

Summary of Submissions Report

**Discussion Paper for Grey Nurse
Shark Protection**

January 2012

Executive Summary

- This report provides an overview of the public exhibition process and comments received in written submissions on a Discussion Paper for Grey Nurse Shark (GNS) Protection released on 31 May 2011.
- The discussion paper was on public exhibition for 3 months ending 26 August 2011.
- Submissions were received and analysed for comments and suggestions related to changes that could be introduced to improve the current level of protection for GNS.
- A total of 960 individual submissions, 1247 form submissions (from 7 groups) and 122 petition signatures were received (2329 in total). Form submissions were treated as single submissions for the purpose of the analysis i.e. as 7 submissions. Similarly, petition signatures were treated as a single submission. However, additional individual comments received on form submissions were included in the analysis.
- The most commonly raised comments and suggestions related to GNS management in submissions were:
 - The GNS population is depleted and requires increased protection.
 - Increase protection at Fish Rock and Green Island.
 - All forms of fishing should be prohibited at GNS aggregation sites.
 - Not convinced/don't believe GNS numbers reported. More research is required about GNS population including numbers outside reported aggregation sites.
 - Comments that individuals had observed GNS with fishing related injuries.
 - Implement 1500 m no take sanctuary zones around all GNS aggregation sites.
 - Reinstate closures revoked in April 2011.
 - Some form of fishing restrictions need to be put in place at GNS aggregation sites.
 - Increase community education programs.
 - Comments from individuals that they had never hooked a GNS.
- 52% of submissions were received from NSW, followed by 20% from international respondents, 12% from Queensland and 8% from Victoria. The remaining States and Territories accounted for 8% of the submissions.
- The most common interest groups identified by respondents were SCUBA diving (485), conservation (313), recreational fishing (276), community (234), boating (146), scientific research (128) education (109) spearfishing (87) and business/tourism (66).
- In many cases strongly held, but diametrically opposed opinions and management suggestions were put forward by different respondents. The large number of submissions received (2329) indicates that there is a high level of public interest in this issue, and emphasises the importance of consultation and involvement of affected stakeholders in the development of future management arrangements.
- Further involvement of key stakeholder groups in a facilitated workshop process is recommended to develop management options that as far as possible address stakeholder concerns and meet community expectations, while delivering on the NSW Government's policy commitments and legislative obligations.

1. Introduction

During 2010, the NSW Government reviewed fishing arrangements at several locations on the NSW mid-north coast in response to scientific research highlighting the impact of certain fishing practices such as hook and line fishing with bait in proximity to Grey Nurse Shark (GNS) aggregation sites.

The review concluded with new fishing rules being implemented at North and South Solitary Islands near Coffs Harbour and Fish Rock and Green Island near South West Rocks. The new rules did not affect spearfishing, beach fishing, rock fishing, spinning or trolling. However, other line fishing methods including hook and line fishing with bait, and jigging were prohibited. Commercial fishing methods were not affected as most forms of commercial hook and line fishing with bait and jigging have been prohibited at these sites since 2007.

The new rules were contentious with several interest groups and there was criticism at the time that there had been inadequate community consultation. The NSW Government subsequently revoked the closures and committed to a further 3 months community consultation to provide additional opportunity for the public to have a say in the decision making process.

A Discussion Paper for Grey Nurse Protection (the discussion paper) was exhibited from 31 May until 26 August 2011 to form the basis for the community consultation. This report documents the consultation process; presents an analysis of the submissions; and summarises the main comments and suggestions arising in the submissions.

2. Consultation Process

2.1 Discussion paper

The discussion paper was released on Tuesday 31 May 2011 accompanied by a media release (Appendix 1). The discussion paper provided a context for the review, background information, set out the conservation history of GNS, reviewed the current conservation status of GNS, described existing critical habitat regulations and locations, and discussed a range of matters related to the management of fishing, SCUBA diving and other issues. The discussion paper did not propose specific management options as the objective was to provide an opportunity for the community to have their say on GNS management.

The discussion paper referenced several recent scientific papers and relevant publications for the public to obtain additional information if interested.

2.2 Submission form

A submission form was distributed with the discussion paper (Appendix 2). The form was designed to collect a common set of basic information including the respondent's name, address, email, organisation, and interest group. In addition, the submission form contained an open field for respondents to comment on the issues identified in the discussion paper and suggestions to address them. Additional information could be attached to the submission form.

An online version of the submission form was also provided through the NSW Department of Primary Industries (NSW DPI) website. This version allowed respondents to type their responses directly into a series of field boxes and to lodge their submission by clicking a "submit" button.

Submissions could be lodged by conventional mail, fax, email, or through the online form. Submissions were also accepted at a range of community information sessions held along the

NSW coast during the exhibition period. For the purposes of clarification and to avoid subsequent follow up enquiries, the submission form indicated that individual submissions would not be replied to. Given the diverse range of methods that could be used to make submissions and the total number of expected submissions, individual acknowledgements or responses could not be provided to every submission. Notwithstanding this, some respondents specifically requested an acknowledgement that their submissions had been received, and efforts were made to meet these requests.

Submissions were received and processed using a dual-stage analysis described in Section 3.

2.3 Exhibition period

The discussion paper was not associated with any specific proposed management change and as such the *Fisheries Management Act 1994* does not establish statutory consultation time frames. However, the public consultation process that was implemented met and exceeded the requirements of section 284 of the *Fisheries Management Act 1994* that sets out public consultation procedures for a range of statutory processes.

The discussion paper was exhibited for a period of 3 months to honour pre-election commitments. The exhibition period ran until Friday 26 August 2011, however following requests from several stakeholder groups for additional time to prepare responses, extensions of time were granted and submissions continued to be received and processed until Wednesday 31 August 2011.

2.4 Distribution

In total 8839 copies of the discussion paper were distributed to a diverse range of stakeholders (Table 1).

Table 1 - Discussion paper distribution details

Group	Recipients	No. distributed
Coastal recreational fishing licence agents	505	6080
NSW saltwater and saltwater/freshwater mixed fishing clubs	493	493
Peak recreational fishing groups	17	17
Peak conservation groups	13	13
NSW SCUBA diving clubs & retail stores	115	575
NSW coastal regional tourism organisations	6	6
Ocean trap and line fishing business owners and endorsement holders	454	454
Commercial fishing cooperatives	19	38
Coastal Catchment Management Authorities	5	50
Peak scientific groups	5	5
Coastal Aboriginal Land Councils	30	30
Commonwealth/State Government natural resource management agencies	11	11
NSW Marine Parks Authority Offices	6	210
NSW Fisheries Offices	19	720
Major aquariums	5	10
Coastal councils	31	31
Total	1734	8839

The number of discussion papers distributed to recreational fishing licence agents varied based on the volume of their annual fishing licence sales, with larger agents initially receiving 40 copies, while smaller agents received 5, 10 or 20 copies. Covering letters were sent with

the discussion papers providing details of where additional copies of the discussion paper could be obtained if required, and these were supplied as requested.

The discussion paper and submission form were also available online, and a prominent link to the relevant web page was created on the NSW DPI website.

2.5 Promotion

The release of the discussion paper was accompanied by a media release (Appendix 1). Advertisements were placed in Sydney and local newspapers the following week (Table 2). The advertisements announced the release of the discussion paper; provided information on where the public could obtain copies; the closing date for submissions; and details on lodging submissions (Appendix 3). A dedicated web page was hosted on the NSW DPI website consisting of copies of the discussion paper, submission forms, and links to the online submission form.

