, habitats, and ecosystems

There are six high level management actions which have been proposed to deliver this objective across the marine park network. Individual draft actions sit beneath each high-level action. This is set out within the draft plan document and can be viewed again [here](#).

15) To what extent do you agree with the high-level network actions proposed under this [objective](#)?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
1.1 Support planning and development to conserve marine park values	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
1.2 Conserve marine habitat, species and ecosystem values	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
1.3 Manage beaches and foreshores to conserve marine park values	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
1.4 Minimise the impact of pests and disease.	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
1.5 Enhance marine habitat	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
1.6 Support sustainable marine resource use	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided

16) If you would like to provide any information in support of your answer, please comment below:

1.1 Should have been to conserve biodiversity and ecosystems in the marine park rather than conserve marine park values.

1.1a-1.e these are all positive however a few of them still referring to the values rather than the park itself which narrows the possible positive outcomes. E.G A proposed water sharing plan- shown to negatively affect x & z conservation values in the marine park however they positively effect y & a values, cancel each other out and go ahead even though y & a are not a value that has any positive conservation outcomes and in fact are often themselves considered as threats to the marine park. We would have loved to have seen a true focus on

the purpose of a marine park *to conserve the biological diversity, and maintain ecosystem integrity and ecosystem function, of bioregions in the marine estate.*

1.2a How can we partner and help with these as so few partners listed on this point

1.2b “By its nature, well-managed, sustainable fisheries management can alter the natural structure of fish populations, for example by reducing the number of larger fish in a population to make room for greater numbers of new recruits. A population of predominantly smaller and younger individuals can change ecosystem integrity and function.”

This one is particularly concerning as it states reducing the number of larger fish in a population would benefit the ecosystem- where is the scientific evidence that this is the case? As far as I know one of the biggest pressures on ecosystems come from upsetting the balance and removing keystone predators and larger animals. The “Big fish” are actually already gone compared to 50 years ago and it’s already too late for a lot of populations as the big fish are the breeding females. “Spatial management can provide areas of protection from these ecosystem changes” does this sentence mean you are going to use the sanctuary zoning to protect the marine park from crashing when you fish out all the large fish? What does this mean? Very concerning! Why would the ecosystem changes need protecting if it was a good idea in the first place?

It seems the above (1.2b) is the closest item to mentioning sanctuary areas. Wow way to prioritise one of the most beneficial purpose supporting aspects of the marine park. Very scary to us to have so little attention paid to it and so little specific wording. The regular person may not understand what spatial management is and we feel like this is a deliberate wording to play down the importance on sanctuary areas.

1.2d This is great if a study takes place that is not based on hearsay catch and bycatch level reports of those doing the fishing. A scientific study using video cameras in a variety of areas or photographic evidence of park visitors or divers similar to what takes place with the dolphin or sea slug census. Partners need to be extended there is many local partners who could assist with this apart from Parks Australia.

Separately if this is a loophole that would see some species being permitted to be caught in in sanctuary zones and others not. This is completely unacceptable. So many times, a year we chase fishermen out of sanctuary areas, especially on school holidays where they claim they are not from the area and didn’t know.

If there is no distinct lines where all species are protected regardless if they are endangered there will be no way of us controlling who is breaking the rules and who is not- their won’t be a person sitting on every boat and checking every bucket- we already know that some people try to break the rules - allowing them the benefit of the doubt that they will follow rules when they are allowed to fish there for certain species or catch and release would ultimately result in them getting away with way more than they do now. Who knows what is happening out of view, would there be government funds to waste checking each boat? No way. It would result in the marine parks not succeeding in the purpose as it would change the behaviours of the species within and shift the entire balance of the sanctuary.

1.2e This is great, who are the partners, what is the budget, how can you involve citizen science

1.3a There is studies showing the ill effects of rock structures/ break walls, with it proven time and time again that habitats such as mangroves protect the coast against winds and waves, erosion and climate change. There is much new and wonderful technology popping up around the world bridging the gap between “rock structures” and natural habitat. This is what should be listed here- exploring new options.

