

Australian Coral Reef Society Inc.

A society promoting scientific study of Australian Coral Reefs

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5-May-05

Plan Coordinator
Indicative Management Plan for the proposed Dampier Archipelago
Marine Park and Cape Preston Marine Management Area
Marine Conservation Branch
Department of Conservation and Land Management
47 Henry Street
Fremantle WA 6160

Dear Sir,

Re: Comments on the Indicative Management Plan for the proposed Dampier Archipelago Marine Park and Cape Preston Marine Management Area from the Australian Coral Reef Society

The Australian Coral Reef Society (ACRS) would like to congratulate the Department on the development of the above Plan, which is certainly needed given the current and projected use of the area by a wide variety of users including recreational, commercial fishers, scientists and numerous industry groups and the aquaculture industry and we welcome this opportunity to comment on the Plan.

The Australian Coral Reef Society (ACRS) is the oldest coral reef society in the world and was founded as the Great Barrier Reef Committee in 1922. The Society has over 250 Australian and overseas members and represents the coral reef research community in Australia. The Society's members are primarily employed through government research and management agencies, as well as private organisations. We hold annual scientific meetings and support postgraduate research on Australia's coral reefs. A central tenant of the Society is to support the sustainable management of coral reefs and so the comments we provide here are drawn from this perspective.

The Society supports the Department's adoption of many of the Guidelines and strategies employed by the Great Barrier Reef Marine Park Authority's recent extensive rezoning of the GBR, which had a strong scientific foundation to it and was based on at least 20% of each of the 70 odd bioregions being conserved as a "no take zone". However we have some specific questions and comments to make on the plan.

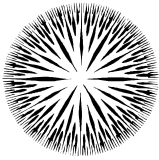
Page 1- We would like clarification of the way in which representative and unique areas of Western Australia's marine waters were identified by the Marine Parks and Reserves Selection and Working Group, although a report was released in June 1994, this is not easily available. Following on from in Figure 3 the major habitats identified in the proposed Dampier Archipelago Marine Park and Cape Preston Marine Management Area are based on an unpublished report by Bancroft and Sheridan (2000) and although it is stated that little ground truthing has been undertaken, it obviously forms the bases on which zoning plan is based. However trying to equate Figure 15 with this suggests that not all the identified habitats have been included in "no take zones", and certainly where habitats have a wide latitudinal distribution no replicate no take zones have not been proposed. Figure 3- indicates extensive areas of silt and sand communities, and one must ask if there is data to support such widespread uniform communities, sampling by some of our members suggests that sediment characteristics vary considerable within these communities suggesting that benthic communities will also vary.

Page 2- We strongly support the inclusion of intertidal areas into the marine park, and the integration of marine and terrestrial management plans as they are intimately associated.

Page 5- While we support the conservation objectives of the plan to maintain the marine biodiversity and ecological integrity of the reserves, it must be stated this will not be easy given the limited knowledge of the biodiversity and the functioning of the key ecosystem structures within the park and the lack of any baseline data on which to assess any

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changes in key ecosystem structure and function, especially in the light of planned expansion of commercial activities within the park.

Page 8 While emphasis is given to the value of the commercial activities in the area which are substantial and will increase, it must be stated that there are considerable economic values in the recreational fisheries and other recreational uses of the area, and properly managed these values can be maintained for posterity.

Page 16- It is important that performance measures for some of the social values listed earlier are developed as soon as possible.

Page 17- While accepting the needs for expansion of the infrastructure in the area- it should be clarified as to the location where dredge spoils can be dumped- without impacting on the benthic communities especially any from the harbour areas where sediment may be contaminated by hydrocarbons etc.

Page 19- Is there any data to support the statement that the sediment quality is high? and are funds and personnel available to determine anti fouling agent concentrations in the sediment? Such measurements should be ongoing given the likelihood of increased shipping movement in the area- both from commercial and recreational.