Table 2 - Advertising details

Region	Newspaper	Advertising Date
North Coast	Byron Shire News	9 June 2011
North Coast	Yamba Clarence Valley Review	8 June 2011
Mid-North Coast	Coffs Coast Advocate	8 June 2011
Mid-North Coast	Nambucca Guardian News	9 June 2011
Mid-North Coast	Kempsey Macleay Argus	7 June 2011
Mid-North Coast	Port Macquarie News	8 June 2011
Mid-North Coast	Laurieton Camden Haven Courier	8 June 2011
Mid-North Coast	Taree Manning River Times	8 June 2011
Mid-North Coast	Forster Great Lakes Advocate	8 June 2011
Hunter	Port Stephens Examiner	9 June 2011
Hunter	Newcastle Herald	8 June 2011
Central Coast	Central Coast Express Advocate	8 June 2011
Sydney Metropolitan	Sydney Morning Herald	8 June 2011
Sydney Metropolitan	Daily Telegraph	8 June 2011
Illawarra	Illawarra Mercury	8 June 2011
South Coast	Nowra South Coast Register	8 June 2011
South Coast	Batemans Bay Post	8 June 2011
South Coast	Moruya Examiner	8 June 2011
South Coast	Narooma News	8 June 2011

2.6 Community information sessions

A series of community information sessions were held during July; approximately half way through the exhibition period, providing time for the discussion papers to be distributed within the community and considered. Advertising of the community information sessions also assisted in maintaining the public profile of the discussion paper, and served as a reminder of the closing date for submissions.

The purpose of the sessions was to provide an opportunity for members of the public to discuss any of the issues raised in the discussion paper with officers from NSW DPI. Members of the public could also ask questions, pick up additional copies of the discussion paper and submission forms, lodge submissions, and view a range of static display materials related to GNS management.

Dates, venues, and advertising details of the community information sessions are shown in Table 3 and Appendix 4. In addition, the NSW DPI website was updated to provide relevant

details of the community information sessions. The sessions commenced mid-afternoon and concluded at approximately 8 pm to provide an opportunity for the public to attend outside business hours as required.

The community information sessions were attended by a Senior Conservation Manager involved with the review of GNS protection, a recreational fishing Education Officer, and local Fisheries Officers. A “drop in” style was used that allowed members of the public to arrive and leave at any time between the advertised hours. The sessions did not involve a formal presentation and instead members of the public could individually or in groups, speak with representatives of NSW DPI and ask questions or discuss any of the issues identified in the discussion paper. More information regarding the attendance details of the community information sessions is presented in Appendix 5.

Table 3 - Community information session details

North Coast			
Date	Location	Venue	Advertising details
Mon 11 July 2011	Byron Bay	Byron Community Centre	Byron Shire News 7 July 2011
Tue 12 July 2011	Coffs Harbour	Solitary Islands Marine Park Office	Coffs Coast Advocate 6 July 2011 Nambucca Guardian News 7 July 2011
Wed 13 July 2011	South West Rocks	CWA Rooms	Kempsey Macleay Argus 5 July 2011
Thur 14 July 2011	Port Macquarie	Rotary Clubs Community Centre	Port Macquarie News 6 July 2011
Fri 15 July 2011	Forster	Forster School of Arts Hall	Forster Great Lakes Advocate 6 July 2011 Taree Manning River Times 6 July 2011
South Coast			
Tue 26 July 2011	Narooma	Narooma Golf Club	Narooma News 20 July 2011
Wed 27 July 2011	Batemans Bay	Batemans Bay Community Centre	Batemans Bay Post 20 July 2011 Moruya Examiner 20 July 2011
Thur 28 July 2011	Illawarra	Oak Flats Neighbourhood Centre	Illawarra Mercury 20 July 2011 Nowra South Coast Register 20 July 2011

2.7 Sydney Aquarium Conservation Fund GNS seminar

In addition to the regional community information sessions, an information seminar on the review of GNS protection and the discussion paper was organised by the Sydney Aquarium Conservation Fund (SACF) on 20 July at Sydney Aquarium. The seminar was held in the Reef Theatre and was open to the public (RSVP required).

The SACF sent invitations to the Sydney Institute of Marine Science, dive shops, conservation groups, research scientists, photographers, and the SACF online subscriber lists. The event was also promoted on at least one recreational fishing interest website, and recreational anglers were encouraged to attend.

The seminar involved a formal presentation followed by questions and answers, and discussion.

2.8 Media coverage

The release of the discussion paper and subsequent consultation period was extensively covered in print and electronic media, in addition to online forums and websites. Coverage included:

- Australian Marine Conservation Society website www.amcs.org.au
- www.marineconservation.org.au
- Marine Business website www.marinebusiness.com.au
- Coffs Coast Advocate newspaper and website www.coffscostadvocate.com.au

- Macleay Argus newspaper and website www.macleayargus.com.au
- Bryon Echo newspaper and website www.echo.net.au
- Narooma News newspaper and website www.naroomanewsonline.com.au
- Sydney Morning Herald newspaper and website www.smh.com.au
- Great Lakes Advocate newspaper and website www.greatlakesadvocate.com.au
- Lismore Northern Star newspaper and website www.northernstar.com.au
- Port Macquarie News newspaper and website www.portnews.com.au
- Western Advocate newspaper and website www.westernadvocate.com.au
- Newcastle Herald newspaper and website www.theherald.com.au
- ABC Regional Radio (Nth Coast, Coffs Coast, Mid-Nth Coast, Central West, Sth East)
- ABC website www.abc.net.au
- National Parks Association newsletter and website www.npansw.org.au
- www.ozpolitic.com
- www.sydneyangler.com
- www.diveoz.com.au
- www.marinehealth.org
- www.wetpixel.com
- www.underwater.com.au
- Nature Conservation Council of New South Wales website www.nccnsw.org.au
- Fishing World Magazine and website www.fishingworld.com.au
- Sydney Aquarium Conservation Fund website www.sacf.org.au
- www.divoluntourism.com
- www.sharksavers.org
- www.almcglashan.com
- Wilderness Society website www.wilderness.org.au
- Tracking Research for Animal Conservation Society website www.tracsaustralia.com.au
- www.care2.com
- www.fishingboatingworld.com
- www.fishraider.com.au
- www.getup.org.au
- www.type-news.com
- www.northcoastfishingnsw.com.au
- www.2st.com.au
- www.powerboat-world.com
- www.seabreeze.com.au
- www.projectaware.org
- www.sharkyear.com
- www.sharkdefenders.com
- www.heartsforsharks.com
- www.greentimes.com.au
- www.extremespearfishing.com.au
- www.catefaehrmann.org
- www.calderaenvironmentcentre.org
- 2CS (Coffs Harbour)
- WIN TV

2.9 Face-to-Face Briefings

In addition to the process described above, face-to-face briefings were held with the Fisheries Scientific Committee (FSC) and the Advisory Council on Recreational Fishing (ACoRF)

during the public consultation period. A chronology of the consultation process is presented in Table 4.

Table 4 - Consultation chronology

Event	Date
Ministerial release of the Discussion Paper for Grey Nurse Shark Protection.	31 May 2011
Media release	31 May 2011
Fisheries Scientific Committee Briefing	29 June 2011
Byron Bay Community Information Session	11 July 2011
Coffs Harbour Community Information Session	12 July 2011
South West Rocks Community Information Session	13 July 2011
Port Macquarie Community Information Session.	14 July 2011
Forster Community Information Session	15 July 2011
Sydney Aquarium Presentation	20 July 2011
Narooma Community Information Session	26 July 2011
Batemans Bay Community Information Session	27 July 2011
Oak Flats Community Information Session	28 July 2011
ACoRF Briefing	24 August 2011
Closing date for submissions	26 August 2011
Final submissions received	31 August 2011

3. Receipt and processing of submissions

3.1 Individual submissions

Individual submissions were received by mail, email/internet, fax, and hand delivered. On receipt, all mailed, faxed and hand delivered submission forms were scanned into electronic form. Submissions were checked for duplicates, allocated a unique number, entered into the NSW DPI TRIM records management software, analysed, and information migrated into an Access database. The database contained fixed fields to record common information (e.g. name, address, email contact, interest group etc) as well as open fields to capture unique issues.