1.3e This is great & developing a pop-up shorebird saver would be an amazing solution E.G. the bird that lays their eggs in the tire tracks on 4wd beaches could be protected by a concrete road barricade or pole placed adjacent warning cars and pet owners of the nest from afar so they can act accordingly as they approach it. Once they eggs catch and they are on their way it is removed back to a waiting location for the next nest.

1.3f best practice guidelines could be good however this is definitely not a one size fits all area and taking that approach could have ramifications. Partners on this should ultimately be the indigenous peoples and perhaps the local historical groups with records on the natural processes of the catchment before we started interfering many years ago. If the best practice guidelines are to consult with these people and try to replicate the original natural opening, closing salinity levels and prevalent species that would be a great start. The very sad thing about developing this plan is we are already working in effected or broken habitats so sometimes restoration will be required to reintroduce habitat that was naturally found in the park 100 years ago.

1.5 Amazing. This is what it’s all about!

1.6e This needs partners and should NOT only be “while” the sustainability of changed harvesting practices is assessed, it should be ongoing.

The rest of 1.6 & p1.2 is wonderful though more effort needs to be put into seeking the most helpful partners in each case.

Improve water quality and reduce marine litter

There are four high level management actions which have been proposed to deliver this objective across the marine park network. Individual draft actions sit beneath each high-level action. This is set out within the draft plan document and can be viewed again [here](#).

17) To what extent do you agree with the high-level network actions proposed under this [objective](#)?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
2.1 Protect riparian buffers.	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
2.2 Reduce marine debris	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
2.3 Reduce diffuse and point source pollution	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
2.4 Minimise impact from sediment contamination	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided

18) If you would like to provide any information in support of your answer, please comment below:

2.1a&b are great

2.1c Why is this the only time “Conservation groups” has been listed as a partner in all the actions of all the objectives! Should not Conservation Groups play a huge roll in the entire management plan given the purpose? It should be listed in almost every part.

2.2 These are all great, however this is some gaps missing, here are some ideas from Sea Shelter:

- Clean up the marine park (rather than monitor the rubbish) or pay the community to do so or pay local groups to organise the community to do so. They are already doing it on their own for free, they wouldn’t need much incentive to do more
- On site surprise litter reviews for industry, whether they be a tourist vessel or an oyster farmers property/vessel to a badly managed crab trap. Have a system that publicly rewards those doing it right, helps change the ones not doing it and fines the ones deliberately allowing plastic waste or marine debris escape from their property into the marine estate.
- Target high traffic fishing areas that are being left in a poor condition by its users littering and put up a warning sign stating This is a Marine Park and this litter is unacceptable. All the rubbish must be removed by visitors in the next three weeks (off their own backs) by this date If it is not there will be cameras installed and monitored with fines given out to those who litter of \$1000 each for the next 6 months. Come back in three weeks and if its clean move the signs on to another high litter area. Repeat around the park through-out the year then return to the original spot. Some of our break wall clean ups have been deplorable and it seems we have asked nicely and it’s not working.
- Collaborate with town events and other road closures to organise large even clean ups for E.G., when Gan Gan road is closed for the triathlon it should be run alongside a huge clean up all the towns folk can walk all the way along Gan Gan filling up bags and a bus could take them back at the other end. Gan Gan road is a tragedy and groups like us would have to pay a fortune to close the road. We paid \$1800 of our hard-earned funds one year help to close Marsh Rd & \$800 for a traffic light the next

with councils to safely clean the road up. We pulled out 2.9 tonnes the first year & 1.5tonnes the second. That would all still be there if it wasn't for us pushing to fix it. It saddens me to say there has been more rubbish dumped there since.

- Budget to pay for all rubbish removal for private clean ups that are pre-arranged, or a dumpster left at the location for extra-large clean ups
- Tracing of river & estuary marine debris to their source with fines attached. Camera traps in known dumping sites with pictures posted on local pages to locate the perpetrators.
- Instillation of a sea bin in every marina & other areas of high use like CBDs
- Instillation of other new age rubbish removal devises as seen in other countries on social media.
- Instillation of tangler bins at all hotspots for fishing
- Partner with Tangaroa blue and ensure all clean ups are counted and recoded for the future statistics of the country
- Purchase of microplastic clean up sieves like OCCI did and have them available with buckets at beach entrances for the public to use whilst they are having leisure time (just to name a few)

2.3e Implement and enforce with monetary fines would be great. Regarding water quality, it is widely unknown just how polluted Australia's waters are becoming after storm events. It would be great so see the water of the park tested weekly with a warning going out to the public when the quality is poor. Last year there was a gastro outbreak right across the area, yet the general public simply did not realise they were swimming in human faeces, pesticides, herbicides & who know what else that was washing out after the storms, some education is definitely needed.