Page 22- While the strategies for ensuring the water quality of the proposed reserves is not impacted by the discharges from the Dampier Salt Ltd operations, are sound, they are dependent on funds being made available to monitor these uptakes and discharges and also they require considerable co-operation with a number of government agencies, with presumably CALM acting as the co-ordinating agency. Nowhere in the plan does it provide any information as to the availability of such funds

Page 25- The Society would like to see more information given as to how to educate reserve users about the ecological importance of the coral communities given that these can be accessed from both the shore and from boats- and often in large numbers.

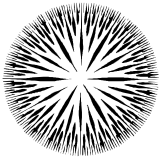
It is stated that the cumulative area of change in areas from human activity is not to exceed 1%, given that coral communities fluctuate naturally over time- how will changes as small as 1% be monitored- also given the lack of long term datasets showing the natural fluctuations over time. More meaningful KPI's need to be developed.

Page 26- It is stated that quantitative targets for water and sediment quality and marine habitats in the commercial and unzoned areas will be determined in consultation with the stakeholders prior to the finalization of the plan or early in the life of the management plan, following additional habitat mapping- all this will take time and realistically unless already started may take several years to develop. These targets must be developed without allowing commercial interests to determine them at too low a level, as once such habitats are degraded expensive and difficult to restore. We presume that sufficient funds have been already been allocated to allow this additional mapping to occur, and that there is sufficient technical expertise to undertake this in the short term.

Page 27- while some mangrove areas are to be reserved within conservation areas- unclear as to the % of mangrove areas which fall outside such areas and could therefore be subjected to further clearance. These mangrove communities have been recognized as of international significance and are a critical part of the marine park and mangrove areas outside the conservation areas should also be protected from any further clearing.

For all of the biological communities 7.1.5-7.1.14 very sound management strategies and objectives are stated but all require significant funds and personnel to be achieved and given the lack of baseline data they will be difficult to implement. There needs to be clear independent monitoring of these strategies to ensure that they are being undertaken and not just being quoted as 'motherhood statements'. For example on Page 31- one of the management objectives is to ensure that there is no loss of species diversity of subtidal soft bottom communities, given that little information exists on these communities, it will be difficult to determine if this objective has been achieved or not. A scientific steering committee should be established within CALM to ensure that the probable limited funds are effectively used and that valid statistical data is collected.

7.1.10- Unclear as to the source of data that supports the statement that the turtle population is probably stable within the proposed reserves given the migratory nature of these animals, into areas where little or no protection is afforded. We suggest that the use of TEDS be investigated for the fishing fleet to reduce the number of animals entangled in nets.



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Similar problems arise with respect to migratory seabirds using the proposed reserves as rookeries and feeding areas during migration, in that the numbers using the area are largely controlled by factors operating outside of the reserves.

7.1.13-While fishing has been identified as one of the key recreational activity in the area and likely to increase, and we hope that the DoF report on fishing in the Pilbara is now available although no citation is given to it, and that its recommendation of implementation of new bag limits, and new legal size limits and the protection of vulnerable species will be implemented asp. However it is obviously difficult to comments on these recommendations without access to the report. We note that a series of sanctuary zones were suggested in the western part of the marine park and these have been deleted due to opposition by recreational fishers, and to be replaced by a review of fishing regulations which may suggest that catch restrictions may need to be tightened. Given the level of usage by this group, the Society would like to see these sanctuary zones reinstated, or at least the review of the fishing regulations become a transparent process with the ability of other user groups to be able to comment on them. As little baseline data of the current stocks currently exists and it is unclear as to the amount of reliable data on current landings it is difficult to comment on this part of the plan. However as implementation and acceptance of the plan by the community requires that a transparent process has been followed with equity being given to all users, this preferential treatment to recreational fishers appears to be an unfortunate one. Certainly the data provided on Page 75 suggests that substantial numbers are removed.

