The MEMA 5 step process and risk assessment framework

The 5 step process outlined by MBMA is well founded as a science driven,

SFM is further concerned because, unlike fishing, the threats to environmental assets from most of the other listed activities have been significantly understated and that management actions adequate

Initiative 2: On-ground works for healthy coastal habitats and wildlife

SFM strongly endorses efforts to improve coastal habitats and wildlife protection. SFM has been a strong supporter of OceanWatch Australia (OWA) since its inception and a member of the NSW Fish Habitat Partnership. SFM assumes that the Government will work particularly with OWA as the national NRM organisation, and other relevant organisations to implement the priority aspects of this strategy.

Initiative 3: Marine research to address shipping and fishing knowledge gaps

SFM has long been a strong supporter of improved science with respect to the sustainability of fisheries and the marine environment. SFM supports basing all marine management on a cause and effect approach that is underpinned by evidence-based research that looks critically at all threats. MEMA initiatives of particular relevance to this this specific Initiative are; addressing the impact of offshore marine anchorages, sediment re-suspension in the lower Hunter River and the effectiveness of bycatch mitigation measures in both commercial and recreational fishing.

Initiative 4: Spatial management for biodiversity conservation and use sharing

This initiative is completely inconsistent with the overarching MBMA strategy of a risk-assessment-based approach to the conservation and management of the NSW Marine Estate including the Hawkesbury bioregion. Its fundamental logic and strategy are in contrast to the rest of the Report, to the extent that this initiative detracts from the credibility of the MBMA strategy. Sx of the other seven initiatives are based on identifying problems, no matter where they occur, and then directly addressing them; this one assumes that a strategy of pre-selecting sub-sets of areas and closing them to pre-determined activities that are not priority threats to those areas or elsewhere, will represent cost-effective action.

As an introduction daimed to support

the Marine Estate Community Survey indicated the importance of maintaining the abundance and

This imprecise and incorrect use of survey output is

worryingly misleading. Why do only 82% appreciate the importance of marine biodiversity throughout NSW? Respondents did not indicate that they wanted management of subsets of areas at the expense of the efficient, evidence-based protection of the whole of the Marine Estate. These respondents would rightfully have assumed that the conservation of marine life would be based on scientific evidence and an appropriate management strategy, such as that outlined in this MEMA process. The percentage of seafood consumers (more than 90% of the NSW population) that want effective protection of all marine ecosystems, particularly those that support prominent marine resources, would be higher than 82%.

This Initiative assumes, without justification, that it represents an appropriate response to numerous threats, such as climate change

SFM believes that the disproportionate priority given to fishing closures in pre-selected areas will bias protection away from the cause-and-effect management approaches put forward in this MEMA process. This will result in diminution of the marine systems. Giving priority to managing in a few areas, a threat that is acknowledged in the whole MEMA Assessment to not be a major threat to the NSW Marine Estate, is confirmation of the irrelevance of this initiative to an evidence-based response to the biodiversity conservation problems in NSW.

No evidence is given of how this initiative will efficiently address any of the threats (copied below) that are listed as related to it:

Oimate change (H) environmental risk - environmental risk

environmental riskenvironmental risk

- environmental risk
- environmental risk
Charter activities (M) - environmental risk
-use conflict (H) socio economic risk

socio economic risk

The justification given for this initiative is stated to be based on the CAR (comprehensive, adequate and representative) principle. MEMA has clearly accepted the need to address the conservation of the NSW Marine Estate as an entity (a comprehensive strategy for the total [fully representative] area). No amount of closures of parts of areas to selected lower level threats will ever provide adequate protection of the Marine Estate. The pursuit of a strategy that is not based on addressing threats in priority order is not even appropriate.

The second objective of this initiative, resource use sharing, is highlighted by the TARA risk assessment process as a socio-economic risk, NOT an environmental risk. This issue will not be effectively or efficiently addressed by having a sub-set of areas that have been identified on the basis of biodiversity content, and not resource use or competition, allocated among current or future resource users. SFM supports science and evidence-based resource sharing. However, resource allocation issues must be addressed on resource use principles. Fisheries legislation is designed specifically for the management, including allocation, of living resources to all competing users throughout the entire Marine Estate and its effectiveness for doing so has already been demonstrated.

With growing population pressures in the Greater Sydney region MBMA agencies will need to continuously address the Resource Use/Conflict allocation issues. In doing so MBMA agencies should clearly annunciate this rather than trying to package allocation up as some environmental protection measure that is proj T5ETr 0 17 3011.04lcal

Initiative 5: Improving boating infrastructure

With growing population pressures SFM can see why MEMA would be looking to provide improved boating infrastructure to the recreational sector. However, it is hard to see how the measures proposed will reduce the environmental stressors and threats to the marine environment. Surely increased infrastructure that promotes increased use and does not effectively address the primary threats associated with increases in usage, such as the impact of antifoulant paints and vessel discharge, will increase the pressure on the marine environment, not ameliorate it?

SFM does not believe this Initiative is consistent with the overall MEMA evidence-based approach. It does not represent an effective response to the threat posed by increased boating.

Initiative 6: Reducing user conflicts in Pittwater

As with initiative 4 this is a clear case of biased expectations of area management and NIMBYIsm in action. At least in this case the initiative is transparent with regard to its motives: It is based on acknowledging that MEMA agencies wish to remove commercial fishing from a waterway to provide greater scenic amenity and add va

obviously includes anticipation of the negative impacts of threats, such as ocean warming and sealevel rise.

ensure the outcome does not weaken the environmental controls that are in place to protect the marine environment.

Conclusions

SFM strongly supports the MEMA process and the risk-based TARA approach being taken by the Government agencies involved. Through this process MEMA has attempted to address a comprehensive list of risks to the marine environment. We acknowledge the complexity of the issues involved and the relationships between many of the threats that make precision in their management difficult.

SFM acknowledges that 5 of the 8 initiatives identified logically flow from the environmental risk-assessment process. The concept of Initiative 5 flows from the identification of risk from increased boating but the specific actions proposed appear more likely to exacerbate rather than ameliorate the problem. Initiatives 4 and 6 have more to do with unjustified restriction of access to certain parts of the Marine Estate, rather than the tackling of the environmental threats and risks that have been identified. As MBMA acknowledges, appropriate protection of marine ecosystems is necessary throughout NSW with priorities for management to be based on the targeted addressing of dearly identified threats no matter where they arise. Initiatives 4 and 6 are resource allocation actions, based on restricting access to areas, which are packaged up as environmental protection. Resource allocation issues are real and they need to be dealt with for what they are. They must be evaluated in the light of the necessary social and economic assessments.

In the case of access to, and allocation of, fisheries resources strategic assessments must include the interests of the seafood consuming public who constitute more than 90% of the population of NSW and a very high proportion of the tourists who visit this State. The maximum possible sustainable supply of seafood is, like the true protection of biodiversity, dependent on the protection of all of the NSW Marine Estate against all of the threats. Optimum supply will only be achieved if the whole of the Marine Estate is protected. Acceptance that not all threats can be adequately addressed in this plan further endorses the need to ensure that what management is undertaken is tightly focussed on the greatest threats to the Estate.