# Summary of Submissions Report

# Draft Management Plans for South Australia's Marine Parks Network

November 2012



Department of Environment, Water and Natural Resources

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#### 1. EXECUTIVE SUMMARY

On 26 August 2012 the Hon Paul Caica MP, Minister for Sustainability, Environment and Conservation, released 19 draft management plans for South Australia's Marine Parks Network for an eight-week period of public consultation.

A comprehensive suite of public information accompanied the release of the draft management plans. This included an impact statement covering environmental, economic and social factors for each marine park and a colour brochure summarising the draft zoning and management strategies for each park. In addition, supporting information relating to park values, design and science, and policies in relation to sectoral interests was made available. This information was distributed at public information sessions and prominent public outlets and via the marine parks website www.marineparks.sa.gov.au.

A state-wide program of consultation activities was advertised in Adelaide and regional newspapers. Over the eight weeks, staff of the Department of Environment, Water and Natural Resources (DEWNR) conducted 40 briefings for stakeholder and interest groups and 41 information days, with approximately 2,900 people engaged in face-to-face discussions about marine park concepts, zoning and management.

By the end of the consultation process, at close of business 22 October 2012, a total of 8,649 submissions had been received. Of these, 337 were unique submissions while nineteen different form letters were received from 8,306 respondents. Six petitions were also received. The majority of submissions arrived via email and a number included maps and coordinates to assist in describing suggested alternative zoning.

Respondents included individuals and organisations from Adelaide (1,082), Greater Adelaide (311) and regional South Australia (799), as well as other Australian states (4,522) and overseas (1,392). The high number of emailed submissions made it difficult to ascertain the origin of a number of respondents (543). The Yorke Peninsula/Mid North region was particularly well represented among respondents from regional South Australia.

Respondents identified their main interests as being:

- aquaculture (26)
- commercial fishing (374)
- conservation (7,217)
- cultural (3)
- diving / snorkelling (3)
- education (2)
- other (67)
- recreational boating (20)
- recreational fishing (565)
- research (2)
- tourism (32)
- undetermined (435)

(Note that some respondents indicated more than one interest or did not specify an interest.)

Whilst the Government sought comment on both draft zoning and draft management strategies for the 19 marine parks, the overwhelming majority of submission comments were directed at the zoning arrangements and, in particular, the size and location of sanctuary zones.

As a broad summary of feedback, of the 8,649 respondents 40 (<1%) indicated agreement without change for the draft zoning proposals, while 7,251 (84%) supported increasing the number or size of sanctuary zones to achieve a stronger conservation outcome, especially in key areas of known high conservation value. A total of 1,358 respondents (16%) supported

changes to the draft zoning proposals in order to reduce impacts on current uses, such as commercial or recreational fishing or aquaculture.

This report includes a selection of summarised comments and quotes from submissions for each marine park. Submission comments indicate there are significant differences in community opinions about the draft management plans. For example, while support is expressed for large sanctuary zones in areas of high conservation importance, opposition is also expressed where existing uses such as fishing would be impacted.

Examples of comments typically associated with submissions advocating for increased conservation include:

- strong support for the establishment of sanctuary zones as the core conservation areas within marine parks;
- strong support for the protection of those places of high conservation significance included in the draft proposal, such as St Francis and Pearson Isles and areas around Kangaroo Island:
- advocacy for the inclusion within sanctuary zones of other areas not in the draft proposal, such as Cape Blanche and Top Gallant Island; and
- suggestions that the draft proposal falls short of internationally recognised guidelines for comprehensive, adequate and representative conservation of South Australia's marine environment.

Examples of comments typically associated with submissions advocating for reducing impacts on current uses include:

- strong support for fisheries management arrangements with suggestions that there is no basis for displacing commercial or recreational fishing from sanctuary zones;
- suggestions for alternative zoning arrangements which would avoid or minimise impact on industry or recreational use;
- statements about the level of economic impact predicted either by Government or stakeholders;
- that recreational fishing has no or minimal environmental impact;
- that recreational fishing from the shore should not be prevented anywhere;
- that marine conservation planning should be focused on known threats to marine ecosystems; and
- that on-water compliance with zoning will present difficulties for park users and implementation challenges for Government.

Far fewer comments were received in relation to proposed management strategies and other management arrangements. Examples of comments received include:

- that the management plans lack operational detail relating to timelines, performance measures, research needs and compliance arrangements;
- advocacy for a high level of community education in the early stages of marine park implementation;
- strong support for oyster aquaculture to be accommodated within general managed use zones rather than habitat protection zones; and
- support for a monitoring program for marine parks which focuses on environmental, economic and social elements.

This report does not evaluate the efficacy of suggestions made by respondents nor options for amending zoning or other management arrangements.

#### 2. INTRODUCTION

This report addresses the submissions received in response to a state-wide community consultation process conducted by the South Australian Government for the State's 19 marine park draft management plans. The report describes both the consultation and submissions management process undertaken by the Department of Environment, Water and Natural Resources (DEWNR). It provides statistical information about the responses received and an indication of the type of issues raised by the community.

The purpose of this report is to illustrate the diversity of views expressed by the community without making a judgement about the accuracy or otherwise of comments received. It is not the purpose of this report to evaluate options for amending the draft management plans.

#### 3. BACKGROUND

The public review of the marine park draft management plans is one of two significant public consultation processes relating to marine parks that are required by the *Marine Parks Act 2007*. The first relates to the public consultation period on the outer boundaries following their proclamation on 29 January 2009. The aim of this release was to inform the public of the outer boundaries and to seek feedback to improve their design. Over an eight-week period around 4,800 people were directly engaged and 2,357 written responses were received. An appraisal of this process is detailed in the *Summary of Submissions Report: Outer boundaries of South Australia's Marine Parks Network* (Department for Environment and Heritage 2010). Following the consultation process and additional advice received from three regionally based Pilot Working Groups, amendments to the boundaries of seven marine parks were made in July 2009. This process fulfilled the requirements of section 10 of the *Marine Parks Act 2007*.

The second consultation process required by the *Marine Parks Act 2007* relates to the development of management plans. The Government has long recognised that maximising community involvement in the planning process is critical to ongoing community acceptance of, and compliance with, the final zoning and other management arrangements. For this reason, the Government far exceeded the requirements of the Act in relation to management plan development. Significant resources were applied to early engagement of the community in gathering environmental, economic and social knowledge. In addition, the Government had earlier made a range of policy commitments to help ensure South Australian lifestyles and livelihoods are maintained, and to help provide additional certainty for industries that rely on the marine environment. A complete list of the policy commitments is available on the marine parks website <a href="https://www.marineparks.sa.gov.au">www.marineparks.sa.gov.au</a> or in *South Australia's Marine Parks Network Explanatory Document* (DEWNR 2012)

In one of the most extensive community engagement programs undertaken by the South Australian Government, 13 Marine Park Local Advisory Groups (MPLAGs) were established to provide local advice early in the management planning process. The Great Australian Bight Marine Park Consultative Committee, with two additional members, also formed the equivalent of a MPLAG for the Far West Coast Marine Park, bringing the total number of MPLAGs to 14. Each MPLAG comprised around 15 members from the local community and included members of key stakeholder groups. A total of 67 MPLAG meetings were held across the state, which were open to the public. Additional public information sessions were held in a number of areas to help communicate the outcomes of the MPLAG process to the broader public. MPLAGs along with key stakeholder groups significantly informed the development of the draft management plans with zoning. Input was also provided by the Scientific Working Group (SWG) and the Marine Parks Council of South Australia (MPCSA) and advice was also received from relevant Government agencies.

Working with the advice provided from all groups, on 11 and 12 April 2012 a forum of leaders from the conservation, recreational and commercial fishing sectors identified a series of priority areas for conservation and reached an agreement on the zoning approach for South Australia's

network of marine parks. Later in April 2012, the Government publicly released zoning preview maps on its *South Australia's Strategic Plan - Your SAy* website <a href="http://saplan.org.au/yoursay/">http://saplan.org.au/yoursay/</a>. The preview maps displayed proposed sanctuary zoning based on the priority areas for conservation, which would later appear in the draft management plans. Following this, on 10 July 2012 the Government also released the full set of proposed zones for the marine parks network, also through the Your SAy website. Marine parks staff participated in an interactive blog with a record 1,892 comments and questions received, which can be viewed on the website.

In accordance with sections 13 and 14 of the *Marine Parks Act 2007*, based on the collective advice from MPLAGs, other community members, peak stakeholders, SWG, MPCSA and relevant agencies, the Government developed a draft management plan with zoning for each of the 19 marine parks. Although zoning preview maps had been publicly available for some months, the full draft management plans were formally released for an eight-week public consultation period commencing 26 August 2012.

#### 4. CONSULTATION PROCESS

Consultation during the eight-week public review period was designed to encourage and support written submissions from the public and stakeholder groups. The consultation period expired at the close of business 22 October 2012.

#### Public information supporting the consultation process

As required by the *Marine Parks Act 2007* key information supporting the consultation process was made readily accessible, including the 19 draft management plans with detailed zoning maps and 19 impact statements covering environmental, economic and social factors.

#### **Additional consultation materials**

Many other supporting documents were made available on the marine parks website and information CDs, including:

- a full colour consultation brochure summarising the zoning arrangements, key assets conserved, activities permitted and management plan strategies for each marine park;
- executive summaries of the impact statements;
- summary bioregional inventories of environmental assets that exist within marine parks;
- an explanatory document for the marine parks network;
- an environmental, economic and social values statement for each marine park which included full colour atlases of maps providing environmental, economic and social information;
- design principles and policy commitments guiding the development of the draft management plans;
- fact sheets relating to the aquaculture, commercial fishing and mining, petroleum and geothermal industries;
- proceedings from the MPLAG process, including meeting minutes, maps and MPLAG advice for all marine parks;
- a range of scientific reports; and
- fact sheets and other information about the marine parks program.

Primary consultation materials were provided to DEWNR regional offices and selected public outlets such as fishing tackle shops, general stores, local government offices, libraries, caravan parks, regional service stations and others. The full range of consultation materials were also available at public information sessions held across the state or could be obtained by telephoning the marine parks freecall number 1800 006 120.

The community was invited to send written submissions (by mail or email) to:

SA Marine Parks Submissions Department of Environment, Water and Natural Resources

#### REPLY PAID 1047 ADELAIDE SA 5001

Or email to: marineparks@sa.gov.au.

#### Advertising and promotion of the consultation process

In accordance with section 14(4)(f) of the *Marine Parks Act 2007* notice in relation to the public release of draft management plans and impact statements was published in the South Australian Government Gazette on 30 August 2012. In addition notice of the public review period was published state-wide in The Advertiser on 27 August 2012. The notice included places at which copies of the draft plans and impact statements could be freely obtained, an address to which interested people could send written submissions and a state-wide schedule for public information sessions.

Advertisements were lodged in relevant regional newspapers advising communities of the release and the opportunity to attend public information sessions in their local area. Schedules of public information sessions were displayed at selected public outlets across regional areas and were also available on the marine parks website.

Upon public release of the draft management plans, as a courtesy, key stakeholders such as local government mayors and chief executives and key sectoral representatives were individually contacted (via email or telephone) to notify them of the release (see also *Engagement with representatives of key sectors* below).

In addition, all former MPLAG members and approximately 4,000 people who had previously registered an interest in the marine parks process were sent notification of the release of the draft management plans either by email or postcard.

#### Marine parks website

The marine parks website was redesigned for the consultation process to assist public accessibility to the consultation materials listed above.

During the eight-week consultation process, 10,081 website visits were recorded by 8,133 unique visitors. The average duration of visits was 5 minutes 6 seconds and the total number of page views was 53,572. Marine parks of the Yorke Peninsula region were particularly well represented in the record of page views.

#### Public information sessions and briefings

A total of 41 public information sessions were held in 36 different locations across the state, from the Adelaide metropolitan area to the far west and the south east. Included here is the three-day attendance at the SA Boat and Fishing and 4WD and Adventure Show in Adelaide, at which DEWNR partnered with RecFish SA in a display dedicated to marine park issues and recreational fishing. Also included is a public meeting held at Port Wakefield which was organised by the local community in addition to the public information day. DEWNR staff attended the public meeting and provided the full suite of consultation materials.

Public information sessions provided opportunities for the community to obtain information on the proposed zoning and management strategies for marine parks, collect other supporting information and clarify information through face-to-face discussions with DEWNR staff.

In addition, briefings or presentations were offered to a variety of organisations including coastal councils adjacent to a marine park, Natural Resources Management (NRM) boards, regional development boards and community groups, such as conservation, fishing, sailing and service clubs. A total of 40 briefings or presentations were conducted.

Over the eight-week consultation period, approximately 2,900 individuals were engaged in face-to-face discussions about marine park concepts and the draft management plans. Since 2008 DEWNR staff have held over 35,000 discussions with members of the South Australian community interested in marine parks.

#### Engagement with representatives of key sectors

Section 14(4)(d) of the *Marine Parks Act 2007* requires that the Minister must, in relation to a proposal to make or amend a management plan:

- (d) seek the views of-
  - (i) all relevant Ministers; and
  - (ii) the Council; and
  - (iii) a representative of all signatories to any indigenous land use agreement that is in force in relation to any of the area comprising the marine park; and
  - (iv) a representative of any native title holders or claimants that have a native title determination or registered native title claim; and
  - (v) such persons or bodies as the Minister determines to be leading representatives of—
    - (A) the environment and conservation sector; and
    - (B) local government; and
    - (C) the commercial fishing industry; and
    - (D) the aquaculture industry; and
    - (E) the recreational fishing sector; and
    - (F) the mining and petroleum industries; and
    - (G) the tourism sector; and
    - (H) the general business sector,

in relation to the draft.

To fulfil this requirement, the Minister for Sustainability, Environment and Conservation wrote to the key representatives of each of the sectors listed above advising them of the release of the draft management plans and associated impact statements and the opportunity to make comment. Briefings and meetings were held with representatives of various sectors as required.

#### 5. RECORDING OF SUBMISSIONS

#### **Receipt of submissions**

All written submissions received by mail or email, delivered to DEWNR officers at public information sessions or addressed to the Minister for Sustainability, Environment and Conservation, were entered into an Access database and allocated a reference number.

With the release of the zoning preview maps in April and July 2012 (described above), the Government had received some correspondence from the public on the zoning proposals prior to the release of the full draft management plans. DEWNR has included these items of correspondence, totalling 30 in number, as submissions and each was allocated a reference number.

All respondents who included a valid address (postal or email) were sent a letter or email of acknowledgement.

All submissions received are considered as public documents unless confidentiality was requested by the respondent. Copies of submissions received may be viewed by the public by appointment at the following location:

DEWNR Office 1 Richmond Road, Keswick (Adelaide)

Telephone: 8124 4900

#### **Invalid submissions**

Submissions were considered invalid if they provided no means by which the respondent could be contacted to verify the submission, such as by postal or email address or by phone number. Submissions received after the advertised expiry of the consultation process, being close of business on 22 October 2012, were read and checked for substantive issues but were not included in the submissions analysis. Over 300 submissions were received late.

#### Confidential submissions

Submissions marked confidential were analysed and are included in the statistical reporting but are not included in the sample comments in subsequent sections and will not be made available for public viewing.

#### Types of submissions received

Respondents to the consultation process included individuals and organisations who submitted three main types of correspondence for consideration by the Government - unique correspondence, form letter correspondence and petitions. Unique correspondence, as its name suggests, is a unique piece of commentary received from either an individual or organisation. Form letter correspondence comprises identical commentary submitted by multiple respondents. Form letters were received from both individuals and organisations from a range of interests including recreational and commercial fishing and conservation. Petitions may take many forms but are most commonly recognised as a group of signatories to a particular statement. Petitions differ from form letters in that the contact details of each signatory are not included, meaning that the validity of the signature cannot be verified.