2.3f Sounds perfect and publicised would be great

It is a little sad to see all of these great actions under this objective 2 focused into the marine park and not on the entire coast. Some of these are incredibly important for the ocean and need implementing everywhere

Understand mitigate and adapt to the impacts of climate change

There is one high level management action which has been proposed to deliver this objective across the marine park network. Individual draft actions sit beneath each high-level action. This is set out within the draft plan document and can be viewed again [here](#).

19) To what extent do you agree with the high-level network action proposed under this [objective](#)?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
3.1 Understand, mitigate and adapt to the impacts of climate change	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided

20) If you would like to provide any information in support of your answer, please comment below:

3.1 During the coastal conference (when it was held at Shoal Bay) Council and NPWF had some great forecasts of the ocean level rise due to happen here over the next 50 years and some of the decisions they have to make about how to navigate it. I hope that all those studies and forecasts will be utilised in this process.

Again, disappointing to see a lack of environmental conservation focused organisations on the list of partners

Partner with aboriginal people for protection of aboriginal cultural values and improved management

There are two high level management actions which have been proposed to deliver this objective across the marine park network. Individual draft actions sit beneath each high-level action. This is set out within the draft plan document and can be viewed again [here](#).

21) To what extent do you agree with the high-level network action proposed under this [objective](#)?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
4.1 Improve access and opportunity for Aboriginal cultural values.	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
4.2 Incorporate traditional Aboriginal knowledge in marine park management	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided

22) If you would like to provide any information in support of your answer, please comment below:

4.1 Mostly would be strongly agree aside from concerns of the sanctuary areas allowing harvesting or aquaculture for the indigenous. As long as this is only permitted in the marine parks, not the sanctuary areas.

4.2 Amazing

Improve access and opportunity for enhanced social, cultural and economic benefits

There are eight high level management actions which have been proposed to deliver this objective across the marine park network. Individual draft actions sit beneath each high-level action. This is set out within the draft plan document and can be viewed again [here](#).

23) To what extent do you agree with the high-level network actions proposed under this objective?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
5.1 Improve access and opportunity for boating	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
5.2 Improve access and opportunity for commercial fishing and aquaculture	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
5.3 Protect maritime heritage	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
5.4 Improve access and opportunity for outdoor recreation and enjoyment	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
5.5 Improve access and opportunity for recreational fishing (including spearfishing)	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
5.6 Provide safe opportunities that are free from conflict.	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
5.7 Improve tourism opportunities	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
5.8 Enhance bequest and intrinsic values	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided

24) If you would like to provide any information in support of your answer, please comment below:

Out of 41 actions only 7 of them have ocean watch as a partner and other environmental conservation organisations are not listed as partners as far as I can tell. Why is Ocean Watch the only partner that “seems” to be environmentally conscious at all? Why are there no postings on the Ocean Watch Facebook page about the draft management plan and getting the community involved and spreading the word? The videos and survey asks us to spread the word about the draft management plan yet a key partner (and the only environmental-like one) does not mention it on its social media. Instead, it mentions happy oyster day, happy world fisheries day, master fishermen programme and reposts from the Sydney fish market giving an insight to it being more of an industry related non-profit than a

conservation based one. It does seem to have some great programs however you get the feeling it is not going to put the sanctuary zone before the fishery.

The partners throughout Objective 5) need to be extended, they are repeated and have a narrow field of environmental organisations given the purpose of marine parks. It should be written in here that 10 local environmental organisations will be approached to be partners in the plan objectives in each marine park. E.g. for Port Stephens the partners added/approached would be Sea Shelter, the marine parks association, Ocean and Coastal Care Initiative OCCI, CHUG, Eco-network, Operation Posidonia and if you can't make 10 you should approach marine conservation minded businesses who are able to help and collect data whilst they are out on the water nearby or above sanctuary areas, like Imagine Cruises, Irukandji Shark & Ray Encounters, Dolphin Swim Australia, Aqua Marine Adventures etc.

