

Marine National Park Zone (Green Zones)

MNP01 – Westways Creek

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP02 – Tripcony Bight

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP03 – Northern Wedge

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP04 – Flinders Reef

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP05 – Cape Moreton

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP06 – Health Island

This area is accessed by commercial net fishers principally targeting sea mullet and bait species in the area. It is a critical area to the haul net fishery because it is one of only two areas of Moreton Island that can be effectively worked during south easterly weather.

The QSIA propose that the no-take zone does not extend beyond the seaward side of the entrance to Yellow Patch Lagoon.

MNP07 – Braydon Beach

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP08 – Deep Offshore Area

This area is frequently used by the trawl and the line fishery, it provides a highly productive area for those operators that are able to work there. Restriction to this area will place unnecessary effort displacement into others areas. Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance, for an alternative zone.

MNP09 – Deception Bay

This area is vital to the commercial fishers in Northern Moreton Bay, many of the fishers working this area have been displaced from Pumicestone Passage. Approximately 12 net and crab licences rely on MNP09 for a majority of their catch during the year. This is an unacceptable loss to the commercial fishing industry.

MNP10 – Cherub's Cave/Henderson Rock

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP11- Hays Inlet

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP12 – Scott's Point

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP 13 – Bramble Bay

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP 14 – Middle Moreton Bay

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP15 – Crab Island

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP16 – Mirapool Islands/Offshore Area

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP17 – St Helena Island

This proposed closure will have significant impact on commercial fishing operators working in and around St Helena. It is an area of particularly high importance for the net fishery, Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP18 – Flat Rock

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP19 – Wanga Wallen Banks

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP20 – Amity Banks

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP21 – Myora Reef

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP22 – Peel Island

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP23 – Cox Bank

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP24 – Price Anchorage

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP25 – Offshore North Stradbroke

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP26 – Lamb Island

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP27 – Pannikin Island

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP28 – Willies Island

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP29 – Cobby Cobby Island

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP30 – Swan Bay/Never Never Creek

Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP31 – McCoys Creek

No Comment

MNP32 – Offshore South Stradbroke

This closure will have impacts on some trawl operators who fish for school prawns coming out of the Jumpinpin bar. Spanner Crab fishers operating out of Southport have indicated that this area is fished regularly. Refer to 'A Participatory and Coordinated Fishing Industry Solution to the Rezoning of the Moreton Bay Marine Park' compiled by the Moreton Bay Access Alliance.

MNP33 – Coombabah Lake

No Comment

Conservation Park Zone (Yellow Zones)

On page 23 of the draft zoning plan it states 'the size, shape and location of the proposed yellow zones have been guided predominately by the scientific guiding principals and feedback from stakeholder groups and the community has also been considered to minimize impacts arising from the placement of yellow zones'. The QSIA as the major stakeholder affected by these zones was not given at any stage during the consultation phase an opportunity to discuss the location of yellow zones by the EPA, despite repeated requests. This statement in a public document is clearly misleading and false.

The EPA justifies the yellow zones as providing a high level of protection to habitats by removing the most threatening processes such as trawling, dredging, spoil disposal, waste disposal and coastal development. While the EPA has identified the above activities as threatening, they have failed to identify the risks of other activities to the habitat. Questions that have never been answered include: what is the risk of a net being used in a yellow zone, what is the risk between 20,000 recreational fishers using 4 pots each as opposed to 50 commercial fishers using 50 pots and what is the risk to the habitat by using 2 hooks instead of 1?

Despite numerous requests to justify and identify the risks associated with these activities on the habitat, none has ever been forthcoming. The QSIA is very supportive of a commercial level of crabbing in the proposed yellow zones. The Moreton Bay Marine Park area supports a very sustainable mud, sand and spanner crab fishery. Commercial operators are using gear that eliminates bycatch and interactions with species such as turtles through progressive gear and fishing behavior modifications. Whilst the recreational sector are using gear that is becoming cheaper through large fishing outlets and bad fishing techniques leading to increased bycatch (using large meshes in crab pots) and more rope than necessary causes entanglements with species of conservation interest. Recreational crab pots have become so cheap that many recreational fishers now choose to leave them behind if the weather gets bad or they can't find them, this is causing a huge ghost fishing problem.

The RIS states that by prohibiting commercial crabbing in yellow zones it will be consistent with other Queensland marine parks. Commercial crabbing is a highly selective and non-threatening activity that poses no risk to any habitat. There are many examples in Queensland where commercial crabbing is permitted in marine park yellow zones including the Great Sandy Straits and five separate areas around Townsville. Allowing commercial crabbing in Moreton Bay Marine Park will provide consistency with other parts of the State. The QSIA also recommends that commercial crabbing should be permitted in all Queensland marine park yellow zones.