Statistics relating to the types of submissions received are included in the Summary of Submissions section.

#### Database and storage of submissions

All submissions were entered into an Access database. Information entered for each submission included:

- address details (name, address, organisation);
- whether or not the submission indicated agreement with the proposed arrangements or whether changes were recommended to the marine park draft management plans;
- the primary interests indicated by the respondent (e.g. recreational or commercial fishing, conservation, tourism, education, recreational boating, cultural activities, aquaculture, research or other);
- whether additional materials were provided (e.g. maps, GPS coordinates or specific references to landmarks);
- comments on specific zoning proposals (by marine park and zone); and
- comments on specific management proposals identified in the draft management plans.

Some submissions provided general commentary rather than specific zoning or management advice. General commentary was received on, for example, the concept of marine parks, the consultation process, fisheries management issues and other Government initiatives. General commentary was not recorded in the database, but where possible a judgement was made to

determine whether the submission was generally supportive or non-supportive of the proposal. All valid submissions were treated equally without prejudice or precedence.

The growing capacity of the public to effect correspondence electronically was considered by DEWNR in determining the most appropriate way to categorise and manage submissions. For example, some respondents chose to comment on multiple parks in one piece of correspondence while others lodged multiple and separate correspondence for each park of interest to them. Some forwarded the same submission multiple times or updated their submission during the consultation process. To account for multiple entries from a particular individual or organisation, DEWNR organised its database primarily by the name of each respondent, being either an individual or organisation. Where a respondent lodged multiple and/or separate pieces of advice, these are recorded under the name of the respondent and treated as a single submission.

#### 6. SUMMARY OF SUBMISSIONS

#### Number and type of submissions

Submissions were received from 8,649 respondents (see Table 1 for the type of submissions and number of respondents). Unique submissions were received from 337 respondents (4%). Nineteen different form letters were received from a total of 8,306 respondents. The majority of form letters were received from individuals with conservation interests. Form letters were also received from individuals and/or organisations associated with a particular industry (e.g. commercial fishing sectors or aquaculture), or from individuals, communities or groups linked to particular marine parks or particular locations (e.g. shack sites). The number of respondents per form letter ranged from 4 to 3848 respondents. Six petitions were received and are counted as one submission each.

**Table 1** Type of submissions with number of respondents.

Submission Type	No. of Respondents
Unique submissions	337
Form letter submissions	8,306
Aust. Marine Conservation Society	873
Blue Crab	26
Central Zone Abalone	4
MP 10	21
MP 11 Action Group	271
MP 11 Questionnaire	63
MP 14 (1)	37
MP 14 Action Group (2)	209
MP 14 Action (3)	61
MP 14 Action (4)	57
MP 14 Action (5)	64
Northern Zone Rock Lobster Industry	95
SA Oyster Growers Assoc	19
Save Our Marine Life	2,453
Save our Seafood	29
Shore fishing	8
Southern Zone Rock Lobster Industry	120
The Wilderness Society	3,848
Western Zone Abalone Industry	48
Petitions	6*
Total	8,649

\* Signatories to petitions cannot be verified, thus a petition is counted as one submission

#### **Focus of respondents**

Each marine park draft management plan contained a draft zoning scheme and a suite of proposed management strategies. Respondents had the opportunity to provide comments on either zoning or management arrangements or both. Many respondents provided multiple comments covering zoning proposals and/or management arrangements for a number of marine parks.

From the 8,649 respondents, 49 commented on the proposed management arrangements.

The marine parks of the west coast (parks 2, 3 and 4), Kangaroo Island/Fleurieu Peninsula (parks 12, 15, 16 and 17) and Upper Spencer Gulf (park 10) were the focus of the majority of respondents. Table 2 shows the number of respondents for each of the 19 marine parks. Note that some respondents commented on more than one marine park and that a significant number (7280) made general comments relating to all parks in the state-wide marine parks network.

**Table 2** The number of respondents for each marine park

·	No. of
Marine Park	Respondents
1 Far West Coast	103
2 Nuyts Archipelago	7,347
3 West Coast Bays	7,341
4 Investigator	7,332
5 Thorny Passage	118
6 Sir Joseph Banks Group	103
7 Neptune Islands Group	152
8 Gambier Islands Group	111
9 Franklin Harbor	37
10 Upper Spencer Gulf	2,610
11 Eastern Spencer Gulf	367
12 Southern Spencer Gulf	4,856
13 Lower Yorke Peninsula	17
14 Upper Gulf St Vincent	464
15 Encounter	7,330
16 Western Kangaroo Island	6,501
17 Southern Kangaroo Island	7,296
18 Upper South East	124
19 Lower South East	122
All Parks	7,280

# **Primary interests of respondents**

The primary interests of the respondents were determined from the submissions. Interests ranged from recreational and commercial fishing, to conservation, tourism, recreational boating and education. In some cases, respondents indicated more than one primary interest (e.g. recreational fishing and recreational boating). The majority of respondents indicated an interest in conservation (7,217 or 83%), recreational fishing (565 or 7%) or commercial fishing (374 or 4%) (Table 3).

Table 3 Primary interests of respondents

Primary interest	No. of Respondents
Aquaculture	26 (<1%)
Commercial fishing	374 (4%)
Conservation	7,217 (83%)

Cultural activities	3 (<1%)
Diving/Snorkelling	3 (<1%)
Education	2 (<1%)
Other	67 (<1%)
Recreational boating	20 (<1%)
Recreational fishing	565 (6%)
Research	2 (<1%)
Tourism	32 (<1%)
Undetermined	435 (5%)

Note: some respondents indicated more than one interest, therefore total number of interests may differ to the total number of respondents.

#### **Location of respondents**

Submissions were received from individuals and organisations (including businesses) throughout South Australia, interstate and overseas. The location and number of individual respondents is shown in Table 4.

South Australians comprised 26% of respondents.

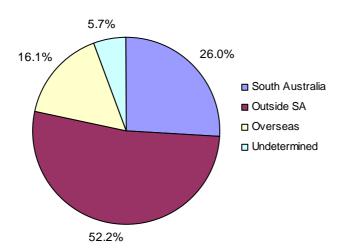
A total of 4,522 responses (52%) were received from other Australian states and territories. International responses totalled 1,392 (16%), coming from the USA and Canada, South America, Europe, Asia, South Africa and New Zealand. The majority of international respondents were affiliated with conservation organisations. Note that due to the large number of responses received by email, in many cases it was not possible to determine the location of the respondent.

Table 4 Location and number of respondents

Location of room	Number & percentage (rounded)		
Location of resp	Location of respondents		
	Adelaide metropolitan	1,082 (13%)	
South Australia	area		
	Greater Adelaide Area (Adelaide Hills, Barossa, Light and Lower North, Fleurieu, Kangaroo Island)	311 (4%)	
	Regional Areas (Eyre and Western, Far North, Limestone Coast, Murray and Mallee, Yorke and Mid North)	799 (9%)	
	Undetermined SA	50 (<1%)	
Interstate	New South Wales	1,372 (16%)	
	Victoria	1,060 (12%)	
	Queensland	885 (10%)	
	Western Australia	902 (10%)	
	Tasmania	175 (2%)	
	Australian Capital Territory	84 (1%)	
	Northern Territory	44 (<1%)	
International		1,392 (16%)	
Undetermined		493 (6%)	
TOTAL		8,649	

Figure 1 Location of respondents



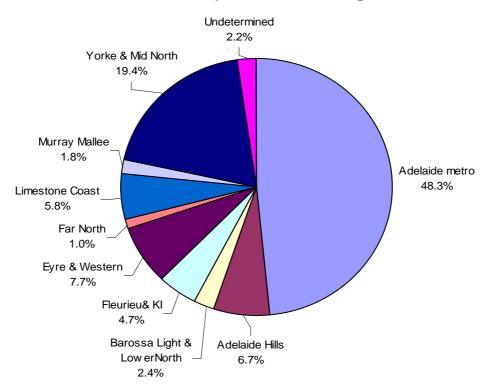


When comparing the location of South Australian respondents in more detail, the majority of respondents came from the Adelaide metropolitan region (1,082 or 48% of SA respondents) with the Yorke Peninsula and Mid North region also well represented (434 or 19% of SA respondents): refer Table 5 and Figure 2. Regions were defined in accordance with the South Australian Government Regions (information available at <a href="http://www.planning.sa.gov.au/go/State-Government-Regions">http://www.planning.sa.gov.au/go/State-Government-Regions</a>).

**Table 5** Location of South Australian respondents by region

South Australian Region	Respondents	
Adelaide metro	1,082	
Adelaide Hills	151	
Barossa Light & Lower North	54	
Fleurieu & Kangaroo Island	106	
Eyre & Western	172	
Far North	23	
Limestone Coast	130	
Murray Mallee	40	
Yorke & Mid North	434	
Location undetermined	50	
Total	2,242	

Figure 2 Location of South Australian respondents by region



# **Location of Respondents - SA Regions**

#### 7. BROAD SUMMARY OF FEEDBACK ON DRAFT MANAGEMENT PLANS

This section provides a broad summary of the feedback received on the draft management plans for South Australia's marine parks network.

#### Assessing the content of submissions

Each submission was assessed for the level of agreement with the proposed zoning and/or other management arrangements in the draft management plans and was placed into one of the following categories:

- Agree as is
- Increase conservation
- Reduce current use impacts

(The 49 submissions making comment on management strategies or other features of management plans also made comments in relation to zoning.)

For example, a submission stating agreement with the proposed arrangements with no changes suggested was categorised as 'Agree as is'. A submission suggesting changes to zoning in order to increase the conservation outcome was categorised as 'Increase conservation'. A submission advocating changes to zoning in order to reduce or remove impacts on existing recreational or commercial uses was categorised as 'Reduce current use impacts'.

Note that many submissions indicated agreement with aspects of the proposed zoning in some parks but not in others. In order to provide a broad summary of feedback a judgement was made as to whether a submission was generally focused on increasing conservation or on reducing impacts on uses. A more detailed summary of feedback on the draft zoning proposal for each marine park is provided in section 8. A detailed summary of feedback on proposed

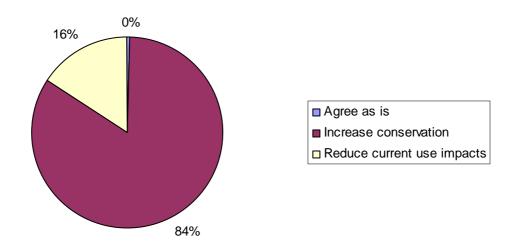
management strategies and other management plan arrangements is provided in section 10 of this report.

# **Broad summary of feedback**

Of the total number of respondents, 40 (<1%) indicated agreement without change for the draft zoning proposals, while 7,251 (84%) supported increasing the number or size of sanctuary zones to achieve a stronger conservation outcome.

A total of 1,358, or 16% of respondents, supported changes to the draft zoning proposals in order to reduce impacts on current uses, such as commercial or recreational fishing or aquaculture.

Figure 3 Broad summary of feedback



#### 8. COMMENTS ON DRAFT ZONING FOR INDIVIDUAL MARINE PARKS

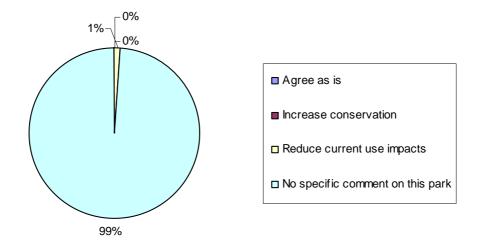
#### Marine Park 1: Far West Coast Marine Park

#### Background

A total of 103 (1%) of the 8,649 respondents commented specifically on the Far West Coast Marine Park. 3 (0.03%) suggested changes to zoning to increase the conservation outcome, 100 (1%) suggested changes to zoning to reduce impacts on current uses, while 8,546 (99%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	0
Increase conservation	3
Reduce current use impacts	100
No specific comment on this park	8,546
Total	8,649

**Figure 4** Summary of feedback on zoning for Far West Coast Marine Park (note: percentages rounded)



#### Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Far West Coast Marine Park are shown in Table 6.

Table 6 Sample comments relating to draft zoning of the Far West Coast Marine Park

Category	Zone Ref	Sample summary comments and/or quotes from submissions (with submission reference #)
General	All	Generally, the LAG advice - option 1 is supported for this area but see also earlier comments provided by SA Marine Parks Management Alliance and report authored by Dr Ian Knuckey to further reduce impact on Northern Zone Rock Lobster Fishery. (2539)  "Restriction of shore based fishing impacts on the local community
		of the far west of South Australia and closes down mulloway fishing beaches that are important to Ceduna recreational and commercial fishers this will damage tourism visitation to fish our remote beaches." (4213)  "use original LAG advice for this region. The current DEWNR

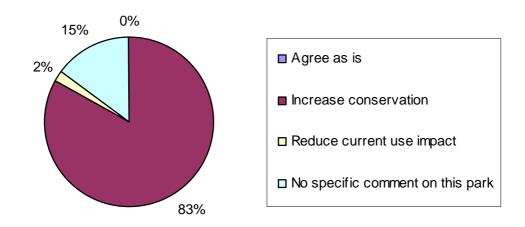
		proposal is extremely high impact." (4392)
		Allow mainland shore based fishing. (23)
Sanctuary zoning	SZ 01	Area already protected by Commonwealth Marine Reserve. Sea
(SZ)		Eagles that nest in cliffs aren't threatened by fishers. (4616)
	SZ 02	Allow along the Hilton camp area between the 1st October to 30th
		April to allow people to fish for mulloway. (47)
		Allow between 1 Nov and 30 April so people can fish for mulloway in
		the area. (48)
	SZ 03	Fishing should be allowed in summer and winter in this area. (2177)
Habitat Protection	HPZ 01 &	"There has not been enough time to study and fully understand what
zoning (HPZ)	02	is trying to be achieved in this marine park." (4531)

# Marine Park 2: Nuyts Archipelago Marine Park Background

A total of 7,347 (85%) of the 8,649 respondents commented specifically on the Nuyts Archipelago Marine Park. 5 (0.06%) agreed with the proposed zoning as is, 7,181 (83%) suggested changes to zoning to increase the conservation outcome, 161 (2%) suggested changes to zoning to reduce impacts on current uses, while 1,302 (15%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	5
Increase conservation	7,181
Reduce current use impact	161
No specific comment on this park	1,302
Total	8,649

**Figure 5** Summary of feedback on zoning for Nuyts Archipelago Marine Park (note: percentages rounded)



#### Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Nuyts Archipelago Marine Park are shown in Table 7.

