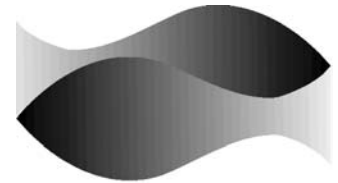


5 October 2005

Northern Rivers Catchment Action Plan  
Northern Rivers Catchment Management Authority  
PO Box 618  
Grafton NSW 2460

Via email: [northern@cma.nsw.gov.au](mailto:northern@cma.nsw.gov.au)



**OCEANWATCH**

*FOR THE FUTURE OF OUR MARINE ENVIRONMENT*

OCEAN WATCH AUSTRALIA LTD  
Locked Bag 247  
Pyrmont NSW 2009  
AUSTRALIA

Tel: 02 9660 2262  
Fax: 02 9660 2786  
E-mail: [ocean@oceanwatch.org.au](mailto:ocean@oceanwatch.org.au)

ABN 86 071 195 901  
ACN 071 195 901

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Dear CAP team

**Submission re: Northern Rivers Draft Catchment Action Plan (CAP)**

This letter sets out the comments of Ocean Watch Australia Ltd (Ocean Watch) in relation to the Northern Rivers Draft Catchment Action Plan (CAP). Ocean Watch is an environmental, non-government organisation sponsored by the commercial seafood industry to represent the environmental interests of industry with respect to protecting and restoring fish habitats, improving water quality and promoting sustainable fisheries.

Ocean Watch would like to commend the Northern 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, with which Ocean Watch was involved in developing through the theme team stakeholder meeting, reflect the discussions that were held during that meeting. We are very supportive of the approach taken by the CMA, however we do make a number of comments as follows.

*1. Longer term results (Page 2)*

The documented aims of the CAP do not reflect the CMA's aims in relation to working with marine industries to adopt best management practice etc. Ocean Watch would welcome the CMA providing funding and incentives for the benefit of fishers (in addition to landholders) with respect to on-ground projects, promotion of sustainable practices etc. (point 3)

*2. Consultation (Page 6)*

As previously discussed, Ocean Watch is happy to assist the CMA in undertaking consultation with the fishing industry within the NRCMA region.

*3. Catchment profile (Page 10)*

The catchment map provided does not show the marine area under the responsibility of the CMA. The map should be modified to include out to 3 nautical miles (nm).

#### 4. CAP themes and targets (Page 11)

The CAP should clearly state upfront that it is not a statutory/binding document. It needs to state what the role and powers of the CMA's are (in addition to the role of the Natural Resource Commission) and outline how the CAP fits in with the myriad of NRM plans in existence for the region. Additionally, the concept of the catchment-coast-marine continuum needs to be stated upfront, such that the linkages between the seven NRM themes identified within the CAP are clear.

#### 5. Community Theme (Page 19-26)

Within the State Pressure Response table, in paragraph 2 of the State of key Natural Resources column, the fishing industry, including fishers and fishing organisations needs to be included.

Point 2 of the Pressure column notes that *"stakeholders have limited ability to further undertake sustainable NRM due to: costs associated with changing land management practices to achieve sustainable outcomes"*. An additional point should also be included relating to the commercial fishing industry's ability to further undertake sustainable NRM outcomes. Fishing businesses are not only restricted by costs in changing fishing practices, but also due to the regulations imposed under the *Fisheries Management Act 1994*. The input controls imposed are designed in most cases, to make fishers inefficient.

Although we realise the difficulties in setting targets, the catchment target on page 21 requires some additional work to make it "smart". For example, what level of increase is being targeted for human and social capital? Perhaps a percentage increase could be quantified? The indicators suggested, while useful, will not necessarily show the effectiveness of the actions taken. It would be good to measure actual "moments" when human and social capital became effective (not sure how to do this though!).

