

24 February 2006

CAP Public Exhibition
Hunter Central Rivers CMA
Mr Glenn Evans
General Manager
Private Bag 2010
Paterson NSW 2421
Via email hrcap@cma.nsw.gov.au



HEALTHY CATCHMENTS
HEALTHY OCEANS

Dear Glenn

Submission on Draft Catchment Action Plan

This letter sets out the comments of OceanWatch Australia in relation to the Hunter Central Rivers draft Catchment Action Plan (CAP). 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 habits, improving water quality and building sustainable fisheries through action based partnerships with the Australian seafood industry, government, natural resource managers, private enterprise and the community.

OceanWatch Australia would like to commend the Hunter Central Rivers CMA on the progress they have made with respect to the comprehensive incorporation of coastal and marine issues and related actions within the CAP. The contents of the coastal and marine themes within the CAP are an improvement on the previous blueprints. We are supportive of the approach taken by the CMA to develop the CAP, however we do make a number of comments as follows.

1) *Page 13 What the CMA wants to achieve?*

To provide emphasis to the regional boundaries of the CMA, we recommend that the first bullet be amended to read "*the land **and** sea that supports....*".

2) *Page 17 Why is the region important to protect natural resources in our region*

The paragraph starting with "*Major issues relating to*" Refers to "wetlands". It would be beneficial to define wetlands in the glossary.

3) *Page 21 What this CAP will do.*

The tables in this section refer to First Line of Attack, Second Line of Attack and Third Line of Attack. It is unclear as to what these levels mean. Do they refer to the priorities for funding within the investment strategy or do they relate to those management targets that will best address the resource condition targets? It would be beneficial to define the meaning of these



levels in this section. If they refer to priorities, then OceanWatch Australia has some concerns relating to the priority given to the majority of coastal and marine targets, being Third Level of Attack and therefore potentially no being funded.

The table headed “How the CAP improves Aquatic Health” should also include the target on Acid Sulphate Soils as a means of improving resource condition.

The table headed “Environmental Pressures on Estuarine Health” should also make reference to a lack of freshwater flows as an environmental pressure. The reference to *Caulerpa* should be expanded to read *Caulerpa Taxifolia* as there are number of varieties of *Caulerpa* of which only *C. taxifolia* is classed as a noxious weed under the *Fisheries Management Act 1994*.

The table headed “Environmental Pressures on Marine Health” should also make reference to the number of identified marine pests in the region and the number of hectares of marine waters within the CMA’s jurisdiction.

4) Page 38 Protect Native Vegetation

An additional economic benefit that will be achieved through this target is improved productivity for estuarine based primary producers (commercial fishers and aquaculture).

5) Page 42 Regenerate Native Vegetation

The second bullet under economic benefit should be amended to read “*agriculture, commercial fishing and aquaculture can benefit...*”

6) Page 44 Treat Weeds

Under the heading “Intent” *Caulerpa* should be referred to as *Caulerpa taxifolia*.

The third bullet under Economic Benefits should be amended to read “*agriculture, commercial fishing and aquaculture can benefit...*”.

7) Page 48 Threatened Species Work

Reference is made in the paragraph titled *Background* to the *EPBC Act 1999* and *NSW Fisheries Management Act 1994* as legislation that lists threatened species, however the agencies charged with these legislative responsibilities, namely the Department of Primary Industries (DPI) and the Department of Environment and Heritage (DEH), have not been acknowledged in the *Priority Areas* section and are not represented on the steering committee referred to. This should be rectified. It may also be worth considering the inclusion of the work undertaken by OceanWatch Australia through our SeaNet program to reduce the interactions between commercial fishers and threatened species as an additional bullet under the heading “*Organisations already doing work in this area*”.

The second paragraph on page 49 refers to a tool to prioritise threatened species actions, however, this tool relates only to terrestrial threatened species. A paragraph outlining how the

priorities for estuarine and marine based threatened species should also be provided. The third paragraph seems to exclude marine threatened species as it relates only to terrestrial actions. This should be rectified.

8) Page 56 Protect Wetlands

The last bullet under the heading *Actions* refers to changing the type of moorings to swing moorings to protect seagrass beds. This bullet requires amendment as swing moorings cause much damage to seagrass beds. More suitable, low impact moorings should be discussed with NSW Maritime and appropriate actions developed. In addition, the same bullet refers to a preference to shift moorings to marinas. OceanWatch Australia does not recommend that the CMA support this measure given the potential damage to aquatic habitat that can arise from marinas.

OceanWatch Australia is also an organisation currently involved in wetland protection and could be included under *Organisations already doing work in this area*.

9) Page 61 Enhance Wetlands

WetlandCare Australia and OceanWatch Australia should also be included as "*Organisations already involved in this area*".

10) Page 63 Treat Animal Pests

The first paragraph should be amended to include accidental translocation as a method for establishing introduced marine pests. The first bullet under *Actions* should be amended to read as follows, "*baiting, trapping, shooting and removal programs*". Additional *Actions* should also be included that are relevant for preventing and managing introduced marine pests such as implementation of the *National System for the Prevention and Management of Introduced Marine Incursions* through for example, rollout of best practice guidelines to the various vectors, education and communication etc. The *Fisheries Management Act 1994* should also be referred to under *Priority Areas* for setting priorities for introduced marine pests. The National Introduced Marine Pest Coordination Group (of which OceanWatch Australia is a member) has identified 10 marine pests of national significance.

Under *Benefits*, the last bullet should be expanded to include estuarine and marine based primary producers in relation to the implementation of best practice guidelines for marine pest management and control.