Table 7 Sample comments relating to draft zoning of the Nuyts Archipelago Marine Park

Category	Zone Ref #	Sample summary comments and/or quotes from submissions (with submission reference #)
General	All	Generally the LAG advice is supported for this area but see also earlier comments provided by SA Marine Parks Management Alliance and report authored by Dr Ian Knuckey to further reduce impact on Northern Zone Rock Lobster Fishery. (2539)  Habitat Protection Zone-type is absolutely sufficient to provide proper marine protection in this area. Generally, the Local Advisory Group advice for this area is supported, however the supporting comments to this LAG advice already provided separately by the SA Marine Parks Management Alliance earlier in the marine park process would further reduce the impact on the Western Zone Abalone Fishery and my business. (3252)
		"In the absence of a risk based approach to zoning for Marine Park 2

		- Nuyts Archipelago, the MFA rejects the current zoning in favour of
		the 'Final LAG Zoning'." (4210)  District Council of Ceduna believes policy commitments 9.1, 9.2, 9.3 and 9.4 relating to coastal development have been breached by the current proposal. (4213)
Sanctuary zoning	SZ 01	"Either remove 1km from the shore or Nuyts reef." (3254)
(SZ)		"The sanctuary zones including the St Francis and Nuyts groups of islands remove legal access to the most productive fishing areas in our waters." (4213)
		"welcome the steps taken toward a scientific solution to protecting iconic areas including Nuyts Reef" (4623)
		"SZ-1 proposed in a modified form under the LAG position. This modification will still have an impact but is more balanced and would serve both the needs of the industry while meeting expectations for protection of representativeness, and maintains the integrity of the regions biodiversity and would have no impact on the sea lion colony." (6687)
		"It is recommended that the final MPLAG advice from the meeting held on 2 May 2011, with Lound Island SZ7are supported as a package for marine park 2." (6718)
	SZ 02	"This has gone too far west, should be from the point and too far east, should be from the road going into "Spogs"" (4537) Sanctuary Zones are much larger than required for protection of
		stated species. (4616)
	SZ 03	Realign by using straight lines to prominent land marks to assist small tinnies without GPS. (4551)
		"SZ-3 should be the North of a line from the first point (32 degrees 7.035'S 133 degrees 28.810"E) North of Nadia Landing, to the first creek (32 degrees 7.735'S 133 degrees 27.040'E) on the Eastern side of Salmon Point" (6714)
	SZ 04	"We are happy with this sanctuary zone." (6714)
	SZ 05	Allocated mainly for shore birds. Small adjustments as per the map provided would make identification and use of the area simpler. (4551)  "The mark (133 degrees 29.032E; 32 degrees 8.900S) is too far west
		as it is out in the Nadia Channel and should only go to the sand edge." (6714)
	SZ 06	Google Earth maps and alternative coordinates are provided in the submission to refine the shape of the proposed Sanctuary Zone. (4537)
	SZ 08	Sanctuary zone should be increased in areas of high conservation value including St Francis Island. (985)
		"This sanctuary zone would take in the northern part of the main island and stretch out around Egg, Freeling, Dog and Smooth Islands and further north-east to Lacey Islands this alternative sanctuary zone would reduce the impact of commercial catches to <1t." p. 18 Knuckey (2012) (3081)
		"Any decrease to the number or size of sanctuaries within the draft proposal would be entirely unacceptable. Instead, I ask that the size and number of marine sanctuaries be increased particularly those protecting iconic areas such as Nuyts Reef, Isles of St Francis, Pearson Island, areas around Kangaroo Island and the Coorong
		Coast." (3913)  "Including isolated offshore areas as sanctuary zones will lead to
		extensive poaching activity and may well cause an increased take of fish due to the absence of monitoring by legal fishers during their normal fishing activities."
		"The closure of this productive fishing area badly affects catch of scale fish species, rock lobster, abalone and sardines for the commercial fishery and recreational catches of various species."
		"As a result of the proposed closure of the area protected by islands it will not be viable for sardine fishing to take place within our area."

		TIPEND!
		"DENR have recommended sanctuary zones which will quite possibly render [the Thevenard Fish Unloading Facility] uneconomical." (4213)  "We very strongly disagree with ostracising the St Francis Island
		Group" (4537)
		Support large sanctuary zones in areas such as this. (6710)
		Increase sanctuary zoning around Isles of St Francis. (6713)
		"It is suggested that the Isles of St Francis SZ is shifted northwards
		therefore providing access for commercial abalone harvesting at
		Fenelon Island, Massillon Island, West Island, Dog Island and the
		southern end of St Francis Island as they are areas of commercial
		fishing importance to the abalone and rock lobster industriesthe
		other areas included in the DEWNR's proposed sanctuary zone could be zoned as Habitat Protection." See submission for specific
		coordinates. If this proposal is accepted the Association and other
		commercial fishery sectors in the region will support the DEWNR
		proposal for Lound Island (SZ-7). (6718)
	SZ 09	Barlows Beach is a popular area for recreational cray fishing. Having
		a sanctuary zone will create boating safety issues. (687)
	SZ 10	The following is suggested in amendment to the final MPLAG advice:
		"The sandbar system on the northern side of the central creek
		represents a significant percentage of the SASQAP approved West Coast Vongole (mud cockle) quota" Suggests alternative zone
		design using the central creek as the northern boundary and
		following the creek into the mangrove system down to a line
		horizontal with the bays southern limit. (4210)
		Move the northern boundary of SZ-10 a short distance south to the
		channel and increase it east to the limestone bluff and increase it
		west into the mangroves. The change would allow for ongoing
	A d d 12 2 1 1 1	commercial cockle fishing. (4456)
	Add new SZ	Add sanctuary zone around Franklin and Eyre Islands. (985)  "A protection zone needs to be established within Fowlers Bay to
	32	protect a very significant Southern Right Whale calving, breeding and
		resting site. They deserve the same level of protection as the whales
		at the Head of the Bight." (3107)
		"Place a sanctuary over coastal waters between Beatrice Point to
		Cape Nuyts. This will capture the extensive soft corals that
		populate bommies to within 10 m of the surface." (6709)
		Suggests an additional area be added to the west of Sanctuary Zone 2 to include Cactus Beach and the western side of Point Sinclair.
		"The aim of the [Point Sinclair National Surfing Reserve] is to protect
		and preserve the spirit and integrity of this remote section of
		Australian coastline, so that future generations of surfers may benefit
		from the unique experience that this fragile coastline and pristine
		surfing environment offers as encountered by the surfing pioneers of
		the 1950's and 60's." The proposal would allow for shore based
		fishing. The area would add to the status of South Australia's first proclaimed National Surfing Reserve. There would be no impact on
		commercial rock lobster fishing. (4342)
Habitat Protection	HPZ 02	"HPZ-2 we do not agree with the size or position of this huge area
zoning (HPZ)		and there is no sanctuary zone to buffer." (4537)
		"There is no place for 4WDs on beaches and ask please that they be
		banned as has happened in Victoria." (6715)
	HPZ 03	"HPZ-2 we do not agree with the size or position of this huge area
	HPZ 07	and there is no sanctuary zone to buffer." (4537)  "The fishery (prawn) would like to modify HPZ-7 to include General
	111.207	Managed Use to the east, south and west as per Map 2. The area
		south of the red line represents the important fishing grounds." (3055)
	HPZ 08	The high conservation value areas of Franklin and Eyre Islands off
		the Ceduna Coast, within and nearby Habitat Protection Zone 8 must
		be protected in sanctuaries. (3913)
		"All oyster leases and existing aquaculture zones in SA oyster
		growing bays be placed in general use zones consistent with

		recommendations made at every stage of marine park consultation processGMU allow ecologically sustainable developmentThis is
		entirely consistent with existing Aquaculture practice." (6711)
		Franklin and Eyre Islands off the Ceduna coast, within and nearby
		habitat protection zone 8 be considered as a sanctuary zone. (6713)
General managed	Add	GRA requests consideration of zoning and/or special purpose area
use zoning (GMUZ)	GMUZ	arrangements to provide for transhipping activities east of Point Bell,
		north of Goat Island and north of St Francis Island. (6)
	All	The RDAWEP Board sought the following assurances - "That all
		aquaculture zones are within a General Use Area". "The size and
		location of many of the Sanctuary and Habitat Zones will be adjusted
		to minimise the economic impact on the commercial or recreational
		industries to less than 5%". (6717)
Special purpose	SPA 04	Allow tow surfing with a jetski in Cape Adieu. (74)
areas (SPA)	SPA 05	Allow tow surfing in Pt Brown Special Purpose Area. Area is unique
		for the sport, unlike anywhere else in SA (74)
	Add SPA	GRA requests consideration of zoning and/or special purpose area
		arrangements to provide for transhipping activities east of Point Bell,
		north of Goat Island and north of St Francis Island. (6)

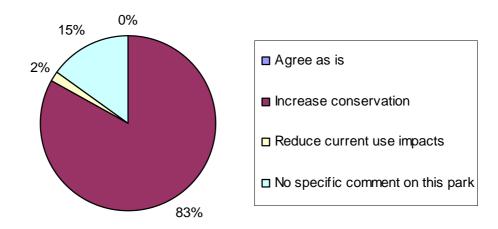
# Marine Park 3: West Coast Bays Marine Park

# Background

A total of 7,341 (85%) of the 8,649 respondents commented specifically on the West Coast Bays Marine Park. 8 (0.09%) agreed with the proposed zoning as is, 7,184 (83%) suggested changes to zoning to increase the conservation outcome, 149 (2%) suggested changes to zoning to reduce impacts on current uses, while 1,308 (15%) expressed no comment on the proposed zoning.

0-1	01
Category	Count
Agree as is	8
Increase conservation	7,184
Reduce current use impacts	149
No specific comment on this park	1,308
Total	8,649

**Figure 6** Summary of feedback on zoning for West Coast Bays Marine Park (note: percentages rounded)



#### Comments on draft zoning

Sample submission comments for the draft zoning proposed for the West Coast Bays Marine Park are shown in Table 8.

Table 8 Sample comments relating to draft zoning of the West Coast Bays Marine Park

Category	Zone Ref	Sample summary comments and/or quotes from submissions
	#	(with submission reference #)
General	All	Generally the LAG advice is supported for this area but see also earlier comments provided by SA Marine Parks Management Alliance and report authored by Dr Ian Knuckey to further reduce impact on Northern Zone Rock Lobster Fishery. (2539)  Habitat Protection Zone-type is absolutely sufficient to provide proper marine protection in this area. Generally, the Local Advisory Group advice for this area is supported, however the supporting comments to this LAG advice already provided separately by the SA Marine Parks Management Alliance earlier in the marine park process would further reduce the impact on the Western Zone Abalone Fishery and my business. (3252)

		"I was critical of previous proposals, but am pleased that the general community comments have been heard and largely adopted. I greatly appreciate the compromise achieved and strongly support the proposal without any further changes." (3427)  "In the absence of a risk based approach to zoning for Marine Park 3 - West Coast Bays, the MFA rejects the current zoning in favour of the 'Final LAG Zoning'."In contrast to the Final LAG zoning, the current zoning proposal removes two minor sanctuary zones from Venus Bay's sheltered waters which we welcome". (4210)  "the District Council welcomes the changes that have been incorporated to the West Coast Bays marine park Draft Management Plan and, while we still have some concerns regarding the economic and social impacts affecting both the recreational and commercial fishing industries, we would not wish to see changes to the proposal
Sanctuary zoning (SZ)	SZ 01	unless these impacts are further reduced." (4539)  "The only change we would like to see is beach fishing to be allowed along the whole of the shoreline in map 1(SZ-1)." (3106)  "It is critical protection extends to the northern side of Cape
		Blanche/South end of Sceale Bay to capture extensive reef habitat which include algal forest and nursery grounds for groper." (6709)
	SZ 02	Having a sanctuary zone around Nicolas Baudin Island will create an unsafe environment for small boats. (687)
		"This remains our most serious concern. Although we are relieved to see at least a small area of sanctuary zone at Cape Blanche, we believe that the sanctuary zone here needs to be considerably larger. In our viewthis is one of the most significant conservation sites in the entire marine park network deserving of a much larger sanctuary zone as was proposed by the Scientific Working Group in the original Starting Point proposalWe urge the SA government to consider again the high conservation importance of this area and increase the size of SZ-2 accordingly." (6696)
		"It is recommended that the final MPLAG advice from the meeting held on 3 May 2011 is supported" to reduce impacts on the abalone fishery. (6718)
	SZ 03	I would be opposed to any increase in further sanctuary zones within this area. (3105)  "We are pleased to see the inclusion of this sanctuary zone, which provides additional protection of ASL feeding habitat and representation of deep water benthic environments." (6696)
	SZ 04	Hard to navigate with GPS given boundaries are not 90 degrees. (4616)  Suggests jet skis should be banned in Baird Bay. Have had several incidents of jet skis disturbing dolphins and sea lions. (236)
	SZ 05	Exchange for RAZ to protect mud flats and salt marshes. (4616)
	SZ 06	Hard to navigate with GPS given boundaries are not 90 degrees. (4616)
	SZ 07	"SZ7 could be reduced in width and the length extended to shore and abut the land based conservation park. The modification would allow more consistent replication for assessment of zoning impacts and provide larger preservation of a suite of habitats." (6712)
	SZ 08	"We support the protection of Germein Island and SZ-8We are not confident that the diversity of marine habitats in Venus bay has been represented within Sanctuary zones. Both of these sanctuary zones should be increased in area to provide adequate representation of the diversity of benthic habitats in Venus Bay" (6696)
	SZ 09	Important garfish fishing, allow capture of this species with dab net. This would have a very low impact to the benthic zone. (74)
	Add new SZ	Zone should cover Smooth Pools, extending to include the Granites towards the Dreadnoughts. This would protect the habitat of the world's rarest sea star 'Little Patty'. (4684)  "We urge the SA Government to recognise the need to protect Jones
		Island and some areas of the entrance basin of Baird Bay within a

		sanctuary zone" (6696)
		"it will be important to include area of high cliff on the eastern side
		of Searcy Bay. One option would be to extend the sanctuary zone at
		Point Labatt 5 km north providing ecological linkages across the
		whole of Searcy Bay area." (6709)
Habitat Protection	HPZ 01	Cape Blanche and Nicholas Baudin Island including the coastline
zoning (HPZ)		adjacent to the Cape Blanche and Nicholas Baudin Island
		Conservation Parks be considered as a Sanctuary Zone. (6713)
Restricted access	RAZ 01	Supported, to protect seal colony. (4616)
zoning (RAZ)	RAZ 02	Supported, to protect seal colony. (4616)
Special purpose	SPA 01	Must be made clearer that fishing is permitted in special purpose
areas (SPA)		areas as it is not specifically listed as a permitted activity. (4533)
	Add SPA	"I believe a solution to minimise impacts to the northern zone rock
		lobster fishery would be to zone over the current sanctuary areas as
		special purpose zones and write into the management plans that rock
		lobster fishing is a permitted activity in this sanctuary zone." (4195)

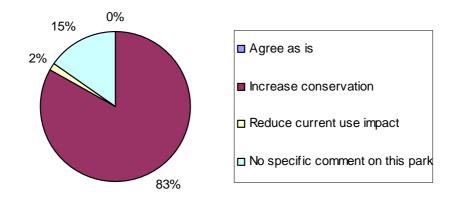
# **Marine Park 4: Investigator Marine Park**

#### Background

A total of 7,332 (85%) of the 8,649 respondents commented specifically on the Investigator Marine Park. 4 (0.05%) agreed with the proposed zoning as is, 7,177 (83%) suggested changes to zoning to increase the conservation outcome, 151 (2%) suggested changes to zoning to reduce impacts on current uses, while 1,317 (15%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	4
Increase conservation	7,177
Reduce current use impact	151
No specific comment on this park	1,317
Total	8,649

**Figure 7** Summary of feedback on zoning for Investigator Marine Park (note: percentages rounded)



#### Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Investigator Marine Park are shown in Table 9.