A dual-stage stage process was used to assess the submissions:

1. The submissions were analysed to determine the interest group of the respondent where stated e.g. recreational fishing, scientific research etc. In some cases respondents did not state their interest group, and in other cases respondents nominated multiple interests.
2. Individual and form submissions were assessed to identify any specific comments or suggestions made by the respondent with respect to GNS management. A new field was created in the database for each new unique comment or suggestion identified. Subsequent submissions that made the same comment or suggestion were recorded against that field in the database.

3.2 Form letters & submissions

In addition to individual submissions, several form letters were received by email and through the online submission form. On receipt, submissions were checked for duplicates, collated and entered into a separate database to the individual submissions. Several of the form letters encouraged respondents to make unique individual comments in addition to the form response.

The form submissions were analysed for unique additional comments and suggestions that were subsequently recorded. Form submissions and petition signatures were treated as single submissions for the purpose of the analysis i.e. the 1247 form submissions received from 7 groups were treated as 7 individual submissions, and the 122 petition signatures received from one group were treated as a single submission. However, as mentioned above any additional unique comments in form submissions were included in the analysis.

3.3 Additional correspondence

Parallel to the exhibition of the discussion paper, many people and organisations sent correspondence to the Minister expressing an opinion on a range of matters associated with the review of GNS protection. In most cases, following checks for duplication, these letters were also treated as individual submissions and assessed in the same manner.

4. Results

4.1 Submission type

A total of 960 individual submissions, 1247 form submissions and 122 petition signatures were received.

Form submissions were received from 7 groups: Australian Marine Conservation Society, Project Aware, Underwater Skindivers and Fishermen’s Association Inc., Greens, Solitary Islands Underwater Research Group Inc., Nature Conservation Council of NSW and Other. Copies of the form letters are attached (Appendix 6 - 11). One individual petition comprising of 122 signatures was also received (from here on referred to as a form submission).

A breakdown of the type of submissions received and their source is shown in Table 5.

Table 5 - Type, source and number of submissions

Type of Submission	Source	No.
Individual	Various	960
Form Letter	Australian Marine Conservation Society	1105
	Project Aware	60
	Underwater Skindivers and Fishermen’s Association Inc.	47
	Greens	17
	Nature Conservation Council of NSW	7
	Solitary Islands Underwater Research Group Inc.	6
	Other	5
Petition	Various	122
Total		2329

4.2 Method of Submission

A breakdown of the method of submission is shown in Table 6. The most popular method of making individual submissions was through the online submission form, followed by conventional mail (including hand delivered submissions), email and fax. Form submissions were most commonly lodged by email, followed by online and conventional mail.

Table 6 - Method of lodging submissions

Method of Submission	Number	
	Individual	Form
Fax	26	0
Email	76	1117
Post	195	122
Online	663	130
Total	960	1369

4.3 Origin of submissions

Submissions were received from all Australian States and Territories. A diverse range of international submissions were also received. Table 7 shows the source of the individual and form submissions by place of origin.

Table 7 - Numbers of individual and form submissions by place of origin

Origin of Submission	Submission Type		Total	% of submissions
	Individual	Form		
NSW	747	471	1218	52
QLD	68	209	277	12
VIC	54	121	175	8
International	26	433	459	20
WA	17	55	72	3
Not specified	16	18	34	1
ACT	14	18	32	1
SA	10	31	41	2
TAS	4	7	11	1
NT	4	6	10	0
Total	960	1369	2329	100

The majority of individual submissions were received from NSW, followed by Queensland, Victoria and international respondents.

The form submissions were more evenly spread with the number of submissions from NSW almost matched by international submissions, followed by Queensland and Victoria.

In total across all submission types, NSW accounted for 52% of submissions followed by 20% from international respondents, 12% from Queensland and 8% from Victoria. The remaining States and Territories accounted for 8% of the submissions.

4.4 Analysis of interest groups

The majority of respondents who made an individual submission identified themselves as being associated with 1, 2 or 3 interest groups, however in some cases individuals identified with up to 8 separate interest groups i.e. the 960 individual submissions identified an affiliation with a total of 1933 interests (Table 8).

Table 8 - Analysis of number of interest groups identified on each submission

Number of interest groups stated	Number of submissions	Total number of identified interests
1	497	497
2	206	412
3	121	363
4	62	248
5	42	210
6	23	138
7	7	49
8	2	16
Total	960	1933

The number of respondents per interest group is shown in Table 9.

Table 9 - Number of interests identified by respondents on individual submission forms

Interest Group	Total	% of submissions
SCUBA diving	485	25
Conservation interests	313	16
Recreational fishing	276	14.5
Community	234	12
Boating	146	8
Scientific research	128	6.5
Education	109	5.5
Spearfishing	87	4.5
Business/tourism	66	3.5
Charter operator	23	1
Commercial fishing	20	1
State Government	19	1
Local Government	13	0.5
Aboriginal	9	0.5
Federal Government	5	0.5
Total	1933	100

Many of the form submissions were not lodged on the standard submission form, and as such specific interest groups could not be explicitly identified. The most commonly identified interest groups were SCUBA diving, conservation, recreational fishing, community and boating; accounting for 75% of all submissions.

Caution must be exercised in interpreting the results as respondent's interpretation of the interest groups varied. For example, of the 19 submissions that nominated 'State Government', only 10 were from State government agencies, while 9 were from individual respondents who had an interest in, but no apparent representative association with, a State government agency. Consequently, it is important to note that the interest groups may not necessarily reflect the origin of submissions.

5. Comments and suggestions raised in submissions

5.1 Comments and suggestions

The discussion paper invited the public to put forward their views on changes that could be introduced to improve the current level of protection for GNS. The submissions were assessed to identify specific comments or suggestions that occurred in 5 or more submissions. As mentioned above unique comments included with form submissions were also included in the analysis.

In general terms, most comments and suggestions related to one of the following subjects:

- Fishing – (not sector specific)
- Fishing - recreational
- Fishing - commercial
- Spearfishing
- SCUBA diving
- Socio-economics
- GNS aggregation sites
- Research
- Compliance
- GNS population size
- Education/community issues
- Shark meshing program
- Discussion paper

The ten most commonly raised comments and suggestions in submissions are shown in Table 10. In addition, there were many comments and suggestions that occurred in fewer than 5 submissions, and often in a single submission. These have been included in Appendix 12.

Table 10 – Most commonly raised comments and suggestions

Issue	Number of Submissions	% of Submissions
The GNS population is depleted and requires increased protection.	206	21
Increase protection at Fish Rock and Green Island.	178	18
All forms of fishing should be prohibited at GNS aggregation sites.	123	13
Not convinced/don't believe GNS numbers reported. More research is required about GNS population including numbers outside reported aggregation sites.	100	10
Reinstate closures revoked in April 2011.	92	10
Implement 1500 m no take sanctuary zones around all GNS aggregation sites.	95	10
Have observed GNS with fishing related injuries.	97	10
Some form of fishing restrictions need to be put in place at GNS aggregation sites.	73	8
Increase community education programs.	54	6
Have never hooked a GNS.	46	5

Tables 11 –23 show the comments and suggestions that were raised in 5 or more submissions by subject area.