There are many actions in this objective- this should be taking a smaller weight as a secondary purpose, instead it is very extensive and overall does not seem to be consistent with the primary purpose.

Action 5.1 how is it consistent with the primary purpose, it should also be focusing on management of boat strikes to turtles, speed limits in extra locations based on latest studies, congestion in the marine park as a whole, water quality results during high congestion periods, removal of unseaworthy crafts, pollution caused from boating and mitigation ideas.

5.2b What is classed as a low or minimal threat to habitat and threatened species- the loss of how many? Who classified it? Was it self-classified by data provided by the industry itself? Where is the evidence that what is low risk? We wish to be informed on exactly what this means (p44) refers to *'providing opportunities for fishing and ecotourism and other secondary purposes in other zones where evidence indicates they are low risk'* with no indication of what this evidence might be.

It then states that under the development of the Rules and regulations for each marine park, it is *'committed to reviewing the approach to multiple use zoning and zoning objectives, including specific objectives'*. could lead to existing sanctuaries being compromised through the introduction of new rules such as allowing 'low risk fishing practices' which are not defined, these could include catch and release.

5.2c How has this ended up in a marine park's management plan- marketing for fisheries. Where is the marketing for conservation in this plan?

5.2d More specifics needed- are you recommending opening up sanctuary protected areas for oyster farmers? Or simply allowing them to maintain the farms they already have in place? If it is the former, we strongly disagree.

5.2e if this involves opening up sanctuary areas to farming, we strongly disagree, we are in support of stewardship programs for farmers and look forward to them combatting the large amount of plastic pollution that is created in the farming process. This should be specifically mentioned as an action.

5.2f Not in any sanctuary protected area. In other parts of the marine park this would need to be very thoroughly stress tested with the potential of having drastic effects on the estuary and all species/habitat/biodiversity. Algae aquaculture would be better tested on land or far out to sea, there is no need to do it in any marine park area.

5.2g Strongly Disagree with the collection of live seaweed. Sea Shelter rescues sea turtles that would benefit from the collection of live seaweed or algae to feed them with and we still never participate in this practice, we believe even us collecting to feed a couple of turtles would have a lasting impact on the ocean habitat and the food available for wild turtles & other species. The collection of seaweed wrack is useful to us to feed the turtles and utilises wasted washed up algae after storm events, we are therefore unsure/undecided. We are a very small practice feeding a small number of turtles and supplementing them with land grown dark leafy greens. We would have concerns of the impacts of a commercial operation collecting all the wrack from beaches would have an impact and needs to be scientifically studied.

5.2h There is a vast amount of coast that is not part of a marine park, plenty of space for developmental commercial fisheries elsewhere aside from the marine parks and certainly not in the sanctuaries. How is this **consistent with the primary purpose** if it is to fall under this objective rather than with the purpose of not allowing it within marine parks

5.3 & 5.4 (all) We are undecided on these due to a lack of specifics, if the given infrastructure is consistent with the primary purpose and does not affect the environment in any way then we would be in support on a case-by-case basis.

5.5a It would be nice to see artificial reefs within the sanctuary protected zones as well as creating habitat in fishing areas. A positive idea everywhere they are implemented.

5.5b Some of these ideas are great, some such a stocking would need serious studies to show the impacts on prey animals for stocked fish or impacts on plant levels with competition between herbivorous fish. Importantly, where would the fry be sourced- not from the ocean hopefully?

5.5c Strongly Disagree. This would completely defeat the purpose of the sanctuary area, if you don't believe sanctuary areas work go for a snorkel at Fly point then follow it with a snorkel at an area that allows spear fishing such as Little Rocky and see how many fish you can spot, secondly notice how those fish are acting (hiding in the darkest corners, fleeing as fast as they can when you get to close, acting like its night and they are being hunted by the night predators when it's not and they should be out and about feeding and fossicking) You will be able to notice the difference in only one day and two locations in Port Stephens.