Table 9 Sample comments relating to draft zoning of the Investigator Marine Park

Category	Zone Ref #	Sample summary comments and/or quotes from submissions (with submission reference #)
General All		Habitat Protection Zone-type is absolutely sufficient to provide proper marine protection in this area. Generally, the Local Advisory Group advice for this area is supported, however the supporting comments to this LAG advice already provided separately by the SA Marine Parks Management Alliance earlier in the marine park process would further reduce the impact on the Western Zone Abalone Fishery and my business. (3252)
		Generally the LAG advice is supported for this area but see also earlier comments provided by SA Marine Parks Management Alliance and report authored by Dr Ian Knuckey to further reduce impact on Northern Zone Rock Lobster Fishery. (2539)
Sanctuary zoning (SZ)	SZ 01	"I have, in the past, used this area for commercial charter fishing, also for Eco Tourism to show off one of the jewels on the west coast. I have also been involved with scientists and their studies out there. I think it is an amazing place and I commend you for making this

		decision, I hope the state can afford the displaced effort that this
		zoning will bring."
		"I still recall an American couple I took out there several years ago
		who were accomplished world travellers, buckets of money and had
		been everywhere and done everything. They considered this place
		to be equivalent to the Galapagos, and it was the highlight of their trip
		to Australia." (73)
		"strongly disagree with ostracizing the Pearsons Group of Islands, an area of 211 square kms." (4537)
		Pearson Island is an extremely important area for rock lobster and
		abalone fisheries and for the charter fishery. Impacts should be
		reduced by applying earlier advice provided by the Alliance. Advice
		provided by the rock lobster and charter fisheries should also be
		applied to reduce impacts on these sectors. (4571)
		"welcome the steps taken toward a scientific solution to protecting iconic areas includingPearson Island" (4623)
		"SZ-1 as proposed under the majority LAG position is supported. This
		modification will still have an impact but is more balanced and would
		serve both the needs of industry while meeting expectations for
		protection of representativeness, maintains the integrity of the
		regions biodiversity and would have no impact on the Australian sea
		lion colony." (6687)
		"We strongly support the proposed sanctuary zone for Pearson
		island. This is an iconic site of high conservation importance"
		(6696)
		Support large Sanctuary Zones in areas of high conservation value
		such as this. (6710)  "It is recommended that the final MPLAG advice for Pearson Island
		from the meeting held on 3 May 2011, with the Cap Island SZ and
		Locks Well SZare supported as a package for marine park 4."
		(6718)
	SZ 02	Biodiversity not under threat in this area. (4616)
		"The other sanctuary areas are supported in line with the majority
		LAG position." (6687)
	SZ 03	"Sanctuary zone 3 will impact on my fishing with a subsequent loss
		of income." (3251)
		"Most of the fishing is to the western side of Cap Islandif the
		sanctuary zone finished in line with the most northern point of Cap
		Island, the impact on commercial catches would be reduced by 50%."
		pg 24 (3081)
		"We believe it is essential that a limestone island and reef
		assemblage be protected within a sanctuary zone for marine park
		4Cap Island fulfils this requirement, with the inclusion of near
		shore reefs and cliffs. This inclusion is particularly important
		considering the loss of Topgallant Island from the latest proposal."
	A al -1	(6696)
	Add new	Add sanctuary zone around Topgallant Isles. (985)
	SZ	"A sanctuary zone taking in the low cliffs at the northern end of
		Sheringa extending 10kms north to take in the transect to high cliffs
		would ensure shallow reef habitat is protected." (6709)
		"Areas excluded from the current proposal that should be protected in
		Sanctuaries include:Top Gallant Isles off the Elliston coast" (6710)
Habitat Protection	HPZ 02	Consider Topgallant Isles off the Elliston coast within Habitat
zoning (HPZ)	111 2 02	Protection Zone 2 to become a Sanctuary Zone. (6710)
		ave been received for all proposed zones

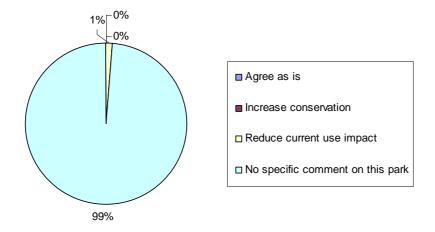
# Marine Park 5: Thorny Passage Marine Park

#### Background

A total of 118 (1%) of the 8,649 respondents commented specifically on the Thorny Passage Marine Park. 4 (0.05%) agreed with the proposed zoning as is, 6 (0.07%) suggested changes to zoning to increase the conservation outcome, 108 (1%) suggested changes to zoning to reduce impacts on current uses, while 8,531 (99%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	4
Increase conservation	6
Reduce current use impact	108
No specific comment on this park	8,531
Total	8,649

**Figure 8** Summary of feedback on zoning for Thorny Passage Marine Park (note: percentages rounded)



# Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Thorny Passage Marine Park are shown in Table 10.

**Table 10** Sample comments relating to draft zoning of the Thorny Passage Marine Park

Category	Zone Ref #	Sample summary comments and/or quotes from submissions (with submission reference #)
General	All	Refer to the earlier submission made by industry through the SA Marine Parks Management Alliance, which commented on the LAG advice. (2539)
		"I personally think the recreational and commercial fishers in the Port Lincoln, Tumby Bay and Coffin Bay have not come off too badly with the draft marine park report." (4532)
Sanctuary zoning	SZ 01	"Area SZ-1 to the South East as shown on map." (3122)
(SZ)		"Agreed to protect small but important areas of seagrass and rubble invertebrate communities." (429)
	SZ 02	Suggests creating a community access / usage area 200m wide around this zone. (4493)
		"I ask please that this beach (Long beach) be preserved and protected so that future generations can also enjoy the Pied Oystercatchers." (6715)
		Sanctuary zone in mouth near Yangie Bay should be reduced to a

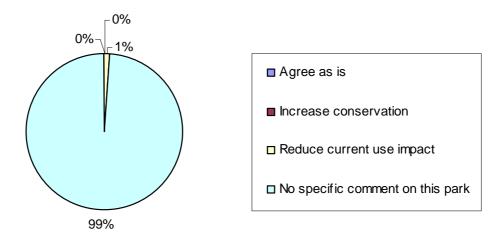
		point where the channel challows and enters the boy. This is an
		point where the channel shallows and enters the bay. This is an important recreational fishing area. (46)
	SZ 03	Kellidie Bay has some of the biggest yellowtail kingfish in the world,
	32 03	need to leave all of this area open for fishing. (60)
		Agreed. Protects low energy sandflat, seagrass and biogenic
		intertidal rocky shore. (429)
	SZ 04	"I would suggest shifting area SZ-4 further south as shown on map
		A large portion of my catch (octopus) from SZ-1 and SZ-4, over
		40%." (3122)
	SZ 05	Create a community access / usage area 200m wide around this
		zone. (4493)
		This zone needs to be extended up the coast to take in Cape
		Donington and surrounding islands. (3107)
	SZ 06	"Agreed to protect a site of Aboriginal significance." (429)
	SZ 07	Have as a seasonal closure (4616)
		"any impact would be removed if the southern boundary of Sleaford
		Bay sanctuary zone was moved 1km to the north." pg 28 (3081)
	Add new	Add a substantial sanctuary zone at Thorny Passage to preserve
	SZ	rocky environment of unique value. (429)
		"I would also like to propose the inclusion of Golden Island as a
		sanctuary zone in the Thorny Passage Marine ParkThis is one of
		the smaller islands in the Whidbey Group, and still leaves open in
		excess of 18 islands still available for commercial and recreational
		fishing in this park alone." (4170)  Support the addition of a sanctuary zone on the southern end of
		Gunyah Beach as per LAG advice. (4532)
		The area around Golden Island and Memory Cove should be
		considered as sanctuary zone. (6713)
Habitat Protection	HPZ 01	"All oyster leases and existing aquaculture zones in SA oyster
zoning (HPZ)	0 .	growing bays be placed in general use zones consistent with
		recommendations made at every stage of marine park consultation
		processGMU allow ecologically sustainable developmentThis is
		entirely consistent with existing Aquaculture practice." (6711)
		"The West Coast prawn fishery recommends that the General
		Managed Use Zoning currently drafted in the mouth of Coffin Bay is
		modified to include the current trawl grounds." (see map 3 in
		submission). (3055)
General managed	All	The RDAWEP Board sought the following assurances - "That all
use zoning (GMUZ)		aquaculture zones are within a General Use Area". "The size and
		location of many of the Sanctuary and Habitat Zones will be adjusted
		to minimise the economic impact on the commercial or recreational
		industries to less than 5%". (6717)

# Marine Park 6: Sir Joseph Banks Marine Park Background

A total of 103 (1%) of the 8,649 respondents commented specifically on the Sir Joseph Banks Group Marine Park. 1 (0.01%) agreed with the proposed zoning as is, 3 (0.03%) suggested changes to zoning to increase the conservation outcome, 99 (1%) suggested changes to zoning to reduce impacts on current uses, while 8,546 (99%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	1
Increase conservation	3
Reduce current use impact	99
No specific comment on this park	8,546
Total	8,649

**Figure 9** Summary of feedback on zoning for Sir Joseph Banks Group Marine Park (note: percentages rounded)



#### Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Sir Joseph Banks Group Marine Park are shown in Table 11.

Table 11 Sample comments relating to draft zoning of the Sir Joseph Banks Group Marine Park

Category	Zone Ref	Sample summary comments and/or quotes from submissions
	#	(with submission reference #)
General	All	Generally the LAG advice is supported for this area but see also earlier comments provided by SA Marine Parks Management Alliance and report authored by Dr Ian Knuckey to further reduce impact on Northern Zone Rock Lobster Fishery. (2539)  "all other marine park zoning proposed in both Gulf St Vincent and
		Spencer Gulf does not impact on the commercial blue crab pot fishery in a significant manner; however this is not the case for other commercial fishing sectors." (3127)
Sanctuary zoning (SZ)	SZ 01	Move the eastern boundary of SZ-1 to the west in line with Longitude E 136 20.00. The change would provide for ease of logistical operation for the sardine fishery in a high catch area. (4458)  Remove the area eastwards of 136 20.000 or rezone to HPZ outside of 20m depth. (4571)
	SZ 02	Currently doesn't allow small boats to trawl through the salmon hole.

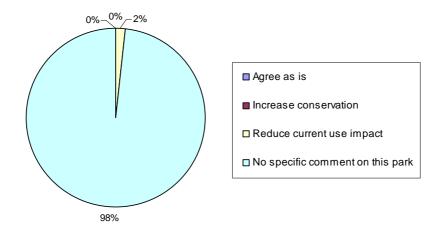
		And sand bar on northern side of creek popular for salmon fishing at low tide. See hard copy for GPS coordinates. (619)
	SZ 03	"SZ-3 as proposed overlaps an area of importance to the Charter Boat Fishery. It is proposed an area inside of 15metres depth off Point Bolingbroke be rezoned as habitat protection zone. The sanctuary zone could be redefined to take in an area to the east of SZ-3." (6687)
		"The inshore waters directly adjacent to Pt. Bolingbroke represent key commercial fishing grounds (hotspot)."  "Moving this zone seaward to waters >15m would dramatically reduce the impact on the MSF sector." (4210)
	SZ 04	The following is suggested in amendment to the final MPLAG advice: "Move the sanctuary zone to seaward side of Spilsby Is. and encompass Stickney Is." This change would provide for commercial fishing in waters sheltered from SE winds at Boucaut Is. (4210)
		"SZ-4 is proposed in a modified from the LAG position. This modification will still have an impact but is more balanced and would serve both the needs of industry while meeting expectations for maintaining the integrity of the region's biodiversity and would have no impact on the dolphin community." (6687)
	SZ 05	Recreational fishers pose no threat to seals, sharks and breeding birds (4616)
	Add new SZ	"Protect the deeper water (30+m) where there are some habitats in the lower Spencer gulf that has suffered from low intensity of trawling that still contain high sponge biomass and richness. Would be good to have at least one deep water zone in Spencer Gulf protected from future potential impacts. Would prefer to see a large square sanctuary zone positioned to the south and east, i.e. north of the Gambier Islands." (6709)
General managed use zoning (GMUZ)	All	The RDAWEP Board sought the following assurances - "That all aquaculture zones are within a General Use Area". "The size and location of many of the Sanctuary and Habitat Zones will be adjusted to minimise the economic impact on the commercial or recreational industries to less than 5%". (6717)

# Marine Park 7: Neptune Islands Group Marine Park Background

A total of 152 (2%) of the 8,649 respondents commented specifically on the Neptune Islands Group Marine Park. 1 (0.01%) agreed with the proposed zoning as is, 1 (0.01%) suggested changes to zoning to increase the conservation outcome, 150 (1%) suggested changes to zoning to reduce impacts on current uses, while 8,497 (98%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	1
Increase conservation	1
Reduce current use impact	150
No specific comment on this park	8,497
Total	8,649

**Figure 10** Summary of feedback on zoning for Neptune Islands Group Marine Park (note: percentages rounded)



#### Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Neptune Islands Group Marine Park are shown in Table 12.

**Table 12** Sample comments relating to draft zoning of the Neptune Islands Group Marine Park

Theme	Zone Ref #	Sample summary comments and/or quotes from submissions (with submission reference #)
Category		"Habitat Protection Zone-type is absolutely sufficient to provide proper marine protection in this area. Generally, the Local Advisory Group advice for this area is supported, however the supporting comments to this LAG advice already provided separately by the SA Marine Parks Management Alliance earlier in the marine park process would further reduce the impact on the Western Zone Abalone Fishery and my business." (3252)
		Generally the LAG advice is supported for this area but see also earlier comments provided by SA Marine Parks Management Alliance and report authored by Dr Ian Knuckey to further reduce impact on Northern Zone Rock Lobster Fishery. 2539)
Sanctuary zoning (SZ)	SZ 01	" A semi-circle around the northern area, rather than completely surrounding the island" pg 33 (3081)  "We support the SZ-1 zone of the North Neptune Island group subject

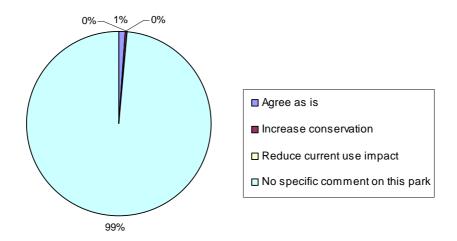
		to playification of parmicolbility of a) barlaying and balting for any
		to clarification of permissibility of a) berleying and baiting for cage
		dive operators with an appropriate Ministerial Exemption to berley; and b) flash photography." (4245)
		Change proposed zone according to coordinates provided: S136 04
		000; E35 13 900. (4392)
		The proposed zoning is not supported. "The SZ surrounding South
		Neptune Island will have a major impact on important fisheries in the
		area, which are detailed in individual fishery-specific submissions."
		EPBC accredited fisheries should not be restricted by sanctuary
		zones - habitat protection zones provide sufficient protection.
		Voluntary compliance is unlikely to be realised and the zoning will be
		unworkable. Suggests revision to address current and future
		economic impact and lack of community support. "Supporting
		comments to the final LAG advice already provided separately by the
		SA Marine Parks Management Alliance earlier in the marine park
		process would further reduce the impact on major fisheries,
		particularly the Northern Zone Rock Lobster Fishery. In addition, the
		SA Rock Lobster Advisory Council (SARLAC) has submitted a report,
		authored by Dr Ian Knuckey, providing information to further reduce
		the impacts from the current proposal in this area and this advice is
		supported." (4571)
		"While SZ-1 as proposed secures the area adjacent to South
		Neptune Island a modified form that limits the Sanctuary zone to the
		north western portion of the North Neptune island area proposed
		would be supportedIf this is not done the it is proposed that the area be reclassified to allow hook and line fishing in order to permit
		approved activities under a NP&WS authorisation. This activity is
		currently offered as a component of the charter services for cage
		diving." (6687)
		"It is suggested that the North Neptune Island SZ is reduced in size
		and located at the north east of the island. This would provide
		access to abalone diving on the eastern and southern ends of North
		Neptune Island as they are areas of high commercial fishing
		importance. The coordinates of the proposed sanctuary zone are
		longitude 35 13 900E and latitude 136 04 000N. This alternative
		proposal is supported by all other commercial fishing seafood sectors
		that operate in the region" (6718)
Habitat Protection	HPZ 01	Suggest change Habitat Protection Zone 1 to create a sanctuary
zoning (HPZ)		zone around South Neptune Islands as well as North Neptune
Destricted.	D 4 7 04	Islands. (4245)
Restricted access	RAZ 01	"We request RZ-1 zone allows access to the island on a permit
zoning (RAZ)	may sat la	system for tour operators." (4245)

# Marine Park 8: Gambier Islands Group Marine Park Background

A total of 111 (1%) of the 8,649 respondents commented specifically on the Gambier Islands Group Marine Park. 98 (1%) agreed with the proposed zoning as is, 13 (0.02%) suggested changes to zoning to increase the conservation outcome, 0 suggested changes to zoning to reduce impacts on current uses, while 8,538 (99%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	98
Increase conservation	13
Reduce current use impact	0
No specific comment on this park	8,538
Total	8,649

**Figure 11** Summary of feedback on zoning for Gambier Islands Group Marine Park (note: percentages rounded)



#### Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Gambier Islands Group Marine Park are shown in Table 13.