5.1.1 Fishing – (not sector specific)

The most commonly raised comments and suggestions on the management of fishing were to prohibit all forms of fishing at GNS aggregation sites (123), comments that individuals had personally observed GNS with fishing related injuries (97), the need to implement 1500 metre no-take sanctuary zones at all GNS aggregation sites (95), suggestions to reinstate the closures revoked in April 2011 (92), and that some form of fishing restrictions need to be put in place at GNS aggregation sites (73).

The results are shown in Table 11.

Table 11 – General fishing – Comments and suggestions

Suggestion	Number of Submissions
All forms of fishing should be prohibited at GNS aggregation sites	123
Have observed GNS with fishing related injuries	97
Implement 1500 m no-take sanctuary zones at all GNS aggregation sites	95
Reinstate closures revoked in April 2011	92
Some form of fishing restrictions need to be put in place at GNS aggregation sites	73
Have never hooked a GNS	46
Boundaries must be consistent throughout the State and easy to interpret	42
Create sanctuaries/marine parks around all GNS aggregation sites and look into connectivity	27
Create artificial reefs to compensate for 'lost fishing grounds'	18
Implement the recommendations of the 2003 Stevens Review	18
Revoked restrictions should have been kept in place while the consultation process took place	13
Implement seasonal closures	12
Increase the size of the existing critical habitat zones	12
Create more/increase marine parks in NSW	11
Ban all 'high risk' fishing methods at/adjacent to GNS aggregation sites	9
Implement 1200 m no take sanctuary zones at all GNS aggregation sites	7
There is no proven case of hooking at Fish Rock	6
Have personally hooked a GNS	5

Commonly raised comments and suggestions that related to buffer zones and fishing rules were:

- To implement 1500 m no-take sanctuary zones at all GNS aggregation sites,
- To reinstate the January 2011 fishing rules,
- To implement some form of fishing restrictions at GNS aggregation sites,
- Ensure fishing rules are consistent throughout the State and are easy to interpret.

Other submissions suggested sanctuaries/marine parks should be implemented at all sites (27) and to create artificial reefs to compensate for 'lost' fishing grounds due to fishing restrictions (18).

Many submissions also commented on the incidence of GNS hooking. 97 submissions commented that they have observed GNS with fishing related injuries, 46 stated they had never hooked a GNS (of which many had numerous decades of fishing experience) and 5 submissions indicated that they had hooked a GNS.

5.1.2 Recreational fishing

The most commonly raised comments and suggestions for the management of recreational fishing are shown in Table 12. Suggestions to prohibit fishing with bait (34) or to prohibit all forms of recreational fishing at GNS aggregation sites (25) were most commonly raised, followed by a range of suggested restrictions on gear (e.g. circle hooks, no wire trace), methods (e.g. trolling only), or based on temporal factors (e.g. no night fishing), and suggestions for advisory programs (e.g. increased educational programs).

Table 12 - Recreational fishing - Comments and suggestions

Suggestion	Number of Submissions
Prohibit fishing with bait at GNS aggregation sites	34
Prohibit recreational fishing at GNS aggregation sites	25
Encourage circle hooks at GNS aggregation sites	19
Recreational fishing poses no threat to GNS or their habitats therefore no further restrictions should be put in place	19
Prohibit wire trace in GNS aggregation sites	19
Educate recreational fishers about GNS and how to unhook and release them safely if caught	14
Permit trolling at GNS aggregation sites	13
Prohibit night fishing at/between GNS aggregation sites	13
Prohibit line fishing at GNS aggregation sites	11
Prohibit stainless steel hooks at GNS aggregation sites	11
Prohibit bottom fishing at GNS aggregation sites	9
Permit lure fishing at GNS aggregation sites	7
Permit jigging at GNS aggregation sites	6
Reduce bag limits	5
Encourage biodegradable fishing gear	5

5.1.3 Commercial fishing

The most commonly raised comments and suggestions on commercial fishing are shown in Table 13.

The main comments and suggestions were concern that commercial fishing has a major impact on GNS and increased restrictions are required (29), to prohibit commercial wobbegong fishing (15), and suggestions to prohibit commercial fishing in GNS aggregation areas (14).

Table 13 - Commercial fishing - Comments and suggestions

Suggestion	Number of Submissions
Commercial fishing has a major impact on GNS therefore increased restrictions are necessary to minimise interactions	29
Prohibit commercial wobbegong fishing	15
Should be prohibited in GNS aggregation sites	14
Long-lining/set-lining/drop-lining/Ocean Trap & Line fishing have a major impact on GNS hooking	5
Undertake research into the effects of long lining and other methods of set hook and bait fishing	5

5.1.4 Spearfishing

The most commonly raised suggestions regarding spearfishing were that spearfishing has little impact on GNS and should be permitted in GNS aggregation sites (45), spearfishing should not be grouped with recreational line fishing when it comes to the development of management rules (13), unrestricted spearfishing should be permitted in all GNS aggregation sites (10) and that spearfishing should be prohibited in all GNS aggregation sites (9).

The results are shown in Table 14.

Table 14 - Spearfishing - Comments and suggestions

Suggestion	Number of Submissions
Spearfishing has little or no impact on GNS and should be permitted in all GNS aggregation sites	45
Spearfishers should not be categorised with recreational fishers	13
Permit unrestricted spearfishing in all GNS aggregation sites	10
Spearfishing should be prohibited in all GNS aggregation sites	9

5.1.5 SCUBA Diving

Comments about SCUBA diving activities in GNS aggregation sites revealed varied attitudes to the activity. Some respondents considered SCUBA diving has little or no impact on GNS, while other respondents suggested SCUBA divers damage GNS habitats, GNS move away from areas that SCUBA divers frequent, closures only benefit SCUBA divers and that SCUBA divers harass GNS (deliberately or inadvertently).

The main management comments and suggestions for SCUBA diving included limiting the number of dive boats accessing GNS aggregation sites and introducing an access permit system for dive boats and SCUBA divers (25), limiting the size of diver groups visiting GNS aggregation sites (23), to ban SCUBA diving if fishing is banned (22), and to conduct more research on the effects of SCUBA divers on GNS (18).

Several other suggestions were made for ways to reduce perceived SCUBA diving impacts such as by banning SCUBA diving near GNS aggregations, diver education and use of codes of conduct. The results are shown in Table 15.

Table 15 - SCUBA diving - Comments and suggestions

Suggestion	Number of Submissions
Limit the number of dive boats or introduce a permitting system for dive boats and/or SCUBA divers at GNS aggregation sites	25
SCUBA diver group size limitations should be implemented in GNS aggregation sites	23
SCUBA diving should be banned if fishing is banned	22
More research should be conducted on the effects of SCUBA divers on GNS	18
Restrictions should be put in place for SCUBA divers	17
SCUBA divers should be banned from GNS areas	7
SCUBA divers should be educated on how to dive with GNS	7
SCUBA divers should adhere to a code of conduct	5

5.1.6 Socio-economics

The main suggestions related to socio-economics were that GNS provide opportunities for eco-tourism, education, and scientific research, and that these are likely to have a positive economic effect (44). Conversely, other submissions suggested that fishing is an economically important activity for many coastal towns and closures would have a negative financial impact on towns (39).

The results are shown in Table 16.

Table 16 - Socio-economics - Comments and suggestions

Suggestion	Number of Submissions
GNS provide eco-tourism opportunities for local communities, and provide an opportunity for GNS education and scientific research	44
Fishing is an economically important activity for many coastal towns and closures will have a negative financial impact on towns	39

5.1.7 GNS protection at aggregation sites

Submissions were assessed for management comments and suggestions regarding protection at individual GNS aggregation sites. Comments and suggestions were received about a range of existing recognised sites, as well as some other lesser known sites.

The largest number of submissions related to increasing protection for GNS at Fish Rock and Green Island (178), North and South Solitary Island (33 & 37), and Mermaid Reef (32).

