

30 July 2021

Manager NPWS Planning Evaluation and Assessment
Locked Bag 5022
Parramatta NSW 2124

Via email: npws.parkplanning@environment.nsw.gov.au

Dear Sir/Madam,

**Royal National Park, Heathcote National Park and
Garawarra State Conservation Area Draft Plan of Management**

Attached for your consideration is a submission made on behalf of the NSW Council of Freshwater Anglers (NSWCFA) relating to the title document.

The NSWCFA is the largest and most active freshwater fishing organisation in NSW. Since 1958 it has represented the state's freshwater anglers in numerous negotiations with government agencies on issues including fisheries management, conservation and regulatory matters, angler access and angler ethics.

Yours faithfully

A handwritten signature in black ink, appearing to read 'P. Gibson'.

Peter Gibson
President

Submission: Royal National Park, Heathcote National Park and Garawarra State Conservation Area Draft Plan of Management

Fishing

General Comments

We preface our specific comments on the title draft to state that members of the New South Wales Council of Freshwater Anglers (NSWCFA), their families and friends have fished in the Park for generations.

Whilst the NSWCFA is pleased that NPWS is looking to implement a new Plan of Management (PoM) for the Royal National Park (the Park), it disappoints us that NPWS refuses to acknowledge and accept how important fishing is to a large sector of the community and how it contributes to the wellbeing of those who fish in the park.

Even though fishing is a very common recreational activity in the Park, fishing does not get the acknowledgement it deserves in the draft PoM. To remedy this failing, the NSWCFA urges that the draft PoM be amended to better reflect the contribution of recreational angling to making the Park more relevant to the community as a whole.

Specific Comments – Proposed amendments and comments

Pages 10 and 11: Protecting the natural environment

Paragraph 3 on Page 11 states in part:

‘These species extinctions and declines are mostly associated with habitat loss from freshwater wetlands, heathlands, rainforest, shorelines and grassy woodlands. As such, these habitats are the highest priority for protection and restoration in the parks.’

Paragraph 4 on Page 11 states in part:

‘Together with habitat fragmentation, cats, foxes, deer and high frequency fire present the greatest threats to biodiversity.’

The above 2 excerpts highlight how loss of habitat and fragmentation of habitat can degrade an environment. So, understandably, it is laudable that the draft PoM in Paragraph 2 on Page 11 states in part:

‘Retaining intact vegetation and maintaining or improving connectivity is a management priority in these parks.’

Whilst not specifically mentioned in the Draft PoM, we recommend that NPWS revisit the installation of a fishway at Audley weir that was started, but not completed, in 2006.

Such a project would be fully consistent with the above management priority of improving connectivity.

Paragraph 3 on Page 10 states in part:

‘The riverbeds of (most of) the Hacking River and its tributaries, as well as South West Arm Creek and Cabbage Tree Basin fall within Royal National Park (see Figure 2). These areas provide essential habitat for juvenile fish, waterbirds and invertebrates.’

Fish, both juvenile and adult, that would most likely benefit from an operational fishway at Audley weir include, Australian bass, Estuary perch, Freshwater mullet, Sea mullet, Freshwater herring, Long-finned eel, Short-finned eel, Common galaxias, Striped gudgeon, Australian smelt and Bullrout. As well, waterbirds and invertebrates would benefit from the improved connectivity along the Hacking River.

Page 15 – Table 2 Visitor management zones, under Visitor opportunities

Fishing is a very common recreational activity in the Park. And for many, it’s the only reason they visit the park. There is a long history of fishing over large areas of the Park including the Hacking River, parts of Port Hacking, as well as the ocean beaches and rocks. This range of opportunities needs to be referred to in the PoM. A convenient way of identifying fishing opportunities in the Park would be to identify them on either one of the 3 maps in the Draft PoM or a separate map

We recommend that fishing be included as one of the opportunities in the Visitor opportunities section of Table 2 and that fishing sites be identified on one of the maps in the PoM

Page 18 – Zone 3 Visitor precincts

We recommend that fishing be included in paragraph 2. (See comments relating to page 15.)

Page 21

We, and we expect many other Park users will rate the PoM as unacceptably superficial if it did not contain an entry on fishing under the heading of: ‘3 Providing for visitor use and enjoyment.’

We recommend that NPWS consult with angling groups, including the NSW Council of Freshwater Anglers and the Recreational Fishing Alliance of NSW to draft an entry on fishing for the PoM.

Page 27 – Table 6 Scheme of operations

We recommend that to amend Outcome 3 to read:

‘a. Prepare and implement a management strategy for Cabbage Tree Basin, Audley weir fishway and other aquatic ecosystems at risk’.

The rationale for including the Audley weir fishway is addressed earlier in this submission.

Page 28 – Table 6 Scheme of operations

Amend the action relating to Outcome 5 to read:

‘d. Work with the relevant road management agency and other stakeholders to improve connectivity between the parks for the safe movement of animals (e.g. road underpasses, the Audley weir fishway and/or fencing).’

We believe fixing the Audley weir fishway is consistent with both outcomes 3 and 5 – and an important reason to proceed with such a project.

Page 30 – Table 6 Scheme of operations

Amend the action relating to Outcome 13 to read:

‘c. In consultation with the relevant waterway management agency, investigate and implement measures that will enable the environmentally sustainable use of personal watercraft and other vessels in South West Arm Creek and Cabbage Tree Basin.’

Page 34 – Table 7 Park use regulations: recreational activities

Insert a fishing pictogram in the water-based recreation section of Table 7.

Page 34 – Table 7 Park use regulations: recreational activities

Amend the paragraph 3 of the “notes/exceptions” relating to “water-based recreation to read:

‘Review the use of Powered watercraft south of the bridge in Cabbage Tree Basin, or upstream of the Audley weir.’

It is premature to ban powered watercraft prior to the outcome of the high priority review referred to in Outcome 3, Action a of Table 6 on page 27 of the draft PoM.

Page 34 – Table 7 Park use regulations: recreational activities

Amend the paragraph 4 of the “Notes/exceptions” relating to Water-based recreation to read:

‘Fishing is permitted throughout the Park including upstream of the Audley weir.’

It is our understanding that the Department of Primary Industries has not closed the Hacking River above Audley weir to fishing so it is incorrect for the PoM to state that fishing above the weir is not permitted.

Page 34 – Table 7 Park use regulations: recreational activities

We recommend that the “Notes/exceptions” relating to “Water-based recreation” be expanded so anglers can conveniently find out under what conditions they can fish in the waterways and along the coastline of the Park

We believe NPWS should consult with the angling community to ensure proper access to fishing throughout the Park. A typical example of misunderstanding of access restrictions is the ability to launch private watercraft e.g. kayaks and canoes above the weir at Audley. We have heard that NPWS frowns on or prohibits this activity. If the advice I’ve received is not accurate, has NPWS provided advice where watercraft can be launched safely above Audley weir. Whether the advice we received is accurate or not anglers should be able to access authoritative advice readily.