Table 13 Sample comments relating to draft zoning of the Gambier Islands Group Marine Park

Category	Zone Ref #	Sample summary comments and/or quotes from submissions (with submission reference #)
General	All	The current proposal is supported. Generally the LAG advice is also supported for this area but see also earlier comments provided by SA Marine Parks Management Alliance. (2539)
		"The Alliance does not have any significant issues to raise with the proposed zoning although the general issues regarding the management planning should be noted." (4571)
Sanctuary zoning (SZ)	Add new SZ	"At least one world class sanctuary zone around South West rock will capture the different depth contours of the park." (6709)
Habitat Protection zoning (HPZ)	HPZ 01	Suggests Gambier Islands habitat protection zone 1 to become a sanctuary zone (6710)

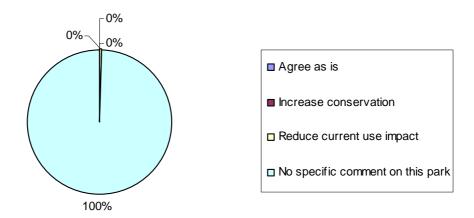
#### Marine Park 9: Franklin Harbor Marine Park

#### Background

A total of 37 (0.4%) of the 8,649 respondents commented specifically on the Franklin Harbor Marine Park. 0 agreed with the proposed zoning as is, 2 (0.02%) suggested changes to zoning to increase the conservation outcome, 35 (0.4%) suggested changes to zoning to reduce impacts on current uses, while 8,612 (99.6%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	0
Increase conservation	2
Reduce current use impact	35
No specific comment on this park	8612
Total	8,649

**Figure 12** Summary of feedback on zoning for Franklin Harbor Marine Park (note: percentages rounded)



#### Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Franklin Harbor Marine Park are shown in Table 14.

Table 14 Sample comments relating to draft zoning of the Franklin Harbor Marine Park

Category	Zone Ref	Sample summary comments and/or quotes from submissions (with submission reference #)
General	All	"In the absence of a risk based approach to zoning for Marine Park 9
		- Franklin Harbor, the MFA supports the 'Current Proposals'." (4210)
Sanctuary zoning	SZ 01 &	Leafy sea dragons aren't endangered by line fishing, but by divers.
(SZ)	02	(4616)
,	SZ 03	Provide for shore based fishing on eastern side of zone, existing plan does not show this allowance as requested by the Cowell Advisory Committee. The Council suspects" it might be an oversight in the
		concept of the whole state Marine Parks consideration". (49)
		"SZ-3 to cover the gap between Germein Point and Victoria Point.
		Extensive sponge beds occur in the area" (6709)
	SZ 04	"Specifically sanctuary zones SZ-4 and, particularly, SZ-5 will impact significantly on the blue crab pot fishery and should be removed" (3127)
		"Inshore fishing between Gibbon Point and the Knob is important commercial and recreational fishing ground (hot spot) within Park 9. It is for this reason the LAG decided the boundaries of this zone should

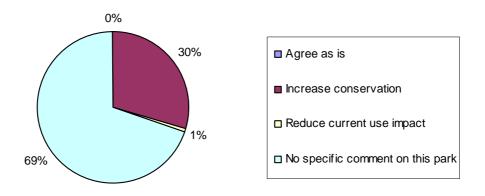
		be outside the 15m depth contour. The MFA suggest that this zone return to the LAG position (in this case), if management by numbers is required add any percentage loss to the eastern side of SZ-5." (4210)  "SZ-4 as proposed in a modified form under the LAG position is supported (exclude waters less than 5 meters depth from the sanctuary zone). This modification will minimise any impact but is more balanced and maintains the integrity of the regions." (6687)
	SZ 05	"Specifically sanctuary zones SZ-4 and, particularly, SZ-5 will impact significantly on the blue crab pot fishery and should be removed" (3127)
	Add new SZ	"A sanctuary zone at Shoalwater point is a must. The currents are very strong here. There are hard coral bommies in the area that are rare now in Spencer Gulf due to trawling" (6709)
Habitat Protection zoning (HPZ)	HPZ 02	"All oyster leases and existing aquaculture zones in SA oyster growing bays be placed in general use zones consistent with recommendations made at every stage of marine park consultation processGMU allow ecologically sustainable developmentThis is entirely consistent with existing Aquaculture practice." (6711)
General managed use zoning (GMUZ)	All	The RDAWEP Board sought the following assurances - "That all aquaculture zones are within a General Use Area". "The size and location of many of the Sanctuary and Habitat Zones will be adjusted to minimise the economic impact on the commercial or recreational industries to less than 5%". (6717)

## Marine Park 10: Upper Spencer Gulf Marine Park Background

A total of 2,610 (30%) of the 8,649 respondents commented specifically on the Upper Spencer Gulf Marine Park. 4 (0.04%) agreed with the proposed zoning as is, 2,559 (30%) suggested changes to zoning to increase the conservation outcome, 47 (1%) suggested changes to zoning to reduce impacts on current uses, while 6,039 (69%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	4
Increase conservation	2,559
Reduce current use impact	47
No specific comment on this park	6,039
Total	8,649

**Figure 13** Summary of feedback on zoning for Upper Spencer Gulf Marine Park (note: percentages rounded)



#### Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Upper Spencer Gulf Marine Park are shown in Table 15.

Table 15 Sample comments relating to draft zoning of the Upper Spencer Gulf Marine Park

Category	Zone Ref	Sample summary comments and/or quotes from submissions
	#	(with submission reference #)
General	All	Allow existing haul netting to continue. (27)
		"keep the Cephalopod exclusion zone in place for False Bay and allow fishing in all areas - in other words don't change anything that is currently in place" (1292)
		"The current sanctuary zoning proposal for this area will not negatively impact on this fishery. However any future changes to the park have the potential for significant impacts on the blue crab fishery." (3217)
		Council believes policy commitments 6.3.1, 6.3.2, and 6.3.3 relating to net fishing have been breached in the Upper Spencer Gulf Marine Park (4213)
Sanctuary zoning (SZ)	SZ 01	"Nursery areas should be protected and at least this area is undeveloped and relatively inaccessible. Extend south to approximately Commissant Point." (6709)
	SZ 02	"It would be important for the future development of Port Augusta that

	1	
		the marine parks as a whole, let alone a sanctuary zone was not included within the boundaries of the City of Port Augusta." (4763)
	SZ 03	Juvenile fish, shore birds, sea grass and mangroves aren't
		threatened by line fishers. (4616)
	SZ 04	Allow fishing in front of the last 27 shacks at Blanche Harbor
		Reserve. (29)
		"the people of Port Augusta will have no where to catch King
	07.05	George whiting so why cant the restriction in SZ 4 be lifted" (3038)
	SZ 05	"We the home owners, residents and recreational users of the
		township of Miranda do not agree with the proposed Upper Spencer Gulf Marine Park Sanctuary Zone 5 in its current form Ifamended
		as per the Miranda Community Submission, it will be supported and
		respected by the vast majority" (detailed map included) (4602)
		"we strongly oppose the exclusion of recreational anglers from the
		Black Point/Mushroom Rock area and we recognise the area as one
		of South Australia's significant snapper rock fishing locations." (1139)
		"SZ-6 boundaries are reset to those originally setup by the MPLAG
		10. That is, eastern boundary at Port Bonython jetty and western boundary 1 km (approx) east of Black Point." (3430)
		"Giant Cuttlefish breeding grounds, extension of SZ6 within the Upper
		Spencer Gulf Marine Park and a mechanism to extend protection to
		any other areas found to support smaller breeding aggregations of
		the upper Spencer Gulf giant Australian cuttlefish." (6713)
	SZ 07	Support as drawn (427)
	SZ 08	Blue crab feeding area and shorebird habitats, no reason to stop
	SZ 10	recreational fishers. (4616)  Tidal flats and salt marshes not under threat from recreational fishers.
		(4616)
	Add new	"A number of environmentally significant areas that should be
	SZ	considered in the current proposal include: The Giant Cuttlefish
Habitat Protection	HPZ 01	breeding grounds, extension of Sanctuary Zone 6." (6708)  Concerned that habitat protection zone will detract from the value of
zoning (HPZ)	TIFZUI	the family shack. (686)
	HPZ 03	"It is recommended that Habitat Protection Zone 3 is modified to
		reduce the potential impact of the current Habitat Protection Zone (for
Conoral managed	ΔII	SG prawn fishery)." (shown in Map 4 in submission) (3055)
General managed use zoning (GMUZ)	All	The RDAWEP Board sought the following assurances - "That all aquaculture zones are within a General Use Area". "The size and
use zorning (GiviOz)		location of many of the Sanctuary and Habitat Zones will be adjusted
		to minimise the economic impact on the commercial or recreational
		industries to less than 5%". (6717)
Special purpose	SPA all	"We therefore request that the issue of Special Purpose Areas being
areas (SPA)		applied to/overlaid on ALL Sanctuary Zones in Marine Park 10 is
		reviewed/Investigated." (4621)
		Review Special Purpose Areas being applied to all sanctuary zones
	<u> </u>	in Park 10. (4217)

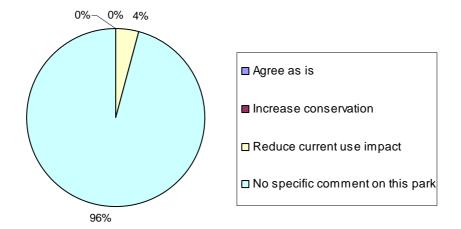
## Marine Park 11: Eastern Spencer Gulf Marine Park

## Background

A total of 367 (4%) of the 8,649 respondents commented specifically on the Eastern Spencer Gulf Marine Park. 0 agreed with the proposed zoning as is, 5 (0.05%) suggested changes to zoning to increase the conservation outcome, 362 (4%) suggested changes to zoning to reduce impacts on current uses, while 8,282 (96%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	0
Increase conservation	5
Reduce current use impact	362
No specific comment on this park	8,282
Total	8,649

**Figure 14** Summary of feedback on zoning for Eastern Spencer Gulf Marine Park (note: percentages rounded)



## Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Eastern Spencer Gulf Marine Park are shown in Table 16.

**Table 16** Sample comments relating to draft zoning of the Eastern Spencer Gulf Marine Park

Category	Zone Ref	Sample summary comments and/or quotes from submissions
	#	(with submission reference #)
General	All	Instead of sanctuary zone you could control fish takes by scientifically applying open and closed seasons based on fish reproduction cycles. (1608)
		"all other marine park zoning proposed in both Gulf St Vincent and Spencer Gulf does not impact on the commercial blue crab pot fishery in a significant manner; however this is not the case for other commercial fishing sectors." (3127)  "In the absence of a risk based approach to zoning for Marine Park 11 - Eastern Spencer Gulf, the MFA rejects the current zoning in favour of the 'Park 11 Action Group's proposals." (4210)
Sanctuary zoning (SZ)	SZ 01	Shore based fishing is an important community asset, particularly at locations including: Yorke Peninsula: Port Arthur (between Pt Wakefield and Pt Clinton), South of Cape Elizabeth (popular for camping and beach fishing), Chinaman's Hat (popular with families). (10)  Marine Park 11 Action Group Proposal shown with an alternative

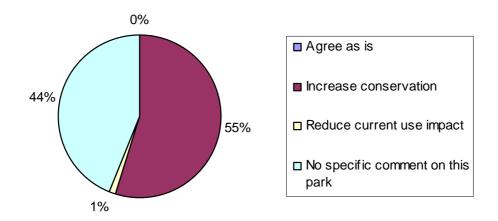
-		,
		map, showing SZ 1 allowing shore fishing. (371)
		Provide for shore fishing at this location. Consider also the
		suggestion (see attachment 2 in submission) of moving the SZ south
		to the Gap / West Tiparra Rocks region which would provide similar
		habitat without interfering with popular recreational activity. (4551)
	SZ 02	Shore fishing should be allowed along the Yorke Peninsula coastline.
		Including fishing with a hand line, float fishing, crab fishing using a
		rake and cockle, razor fish or mussel gathering. (9)
	SZ 03	Marine Park 11 Action Group Proposal shown with an alternative
		map, showing SZ 3 reduced in size. (371)
	Add new	"A sanctuary zone is required that takes in coastline and extends 2
	SZ	kms offshore from reef point to Beatrice rock." (6709)
Habitat Protection	HPZ 01	Marine Park 11 Action Group Proposal shown with an alternative
zoning (HPZ)		map, showing Habitat Protection Zone 1 reduced in size. (371)
		Revert to a 5km buffer around Sanctuary Zones. (3216)
	HPZ 02	Marine Park 11 Action Group Proposal shown with an alternative
		map, showing Habitat Protection Zone 2 reduced in size and split to
		create Habitat Protection Zone 3 around and North of Wardang island
		and across the bay south of Sanctuary Zone 2 (map provided with
		submission). (371)
	HPZ 02	"By replacing the Government Habitat Protection Zone 2 along the
		coast north and south of Pt Victoria with a General Managed Use
		zone 2 the attractiveness of the Port Victoria township for future
		sustainable growth and development will be maintained." (3483)
		"Move the Habitat Protection Zone 2 in a westerly direction from the
		coastline of the Port Victoria Township and southern beaches to
		Wardang Island and replace with General Managed Use zone 2"
		(map provided) to allow for jetty and channel marker maintenance,
		boat ramp dredging activities and for aquaculture. (4550)
General managed	GMUZ 02	Extend GMUZ 02 up to Port Victoria. "Shift the Habitat Protection
use zoning (GMUZ)		Zone 2 away from Port Victoria let the boat ramp be maintained."
		(2318)

## Marine Park 12: Southern Spencer Gulf Marine Park Background

A total of 4,856 (56%) of the 8,649 respondents commented specifically on the Southern Spencer Gulf Marine Park. 4 (0.04%) agreed with the proposed zoning as is, 4,735 (55%) suggested changes to zoning to increase the conservation outcome, 117 (1%) suggested changes to zoning to reduce impacts on current uses, while 3,793 (44%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	4
Increase conservation	4,735
Reduce current use impact	117
No specific comment on this park	3,793
Total	8,649

**Figure 15** Summary of feedback on zoning for Southern Spencer Gulf Marine Park (note: percentages rounded)



#### Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Southern Spencer Gulf Marine Park are shown in Table 17.