CCB1 – Again the target needs to be more specific with respect to the % increase required. A useful indicator for consideration may be the increase in numbers of participants to care groups. Also, the ability to deliver on this target will be dependent on having resources available to develop the Coastal and Marine Education Strategy and undertake other actions. What is the status of the funding of Coastcare positions within the NRCMA region? If these positions are unlikely to continue beyond the immediate contracts, what will be the implications for delivering on this target?

CCB2 – CCB4 - again the targets need to be more specific with respect to the % increase required.

#### 6. Landuse Planning Theme (Page 27 – 34)

The Commonwealth considers primary production to include the commercial fishing industry. This landuse planning theme does not give adequate consideration to the impacts that poor landuse planning can have on the commercial fishing industry through loss of aquatic habitat etc. We suggest that comments to this effect be incorporated into the introduction to this theme on page 27.

Within the State Pressure Response table on page 28, the second point under "Pressure on Natural Resource Condition", should state *"loss of **terrestrial and aquatic** biodiversity resulting from clearing and fragmentation of native vegetation for urban and rural residential development and associated infrastructure."* In addition, the fourth and sixth bullet points in the response column should also read *"including native vegetation (**terrestrial and aquatic**), agricultural land, **fishing grounds...."***

Within the State Pressure Response table on page 29, under the pressure column, the third bullet point should incorporate loss of fish habitat, barriers to fish passage etc as these are also placing pressure on the resource and are the result of poor landuse planning.

The catchment target on page 30 is ambitious. How will the CMA be able to influence the necessary actions to achieve the target when they have no statutory control over landuse planning? Also, does “aboriginal landscapes” include sea country with LUP1 on page 31. Has consideration been given to include this?

LUP2 – The target should be expanded to read “100% of key environmental assets and rural and **fish production areas identified.....**”. The identification of key environmental assets should occur in consultation with the Department Of Primary Industries (DPI) Aquatic Habitat Conservation team, Department of Environment and Conservation (DEC) and the Department of Natural Resources. Priority areas for rehabilitation, if orange trade-offs from developments are necessary should be guided by DEC’s *Biodiversity Certification and Banking in Coastal and Growth Areas, 2005*; and the advice from the above-mentioned agencies. What does the phrase “conserved for sustainable use/and/or protection” mean?

LUP3 and LUP4 – Again consideration of aquatic habitat needs to be incorporated within the intent of these targets to include aquatic habitat and fish production as environmental assets. The priorities for these targets should also include identifying important fishing grounds, in addition to agricultural land.

#### 7. Biodiversity Theme (Page 35-47)

Within the State, Pressure, Response table, where the number of threatened species have been identified, it is unclear as to whether this incorporates threatened species under the *Fisheries Management Act 1994*.

We see a key role for the CMA under “Response of the CAP” on page 37 to implement mechanisms to ensure that mapping and classification of wetlands and other areas of significant ecological value feed back into relevant NRM plans such as the LEP’s and REPs.

Under “Response of the CAP”, (page 38) it is stated that the 10 year timeframe of the CAP is inconsistent with the global impacts of climate change. However, according to the IPCC projections, global sea level rise is occurring at a rate of 0.9mm - 8.8mm p.a. which may have significant impacts within the 10 year time frame of the CAP. Additionally, researchers at CSIRO 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 must also give consideration to the impacts on aquatic habitat, in particular saltmarsh, mangroves and seagrass. Effective links also need to be established by the CMA between the current and breaking research and NRM planners and policy makers (see presentations from the Nature Conservation Council of NSW “The Great Greenhouse Gamble; A Conference on Climate Change on Biodiversity and Natural Resource Management”, held on 15-15 September, 2005)

B1 – It is unclear as to whether saltmarsh and mangroves are considered by the CMA as of high conservation value (HCV). The current priority is stated as “for the other HCV areas.....include aquatic habitat such as wetlands and estuarine seagrass areas.....”. Note that the point starting “identification, assessing and management of threats.....” is duplicated within the examples section in page 40.

Under “Secure Conservation Management” on page 41, all examples of formal conservation agreements relate to terrestrial environments. Are there no examples of such agreements that relate to aquatic environments such as aquatic reserves etc?

