

11/11/2016



Principal Policy Officer,
Aquaculture Policy and Environment Unit
Primary Industries and Regions SA

RecFish SA
6 Mary street
Hindmarsh
SA, 5007

Dear _____,

oa@recfishsa.com.au

Amendments to Eastern Spencer Aquaculture Zones.

RecFish SA thank you for the opportunity to comment on these proposed amendments.

Each year 277,000 South Australian go recreationally fishing and 37% of all recreational fishing effort occurs in the Spencer Gulf, A number of the proposed changes are in areas considered to be very important to the recreational fishing community. Of particular interest are Wallaroo Bay, Cape Elizabeth and Port Victoria.

The towns of Wallaroo, Moonta, Pt Hughes and Port Victoria benefit substantially from recreational fishing visitation and associated tourism spending, with travel, accommodation and hospitality expenditure amounting to major components of recreational fisher spending. RecFish SA want to ensure that any changes to aquaculture zoning do no compromise the realisation of the social benefits experienced by fishers or the economic benefits of related expenditure in regional communities.

We detail our specific concerns about the current proposals, as follows;

- Baseline studies of the benthic habitat have not been presented as part of this amendment. No zone changes should be pursued until a full technical study has been performed on the resident ecology in the areas earmarked for change and an Australian standard risk assessment that takes into account the national standard for development and principles of ESD (Ecologically sustainable development) <http://www.environment.gov.au/about-us/esd>
- The change to permit finfish aquaculture in the vicinity of Wallaroo (from filter feeding molluscs) is not supported without further research. Finfish aquaculture must be modelled prior to introduction in a new area so the benthos in the vicinity is not damaged. Mark Doubell et al's 2015 SARDI report "Modelling of oceanographic variables for the development of additional finfish aquaculture in Spencer Gulf" adequately discusses the oceanographic system but does not specifically model the waste of 2000 tonnes of finfish specifically, or differences between species; only 2 feed types (pellets and pilchards) and its effects on the local ecosystem. Doubell et al's 2015 SARDI report does indicate that the local seagrass is susceptible to damage from nutrients that could be released from finfish farms in the area.
- Damage to benthic areas including seagrass and reef habitat equate to

damage to fish breeding habitat and therefore damage to fisheries both recreational and commercial. The change to allow 2000 (possibly more) tonnes of finfish aquaculture in Wallaroo has not specifically been tested against resident species. In addition, the waste plume from this scale of enterprise has been modelled to enter Wallaroo bay and thereby could negatively impact on shoreline and boat fishing.

- There is no seafloor investigation or oceanographic modelling presented at all relating to Cape Elizabeth, Point Pearce or Tickera. The results of Doubell et al 2015 cannot be extrapolated to these sites, as large changes in oceanography and water quality occur up and down the Spencer Gulf. They require individual assessment.
- Any changes to the zones should be coupled with a suitable environmental monitoring regime and compliance operations, so as to ensure no damage is occurring post introduction. Where any ecosystem damage is detected the operation should automatically be shut down.
- RecFish SA has concerns about the establishment of an aquaculture zone in the Cape Elizabeth area, close to the MPA Sanctuary Zone. Specifically, there is concern about the further loss of access to productive fishing grounds in this important recreational fishing region. We cannot support any changes resulting in further restricting recreational fishing in this vicinity.

We are pleased to answer any questions about the issues we have raised and look forward to our feedback being incorporated into the proposals.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'David Ciaravolo', with a stylized flourish at the end.

David Ciaravolo
Executive Director
RecFish SA