**Table 17** Sample comments relating to draft zoning of the Southern Spencer Gulf Marine Park

Category	Zone Ref	Sample summary comments and/or quotes from submissions (with submission reference #)
General	All	Allow shore fishing at Chinaman's Hat Beach. Location well known for mullet and snapper. (2177)  Accept K I MAG advice. (4400)
		See also a further submission for this area from the Alliance together with the SA Northern Zone Rock Lobster Fishermen's Association Inc and SARLAC. (2539)
Sanctuary zoning (SZ)	SZ 01	Area surrounding the coast of Althorpe Islands Conservation Park should be included in SZ1. "The intertidal and marine areas provide unique and complex habitat for a diverse variety of marine species which need a sanctuary zone for adequate protection. Many fish species spawn here, there are 'fish cleaning' stations which have been observed and it provides habitat for the Western Blue-groper [sic], and has been heavily over fished for rock lobster." (31)

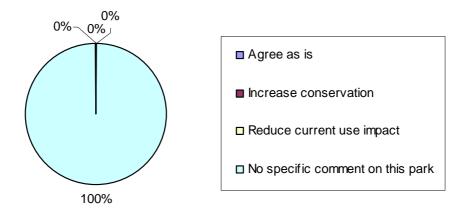
	1	
		Chinaman's beach provides beach fishing for local residents of Marion Bay and many tourists visiting Innes NP, and is one of the best beaches for yellow eye mullet (seasonal). Recommend that the zone extend from the reef by Chinaman's Hat Island rather than the main coastal area (thus allowing fishing off the beach) or an exemption as per other zones eg on Eyre Peninsula. (71)  Sanctuary Zone areas aren't easily defined. Propose to instead put sanctuary zone in more suitable areas, covering a greater diversity of marine environment eg. Cape Spencer Light along coast to headland at Stenhouse Bay. (343)  "In my opinion it should only extend as far as the eastern most land
		GPS mark of 136.56.591E." (3196)
		"The beach in the Chinaman's Hat SZ region is a very popular
		recreational fishing location and allowing shore
		based fishing to continue would be appreciated." (4551)
		"SZ-1 be modified by moving the majority of the zone outside of 20 fathoms, with a specific, more targeted zone adjacent to Chinaman's Hat." (4571)
	SZ 02	Investigator Strait, an excellent proposal to protect known habitat for spawning King George whiting. (432)
		Follows K I MPLAG advice. Pleased with the SZ protecting the Orcades Bank. (4330)
		"SZ-2 be reduced to allow access to at least a portion of Orcades
		bank. This region is important for charter especially for key
		recreational species and migratory fish including tunas and other game fish." (6687)
	Add new SZ	Put zone extending north - easterly from coastline from Point Souttar to Corny Point (to protect extensive dense seagrass habitats in shallow waters). Also put zone to include the Gleesons Landing Rock Lobster Sanctuary (to protect nursery for western blue groper and blue wrasse, nursery area for Port Jackson shark). (38)  Include coastline adjacent to Innes National Park as sanctuary zone.
		(247)
Habitat Protection zoning (HPZ)	HPZ 01	"All oyster leases and existing aquaculture zones in SA oyster growing bays be placed in general use zones consistent with recommendations made at every stage of marine park consultation processGeneral Managed Use zones allow ecologically sustainable developmentThis is entirely consistent with existing Aquaculture practice." (6711)
		Point Turton shackowner and believes will not be able to fish in the waters surrounding Point Turton. (53)
		"Corny Point is an important trawling ground for larger more highly valued prawns It is requested that the Habitat Protection Zone is modified to allow access to the area north of the red line drawn in map 5." (see map 5 in submission). (3055)
	HPZ 02	"other areas just as precious that still need our protection, such as the coastline adjacent to Innes National Park, within Habitat Protection Zone 2 Southern Spencer Gulf Marine Park." (3049)

## Marine Park 13: Lower Yorke Peninsula Marine Park Background

A total of 17 (0.2%) of the 8,649 respondents commented specifically on the Lower Yorke Peninsula Marine Park. 0 agreed with the proposed zoning as is, 0 suggested changes to zoning to increase the conservation outcome, 17 (0.2%) suggested changes to zoning to reduce impacts on current uses, while 8,632 (99.8%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	0
Increase conservation	0
Reduce current use impact	17
No specific comment on this park	8,632
Total	8,649

**Figure 16** Summary of feedback on zoning for Lower Yorke Peninsula Marine Park (note: percentages rounded)



#### Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Lower Yorke Peninsula Marine Park are shown in Table 18.

Table 18 Sample comments relating to draft zoning of the Lower Yorke Peninsula Marine Park

Category	Zone Ref #	Sample summary comments and/or quotes from submissions (with submission reference #)
General	All	Allow shore fishing across Yorke Peninsula. Supports the Lower Yorke Peninsula Community Action Group Proposal (3481)
Sanctuary zoning (SZ)	SZ 01	"The area encompassed by this sanctuary zone is significant fishing grounds (hotspot) for the local Marine scalefish sector. Remove the area currently outside the outer boundaries of the Marine Park to reduce the area affected and improve the demarcation of the zone. The MFA would support the LAG proposal for the eastern boundary as Warooka Road is a practical natural landmark for navigation and compliance. The extra size taken under the current zoning does not encompass any extra conservation values other than more area."  "In the absence of a risk based approach to zoning for Marine Park 13 - Lower Yorke Peninsular, the MFA supports the current zoning proposal with the amendments put forward by the Port Moorowie Action Group." (4210)  Not critical, but consider allowing access for approx 800m of beach. Hard for community to access though. (4212)

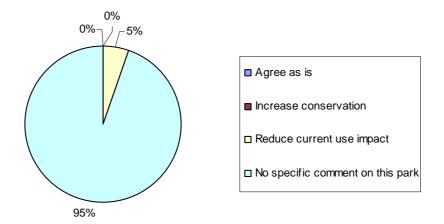
		"the proposed SZ-1 is outside the boundary of the marine park.  Apart from the legality of this, the proposed zone extends into areas of importance for the charter fishing industry whereas little fishing occurs within the marine park boundary. It is recommended SZ-1 be modified by the removal of the sanctuary zone area outside of the proclaimed boundary of the Marine Park." (4571)
		"We are happy for the inside of Surt Bay to be taken as a no take zone but certainly not the Davenport Shoal this is really important to us local small craft fisherman" See maps in submission, 3 options drawn (6688)
Habitat Protection zoning (HPZ)	HPZ 01	"We believe that there is no point in labelling this area as a Habitat Protection Zone because it would make future investors feel threatened and current investment stagnant." (4313)  "All oyster leases and existing aquaculture zones in SA oyster growing bays be placed in general use zones consistent with recommendations made at every stage of marine park consultation processGeneral Managed Use zones allow ecologically sustainable developmentThis is entirely consistent with existing Aquaculture practice." (6711)

## Marine Park 14: Upper Gulf St Vincent Marine Park Background

A total of 464 (5%) of the 8,649 respondents commented specifically on the Upper Gulf St Vincent Marine Park. 1 (0.01%) agreed with the proposed zoning as is, 4 (0.04%) suggested changes to zoning to increase the conservation outcome, 459 (5%) suggested changes to zoning to reduce impacts on current uses, while 8,185 (95%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	1
Increase conservation	4
Reduce current use impact	459
No specific comment on this park	8,185
Total	8,649

**Figure 17** Summary of feedback on zoning for Upper Gulf St Vincent Marine Park (note: percentages rounded)



## Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Upper Gulf St Vincent Marine Park are shown in Table 19.

Table 19 Sample comments relating to draft zoning of the Upper Gulf St Vincent Marine Park

Category	Zone Ref #	Sample summary comments and/or quotes from submissions (with submission reference #)
General	All	Exclude Port Wakefield creek and channel from marine park 14 to ensure Council can dredge. (292)
		Zone as per MP14 Action Group Proposal. (1357)
		Shore fishing should be allowed at Port Arthur. Also fishing should be allowed 1 km offshore for walking, angling including crab hand fishing. (2177)
		"all other marine park zoning proposed in both Gulf St Vincent and Spencer Gulf does not impact on the commercial blue crab pot fishery in a significant manner; however this is not the case for other commercial fishing sectors." (3127)
		In the absence of a risk based approach to zoning for Marine Park 14 - Upper Gulf St. Vincent, the MFA rejects the current zoning in favour of the Park 14 Local Action Group proposals. (4210)

		Suggests policy commitments / other government commitments relating to net fishing have been broken in draft zoning proposal. (4282)
		"we would suggest that an exclusion zone from the park be established centred on the Port Wakefield channel to be at least one
		nautical square mile" (4324)
		The proposed zoning is not supported. The zoning will have a very
		high impact on the haul net fishery in the region and impact the
		economic viability of the Port Wakefield community. The charter
		fishery will also be impacted by SZ-1 & 3. Voluntary compliance is unlikely to be realised and the zoning will be unworkable. Suggests a
		revision of the zoning proposal. The final LAG advice for this area is
		supported by the Alliance. (4571)
Sanctuary zoning	SZ 01	Omit Port Arthur and Devil's Elbow. (19)
(SZ)		"Reduce the size of SZ1 as specified by the Marine Park 14 Action
		Group community proposal as this will ensure the minimisation of the
		social and economic impacts for the Port Wakefield region and at the
		same time set aside areas for conservation." (3194)
		"The MSF Haul Net Fishery is already significantly spatially limited in
		Park 14, GSV, and state waters. The Western side of Upper GSV
		between Pt Arthur and Pt Clinton is the most significant fishing
		hotspot remaining. The Lag and community proposals agreed to protect the Nth Eastern Side of the Gulf as this represented the
		healthiest example of an inverse estuary system in GSV, while
		minimising the effect on commercial and recreational fishers. Having
		the outer boundary run between Port Wakefield Channel and North
		Pt Arthur beach would also ensure ease of navigation compliance via
		prominent natural and existing features. Taking in the mangrove area
		as is the case at SZ-4 would provide an additional conservation
		values and percentage of area protected." (4210)
		Allow for shore fishing at Port Arthur - approx 100m. (4212)
		"From a recreational fishing perspective this is a crucial bio unit."
		Endorses the majority of the SZ remaining intact but allowing limited access as suggested in the map provided in the submission - i.e.
		small access around Port Arthur and realigning around Port
		Wakefield. (4551)
		"As a business owner in Port Wakefield I have grave concerns for my
		future livelihood should Marine Park 14 and especially Sanctuary
		Zone 1, be implemented in it current format. Please accept the
		amended plan by the Marine Park Action Group." (4772)
		"SZ-1 as proposed by the Port Wakefield community action group
		which is largely based on the LAG position is supported. This leaves a significant portion of an area fished by commercial and recreational
		fishers open for further development of the charter industry given its
		proximity to key tourism areas" (6687)
	SZ 02	Extend north as continuation of sanctuary zone 2. (1435)
		"Proposed no take zones would result in a loss of 60% of the
		fisheries and associated income." (4279)
	SZ 03	Already a closure on snapper harvesting during spawning. (4616)
		"SZ-3 as proposed is in part outside the proclaimed boundary of the
		Marine Park. The inclusion of areas outside a park is not supported." (6687)
Habitat Protection	HPZ 01	Zone as per MP14 Action Group proposal, map attached. (1434)
zoning (HPZ)		Minimise Habitat Protection Zone 1 to a small section around each
		Sanctuary Zone and create Habitat Protection Zone buffers Habitat
		Protection Zone 1, 2, 3 & 4 as shown in the Action Group map
		proposal. (3194)
		"Reduce the Habitat Protection Zone which blanketed the Marine
		Park unnecessarily, to become individual buffers around each sanctuary zone." (4396)
General managed	GMUZ 01	To cover area currently zoned as Habitat Protection Zone. (439)
use zoning (GMUZ)		Add new General Managed Use zone near Middle Beach. (146)

Restricted access	RAZ 01	Exchange for Sanctuary Zone. (1435)
zoning (RAZ)		

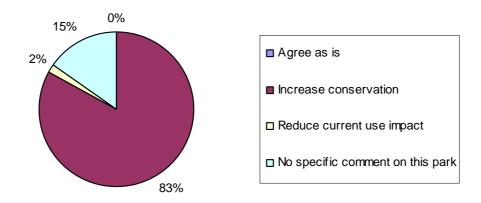
#### **Marine Park 15: Encounter Marine Park**

## Background

A total of 7,330 (85%) of the 8,649 respondents commented specifically on the Encounter Marine Park. 8 (0.09%) agreed with the proposed zoning as is, 7,180 (83%) suggested changes to zoning to increase the conservation outcome, 142 (2%) suggested changes to zoning to reduce impacts on current uses, while 1,319 (15%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	8
Increase conservation	7,180
Reduce current use impact	142
No specific comment on this park	1,319
Total	8,649

**Figure 18** Summary of feedback on zoning for Encounter Marine Park (note: percentages rounded)



## Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Encounter Marine Park are shown in Table 20.

Table 20 Sample comments relating to draft zoning of the Encounter Marine Park

Category	Zone Ref #	Sample summary comments and/or quotes from submissions (with submission reference #)
General	All	Set aside an area to allow for vessels over 80m in length (visiting cruise boats) (4196)
		"All six licence holders in the South Australian central zone abalone
		fishery categorically oppose the proposed sanctuary zonesand
		plead for the LAG recommendations to be used to locate sanctuary
		zones within the
		central zone fishery boundaries." (6716)
		"Accept what the KI MAG propose as this committee is made up of
		local people." (3255)
		Generally the LAG advice is supported for this area but see also
		earlier comments provided by SA Marine Parks Management Alliance
		and report authored by Dr Ian Knuckey to further reduce impact on
		Northern Zone Rock Lobster Fishery. (2539)
		In the absence of a risk based approach to zoning for Marine Park 15

		Engage to the MEA augments in general the Kangaras Island Legal
		- Encounter, the MFA supports in general the Kangaroo Island Local Management Action Group's proposals for Kangaroo Island." (4210)
		"LAG advice should be applied to the Encounter Marine Park." (4767)
		The MPLAG advice is generally supported, but with additional
		specific recommendations to accommodate the needs of the Lakes
		and Coorong Fishery. (6699)
Sanctuary zoning	SZ 01	"(SZ-1) To avoid anglers accidentally fishing in this zone I suggest
(SZ)	02 01	deleting the two points located on the northern shore of the river at
(02)		138 28.624' E 35 9.335' S and 138 28.664'E 35 9.302' S. This would
		then make the northern boundary of SZ 1 across the southern side of
		the river between points 138 28.607'E 35 9.394' S. And if you are
		serious about the wetland prohibit canoeists from accessing it as
		well." (984)
	SZ 02	"The existing Port Noarlunga Aquatic Reserve be overlaid with a
		marine park sanctuary zone and not extended as proposed"
		"The combined population of the Onkaparinga and adjoining Marion
		Local Government (LGAs) represents an estimated 15.3% of the
		State's population." (4686)
	SZ 03	"A sensible compromise after intense community consultation."
		(4302)
		"to accommodate the needs of the Gulf St Vincent Prawn Fishery:
		The area of sanctuary and habitat protection zone be modified and
		contained within the following co-ordinates to eliminate any
		consequential impact on prawn trawling areas - from the northern
		boundary of the park commencing at Point A longitude 35 07.527' /
		138 24.500' then to Point B 35 19.248' / 138 22.156 then to the
		proposed north eastern corner of SZ 5 and the HPZ then to Point C
		35 27.986' / 138 09.000 then to point D 35 32.436' / 138 03.000' then
		to Point E on the shore on Kangaroo Island at 35 35.800' / 137
	SZ 04	37.500'. " (map provided with submission) (6701)
	32 04	These areas are prized fishing spots that are safe in a small boat. Putting zones in place may force recreational fishers to venture out
		further, putting lives at risk. Would like to see stricter fishing limits
		rather than sanctuary zone. (32)
		"We seek for an adjustment of the northern coastal boundary
		intersect of proposed SZ-4 and to move it about 500 metres further
		south to a very permanent and distinct small white sandy beach at
		Fork tree Gully Beach. A westward extension of an amended zone
		would probably not meet any opposition." (4095)
		"The inshore area between Myponga and Cape Jervis is a significant
		seasonal fishing groundtargeting Southern Calamari via handline
		and drift fishing in waters less than 15m." "1.5km buffer along the
		coast would dramatically reduce the impact on the commercial
		scalefish sector. The MFA would support moving the zone
		boundaries to meet the park boundaries to better define the area,
		reduce compliance risks and maintain the total area under sanctuary
		zoning." (4210)
		The area is not under threat and has very little traffic. (4302)
	SZ 05	Change to Habitat Protection Zone. (20)
		Allow offshore boating access between Rapid Head for 500m.
		Location known for good kingfish and snapper. (2177)
		Allow a 500m buffer around Rapid Head to allow for small boats to
		access the area. (4551)
		"to accommodate the needs of the Gulf St Vincent Prawn Fishery:
		The area of sanctuary and habitat protection zone be modified and
		contained within the following co-ordinates to eliminate any
		consequential impact on prawn trawling areas - from the northern
		boundary of the park commencing at Point A longitude 35 07.527' /
		138 24.500' then to Point B 35 19.248' / 138 22.156 then to the
		proposed north eastern corner of SZ 5 and the HPZ then to Point C
		35 27.986' / 138 09.000 then to point D 35 32.436' / 138 03.000' then
		to Point E on the shore on Kangaroo Island at 35 35.800' / 137