7.1.14-We suggest that there are almost certainly undescribed invertebrate species that are extracted commercially and therefore no data exists on their reproductive cycles or their distribution and therefore to manage such species to ensure the long term maintenance of these species will be difficult. For example, we suspect that undescribed species of squid and octopus almost certainly occur in the area and may be collected for human consumption. While some systematic studies have been carried out in the area, much remains to be done and the KPI's listed on Page 48, cannot be contested as no baseline data exists.

7.2-4.The recent introduction of vessel monitoring devices has allowed the GBRMPA to track the movements of fishing vessels and police "green" or "no take zones" far more effectively than before and together with increased surveillance appears to have reduced infringements, and ACRS would like CALM together with DoF to explore similar arrangements.

7.2.6. It is difficult for the Society to comment on the pearling industry as the report prepared by Enzer Marine Environmental Consulting is not easily available,

7.2.7 With the large tonnage of shipping using Dampier Port and the discharge of large volumes of ballast water from a wide variety of overseas ports, it is essential that regular monitoring of port structures for introduced marine pests is undertaken, although we note that to date no comprehensive survey of the port has been undertaken for pest and cryptogenic species, following the guidelines set out by CSIRO_ CRIMP and supported by AQUIS.

7.2.10 As the data given in the Table is from a report in prep by Williamson et al. it is difficult to know how these data were collected and if these numbers vary annually, are increasing or declining, all of which is needed in order to be able to assess if such usage is sustainable. Certainly the reporting and Targets need to be developed as soon as possible.

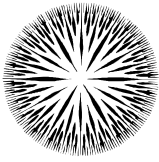
7.2.12 We should like to stress the importance of scientific research in order to provide a sound scientific basis to this proposed plan, for future plans, and to facilitate the development of sound, well designed monitoring programmes to ensure that the proposed performance measures and short and long term targets are achieved.

The Society supports CALM in using the principles developed by GBRMPA which have been recognized both nationally and internationally as state of the art.

However we are somewhat disappointed that only 7% of the Dampier Archipelago Marine Park has been designated as sanctuary zones, and only 7 have been nominated together with 4 special purpose (benthic protection zones- representing about 3%) and 2 special purpose (intertidal reef protection zones, about 2%), given the variety of habitats and diversity recognized as occurring in the area.

In the proposed Cape Preston Marine Management Area about 17% of the area is protected in Conservation Protection Areas. We urge the Department to continue discussions with recreational fishers and we really do need sanctuary areas in Cape Preston- because there is good evidence that reserves have a positive affect on catch rates.

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In Figures 15-18, as there are slight differences in colour and marking in the captions with those on the actual figures and scales, it is not that easy to follow but comparing these to Figure 3 where the major marine habitats are shown it appears that inter reefal areas are poorly represented in no take zones, and unclear if all the variety of coral reef communities identified in Fig 3 are contained within no take zones.

Page 100- re West Enderby Island Special Purpose Zone, the final phrase is slightly confusing, while this zone has been developed for conserving sponge gardens and high diversity, while still allowing some recreational fishing, and anchoring- Unless permanent moorings are established, anchoring will rip up these extensive yet fragile sponge gardens.

In Table 2- it indicates that mineral and petroleum exploration can be assessed in all zones, and that drilling and mineral development can then be assessed in all zones except sanctuary and recreation zones, exactly what does this mean? Is it if that if oil or minerals are found in these other zones then exploitation can occur?.

So while congratulating the Department in the development of the plan, and accepting that limited data exists, and we hope that additional funding will be available to develop the management strategies outlined in the management plan pp 129-135, although we are aware that these will of necessity have to be prioritized. We would like the implementation of stronger bag limits and size regulations for recreational fishers to be given a high priority as well as developing sound baseline data on which to ensure that this activity is sustainably managed. This is critical given that recreational fishing will increase over the period of this plan. These management plans and the monitoring programmes implemented must be transparent with the data being available.

We would be happy to provide additional comment on any aspects of our submission, please contact me.

Yours faithfully

Mike Kingsford