Submissions were also received that suggested decreasing protection for GNS at some sites including Fish Rock and Green Island (34) and Bass Point (6).

The results are shown in Table 17.

Table 17 - GNS protection at aggregation sites - Comments and suggestions

Suggestion	Number of Submissions
North Coast	
Increase protection at Julian Rocks	5
Mid-North Coast	
Increase protection at South Solitary Island (incl. Manta Arch)	37
Increase protection at North Solitary Island (incl. the Steps & Anemone Bay)	33
Increase protection at Mermaid Reef	32
Increase protection at the Cod Grounds	7
Increase protection at Fish Rock and Green Island	178
Decrease protection at Fish Rock and Green Island	34
Increase protection at Latitude Reef, Forster	6
Sydney	
Increase protection at Magic Point, Maroubra	8
Illawarra	
Decrease protection at Bass Point	6
Increase protection at Bass Point	5
South Coast	
Increase protection in Jervis Bay Marine Park	8
Increase protection at Montague Island	5

5.1.8 Research

A broad range of suggestions on GNS research were made in the submissions, although many of the suggestions were raised in less than 10 individual submissions. Comments and suggestions included recommencing the artificial breeding program (42), reviewing current

information on the number and location of GNS aggregation sites (16), and continuing/increasing research on the GNS population and the effectiveness of all current closures (11).

The results are shown in Table 18.

Table 18 - Research - Comments and suggestions

Suggestion	Number of Submissions
Recommence the artificial breeding program	42
Review all current information available and number/location of recognised GNS aggregation sites	16
Continue/increase research on the GNS population and the effectiveness of all current closures	11
Undertake further research to identify additional GNS areas	8
Data collected by divers are biased. Future research should be conducted by an independent body	8
Increase funds dedicated to GNS research	6
Consult with local stakeholders when implementing site specific closures	6
Review, finalise and implement the NSW GNS Recovery Plan	6
Consider other threats to GNS (including the beach meshing program, climate change, pollution, disease, predation, decrease in prey species etc)	5

5.1.9 GNS population

Management suggestions on the size of the GNS population varied. The most frequent comment was that the GNS population is depleted and requires increased protection (230), followed by the importance of GNS to healthy marine environments and local communities and the importance of protecting them (127). Conversely, the third most raised comment was from respondents that had doubts about the reported population size and suggested more research was required (100). Many submissions also suggested that the changes in population estimate suggested the population was recovering and as such doesn't require more protection (45).

The results are shown in Table 19.

Table 19 - GNS population - Comments and suggestions

Suggestion	Number of Submissions
The GNS population is depleted and requires increased protection	230
GNS contribute greatly to healthy marine environments and local economies and should be protected.	127
Not convinced/don't believe GNS numbers reported. More research is required about GNS population including numbers outside reported aggregation sites	100
The GNS population is increasing and therefore doesn't require increased protection	45
GNS are found in much deeper waters than reported	10

5.1.10 Compliance

The most commonly raised suggestions on compliance was a concern that blanket closures were not implemented on all activities at GNS aggregation sites (38) and that regulations to protect GNS need to be enforced and increased compliance activity was required (38). There

were also suggestions for more severe penalties for breaching the regulations (11) and to mark critical habitats with buoys for easier compliance (6).

The results are shown in Table 20.

Table 20 - Compliance - Comments and suggestions

Suggestion	Number of Submissions
No 'blanket closures' on all activities in GNS aggregation sites	38
Enforce regulations/increase compliance	38
More severe penalties for breaching regulations	11
Mark critical habitats with buoys for easier compliance	6

5.1.11 Community education

Increased community education programs and the involvement of recreational fishers in future research were the most frequently raised suggestions related to community education and involvement (55). The other frequently raised comments were to involve community groups including recreational fishers in future studies (11) and the need to provide consistent advisory material to boaters and recreational fishers, including increasing signage (7).

The results are shown in Table 21.

Table 21 - Community education - Comments and suggestions

Suggestion	Number of Submissions
Increase community education programs	55
Involve community groups, including recreational fishers for future studies (i.e. population studies, tag and release etc)	11
Adequate and consistent advisory material (including signage at boat ramps, brochures, maps, GPS coordinates)	7

5.1.12 Shark Meshing (Bather Protection) Program

23 submissions requested a review of the Shark Meshing (Bather Protection) Program (SMP) in relation to GNS mortality.

The results are shown in Table 22.

Table 22 - Shark meshing program - Comments and suggestions

Suggestion	Number of Submissions
Assess the impacts of the Shark Meshing (Bather Protection) Program on GNS mortality	23

5.1.13 Discussion paper

28 submissions commented that the discussion paper was biased against recreational fishing interests. These submissions were generally concerned that the paper did not discuss other causes of mortality, but instead focused on fishing related mortalities and impacts of recreational fishing.

The results are shown in Table 23.

Table 23 - Discussion paper – Comments and suggestions

Suggestion	Number of Submissions
Paper is biased against recreational fishing interests.	28

6. Conclusion

Similar to past public exhibition processes in 2002 and 2003 on management arrangements related to GNS protection, the 2011 public consultation process revealed that there are a diverse range of views about GNS protection and management of activities in proximity to GNS aggregation sites.

In many cases strongly held, but diametrically opposed opinions and management suggestions were put forward by different respondents. The large number of submissions received (2329) indicates that there is a high level of public interest in this issue, and emphasises the importance of consultation and involvement of affected stakeholders in the development of future management arrangements.

Further involvement of key stakeholder groups in a facilitated workshop process is recommended to develop management options that as far as possible address stakeholder concerns and meet community expectations, while delivering on the NSW Government's policy commitments and legislative obligations.



**The Hon Katrina Hodgkinson MP
Minister for Primary Industries
Minister for Small Business**

MEDIA RELEASE

31 May 2011

GREY NURSE SHARK PUBLIC CONSULTATION COMMENCES

Minister for Primary Industries Katrina Hodgkinson today announced the commencement of public consultation on future management arrangements for the protection of grey nurse sharks in NSW, releasing a discussion paper.

Katrina Hodgkinson said the announcement follows the promise made by the NSW Liberals & Nationals Government to revoke the hastily implemented closures brought in by the former Labor Government and put the issue back out to further public consultation for three months.

"The NSW Government is committed to delivering a solution that ensures the best outcome is achieved for both the grey nurse shark population in NSW and local communities," Katrina Hodgkinson said.

"As promised prior to the election, we want to ensure the public as well as the scientific community have a proper chance to be consulted before any final decision is made.

"The NSW Government has also committed to a scientific audit of the effectiveness of marine park zoning and the existing grey nurse shark management arrangements.

"The outcomes from community consultation and the scientific audit will be used to guide the development of new management arrangements for Fish Rock and Green Island.

"Fishing and diving provide many social and economic benefits to local and regional communities and it is important that the community get a clear understanding of exactly what is proposed and have the chance to provide input before final decisions are made."

Ms Hodgkinson said copies of the discussion paper will be available on the NSW Department of Primary Industries website <http://www.dpi.nsw.gov.au> and from local Fisheries and Marine Park offices.

"The discussion paper will be mailed out widely to interest groups and key stakeholders to ensure everyone has a chance to provide comment," Katrina Hodgkinson said.

"We will also be holding public information sessions at venues along the NSW coast in July, with details to be advertised in local papers.

"I invite everyone with an interest in this issue to have their say."

The public consultation period will close on Friday 26 August.

Submissions can be submitted online or by completing a submission form and mailing, emailing or faxing it to the address on the form.