	1	
		37.500'. " (map provided with submission) (6701)
	SZ 06	"Reducing this zone by moving the offshore margin in by around 5kms or so would reduce the area of the zone by around 50% to
		around 20 square kms. It is considered that this would have a lower impact on recreational and commercial fishers while still being large
		enough to assess in terms of any changes in biodiversity, fish size and abundance inside the zone." (4196)
		Move offshore (southern) boundary in a northerly direction by around 7kms. (4610)
		Should be seasonal Restricted Access Zone. (4616)
	SZ 07	The SZ-7 area proposed is in a high impact area of the pipi fishery. (2)
		Extend sanctuary zone for protection of Murray Mouth region. (1139)
		"slight alteration to the Coorong North SZ that would eliminate any
		major impact by moving the SE corner north by about 1.4nm." pg41 (3081)
		"to accommodate the needs of the Lakes & Coorong Fishery: The area of sanctuary zone be modified and contained within an area
		offshore of the ocean beach to a depth greater than 20 meters; The
		remaining areas currently within SZ 7 be amended to Habitat Protection Zone." (6699)
		Support large Sanctuary Zones in areas of high conservation value such as this. (6710)
	SZ 08	"make area north of and including Busby Island to Point Marsden a sanctuary zone." (4101)
		"If the proposed marine sanctuary zone goes ahead in the Bay of
		Shoals you may as well close Nepean bay as well as I cannot make a
		living out of one bay alone." (4199)
		Highly important nursery area. "Should be returned to the community as a sanctuary area." (4321)
		Provide for access to the channel in Bay of Shoals as per the map
	SZ 09	provided in the submission. (4551) Follows LAG advice (4330)
	SZ 10	Cuttlefish Bay to Cape Coutts. Would like north eastern boundary
	02 10	reduced and south eastern boundary extended to include the Posedonia seagrass meadows in the area. (432)
		"Reinstate final LAG advice." (4590)
		"welcome the steps taken toward a scientific solution to protecting
		iconic areas includingareas around Kangaroo Island" (4623)
		"SZ-10 a modified zone for this region is not supported and the zone
		should be removed." (6687)
	SZ 11	Does not follow KI MPLAG advice. (4330)
	Add new SZ	Cygnet River Mouth - regarded as an important fish nursery and migratory bird habitat. Also has extensive samphire community. (432)
		Add sanctuary zone at coastline adjacent to Deep Creek Conservation Park. (985)
		Add Sanctuary Zone U 2 as advised by final KI MPLAG. (4330)
Habitat Protection	HPZ 01 &	"to accommodate the needs of the Gulf St Vincent Prawn Fishery:
zoning (HPZ)	05	The area of sanctuary and habitat protection zone be modified and
- , ,		contained within the following co-ordinates to eliminate any
		consequential impact on prawn trawling areas - from the northern
		boundary of the park commencing at Point A longitude 35 07.527' /
		138 24.500' then to Point B 35 19.248' / 138 22.156 then to the proposed north eastern corner of SZ 5 and the HPZ then to Point C
		35 27.986' / 138 09.000 then to Point D 35 32.436' / 138 03.000' then
		to Point E on the shore on Kangaroo Island at 35 35.800' / 137
		37.500'." (See attached map) (6701)
	HPZ 05	The coastline adjacent to Deep Creek Conservation Park in Habitat
		Protection Zone 5 be considered as a Sanctuary Zone. (6713)
		"All oyster leases and existing aquaculture zones in SA oyster
		growing bays be placed in general use zones consistent with

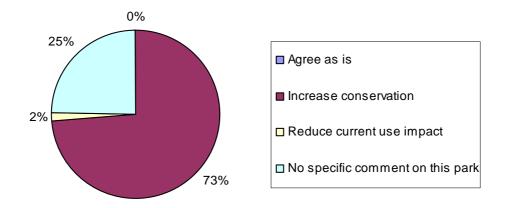
		recommendations made at every stage of marine park consultation processGeneral Managed Use zones allow ecologically sustainable developmentThis is entirely consistent with existing Aquaculture practice." (6711)
		There may be times when it is necessary for sealink ferries to anchor outside the Special Purpose Area 2 and 5 and into Habitat Protection Zone 5. (4691)
General managed use zoning (GMUZ)	GMUZ 05	Shift the western boundary to overlay Nepean Bay to include Oyster lease area. (4546)
		Suggests a Special Purpose Area is needed around Ballast Head (in General Managed Use Zone 5). (6689)
Restricted access zoning (RAZ)	RAZ 01	Supports proposed zoning at Busby Islet. (432)
Special purpose areas (SPA)	SPA 06	Provide for anchoring of vessels larger than 80m (ie cruise ships) as well as harbor activities. (4196)
	SPA 11	Increase shore based fishing area: Map Ref 35' 31442's - Extend towards Middleton where Walkway meets the beach. Map Ref 138' 41.682'E - Extend short distance easterly to point where Bay becomes protected from prevailing seas. Or exclude this area from sanctuary zone. (1300)

## Marine Park 16: Western Kangaroo Island Marine Park *Background*

A total of 6,501 (75%) of the 8,649 respondents commented specifically on the Western Kangaroo Island Marine Park. 0 agreed with the proposed zoning as is, 6,371 (73%) suggested changes to zoning to increase the conservation outcome, 130 (2%) suggested changes to zoning to reduce impacts on current uses, while 2,148 (25%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	0
Increase conservation	6,371
Reduce current use impact	130
No specific comment on this park	2,148
Total	8,649

**Figure 19** Summary of feedback on zoning for Western Kangaroo Island Marine Park (note: percentages rounded)



#### Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Western Kangaroo Island Marine Park are shown in Table 21.

**Table 21** Sample comments relating to draft zoning of the Western Kangaroo Island Marine Park

Category	Zone Ref #	Sample summary comments and/or quotes from submissions (with submission reference #)
General	All	Generally the LAG advice is supported for this area but see also earlier comments provided by SA Marine Parks Management Alliance and report authored by Dr Ian Knuckey to further reduce impact on Northern Zone Rock Lobster Fishery. (2539)
		"For economic, residents and tourist industry reasons Kangaroo Island be exempted from Sanctuary Zoning." (3446)
		"In the absence of a risk based approach to zoning for Marine Park 16 - Western Kangaroo Island, the MFA rejects the current zoning in favour of the Kangaroo Island Management Action Group proposal." (4210)
		Support LAG advice with the following change: S35 57.942; E136 39.111 (Mouth of Rocky River) heading south to S36 01.520; E136

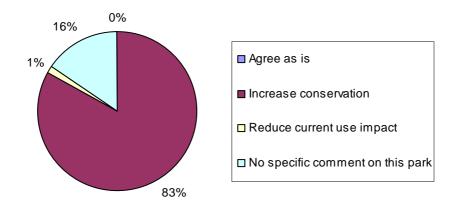
Accept KI LAG proposal. (4428) The proposed zoning is not supported. "The zoning will have a very high impact on a number of commercial fishing sectors, the details of which are included in individual sector submissions." Voluntary compliance is unlikely to be realised and the zoning will be unworkable. Suggests a revision of the zoning and supports the final LAG advice for this area. (4571) "All isx license holders in the South Australian central zone abalone fishery categorically oppose the proposed sanctuary zonesand plead for the LAG recommendations to be used to locate sanctuary zones within the central zone fishery boundaries." (6716) Sanctuary zoning (SZ)  Sz 01 Sz 01 Support for large sanctuaries in areas of high conservation value. (247) "An alternative Cape Borda Sz was provided within the bounds of the current SZ that industry estimated would reduce the impact by almost 90%." pg 47 alternative provided on p 48 of the report. (3081) "Removing the De Mole river bay between Cape Forbin and Cape Torrens from the current proposal. That is make the tip of Cape Torrens from the current proposal. That is make the tip of Cape Torrens from the current proposal. That is make the tip of Cape Borda" (3446) Recommend rezoning SZ-1 (Cape Borda) as habitat protection zone to minimise impacts on sardine fishing in the area. (4458) Reduce SZ so that it extends from Cape Borda to Cape Torrens and not from Cape Torrens to Cape Forbin (4551). Remove Sanctuary Zone 1. (4646) "welcome the steps taken toward a scientific solution to protecting iconic areas includingareas around Kangaroo Island" (4923) Support large Sanctuary Zones in areas of high conservation value such as this. (6710)  SZ 02 Supports KI upwelling as a large sanctuary in an area of high conservation value, (58) Follows KI MPLAG advice. (4330)  SZ 03 "An option to reduce the impact of the Cape du Couedic SA was provided which abutted the western side of Cape du Couedic with did not surround it." P 45 alternative provided on p 46 of report (30	1	12 110 Povert to MPLAG advice in Cane Borda area (1302)
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## Marine Park 17: Southern Kangaroo Island Marine Park Background

A total of 7,296 (84%) of the 8,649 respondents commented specifically on the Southern Kangaroo Island Marine Park. 4 (0.04%) agreed with the proposed zoning as is, 7,178 (83%) suggested changes to zoning to increase the conservation outcome, 114 (1%) suggested changes to zoning to reduce impacts on current uses, while 1,353 (16%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	4
Increase conservation	7,178
Reduce current use impact	114
No specific comment on this park	1,353
Total	8,649

**Figure 20** Summary of feedback on zoning for Southern Kangaroo Island Marine Park (note: percentages rounded)



## Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Southern Kangaroo Island Marine Park are shown in Table 22.

**Table 22** Sample comments relating to draft zoning of the Southern Kangaroo Island Marine Park

Category	Zone Ref #	Sample summary comments and/or quotes from submissions (with submission reference #)
General All	Generally the LAG advice is supported for this area but see also earlier comments provided by SA Marine Parks Management Alliance and report authored by Dr Ian Knuckey to further reduce impact on Northern Zone Rock Lobster Fishery. (2539)  "In the absence of a risk based approach to zoning for Marine Park 17- Southern Kangaroo Island, the MFA rejects the current zoning in favour of the Kangaroo Island Management Action Group proposal." (4210)	
		"All six license holders in the South Australian central zone abalone fishery categorically oppose the proposed sanctuary zonesand plead for the LAG recommendations to be used to locate sanctuary zones within the central zone fishery boundaries." (6716)  Accept K I MAG advice (4400)

		<del>-</del>
		Accept KI LAG proposal (4428)
		The proposed zoning is not supported. "The zoning will have a very
		high impact on a number of commercial fishing sectors, the details of
		which are included in individual sector submissions." Voluntary
		compliance is unlikely to be realised and the zoning will be
		unworkable. Suggests a revision of the zoning and supports the final
		LAG advice for this area. (4571)
Sanctuary zoning	SZ 01	Supports Seal Bay as a large sanctuary in an area of high
(SZ)		conservation value. (58)
		Agrees with Seal Bay proposal. (432)
		Zone doesn't meet the guide lines set out by the minister. Implement
		the KI LAG recommendations (1623)
		"SZ-1 as proposed in the majority LAG position and the KIMAG
		position is supported." (6687)
	Add new	Two additional Sanctuary Zones in D'Estrees Bay to protect seagrass
	SZ	and Osprey habitats (4596)
		Add zone to coastline adjacent Cape Gantheaume Wilderness Area.
		(4684)
		Consider protecting the coastline adjacent the Cape Gantheaume
		Wilderness Area on Kangaroo Island. (4623)
Habitat Protection	HPZ 01	The waters of D'Estrees Bay within Habitat Protection Zone 1 to
zoning (HPZ)		become a Sanctuary Zone. (6710)
		The high conservation value of the coastline adjacent to Cape
		Gantheaume Wilderness Area, located in Habitat Protection Zone 2
		must be protected in sanctuaries. (3913)
	HPZ all	Protects a wide range of benthic habitats. (4330)

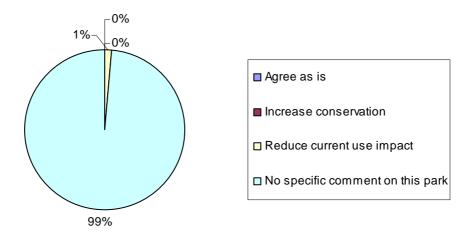
## Marine Park 18: Upper South East Marine Park

## Background

A total of 124 (1%) of the 8,649 respondents commented specifically on the Upper South East Marine Park. 0 agreed with the proposed zoning as is, 3 (0.03%) suggested changes to zoning to increase the conservation outcome, 121 (1%) suggested changes to zoning to reduce impacts on current uses, while 8,525 (99%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	0
Increase conservation	3
Reduce current use impact	121
No specific comment on this park	8,525
Total	8,649

**Figure 21** Summary of feedback on zoning for Upper South East Marine Park (note: percentages rounded)



## Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Upper South East Marine Park are shown in Table 23.

Table 23 Sample comments relating to draft zoning of the Upper South East Marine Park

Category	Zone Ref #	Sample summary comments and/or quotes from submissions (with submission reference #)
General	All	See submission from the SA Marine Parks Management Alliance, South Eastern Professional Fishermen's Association and SARLAC for this area and report authored by Dr Ian Knuckey to further reduce impact on Southern Zone Rock Lobster Fishery. (2703) No significant threats to the marine environment identified in this
		area, therefore no need for sanctuary zones. Habitat protection zoning would be sufficient to provide marine protection. (3478)  Supports SEPFA, SARLAC and SA Marine Parks Management Alliance proposal. (4389)
		"The proposed zoning for this marine park will have impacts on commercial fisheries in the region including rock lobster and abalone fisheries. It is therefore our view that the proposed zoning and management plan can be improved to further reduce impacts. Individual fishing industry associations and community sectors will be making separate submissions providing additional detail. These

		submissions, including independent reports on impacts already
		submitted, will include additional suggested refinements to the zoning
		and management protocols to further reduce impacts." (4571)
Sanctuary zoning	SZ 01	Allow mainland shore based fishing. (23)
(SZ)		Move zone in between 42 and 32 Mile Crossings. (1435)
		"It was noted that one of the interim closure options (slightly to the
		north) for the Coorong SZ developed by the LAG better avoided the
		commercial rock lobster grounds than the final recommendations." p
		55 (3081)
		Move to an area between 32 Mile and 28 Mile Crossings. (4393)
	SZ 02	No identification of threats of to the marine environment in this area.
		Implementing sanctuary zone will have a negative socio-economic
		impact in region. (2186)
		Recreational fishing doesn't threaten sea grass. (4616)
	SZ 03	Move eastern boundary of SZ as far as, but not including the Robe
		jetty to overlay the current Reefwatch monitoring site. (4683)

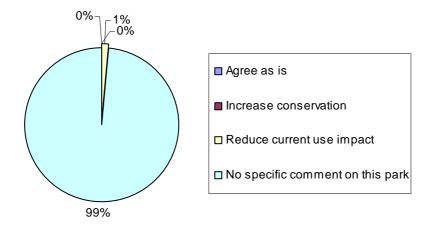
#### Marine Park 19: Lower South East Marine Park

## Background

A total of 122 (1%) of the 8,649 respondents commented specifically on the Lower South East Marine Park. 0 agreed with the proposed zoning as is, 0 suggested changes to zoning to increase the conservation outcome, 122 (1%) suggested changes to zoning to reduce impacts on current uses, while 8,527 (99%) expressed no comment on the proposed zoning.