B23 – It is unclear as to whether this target includes the marine component of aquatic? We are not familiar with the Strategic Threat Management Plans, and it is therefore unclear as to whether this plan includes actions relating to introduced marine pests? As you are aware there is currently a national system for the management of introduced marine pests being developed by a committee consisting of commonwealth and state agencies, industries (Ocean Watch represents the fishing industry on this committee), researchers and other stakeholders. This system's development is reaching a stage where communications will shortly be occurring to roll out guidelines for a number of vectors on what must be done to manage and reduce the impacts of marine pests. Ocean Watch has recently been awarded the contract to communicate with the fishing industry nationally on the system. We suggest an action be incorporated to implement relevant actions arising from the national system for introduced marine species management being developed, in liaison with the Department of Agriculture, Fisheries and Forestry who are the lead agency on this project.

B4 - Priority areas for rehabilitation if amber trade-offs with development are necessary should be guided by DEC's Biodiversity Certification and Banking in Coastal and Growth Areas, 2005, in consultation with DEC and DPI.

B5 – The priorities include *“estuary prawn trawl fishery as per the approved fisheries management strategy”*. There are however, 9 fisheries operating within the NRCMA region, all of which should be included as priorities. In addition, the fisheries management strategies (FMS) being developed are not, in isolation, enough for the industry to meet this target. The industry has identified that it must take a proactive approach, beyond regulations arising out of the FMS and implement environmental management systems and codes of practice that will work towards the stated target. It would also be beneficial to incorporate the recreational fishing industry into the CMA's priorities for this target. There is an increasing number of recreational fishers residing or visiting the NRCMA region, placing increasing pressure on not just fish stocks but also aquatic habitats through poor practices, in addition to the pressure placed on local water supplies, sewage disposal systems and general infrastructure. It is imperative that the recreational fishing industry also be required to adopt best management practices.

Existing facilitation and extension networks for the fishing industry should be utilised to undertake relevant actions under this target,

#### 8. *Water Theme (Page 48 – 60)*

The region's rivers not only support agricultural production, recreation and tourism, but a large commercial fishing industry. Paragraph 3 of the introduction, (page 48) needs to be amended to reflect this. In fact a draw card to the area is the locally caught fresh seafood.

Within the State, Pressure, Response table, under the “State of Key Natural Resources” column, the fourth bullet (page 50) should be amended to include sea mullet as these are a species of high economic importance to the local fishing industry that are greatly impacted by restrictions to their movement/migration within rivers etc. Under the pressure column, it is important to include information on the importance of clean and plentiful fresh water for healthy fish/prawn populations within the estuarine environment.

W1 – Again within the intent section, sea mullet should be included as an example of a migrating fish that requires the whole stretch of a river during its lifecycle.

W3 - A whole of coastal CMA approach is required to ensure a coordinated and strategic approach to water quality monitoring across the state. We recommend that the 5 coastal CMAs work together to ensure

consistency in data collection and interpretation. Although W3 discusses an integrated approach to water cycle management, emphasis needs to be given to the impacts of Sewerage Treatment Plants (STPs) on water quality in the region's rivers and estuaries. There is increasing pressure to augment current STPs or create new STPs in estuaries and rivers to cater for the population growth and increased peak holiday loads. This will have significant impacts on quality of the receiving waters, aquatic environments and the health, viability and operation of the region's recreational and commercial fisheries. This is a key issue in the light of the NSW Government's recent Draft Policy Paper *Management of Sewage Effluent in NSW*, which outlines the government's opposition to new ocean outfalls unless it is clearly demonstrated that the environmental and public health risks of alternate options would be greater.

#### 9. Coastal Management Theme (Page 61-74)

Following from the above comments relating to climate change, the CAP needs to be able to accommodate new and emerging science in relation to climate change. The current research has more certainty in the predicted and observed short-term impacts of climate change, particularly research and modeling conducted by CSIRO and the Institute of Marine Science at the University of Sydney (Dr Peter Cowell).