11) Page 89 Protect Native Riparian Vegetation

The last bullet under *Environmental benefits* should be amended to read as follows, "*higher quality aquatic habitat and therefore fisheries productivity*."

12) Page 93 Regenerate Native Riparian Vegetation

The *Actions* outlined focus on agricultural or private landholder properties. There are a number of estuaries and rivers within the HCRCMA region that also have urban activities that are impacting on riparian vegetation, for example through weeds. It is also important to note that to improve instream fish habitat, riparian vegetation should be that which creates fish habitat, for example through falling in once they have reached the life expectancy.

The previous target *Protecting Native Riparian Vegetation* refers to the tool Riverstyles as belonging to Macquarie University. Here it is stated as belonging to the Department of Natural Resources. This contradiction should be rectified.

Estuary Management Plans should be referred to, to determine *Priority Areas* along estuaries. Riverstyles may not be a suitable tool for assessing estuaries and an alternate means may need to be adopted. The Healthy Rivers Commission reports may be a useful source of information as an alternate.

The Estuary Management sections of the Department of Natural Resources and local council works should also be referred to under *Organisations already doing works in this area*.

The *Existing Laws, Plans and Strategies* section does not make mention of the NSW estuary planning process. This should be incorporated.

The second bullet under *Environmental benefits* should be replaced with “*higher quality aquatic habitat and therefore fisheries productivity.*”

13) Page 99 Instream and Foreshore Stabilisation

Again estuaries do not appear to be included in the discussion under *Background*. This section should be expanded to incorporate estuaries.

The DPI has a policy on snagging of rivers and this should be included in *Existing Laws, Plans and Strategies*. This section also should refer to the Estuary Management Planning process in NSW.

14) Restore Instream Habitat

Again, this section focuses on freshwater instream habitat. Estuary Management Plans should be used as a basis for determining *Priority Areas* This target area should also be included as contributing to Estuarine Health.

The DPI should be included as an *Organisation already doing works in this area*.

Again, the relevant DPI policies relating to re-snagging and woody debris and the NSW Estuary Management Planning process should be referred to under *Existing Laws, Plans and Strategies*.

15) Page 111 Effluent Management

The first bullet under *Actions* should be amended to include wetlands also.

Priority Areas should also include areas upstream of commercial fishing grounds.

16) Page 115 Floodgate Management

The third last bullet under *Benefits – environmental* should be amended to read “*saltmarsh is a key habitat for some migratory waders and other native birds, as well as an important food source for juvenile fish*”.

17) Page 123 Protect Marine Habitat

The *Priority Areas* section highlights that the Marine Parks Authority and the Department of Environment and Conservation (DEC) will be responsible for determining priorities. This should be amended to also include DPI.

The last bullet under *Existing Laws, Plans and Strategies* should be amended to read “*Commercial Fishing Management Strategies and regulations*”. The Commonwealth Oceans Policy should also be referred to here.

18) Page 125 Environmental Management Systems

OceanWatch Australia should be included under the *Organisations already doing work in this area*. In addition, ISO14001 Environmental Management Systems, the Manning River EMS and Wallis Lakes EMS for commercial fishers should also be referred to under *Existing Laws, Plans and Strategies*. The *Australian Seafood Industry Green Chooser for developing Environmental Management Systems* should also be included under *Supporting Information*.

19) Page 130 Enhance Marine Shorelines

OceanWatch Australia believes that 10km of enhanced marine shorelines by 2016 is too easily achievable and should be increased.

The *Existing Laws, Plans and Strategies* section should include the Coastline Management Plans, Commonwealth Threat Abatement Plans, the Integrated Coastal Zone Management Plan and NSW coastal protection regulations etc.

20) Page 151 Estuary and Marine

It is important that cumulative impacts are considered and incorporated as a policy statement from the CMA.

21) Page 159 Current Best Practice

Reference should be made to the Australian Seafood Industry Green Chooser under *Relationships to government and/or Industry Association Policies*.

It is important to recognise on page 165 that the current offset schemes do not consider aquatic values.

The last bullet on page 166 should be amended to read “Landholders **and marine based primary producers...**”. The Seafood Industry EMS Pathways project should be referred to under national *Relationships to Government and/or Industry Association Policies*.

22) Page 169 Climate Change

Although a policy has been developed relating to CMA response to climate change, the CMA must factor in the latest projections from IPCC which suggest that global sea level rise is occurring at a rate of 0.9mm – 8.8mm p.a. This may have a significant impact within the 10year timeframe of the CAP. Additionally, CSIRO researchers have developed a model/scheme which outlines how to retrofit recently developed plans and policies such that they allow for the impacts of climate change. Any actions to be undertaken by the CMA relating to climate change must also give consideration to the impacts on aquatic habitat, particularly saltmarsh, mangroves and seagrasses. Effective links also need to be established by the CMA between the current and breaking research and NRM planners and policy makers (see presentation from the Nature Conservation Council of NSW “The Great Greenhouse Gamble: A conference on climate change on biodiversity and natural resource management” held on 15-18 September 2005.

23) Page 211 Our natural resources and how we use them

The heading *Fishing* should be amended to read “Fishing **and aquaculture**”. It would also be beneficial to include the tonnage of fish supplied by commercial fishers from within the HCRCMA region.

24) General Comments

Although the structure of the draft CAP is relatively easy to navigate, it may be beneficial to include within the CAP an addendum as to how this CAP fits with the template provided by NRC and which all other CMAs have adopted to develop their CAP.

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

Yours sincerely



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OceanWatch Australia Ltd