MEDIA: Sarah Wright 0427 075 167

Appendix 2 – Submission form distributed with the discussion paper

Have your say on Grey Nurse Shark protection

Surname: First name:
Address:
.....
..... State: Post code:
Email:
Organisation (if applicable):

Please tick this box if you would like your submission to remain confidential

Please note:

- Additional information and copies of the Discussion Paper are available at:
www.dpi.nsw.gov.au/fisheries
- Submissions should be marked "Grey Nurse Shark Submissions" and sent to:
Email: fisheries.threatenedspecies@dpi.nsw.gov.au ;or
Fax: (02) 4916 3880; or
Post: NSW Department of Primary Industries
Locked Bag 1
Nelson Bay NSW 2315
- NSW DPI will not be replying to individual submissions.

Interest Group:

- | | | |
|---|---|--|
| <input type="checkbox"/> Aboriginal | <input type="checkbox"/> Boating | <input type="checkbox"/> Charter operator |
| <input type="checkbox"/> Conservation | <input type="checkbox"/> Recreational fishing | <input type="checkbox"/> Scientific research |
| <input type="checkbox"/> Federal government | <input type="checkbox"/> Spear fishing | <input type="checkbox"/> SCUBA diving |
| <input type="checkbox"/> Local government | <input type="checkbox"/> Commercial fishing | <input type="checkbox"/> Community |
| <input type="checkbox"/> State government | <input type="checkbox"/> Education | <input type="checkbox"/> Business/tourism |

Other (please specify):

Comments on issues identified in the discussion paper and management options to respond to them (Please attach additional pages as required)

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Appendix 3 – Advertisement placed in Sydney and local newspapers

Call for Submissions

‘Discussion paper for grey nurse shark protection’

Public submissions are invited on a discussion paper for the protection of the critically endangered grey nurse shark in NSW.

The discussion paper and submission form are available at:

www.dpi.nsw.gov.au/fisheries

Copies are also available at coastal fisheries and marine parks offices.

Written submissions marked “Grey Nurse Shark Submissions” should be posted to:

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

Faxed to: (02) 4916 3880; or

Emailed to: fisheries.threatenedspecies@dpi.nsw.gov.au

Submissions close on Friday August 26 2011.

Appendix 4 – Details of the community information sessions

Community Information Sessions – Grey Nurse Shark Discussion Paper

Community information sessions will be held at the following venues:

Town	Date	Venue
Byron Bay	Mon 11 July	Byron Community Centre, 69 Johnson St
Coffs Harbour	Tue 12 July	Solitary Islands Marine Parks Office, 32 Marina Drive
South West Rocks	Wed 13 July	CWA Rooms, 47 Landsborough St
Port Macquarie	Thurs 14 July	Rotary Community Centre, 198 Hastings River Drive
Forster	Fri 15 July	Forster School of Arts Building, 12 Little St

Officers from the NSW DPI will be available between the hours of 2:30PM and 7:30PM to answer public enquiries. Copies of the discussion paper, submission forms and background papers will be available.

Members of the public are welcome to attend at any time during these hours.

For additional information please see the NSW DPI website at:

www.dpi.nsw.gov.au/fisheries

Community Information Sessions – Grey Nurse Shark Discussion Paper

Community information sessions will be held at the following venues:

Town	Date	Venue	Time
Narooma	Tue 26 July	Narooma Golf Club, 1 Ballingalla St	3.30PM - 7:30PM
Batemans Bay	Wed 27 July	Batemans Bay Community Centre, 2 Museum Place	2:30PM - 6:30PM
Oak Flats	Thurs 28 July	Oak Flats Neighbourhood Centre, 44 Fisher St	4.00PM – 7:30PM

Officers from the NSW DPI will be available between the hours listed to answer public enquiries. Copies of the discussion paper, submission forms and background papers will be available.

Members of the public are welcome to attend at any stage during the allocated times.

For additional information please see the NSW DPI website at:

www.dpi.nsw.gov.au/fisheries

Appendix 5 – Attendance details of the community information sessions

Community Information Sessions

Byron Bay – Community Centre 11/07/11

Attended by approximately 40 people including representatives from recreational fishing and conservation non-government organisations, SCUBA industry, recreational SCUBA divers, local fishing club, conservationists, interested members of the community. Received promotion on ABC regional radio.

Coffs Harbour – Solitary Islands Marine Park Office 12/07/11

Attended by approximately 7 people including representatives from a local fishing club, fishing journalist, conservation interests, commercial fisher, commercial industry (cooperative) and spear fishing interests. Received promotion on local television.

South West Rocks – CWA Rooms – 13/07/11

Attended by approximately 20 people, including representatives from the Community Action for Fish Rock, visiting dive tourists, local fishers, local fishing clubs, charter boat operator, fishing tackle business, SCUBA diving business. Received promotion on ABC regional radio and local newspaper attended.

Port Macquarie – Rotary Community Centre – 14/07/11

Attended by approximately 8 people, including representatives from recreational fishing and conservation non-government organisations, underwater research group, and recreational SCUBA interests. Received promotion on local television.

Forster – School of Arts Building – 15/07/11

Attended by approximately 7 people including conservation, recreational fishing, commercial fishing, underwater research and SCUBA diving interests, and local government. Local newspaper attended.

Narooma – Narooma Golf Club – 26/07/11

Attended by approximately 25 people including recreational fishing, commercial fishing, charter boat, conservation, and SCUBA diving interests, and representatives of Narooma Port Committee.

Batemans Bay - Community Centre – 27/07/11

Attended by approximately 20 people including SCUBA diving interests, recreational fishing interests, recreational fishing clubs, commercial fishers, tackle business, and general public. Received promotion on local radio.

Oak Flats – Neighbourhood Centre – 28/07/11

Attended by 3 people including scientific and spear fishing interests. Attended by television.

Appendix 6 - USFA Form Letter

1) The Recreational Fishing Alliance (RFA) worked in consultation with Spearfishing and Fishing Clubs to develop a response which I completely agree with.

2) More scientific work is required and the population estimates need further studies along with the mortality/extinction modelling.

Count 1 by Otway was 302 sharks

Count 2 by Otway was 443 sharks

Count 1a by Lincoln Smith was 1500 plus sharks

Once free swimming Spearfishers assisted Otway in count 2 and Lincoln Smith in count 1a the locations increased and so did the numbers of sharks at locations. Lincoln Smith was unable due to time & conditions to properly cover the Eastern Coast. In fact less than 40% of possible areas known to spearfishers were counted. Further counts with spearfishers assisting will show greater numbers, given the right conditions & season. Continue the breeding programme please.

3) We agree that Spearfishing should not be affected by Critical Habitat regulations & accept that special rules should be applied at some locations. The Critical Habitat locations that occur in marine parks do not allow spearfishing which is inconsistent and unfair. These Critical Habitat sites in Marine Parks must be opened up to spearfishers and we urge the Government to negotiate with the USFA to set out some special rules applicable to spearfishers.

These rules may include,

- Limited hours of spearing
- Limited time at sites
- Limited numbers of persons per visit
- Limited numbers of visits
- Limited species list to be taken
- Limited number of fish per species
- USFA accredited spearfishers only
- Spearfishing to USFA codes of conduct only
- Log in and log out and captures recorded
- Grey nurse numbers and behaviour recorded

Spearfishing is already the most restricted recreational fishing activity in marine parks and we need these areas back.

4) Evidence exists that SCUBA diving has driven the GNS out of Fish Rock Cave and Foggies Cave on the Central Coast. The GNS at Long Reef and Magic Point have changed locations since impacted by Scuba diving.

We suggest that further rules should apply to Scuba diving such as:-

- Log in and log out, permit system
- Max 5 persons per visit
- At least 2 hours between visits
- Limited hours for visits to say 9am to 4pm only
- Accredited guide to accompany divers

5) We feel that the wobbegong shark fishery must be closed down as there is strong evidence that this is the highest risk to GNS. Fisheries need to protect the Wobbegong in order to save the GNS.