Category	Count
Agree as is	0
Increase conservation	0
Reduce current use impact	122
No specific comment on this park	8,527
Total	8,649

**Figure 22** Summary of feedback on zoning for Lower South East Marine Park (note: percentages rounded)



## Comments on draft zoning

Sample submission comments for the draft zoning proposed for the Lower South East Marine Park are shown in Table 24.

**Table 24** Sample comments relating to draft zoning of the Lower South East Marine Park

Category	Zone Ref	Sample summary comments and/or quotes from submissions
	#	(with submission reference #)
General		Other parks in Otway Bioregion have not been properly considered
		when zoning this park.
		Generally the LAG advice is supported for this area but see also
		earlier comments provided by SA Marine Parks Management Alliance
		and report authored by Dr Ian Knuckey to further reduce impact on
		Southern Zone Rock Lobster Fishery. (2703)
		No significant threats to the marine environment identified in this
		area, therefore no need for sanctuary zones. Habitat protection
		zoning would be sufficient to provide marine protection. I support the
		LAG advice for this area. (3478)
		Supports SEPFA, SARLAC and SA Marine Parks Management
		Alliance proposal. Generally supports the LSE MPLAG zoning
		proposal. (4389)
Sanctuary zoning (SZ)	SZ 01	Allow mainland shore based fishing. (23)

	"in comparing the inner and outer regions of the sanctuary zone, they estimated catches to be about 200kg/kmsquared in the inshore area and 600kg/kmsquared in the offshore area." p 61 (3081)
SZ 02	"The central area of this sanctuary zone is comprised of mainly sandy flats and has less production than either side which contain heavy reef habitat." (Pg 58, alternative provided on pg 60 of the report.) (3081)
	"My proposal is that the proposed western alignment of the fishing area be moved to the western visible point of land some 700 metres to the west. At this point there is a reef that is unseen from the beach as it is bare of all growth." (3491)
	"Recreational beach fishing access restrictions be removed." (4559)

## 9. OTHER COMMENTS ON ZONING

A range of comments were noted in submissions relating to various aspects of zoning which are taken to apply generally across all marine parks. The majority of 'other' comments on zoning recorded here relate to sanctuary zoning.

Table 25 Other comments on zoning

Category	Sample summary comments and/or quotes from submissions (with		
	submission reference #)		
Sanctuary zoning	To meet international scientific standards, SA's Sanctuary Zones must meet		
(SZ)	the following design criteria: SZ should be at least 10-20km in diameter;		
	should be simple shapes; should be no more than 15-20km apart; protect at		
	least 3 examples of each habitat to ensure adequate representation; variety of		
	temperature regimes; protect nursery areas, spawning aggregations; maintain		
	functional groups. (50)		
	"why are fishers the only group having their activities curtailed? I do not		
	understand why boating activity, anchoring, diving, jet skiing which also affect		
	the environment would not be curtailed."		
	Suggests catch and release be permissible in sanctuary zones to prevent a		
	large impact on anglers. (984)		
	Proposes that all zones start from the low water mark, 200m out to sea.		
	(1435)		
	Marine parks are unnecessary due to extremely well managed fisheries in SA (1775)		
	Insufficient research undertaken into business and fish stocks. (3432)		
	"It is highly recommended that land based fishing be allowed in all Sanctuary		
	Zones." (3751)		
	"The final area of marine parks proposed is too small at only 6% of SA waters		
	and the provision for sanctuary zones appears too low." (4100)		
	Allow state-wide unrestricted shore based fishing. (4207)		
	"Shore fishing is not a threatening process." (4251)		
	"Our industry, together with all other sectors have identified the following		
	protocol in order of preference: 1. Removal of sanctuary zones from the		
	marine park process. The habitat protection zoning should be a sufficient leve		
	of maximum protection. 2. Allow Rock Lobster fishing to take place in these		
	sanctuary zones either by a way of permit or exemption. 3. Changing certain		
	sanctuary zone boundaries to reduce the impact to the Rock Lobster fishery		
	as proposed in the various documents provided to DEWNR. (4392)		
	"There is absolutely no doubt that without adequate habitat protection the		
	marine resources of SA will diminish considerably in the medium term." (4411)		
	Unless boundaries run north-south and/or east-west, it will be difficult to determine where sanctuary zones are. (4598)		
	Extremely difficult to navigate sanctuary zone boundaries. Many borders don't		
	align east-west, north-south as recommended by the marine park design		
	principles. (4616)		
	"sanctuaries should be increased in size and number where possible to		
	meet internationally recognised standards for long-term marine protection."		
	(4623)		
	"Strengthen Sanctuary Zones to comply with design principles." "Install a		
	process to expand the size of Sanctuary Zoning from 6% in order to create a		
	truly CAR network." (6713)		
	Recommendation 1 - remove sanctuary zones from marine park planning due		
	to flawed assumptions about their benefits, no threat assessment to underpin		
	this course of action, inconsistency with the requirements of the NRSMPA and		
	extent of economic impacts.		
	Recommendation 2 - allow commercial abalone diving within sanctuary zones		
	due to the low impact of the fishery on the marine environment. (6718)		
	"Declaring marine parks and sanctuary zones and then restricting fishing		
	activity will not lead to more 'no-take' marine tourism activity starting up to fill a		
	void left by diminished charter fishing" (6719)		

Habitat protection	Where fisheries are accredited under EPBC Act as not having unacceptable
zoning (HPZ)	risks to biodiversity, Habitat Protection Zoning would be sufficient to provide
	proper marine protection. (2539)

#### 10. COMMENTS ON MANAGEMENT ARRANGEMENTS

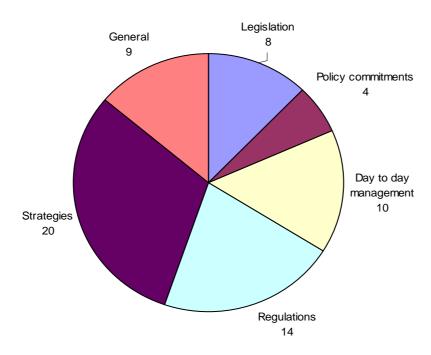
## Background

Comments relating to proposed marine park management arrangements were usually of a generic nature, rather than specific to a particular marine park and are therefore presented in a generic manner below.

Comments relating to proposed management arrangements were noted in 49 (0.6%) submissions. Comments were categorised as relating to management strategies, regulations, day to day management, legislation, policy commitments and general issues. Figure 23 shows the proportion of issues raised in relation to the proposed marine park management arrangements. Issues relating to habitat protection zone regulations and performance assessment and monitoring were prominent.

Figure 23 Issues raised in relation to proposed marine park management arrangements

# Number of respondents commenting on proposed management arrangements



#### Comments on management arrangements

Sample submission comments for the proposed management arrangements were generic to all marine parks and are shown in Table 25.

**Table 25** Sample comments relating to contents of management plans

Category	Theme	Sample comments / quotes from submissions (with submission reference #)
General	Phased implementation	Encourages a phased implementation of any draft management plans. (4619)
	Origin of zoning	Page 1( Para 2) This section needs to fully explain how community advice informed the final zoning decision. S( 2.2) A fuller explanation of the environmental, social and economic values is preferred (6689)

	Review period	Management plans should include mention of the fact that the
	·	Minister must review a plan at least once in every 10 years and each management plan should state its duration.  Management plans should include the activity and use zoning tables as zoning provides the basis for management of the marine parks. (6720)
Day to day management	Partnerships for implementation	The Nukunu People's Council note the Nukunu land and sea tenure includes areas of MP10. The Council wish to discuss partnership potential with DEWNR. (1774)
	Compliance	Concern expressed regarding lack of enforcement arrangements. (297) "We strongly recommend more resources for marine surveillance." (6690)
	Implementation plans	P9 ( Para 2 ) Ensure that implementation plans are available for each park from day 1 of operation. (6689)
	Strategic content vs operational detail	Suggests the management plan provide more detail on: 1) objectives for the management of the park with links to performance monitoring; 2) how the 'Management Challenges' for each park will be addressed; 3) the way in which the parks will be managed; 4) park specific compliance arrangements and regulations; 5) Costs for management, compliance, research and monitoring; 6) Scheduling of implementation of management actions and monitoring programmes. (4571)
Legislation	Recognition of other Acts	"The Draft Management Plan does not take into account at Section s 1.4.2 and/or 1.4.3 existing protection afforded under the Fisheries Management Act (2007), the Historic Shipwrecks Act (1981) or the National Parks and Wildlife Act (1972) where a large number of marine reserves (or marine components of existing land reserves) contribute significantly to marine biodiversity conservation and to the protection of significant ecological and historic features. This is a major omission." (4571)
Regulations	Aboriginal traditional activity	"How will the exercise of acting in accordance with 'Aboriginal tradition' be defined and regulated, if at all?"  "What is the legal basis upon which the Wirangu No. 2 People's right of 'traditional Fishing and Collecting' will be protected?"  "The Wirangu No. 2 People have not yet been afforded the right to negotiate Indigenous Land Use Agreements (ILUAs). We seek confirmation that , first they will not be prejudiced during Fishing ILUA negotiations and second, they will still have their 'Traditional Fishing and Collecting' rights protected" (3082)
	GMUZ regulations and aquaculture	"At the beginning of the Marine Park process the South Australian government made a commitment to the aquaculture industry, that there would be no impact on existing aquaculture. By placing oyster leases in HPZ this commitment has not been honoured. The Marine park process has been flawed because of the absence of an economic impact statement in relation to the oyster industry. SAOGA strenuously request all oyster leases and aquaculture zones in South Australian oyster growing bays be placed in GMU. This is entirely consistent with existing Aquaculture practice" (6711)
	HPZ regulations	Disallow netting and other commercially extractive activities in HPZ. (249)
		Would support marine parks if restrictions on collecting was removed from Habitat Protection Zone. (1609)  There is community confusion over the effect of Habitat Protection Zones. "It is recommended that a definitive statement be made by the Premier and the Minister that the regulations related to Habitat Protection Zones, or any future changes to them, will not affect recreational fishers." (3751)  Instead of using Habitat Protection Zones as 'buffer zones' to sanctuary zones, replace with recreation zones (allows recreation activities without inappropriate activities and commercial exploitation including animal feeding, baiting, waste water disposal etc). Also

	SZ regulations	suggest introducing two types of zoning within Habitat Protection Zones: HPZ A - would be recreation zones and HPZ B - would manage as per current HPZ description. (4611)  Buffering of Sanctuary Zones - "While Habitat Protection Zones provide some buffering of Sanctuary Zones there is the need to ensure that Sanctuary Zones are fully protected from human activities if they are to provide conservation value". "Without buffer zones activities like animal feeding/baiting/berleying, some forms of aquaculture, wastewater disposal/discharge and outfall, dredge spoil, active seismic survey, oil/gas, seabed mining and pipelines in areas adjacent to sanctuary zones, undermine the primary purpose of a marine park" (6713)  Implications for Councils releasing stormwater into, or adjacent to, SZ
	Regulations and fishing	are not clear in the draft management plan (4625)  Suggests regulations for recreational and charter fishing should be considered separately from other activities which have a greater,
	activity  Regulations and 4WD activity	possibly unsustainable, impact on the marine environment. (6719)  Marine park zoning should minimise 4wd impacts on shorebirds such as hooded plover. (1618)
	Administrative approvals processes	"DEWNR and DMITRE need to develop guidelines available to resources companies that provide clarity on the joint approvals process for resource exploration and production within marine parks." (6720)
Policy commitments	Extend policy commitments  Current policy commitments	Recommendation: "Shore-based fishing will be permitted from all accessible beaches." (1)  "the fundamental issues of ensuring the parks do not impede the development and operation of new and expanded port facilities, and that actual and proposed transhipment points are facilitated for
Management strategies	Protection	current and future purposes." (6697)  "The Draft Management Plan does not address threats (if any) to the ecological values and habitats within the Marine Park and particularly, any threat posed by commercial or recreational fishing. This threat assessment is not only a requirement of the NRSMPA but is also a legal obligation under Article 206 of the UN Convention on the Law of the Sea (UNCLOS) to which Australia is a signatory. The absence of any threat identification and assessment undermines the very basis of a management plan." (4571)
	Community education	"The Board would like to see a strong program of community education and awareness to encourage voluntary compliance and community support for the concept of marine parks. It is suggested that effort is prioritised towards education activities rather than enforcement activities for the first three years from when the parks are implemented to enable the community and industry to learn and adapt to the new arrangements." (4365)  Consideration must be given to ways to educate the community about complying with zone boundaries, especially those who do not have access to GPS. (4539)
	Community involvement	No environmental benefit unless there is significant engagement in the supervision of plans by the local K I community. Community stewardship will only be ensured if local people are involved and engaged (4619)
	Management challenges	S( 3.1 ) Supports the 5 management challenges however recommends * "Ensuring effective management of protected species and ecological communities".
		Board felt the draft plans have omitted the following challenges:  * Ensuring community connection/ownership and support of marine parks.  * Monitoring the environmental, social and economic impacts of marine parks

		* Ensure adequate funding for management (6689)
	Performance	"The information about - and the commitment to monitoring are both
	assessment	a little vague. Could you please provide more specific information
		about monitoring for the marine parks and how this will be continued into the longer term?" (4100)
		S( 4.3 ) Suggests a new strategy is required to develop a monitoring
		program to measure the contribution to the social and economic sustainability of the K I community. (6689)
		"It is critical that the benefits of marine parks are monitored and assessed over time against specific criteria. Industry and the community should be provided with information to understand the
		data sets and how they will be collected to allow the performance of the parks to be assessed in the future. It is essential that in years to
		come government can answer the question of 'How do we know if the
		marine parks and their respective zoning are achieving what they were intended to achieve?' It is essential that there is economic
		monitoring to identify if the parks are of economic benefit to regional
		communities, rather than simply the numbers of tourists that visit the parks." (6718)
		The MER program should already be in place prior to any legislative enactment of sanctuary zones. (4559)
		"6. It is recommended that ongoing monitoring and evaluation
		conducted as part of the management of the Marine Park should
		include continuous feedback to the community or at least bi annual
D		publication of the activities and results." (3429)
Permits		Section 5 of the management plans should include statements that
		resource exploration and production is an activity able to be granted
		a permit in accordance with Section 19 of the Marine Parks Act. (6720)

Note that comments were not received for all management plan features.

#### 11. REFERENCES

Department for Environment and Heritage 2010 *Summary of Submissions Report. Outer boundaries of South Australia's Marine Parks Network.* Department for Environment and Heritage, Adelaide, South Australia.

Department of Environment, Water and Natural Resources 2012 *South Australia's Marine Parks Network Explanatory Document*. Department of Environment, Water and Natural Resources, South Australia.