Within the State Pressure Response table on page 65, under the pressure column (2<sup>nd</sup> paragraph), we see a key role for the CMA being to encourage agency responses regarding natural resource use to consider cumulative impacts.

In relation to the mechanical opening of ICOLLS, we see a key role for the CMA in ensuring that council policies are in line with current scientific research, for example, the recent paper by M. V. Jones; and R. J. West, "*Spatial and Temporal Variability of Seagrass Fishes in Intermittently Closed and Open Coastal Lakes in Southeastern Australia*". The roll out of the Sustainability Assessments for Coastal Lakes is to include specific guidelines, however as this is a slow process, councils will need interim guidelines in place.

On page 66 under the state column, the first paragraph should be amended to read ... " *population, **tourism and industry growth**...*" Within the State, Pressure, Response table, where the number of threatened species have been identified, it is unclear as to whether this incorporates threatened species under the *Fisheries Management Act 1994*. There has been no growth in commercial fishing for many years due to restrictions on the number of entrants to the industry and capping of licenses. Note other industries such as recreational fishing have grown dramatically.

Under "Pressure of Natural Resource Condition" (page 66), mangrove expansion is also due to climate change, sea level rise and the resultant "coastal squeeze". It may also be linked to changes to saltmarsh eg through mangrove encroachment on saltmarsh due to barriers that prevent saltmarsh from also receding.

C2 – The plans noted in the mechanism section need to consider not only the indigenous fishing strategy and implementation plan, but also the FMS for estuary prawn trawl and estuary general fisheries and industry driven environmental management systems, such as that developed by the Manning River fishers and those currently being developed by fishers in Coffs Harbour.

#### 10. Marine Theme (Page 75 – 89)

The introduction to this theme within the 3<sup>rd</sup> paragraph should be amended as follows: "...*supports a diverse range of **commercial, recreation and tourism**...*". Paragraph 4 should also be amended to read as follows: "...*strongly linked to the health of the region's river, land, **estuarine** and coastal ecosystems...*"

Under the state column, we are not aware of any comprehensive mapping of the marine environment being undertaken. Who is currently doing this mapping? We are aware of limited high-level mapping around critical grey nurse shark habitat sites, some broad scale mapping as part of the bioregion biodiversity assessments and mapping of coastal seagrass, saltmarsh and mangroves.

The pressure column (page 77) should also include ocean outfalls discharging nutrient rich fresh water into a highly saline environment as a pressure. We have much anecdotal evidence from fishermen that ocean outfalls have a great impact on some species of fish, particularly pelagic species that are very sensitive to changes in salinity levels.

Ocean Watch would be happy to assist the CMA in providing the pending industry information required on page 78. Please contact us to let us know what information you require.

We question whether the catchment target on page 80 is achievable. In many cases, the impacts on the marine environment are a factor of estuarine and coastal pressures that are beyond the sphere of control of the CMA, such as, population pressure. This catchment target will in many respects be highly integrated with the outcomes from the coastal and estuarine targets.

M1 – It would be beneficial for the intent of this target to recognise the need to ensure adequate consideration is given to the social and economic impacts of establishing marine parks, particularly for those users who are likely to lose access to some areas.

M4 - This target intent needs to give reference to include the need to understand ocean outfalls and their impacts on the marine environment. It is encouraging to see that the CMA have included industry (with respect to fishing) to be involved in monitoring the marine environment, recognising that fishers are anecdotal experts on the day-to-day hydrodynamic conditions of the marine/coastal environment and are best placed to monitor it.

The mechanisms by which farmers/landholder industry partners develop and implement best management practices should be applied to commercial fishers. For example, fishers should be provided with the assistance Community Support Officers provide landholders to leverage funding to implement plans.

#### *11. Soil/Land Resource Theme*

L5 – The intent of this target should be to educate landholders on the down stream impacts of their activities.

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

Yours sincerely



**Anissa Lawrence**  
**Executive Officer**  
Ocean Watch Australia Ltd