The yellow zones proposed are also aimed at prohibiting commercial netting with the exception of bait netting. Commercial netting is regularly documented as a highly selective, efficient and environmentally friendly fishing method. Relatively minimal bycatch has been observed and only very minor interactions with the sea floor.

The EPA has targeted some very important and productive areas through the yellow zones particularly CPZ02, CPZ05 and CPZ06. Commercial netting as stated above offers minimal risk to the habitat compared to other permitted activities such as recreational cast netting which is renowned for the capture of huge quantities of juvenile fish. QSIA fully supports that commercial net fishing be allowed in most yellow zones within the marine park.

CPZ01 – Northern Pumicestone Passage

No Comment

CPZ02 – Southern Pumicestone Passage

It is noted in the RIS that this zone has no impact on commercial fishing as it is currently closed to all commercial fishing. This is an obvious over-sight as this area is heavily commercially fished by the net and crab fishery. This zone in combination with MNP09 will destroy the Northern Moreton Bay fishery that supports more than a dozen operators and supplies fresh local seafood to Brisbane Island, the northern suburbs and many interstate markets.

The QSIA strongly supports commercial crabbing and netting to continue within this area, otherwise the proposed yellow zone should be removed as a result of the significant impact to the fishery and the community.

CPZ03 – Flinders Reef

No Comment

CPZ04 – Health Island/Cape Moreton

This proposed zone is important to the crab and net fishery. The proposed yellow zone prohibiting commercial netting and crabbing is an unacceptable loss to the industry unless these activities can continue.

CPZ05 – Bramble Bay/Shorncliffe

This proposed zone is important to the crab and net fishery, the wider stakeholders have agreed to MNP11 and MNP13 and believe this is sufficient protection for the area. The area of yellow zone that occurs within the trawl grounds should be removed, although small by area it provides large catches of

prawns throughout the year. The proposed yellow zone prohibiting commercial netting and crabbing is an unacceptable loss to the industry unless these activities can continue.

CPZ06 – South Passage/Point Lookout

This area is an extremely important area for the net, crab and trawl fishery. The fishing industry is incurring ever increasing transport costs, the placement of closures in highly productive areas close to shore led to unviable fisheries. The proposed zone is not accepted unless commercial netting and crabbing can continue.

CPZ07 – Peel Island

This area is extremely important to the net fishery, whilst it is a significant loss the industry is prepared to accept the yellow providing it does not include area above the low water mark.

CPZ08 – Bird and Goat Islands

CPZ09 – Canapia Passage and surrounds

This area is vital to the net & crab fishery, supporting more than a six operators. It is a highly productive area offering protection from adverse weather. The proposed zone is not accepted unless commercial netting and crabbing can continue.

CPZ10 – Jumpinpin and surrounds

This zone contains some highly productive trawl and spanner crab fishing grounds, the current proposal will not permit these activities to continue at a commercial level. The trawl fishery has acknowledged they are willing to surrender this area provided adequate structural adjustment is provided for current and future loss of fishing area.

This area is particularly important for the Spanner Crab operators working from Southport, it provides productive fishing grounds throughout the year and being close to the shore provides good protection in bad weather. QSIA supports that spanner crabbing be allowed to continue in this area.

Habitat Protection Zones (Dark Blue Zone)

On page 25 of the draft zoning plan it states ‘the size, shape and location of the proposed dark blue zones have been guided predominately by feedback from the stakeholder groups and the community’. The QSIA as the major stakeholder affected by these zones was not given at any stage during the consultation

phase an opportunity to discuss the location of dark blue zones by the EPA, despite repeated requests. This statement in a public document is clearly misleading and false.

The draft zoning plan proposes significant areas to be zoned dark blue, thereby allowing almost all activities with the exception of trawling. Trawling is a heavily regulated industry, managed by a complex measure of input and output controls by the DPI&F and closely monitored by the commonwealth Department Environment and Water Resources (DEWR).

Whilst the perception of trawling is seen as a key threatening activity by some stakeholders, all recent studies on the effect of trawling on the seabed and biodiversity indicate a far less impact than originally thought. The CSIRO report of Seabed Biodiversity 2007 stated ‘ . This report in combination with others and recognition given by the DPI&F/DEWR as an accredited and approved export fishery demonstrate that the Queensland trawl industry is sustainably managed and meets the worlds highest environmental standards.

Already within the Moreton Bay Marine Park more than 50% is closed to trawling through the *Fisheries (East Coast Trawl) Management Plan 1999* and different marine park zones managed by the EPA. A significant proportion of the area that is available to the trawl fleet is not utilised either because it is not productive prawn grounds or the habitat is not suitable for trawling. The area that remains for the trawl fleet is small and further losses through the implementation dark blue zones is not accepted by the QSIA, with a few exceptions.