6) I agree with the proceeding comments and further add

Appendix 7 - Australian Marine Conservation Society Form Letter

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

Email to: fisheries.threatenedspecies@dpi.nsw.gov.au

Grey Nurse Shark Submissions

I am writing as a member of the community to provide a formal submission to the New South Wales government's public consultation on grey nurse shark protection.

I do not support the NSW governments revocation of the protection measures introduced earlier this year. Instead, given their status is 'Critically Endangered' under the NSW Fisheries Management Act 1994, I believe future management arrangements must introduce the greatest protection possible for grey nurse sharks.

In particular, I call on the NSW government to ensure the following measures are implemented as a matter of urgency:

1. Immediately reinstate recreational fishing rules introduced in early 2011 around Fish Rock, Green Rock and North and South Solitary Islands.
2. Ensure consistency in grey nurse shark protection throughout State waters by:

- implementing in full the findings of the Steven's Review, and
- establishing 1.5km fishing exclusion zones around all identified grey nurse shark critical habitat zones.

3. Review the number and location of critical habitat zones in NSW waters and undertake further research to identify additional zones.
4. Review the NSW Beach Meshing Program with the intention of preventing further grey nurse shark captures in nets.
5. Ensure these new grey nurse shark protection measures are accompanied by sufficient funds to ensure compliance with new regulations.

The vulnerable state of the east coast grey nurse shark population warrants high levels of protection. I believe management arrangements should be based on the best available science, which clearly indicates fishing should be excluded from areas of grey nurse shark critical habitat.

Yours faithfully,

Appendix 8 - Project Aware Form Letter

As a keen scuba diver I have become alarmed at recent developments in marine protection in NSW including the removal of newly introduced sanctuary zones in the Solitary Islands and Jervis Bay Marine Parks, the five-year moratorium on new marine parks and the handing over of marine park management to the Department of Primary Industries. I am also very concerned for the grey nurse sharks and call on the NSW Government to put in place greater protection for these critically endangered animals. The NSW State and Australian Federal Governments both classify grey nurse sharks as critically endangered to becoming extinct on the east coast of Australia. That is how high the stakes are in this issue and avoiding this outcome should be the only consideration when developing management strategies.

Sharks contribute greatly to healthy marine environments and local economies. Research has shown that reefs with a healthy shark population have a greater abundance of other fish species and that those fish are bigger than on reefs with fewer sharks. Through my diving I support businesses and jobs in regional NSW. As a diver I want to see healthy reefs with many fish and sharks. In fact seeing large sharks is one of the main reasons I dive. Recent research has resulted in two important findings: the east coast population of grey nurse sharks is at a dangerously low level, and fishing has a major impact on shark numbers. That grey nurse sharks are at risk from fishing has been recognised in restrictions to commercial fishing. This recognition now needs to be applied to recreational fishing.

I call on the NSW Government to increase protection for grey nurse sharks by creating a network of large no-take marine sanctuaries around designated critical habitats and recognised aggregation zones. These regulations should be applied to new aggregation zones as they are discovered. No-take sanctuaries need to be large enough to allow the grey nurse shark to repopulate without risk of injury or death from fishing activities. No-take sanctuaries will protect other species in addition to the grey nurse shark. They are recognised internationally as being of primary importance in maintaining a healthy marine environment and they have been shown to enable fish stocks to recover after heavy over-fishing. NSW is behind in its obligations to create no-take marine sanctuaries. Only 6.7% of NSW marine waters are protected from extractive activities such as fishing. That gives fishers access to 93.3% of NSW waters. This is an unreasonably high level of access considering that NSW marine waters are commonly owned by all NSW citizens. Scientists agree that 20% of each marine ecosystem should be protected as a minimum to ensure a healthy ocean. By creating a network of large no-take sanctuaries the NSW Government will give the grey nurse shark a fighting chance and ensure that recreational fishing continues for future generations. With the current low level of protection given to these animals we are at risk of seeing the end of the grey nurse shark in NSW waters.

I call on the NSW Government to increase protection for grey nurse sharks by creating a network of large no-take marine sanctuaries around designated critical habitats and recognised aggregation zones.

Appendix 9 - Greens Form Letter

There are only 1000-1500 grey nurse sharks left on the east coast of Australia and it is critically endangered. Much stronger protection is needed.

We know that the death of 4 mature females a year will prevent recovery in this species. Hook and line fishing – a key threatening process under the NSW Threatened Species Conservation Act – causes 12 known mortalities each year.

There are 16 key habitat areas including 10 declared critical habitat areas in NSW waters. Current research shows that the level of protection at most of these sites is inadequate. Research conducted by the NSW Department of Primary Industries has shown that grey nurse sharks will readily take a range of commonly used baits meaning the animals are not protected from accidental hooking.

The NSW Government has known since 2003 that the best way to protect sharks is to have a 1,500m sanctuary zones around each key habitat area (as recommended by an independent shark expert). Key habitat areas include Julian Rocks and Spot X off Byron Bay, Pimpernel Rock, The Steps and Anemone Bay at North Solitary Islands, E-Gutters at North West Solitary, Manta Arch at South Solitary, Fish Rock and Green Island, Cod Grounds, Mermaid Reef off Laurieton, Latitude Reef and Spot A off Forster, The Pinnacle off Forster, Big and Little Seal Rocks, Broughton Island, Foggys Cave off Terrigal, Long Reef off Sydney, Magic Point at Maroubra, Bass Point at Shellharbour, Tollgate Islands and Montague Island.

Fish Rock and Green Island at South West Rocks are in particular need of protection. This area consistently has some of the highest numbers of grey nurse sharks but has some of the lowest critical habitat protection in the state.

With the recent increase in commercial fishing for sharks there is likely to be an associated increase of accidental hooking of grey nurse sharks. The best way to minimise this risk is to provide sanctuary level protection in the place they spend most of their time – their key habitat areas.

Fully-protected sanctuaries around these critical grey nurse shark aggregation sites will make sure that grey nurse sharks have a safe haven from all fishing. Protection will also benefit other species in these areas, including the endangered black cod.

Appendix 10 - Nature Conservation Council NSW Form Letter

Please provide protection for the grey nurse shark as the population in NSW is critically endangered and needs much stronger protection from all threatening processes, including fishing-related impacts, to prevent its extinction; Up to date scientific evidence supports further restriction of specific, high-impact fishing techniques adjacent to grey nurse shark aggregation sites. Recent research by the NSW Department of Primary Industries clearly shows that grey nurses sharks interact with static baits used near aggregation sites, and knife jigs and soft plastic jigs cause risks to them. Recently commercial fishing effort has increased for large sharks in NSW, and this increase is likely to impact on grey nurse shark populations through increased incidental capture of threatened species. (Source: <http://www.dpi.nsw.gov.au/research/areas/systems-research/wild-fisheries/outputs/2009/1600>). This potential impact of commercial fishing should be offset by increasing protection of this species where possible. A 1500 m radius sanctuary zones should be implemented for all critical habitat and aggregation areas for Grey Nurse Sharks, including Fish Rock/Green Island, Mermaid Reef, Magic Point, and Bass Point.

Appendix 11 - Solitary Islands Underwater Research Group Form Letter

The Grey Nurse Shark (GNS) became the world's first protected shark when the NSW Government declared it a protected species in 1984 under the Fisheries and Oyster Farms Act. Currently GNS are listed as 'critically endangered' under the NSW Fisheries Management Act 1994 and the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 as well as the IUCN Red List. Despite these measures, GNS numbers have not increased since 1984. The implication is that the GNS needs increased levels of protection if the species is to have any chance of survival.