Sanctuary areas must remain no take zones to all forms of fishing at all times. This is imperative, no fishing of any kind can be carried out within a sanctuary without affecting its purpose

Fishing of certain species or catch and released cannot be effectively governed on people's boats, as soon as nobody is watching they will slide it into the glove box just like they do the

shark fins etc Nobody from another vessel, snorkelling or on shore will be able to look at the vessel and realise they are doing the wrong thing, no public will be able to move them on or do them in from a distance or record their numberplates. Not only would the governance be reduced without clear sanctuary lines it would be far more expensive to try to govern individual boats or buckets. Using “technology” like cameras is very expensive, requires a number of angles and is an “invasion of privacy” on a private boat. A much bigger job than a simple line along the water that can be governed by everybody, especially on school holidays- the line-up for the boat ramps are packed at three AM and for the first few hours in the dark it’s the local fishermen who are keeping the holiday makers out of the sanctuary areas, local fishmen do not want their area reduced to microorganisms every school holidays, they understand the importance of maintaining the balance and they help to move on people who are fishing astray.

“showcasing best practice recreational fishing” has no place in marine sanctuaries and certainly should be the rule not the exception for all recreational fishing practices.

Catch and release fishing is not low impact:

Catch and release among other fisheries management method have been touted by recreational fishers as a reasonable approach to fishing in sanctuary zones. However, catch and release is far from benign. The best estimates for catch and release mortality rates of snapper and mullet is 10 % to 40 % and 10% to 30 % respectively, approximately 3 – 4 out of 10 fish released die and may be more.

The released animals are extremely stressed, exhausted and ready prey to nearby predators. Stressed female fiddler crabs abort all their eggs when released, clearly demonstrating extreme stress.

IF this were to occur in a sanctuary zone, this would represent a considerable mortality of animals in an area designated for no fishing, no extraction. Furthermore, if the catch and release system is applied in marine sanctuaries it will require some sort of trust system between the authorities and the recreational fishers. It is unlikely that there will be sufficient resources to effectively police sanctuary zones if recreational fishing boats have access to fish in them – even if it is “only” catch and release.

At that point, the sanctuary zones would no longer be functional. The precautionary principle supported by sound scientific evidence should be applied to ensure that there will be no impact on the ecological integrity of the sanctuary area before any action is taken changing activities allowed in sanctuary zones.

Furthermore, catch and release changes the behaviour of the species residing within the zone, which impacts the biodiversity and does not allow nature to truly be protected in a natural state. Nature was not designed to withstand the pressure of so many humans with so much technology all fishing at once. It can be seen all over the world in the high use unprotected fishing areas and the resulting lack of biomass. We are on the brink of global mass ocean extinction and still we are trying to allow fishing in every last corner of the ocean. This has to be stopped.

Marine Parks and Marine sanctuaries again, are not the spot to be considering “trophy waters” with different bag and size or slot limits. The fact it is even considered is worrying

and a sign that they work, the fisheries that occupy the entire rest of the coast can look at that sort of thing far away from the sanctuary. It has no consistency with the primary purpose and needs to be scrapped.

It states “fishing was not recognised as a high or moderate priority threat” regardless if it is a high threat or a low one it has absolutely no place in sanctuary protected zones. Spear fishing seriously affects fish behaviour resulting in unnatural sanctuary behaviours and relationships between species which could be life and death for some. Having spoken to some spear fishermen about their views they were 100% in support of the sanctuary zones and agree with the spill over effect.

Documented effect of MPAs for many species is to increase the proportion of larger, older individuals (Sect. 2.2). Modelling by Barneche et al. (2018) and Marshall et al. (2019) shows that because fishes inside no-take MPAs are usually larger, and reproduction in fishes scales hyper allometrically with size, the larger fishes in MPAs could contribute much more significantly to recruitment of fishes outside MPAs than has previously been assumed.

Why is the draft management plan and those implementing it so set on opening the sanctuaries up to fishing if not for political reasons. Majority of local fishermen we spoke to were for keeping them the same or extending them further. It’s not our locals fighting for it that I can see and if it is it is such a small portion- why do they get priority when it is publicly preferred to keep them in place?