EPA staff members at a meeting on the XXXX 2008, indicated that even though some habitat types are already exceed the minimum 10% protection and in some cases up to 46% protection from the trawl fishery, that this level of protection is still not sufficient. The term used was ‘no net benefit’ to the habitat if it was already protected from an activity, this is a relatively new argument developed by the EPA and is used as the basis to further restrict the trawl fishery.

The QSIA have proposed in general that dark blue zones would be acceptable in permanent trawl closure boundaries and a few other locations as detailed in the below points.

HPZ01 – Bribie Island

Noted in the RIS that the impacts to the trawl sector are minimized by not extending the zone further than 1km from the shoreline. The area within 2km of the shoreline of Bribie Island is the most heavily trawled area within the North West Channel area.

To minimize impact to the trawl sector, the QSIA propose that the dark blue zone be relocated no closer 2km from the shoreline of Bribie Island and extending towards the shipping channel.

HPZ02 – Moreton Island to Broadwater

This proposed zone needs to be modified significantly to avoid considerable impact to the trawl fishery. The area immediately north of MNP03 is important to the trawl fishery as indicated in the meeting with the EPA on the ????? Through using the VMS data the trawl ground is easily identified, the dark blue zone will have to be moved south towards MNP03.

The dark blue zone extending from Cape Moreton to MNP16 should not extend beyond the 10 metre depth contour line.

The dark blue zone below MNP14 that extends beyond the permanent trawl closure needs to be removed and placed in an area that is identified to the west of Amity Banks currently a general use area that is within the permanent trawl closure.

The dark blue zone north and south of Peel Island within the Southern Moreton Bay Seasonal trawl closure needs to be removed. This area is of extremely high importance to the trawl fishery supporting a large number of vessels. The closure of this area would mean a significant effort displacement of vessels north and severely affecting the effort dynamics of the Moreton Bay fishing fleet.

The area below Peel Island is only used approximately 3-4 months of the year producing large volumes of prawns, within this area only a small portion of the area is actually trawled. Most of the area in the dark blue zone consists of undulating sand gutters (not trawl-able) the effort distribution patterns from the VMS data will confirm this. Therefore a large proportion of the area is already protected from trawling and should meet the objectives of the marine park without implementing a dark blue zone in this area.

HPZ03 – North Point and beach

No Comment.

HPZ04 – Deception Bay & Redcliffe

All the dark blue zone is accepted within this area with the exception of the Caboolture River. The Caboolture River supports moderate levels of beam trawl activity and is an important source of bait and fresh prawns to the local communities.

The draft zoning plan already has 22.30% of river/estuary habitat protected by 'green zones', this far exceeds the minimum of 10% required. I note the EPA stated that dark blue zones also prohibit the development of private infrastructure (such as jetties), on closer examination very little of the Caboolture River would be suitable for this development considering it is largely mangrove forests.

If one of the objectives was to limit private infrastructure within this area, it could still be achieved through a rigorous permit system in a general purpose zone.

HPZ05 – Pine River

The QSIA do not accept the proposed dark blue zone in the Pine River, the river supports moderate levels of beam trawling for up to 4 operators. The QSIA will only support a general use zone in this area.

HPZ06 – West Banks

The area purposed in HPZ06 is the most important and productive area for the entire beam trawl fishery, it is approximated that about 70% of the entire catch is caught within this area. The area specified under the *Fisheries (East Coast Trawl) Management Plan 1999* in sections xxx and xxx, should remain a general use zone.

The inclusion of the T5 symbol area at the mouth of the Brisbane River as a general use zone is acceptable to the QSIA, this still allows a large area of HPZ06 to remain dark blue. This change to the zoning will have no impact on the beam trawl fishery.

HPZ07 – Mud Island

The zoning around Mud Island has no impact on any fishery, it has been proposed by the fishing industry that the dark blue zone be extended out to the navigation markers surrounding the Island.

HPZ08 – Waterloo Bay

In general the QSIA supports this zone, however the dark blue zone that extends beyond the permanent trawl closure north west of St Helena Island should be removed.

HPZ09 – Flinders Beach

No Comment

HPZ10 – North Stradbroke Island

This area is important to the trawl fishery, any dark blue zone should not extend beyond the 10 metre depth contour line.

HPZ11 – South Stradbroke Island (north)

No Comment

HPZ12 – South Stradbroke Island (south)

This area is important to the trawl fishery, any dark blue zone should not extend beyond the 10 metre depth contour line.