



## CLARENCE ENVIRONMENT CENTRE

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NSW Department of Primary Industries  
Locked Bag 1  
Nelson Bay NSW 2315;

Dear Sir/Madam

### Submission on Grey Nurse Shark Discussion Paper

#### Introduction

The Clarence Environment Centre has maintained a shop-front in Grafton for over 21 years, and has been a strong advocate for conservation of our unique environment. As a result we have followed the current politicisation of environmental protection, particularly in relation to marine parks, with deep concern.

In the bigger picture, Grey Nurse Sharks are not the only marine species under threat. Around the world fisheries have dramatically collapsed as a direct result of over exploitation, and even here in Australia there has been a need to reduce the commercial take of several species, most recently the Blue-finned Tuna. So adequate marine parks and sanctuary zones that can provide breeding grounds, to assist in the recovery of these fish stocks, is crucial.

#### The Grey Nurse Shark

The Public Consultation Discussion Paper on the Grey Nurse Shark makes the point that *“In 2010, research was published that concluded that the proportion of sharks that have been hooked at least once has not declined and that the current protection measures have not succeeded in reducing hooking rates. During this research, grey nurse sharks at Fish Rock recorded the highest occurrence of retained fishing gear of 25 sites studied.”*

The Paper explains that the protection currently provided to the sharks, a mere 200 metre radius critical habitat, and a 1,000 m sanctuary zone around some (not all) aggregation sites has not reduced the incidence of 'accidental' hooking.

We make the point that recreational fishers, using baits, are happy to catch any species of fish. Knowing that Grey Nurse Shark take baits means that there is no such thing as “accidental” hooking, unless we accept that any fish catch is accidental.

The 2003 recommendation that sanctuary zones be extended to 1,500 m around aggregation sites, was not adopted. However, in light of the latest research findings of no decrease in shark hooking, suggests either, that recreational fishers are not observing the sanctuary zones, or that the zones should be expanded.

The Discussion Paper claims that: *“Issues around grey nurse shark management are contentious and a range of views exist about the best way to manage activities that impact on grey nurse sharks, and the level of protection required for the species.”*

These views appear to depend on whether one is a recreational fisherman or not, so here is our view.

- We agree with criticism that there is a lack of consistency, and believe this should be addressed.
- In respect of protection measures for the Grey Nurse Shark, it is our opinion that, based on the scientific research findings, detailed in the Discussion Paper, no bait fishing should be allowed within marine parks,
- sanctuary zones should be extended to the recommended 1,500,
- there should be a complete ban on the use of jigs, and
- compliance monitoring should be stepped up.

We assert that the **worst** way to manage activities that impact on the Grey Nurse Shark is to remove what little protection they currently have, and subject them to the threats that have repeatedly been identified as harmful. Yet that is exactly what the NSW Government proposes, in its very obvious desire to get Shooters Party support in the Upper House.

We thank you for the opportunity to comment,

Yours sincerely

John Edwards  
(Honorary Secretary)

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**Submissions close on Friday August 26 2011.**