These surveys also show considerable support for Sanctuary Zones among the recreational fishing community.

Percentage For Sanctuaries	Percentage Against Sanctuaries
72% of active recreational fishers in areas with established marine parks (older than 10 years old) supported their marine sanctuaries	only 9% were opposed
67 % of the NSW public supported Sanctuary Zones with no extractive activities	Associated high percentages of 11 – 25 % ‘don’t know’ responses to all questions.
82 % considered marine parks important to maintain the abundance and diversity of marine life	2% of respondents were somewhat against and only 1 % strongly against Marine Parks.
78 % to 80% of respondents considered the natural beauty and socio economic (tourism) benefits most important values provided by the marine estate and agreed that more should be done to protect marine habitats in marine parks even at the expense of recreational and commercial fishing	11 – 18 % ‘don’t knows’
53 % of coastal residents were in favour of larger sanctuary zones in NSW	

69 % of the community believed that management strategies should be informed by science rather than political expediency	
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(Sweeney Research MEMA and DPI 2014 released 2018)

Other literature showed 87 per cent of surveyed NSW residents indicating a willingness to pay for MPAs (Pascoe et al. 2019) while only 65 % of respondents were willing to consider a levy for beach protection and beach protection. This demonstrates how the high value attributed to marine parks over beaches and other habitat, despite the recreational popularity of beaches and problems with their erosion.

This action has no environmental partners listed- no parties to dispute, where is the “inclusive” in this action, how can we defend our oceans when you are to open the sanctuary areas to fishing without even consulting with local conservation organisations as key partners.

5.5d This could be a great opportunity to get some ideas of trends as long as it is not used as a trade-off for marine sanctuaries and is not done in place of a legitimate scientific study. This would be a great opportunity to enable fishermen to monitor and take responsibility for the huge marine debris problem that is harming wildlife in fishing areas.

5.5e Again we should not be wasting marine park money on promoting anything apart from marine conservation. Separately we would love to see what this “Strategic Initiative 6” is that keeps popping up in this objective. Where is the “Conservation Initiative 6” or similar?

5.6 These actions are great provided they focus on the primary purpose prior to the secondary purposes

5.7 Ok provided they focus on the primary purpose prior to the secondary purposes and there are limits in place to prevent overcrowding of popular areas and litter is taken with them with each operator taking responsibility for ensuring their visitors are cleaning up after themselves

5.8 Interesting that promote was not suggested in this one like it was in the others.

P5.2i Again, money for marine park management should only be used on conservation, not promoting industry

P5.4e It would have been nice to see something about ensuring the development does not affect the sanctuary areas as it is constructed as well as supporting it.

Support evidence-based, inclusive, and effective decision-making

There are four high level management actions which have been proposed to deliver this objective across the marine park network. Individual draft actions sit beneath each high-level action. This is set out within the draft plan document and can be viewed again [here](#).

25) To what extent do you agree with the high-level network actions proposed under this objective?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
6.1 Improve knowledge to support evidence-based management	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
6.2 Improve education, stewardship and compliance	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
6.3 Improve community engagement and partnerships in marine park management	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided
6.4 Reduce the regulatory burden	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Unsure/undecided

If you would like to provide any information in support of your answer, please comment below:

Let's break it down: "Evidence based" great we can all agree we need more studies of marine environment, and we can certainly agree that any decisions made need to be first proven and not here say or provided without proof. "Inclusive" of what? Industry, all key stake holders? Beginning to lose the way. Then finally "effective" should not everything be effective? What about peer reviewed? Financially obtainable? Conservation based?

The partners throughout Objective 6) need to be extended, they are repeated and have a narrow field of environmental organisations. It should be written in here that 10 local environmental organisations will be approached to be partners in the plan objectives in each marine park. E.g. for Port Stephens the partners added/approached would be Sea Shelter, the marine parks association, Ocean and Coastal Care Initiative OCCI, CHUG, Eco-network, Operation Posidonia and if you can't make 10 you should approach marine conservation minded businesses who are able to help and collect data whilst they are out on the water nearby or above sanctuary areas, like Imagine Cruises, Irukandji Shark & Ray Encounters, Let's go adventures etc.

