

4 March 2008

Mr Peter Lloyd-Jones
DSWP Project Manager – Water Policy
Department of Environment and Climate Change

Via email: peter.lloydjones@environment.nsw.gov.au



HEALTHY CATCHMENTS
HEALTHY OCEANS

Dear Mr Jones

Re: Comments on the Draft Diffuse Source Water Pollution Strategy for New South Wales.

OceanWatch Australia (OWA) would like to comment on the Department of Environment and Climate Change's (DECC) Draft Diffuse Source Water Pollution Strategy for NSW (the Strategy). OceanWatch Australia is a national environmental, not-for-profit company that works to achieve sustainability in the Australian seafood industry through protecting and enhancing fish habitats, improving water quality and advancing the sustainability of fisheries through action based partnerships with the Australian seafood industry, government, natural resource managers, private enterprise and the community.

OWA would like to congratulate DECC on this initiative, to provide a coordinated approach to address diffuse source water pollution (DSWP) in NSW, minimising pollutant loads at the source by focusing on land use and related management practices and adapting to meet changing priorities, new science, emerging threats and stakeholder needs.

However, the Strategy fails to recognise the fishing industry (commercial and recreational) as a key stakeholder in this process and one which is heavily impacted on in terms of deterioration of fish habitat (including water quality) and loss of operational viability as a consequence of DSWP. Some recent examples with severe economic and environmental consequences for the fishing industry include the closure of Sydney Harbour to fishing (dioxins), closure of the Richmond River in 2001 and 2008 (low dissolved oxygen, acid leachate/heavy metals associated with over drained coastal floodplains and wetland) and restricted access to fishing grounds in the Hawkesbury-Nepean River due to excessive aquatic weed growth (high nutrient levels). These impacts are also felt heavily by the tourism industry, which, like the fishing industry, is intrinsically linked to the health of the aquatic environment.

OceanWatch Australia Ltd
Locked Bag 247
Pyrmont NSW 2009
AUSTRALIA

t 02 9660 2262
f 02 9660 2786
e ocean@oceanwatch.org.au
ABN 86 071 195 901
ACN 071 195 901

SEA  NET
SMARTER FISHING FOR INDUSTRY
TIDE TO TABLE
RESTORING AQUATIC HABITAT

www.oceanwatch.org.au



Specific comments on the Strategy

Identification of priority problems

OWA is encouraged that the impacts of DSWP on the oyster and tourism industries have been recognised and in some part addressed in the Strategy (eg priority problem 3 *high pathogen levels in estuaries impacting on commercial oyster growing, recreational amenity and tourism opportunities*). However, the priorities of the fishing industry need to be factored into the prioritisation of problems and actions. The commercial and recreational fishing industry are currently progressing a water quality initiative, based on the Oyster Industry Sustainable Aquaculture Strategy (OISAS). This initiative will be driven by the new environmental subcommittee of the Seafood Industry Advisory Council (SIAC), of which OWA is a member. The Strategy, as an adaptive strategy, needs to be reflect these issues and also kept informed by the priorities/outcomes of this initiative/subcommittee. (Note – high pathogen levels also impact on the viability of industry which have to comply with NSW Food Authority Guidelines).

Acid Sulfate Soils

The Strategy (p 6) notes that acidity is being “partially addressed” through specific programs such as the hot spots program. However, it is clear that current actions and efforts are not adequately addressing the issue, with the devastating fish kills associated with poor land management of ASS areas, recurring in many coastal rivers in NSW, particularly in the Richmond River. The Strategy needs to be updated to include acid runoff as a priority problem (Table 2.1) that should be addressed under the Strategy.

Priority Action Plan/ Coastal Priority Setting

There is no reference to the fishing industry within the *Priority Action Plan* nor within *Table C. “Coastal Priority Setting.”* All pollutants listed in Table C, have an impact on the fishing industry (in social, environmental and economic terms). For example:

Gross pollutants: rotting non-native vegetation entering waterways depletes dissolved oxygen and results in death of fish and other aquatic organisms. This was a prime factor in the recent fish kill on the Richmond River, which was the worst on record with an estimated 33 tonnes of dead fish collected in one weekend, with thousands, if not millions of other species also killed. This resulted in a loss of income in the order of \$2000 a week for local fishers for several months.

Nutrients (total nitrogen and phosphorous): elevated nutrient levels and associated excess aquatic weed growth has a deleterious impact on the health of the river, fish stocks and on the operation of the fishing industry with access to fishing grounds restricted. The Hawkesbury River is a prime example.

Pathogens (coliforms, viruses, protozoa): fishing areas have been closed due to excessive levels of pathogens entering waterways (industry must comply with NSW Food Authority Guidelines).

Acidity: enormous economic consequence to fisheries production of fisheries due to diffuse pollution associated with poor landuse in the upper catchment/floodplain.

Thus in order to address all sources of DSWP that affect the fishing industry, OWA recommends that a new action be added under “*Education/Guidance Management Actions*” to develop and promote the adoption of a “*Sustainable Estuaries for Healthy Fisheries Strategy*” for priority commercial and recreational fishing estuaries.

Expected Outcomes: increased awareness of DSWP impacts on priority commercial and recreational fishing areas and improved management of water quality in estuaries.

Suggested measurement method: completion and dissemination of strategy.

Lead Agency: DPI

Partners: NSW Food Authority, OceanWatch Australia, CMAs, commercial and recreational fishing representatives, Local Councils, Catchment Management Authorities.

Time Frame: 2009

Related Projects: the Strategy will build on the OISAS model developed by the oyster industry.

Under “*Industry Lead Management Actions*” p 23, “*Sources*” needs to include:

“degraded or drained coastal floodplain and wetlands”.

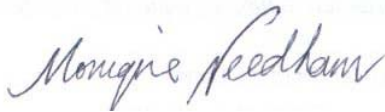
Expected outcomes “improved dissolved oxygen levels during flood events and reduced acid sulfate soil discharges, improved fish/shellfish health.”

Conclusion

OWA recommends that the DSWP Strategy be amended such that the impacts of DSWP on the fishing industry are incorporated and addressed through such actions/changes outlined above. This will ensure the improvement in the water quality of receiving waterways and for the industries that rely on good water quality and healthy functional waterways.

Please do not hesitate to contact me on (02) 9660 2262 should you require further information.

Yours sincerely



Monique Needham
Program Manager - Aquatic Habitat Protection
OceanWatch Australia Ltd