Given the primary purpose of marine parks 'to conserve biological diversity and maintain ecological integrity' this needs to be reflected in the primary purpose of the partners that are chosen to carry out the plan. Especially as many of these organisations would help out free of charge (volunteer basis) it seems like it would be preferred to pay somebody to give

the “right answer” rather than truly searching for the “real answer” from those who are on the ground in the conservation field.

Not only that it seems that there is not even one environmentally focused partner in a lot of the individual actions. In fact, out of 26 actions only 11 of them have partners that have any environmental outlook, and they are only made up of a few repeated, mostly Ocean Watch. Why is this the case? How can we effectively create a plan for environmental conservation without collaborating with key partners in the field?

The first management action 6.1 under this objective starts with “improve knowledge to support” We believe it should start with “implement various scientific studies to create evidence-based management”

The second management action 6.2 should be divided- compliance cannot fall in the same category as stewardship they need to be approached very differently as they are often the opposite of each other, the people practicing stewardship are often the ones who are ensuring the compliance of the other party

The third management action 6.3 should change to “Improve community engagement and partnerships for conservation in the marine park”

The fourth should be “Government budget for the Action Plan and implement money saving strategies”. The regulatory “burden” is a terrible name for an action as it suggests regulation is costing too much and needs to be scrapped. Again, the wording is leading the general public to choose money and ease over the environment. This section could instead be a great time to look at the costings of all the actions and compare them with each other and utilise volunteers in all the suitable areas, look at the over-all budget, ensure it fits to funds available and have complete transparency with the general public. Another idea would be to engage the key partners within the scientific government community and give individuals the opportunity to volunteer their services whilst giving their expertise and opinion on the best solutions going forward, many employees could jump at the opportunity to be involved on a voluntary basis when it is something close to their hearts- like ocean conservation. We spend huge parts of our lives volunteering our time for ocean conservation, yet some experienced and well-equipped government employees could be utilised if they were permitted to help out in their own time without conflicts.

Stand out actions:

6.1e Were is the environmental focus for scientific research in the same layman’s terms as this? The environmental aspect needs to be equally studied in this category not withheld from the study/s especially as it refers to spatial mapping.

6.2i- why is the environmental protection authority only engaged on this and not others?

6.4b and c streamline should be replaced with strengthen

6.4c- these marine parks assessments should already have been done before putting out the draft plan you would expect? How could the review take place without assessments?

26) Would you like to provide any additional comments or suggestions to improve the draft plan?

1. Yes

Additional Comments:

- We are in full support of the document released on the Eco-network webpage: The Full Marine Parks Association/Eco Network Port Stephens Submission found here: <https://www.econetworkps.org/response-to-the-nsw-mainland-marine-parks-network-dmp/>
- Items in green in this survey have been sourced from the Eco-network document and we wish it to be thoroughly examined with the weight of all submissions using this PDF as it very specific, created by scientists and with a much better understanding of the whole process. Our hats go off to them, thank you very much to Eco-network for their incredible work protecting our ocean.
- This plan gives a duration of 10 years however there is no true plan with dates, costs, outcomes and kpi's

27) Which marine parks in NSW are you most interested in?

1. Cape Byron
2. Solitary Islands
3. Port Stephens Great Lakes
4. Jervis Bay
5. Batemans

Please choose all that apply

We are local to the Port Stephens Great Lakes Marine Park however we believe that they all need to be equally valued regardless of our personal experiences, if some parks are making more money or more people live close by or more people are interested in it should be irrelevant. These parks are imperative to the future of the ocean regardless who is interested in it.

28) On average, how often do you visit these marine parks?

This also falls under the same category of above. Marine park strategy is being decided based on human use/pressure. This is very sad to see and needs to be refocused onto marine conservation & protection.

29) Please select the options that best describe your main interests and activities within marine parks?

Is this the loophole to be used to roll back the sanctuaries? The heavier the wight of "marine park interested and activities" the larger the weight can be for the secondary purposes within that marine park?! Even though all secondary purposes are supposed to be *consistent with the primary purpose* and the primary purpose is *to conserve the*