Sharks contribute greatly to healthy marine environments and local economies. Research has shown that reefs with a healthy shark population have a greater abundance of other fish species and that those fish are bigger than on reefs with fewer sharks.

The Solitary Islands Underwater Research Group Inc. (SURG) is a community organisation comprising divers and others who have been undertaking scientific research in the Solitary Islands Marine Park (SIMP) NSW since 1985. (see www.surg.org.au). The Group has been involved in GNS surveys in the past and regularly observes GNSs at known aggregation sites and at other locations within SIMP.

SURG members frequently observe sharks bearing signs of injury. For example, GNS are often seen trailing monofilament fishing lines, commonly bearing algal growth; indicating that the shark has been carrying the injury for sometime. Observations have also been made of individuals with apparent 'gaff' injuries; perhaps sustained when a fisherman tried to retrieve fishing gear at the expense of the shark's health. In addition, sharks have been observed with fishing lines and ropes wrapped around their bodies and/or tails.

Scientific research indicates that hook and line fishing is the greatest threat to GNS survival. Research recently undertaken on behalf of the NSW DPI clearly demonstrates that GNSs interact with baits, especially static baits, used near aggregation sites, and that soft plastic jigs and knife jigs are a risk to the sharks. When baits were bottom-set close to aggregation sites during this study, GNS were the only bait takers at night. Recreational bait fishing is permitted in many areas in SIMP, in close proximity to GNS aggregation sites.

Research undertaken in 2010 determined that current protection measures have not succeeded in reducing the hooking rates for GNS. The sharks are being hooked, captured and injured in increasing numbers. Although GNS caught accidentally are released alive when possible, little or no research has been undertaken on the long-term survival of such individuals. It is difficult to believe that a GNS with a hook in its mouth or digestive tract can live a normal or productive (fecund) life.

Another recent study has determined that although grey nurse shark behaviour can be disturbed by the presence of SCUBA divers, the sharks return to their previous behaviour patterns as soon as the divers leave the area. In addition, interactions with divers do not leave injuries, hooks or trailing fishing gear. The shark's digestive tract,

Appendix 11 - Solitary Islands Underwater Research Group Form Letter

ability to feed and normal behaviour are not affected by the interaction. The shark is free to continue with its normal behavioural patterns, its health uncompromised.

GNS aggregation sites within SIMP include Manta Arch at South Solitary Island (30°12'9.79"S, 153°16'2.11"E), Shark Mooring at North Solitary Island (29°55'21.59"S, 153°23'22.26") and E-gutters at North West Solitary Island (30°1'10.04"S, 153°16'15.98"E). The first two of these are listed as 'critical habitat' and as such are afforded a modicum of protection, but E-gutters is not included in the list of GNS aggregation sites in NSW. SURG members have frequently observed GNS, at times in large numbers, at E-gutters and believe it should be categorised as critical GNS habitat immediately. Importantly, juvenile sharks are commonly seen in the gutter complex, but infrequently at the other two aggregation sites.

SURG members believe that protection currently offered by critical habitat recognition is insufficient. At the time of writing, a 'Grey nurse shark critical habitat buffer zone' extends from the boundary of a critical habitat for a further 1 km. This zone prohibits recreational fishers from using a wire trace line while anchored or moored, but bait may be used.

Given the population status of GNS and the obvious lack of success of current protection measures, decisive action is needed immediately. SURG recommends habitat and protection measures within a radius of 1500 metres of the identified core of each GNS aggregation site. The suggested 1500 metres radius has been identified as the foraging zone through which GNS frequently move while feeding at night. Protection should take the form of complete prohibition of all fishing activities within the 1500 metre zone.

GNS are known to travel between aggregation sites, particularly between dusk and dawn and there is also evidence that GNS hunt over soft substrata, especially at night. As noted above, GNS are known to take baits at night and so in order to assist with GNS protection, all fishing activities should be prohibited during these times between the known aggregations sites in SIMP.

NSW is behind in its obligations to create no-take marine sanctuaries. Only 6.7% of NSW marine waters are protected from extractive activities such as fishing. That gives fishers access to 93.3% of NSW waters. This is an unreasonably high level of access considering that all NSW citizens commonly own NSW marine waters. Scientists agree that 20% of each marine ecosystem should be protected as a minimum to ensure a healthy ocean.

By creating a network of large no-take sanctuaries, the NSW Government will give the grey nurse shark a fighting chance and ensure that recreational fishing continues for future generations. With the current low level of protection given to these animals, we are at risk of seeing the end of the grey nurse shark in NSW waters.

Appendix 12 – Additional management comments and suggestions (raised in less than 5 submissions)

Fishing (General)

Restrict specific gear types at GNS aggregation sites.
Ban fishing directly over shark gutters.
Modify fishing equipment to minimise impacts of ingested hooks.
More research into 'low-risk' fishing techniques is required.
Engineer hooks that don't catch GNS.
No boats should be allowed within 1.5 kms of GNS aggregation sites without a permit.
Limit the number of fishermen permitted on charter groups, with strict controls on where and when fishing takes place.
Introduce industry incentive schemes to convert fishers from using 'J' hooks to using circle hooks.
Modify existing conservation legislation to encourage the reporting of GNS sightings, removing the potential for a fisher to be fined and have a criminal conviction recorded against them.
Conduct a review of commercial fishers at South West Rocks.
Seasonal closures at GNS aggregation areas should be implemented for both SCUBA divers and fishers.
Further exclusions or closures should only be considered with a compensation package to commercial fishers for loss of access to prime fish habitat.
Permit fishing and diving in GNS aggregation areas on alternate days
Implement 500 m no take sanctuary zones around all GNS aggregation sites.
Implement 1000 m buffer no take sanctuary zones around all GNS aggregation sites.
Produce marine park and marine protected areas as GPS map overlaps for better compliance.
Maintain the current buffer zone of 200 m.
Establish standardised rules at GNS aggregation areas across Australia.
Increase the no-fishing while anchored restrictions from 200 m to 400 m at GNS aggregation sites.
Implement a minimum of 1500 m buffer zone and 500 m critical habitat zone.
Implement 300 m no take sanctuary zones around all GNS aggregation sites
Implement 5000 m no take sanctuary zones around all GNS aggregation sites.
More accurate data is required before the introduction of more marine parks.
GNS breeding areas should also be protected as well as their aggregation areas.
Ban bottom fishing within 200 m of GNS aggregation sites within peak aggregating times only.
Except spearfishing, all forms of fishing should be banned within 1500 m radius of all GNS aggregation sites in Australia.
More populated areas should have larger exclusion zones (0.5km) than less populated areas.
Increase the length of seasonal closures.
Only increase protection at GNS breeding areas (not at aggregation sites).
500 m buffer zones should be trialled at some aggregation sites during the day and 1000 m during the night.
Closures should only take place for 3 months a year as GNS are migratory and therefore do not remain at one site year long...
Only some restrictions should be put in place on the size of lines and the use of single circle hooks in the existing 10 GNS aggregation sites.
Increase the large hook restriction zones to 1500 m.
1000 m exclusion zone should be put in place for all commercial and recreational bait fishing around critical habitat.
Create a broad range of interconnected marine parks at both state & federal level, including continental shelves & deep sea areas of critical habitat.
Stage any proposed regulations.
Any new restrictions placed should be across all marine activities.
All sanctuary zones should be revoked
Reopen all areas until proper consultation/scientific research is available
Protection at each site should be considered individually as all sites are different.
Retain the current closures and engage all industries (SCUBA, commercial and recreational fishing) in a series of scientific studies before implementing any new closures
Protect GNSs and their habitats.
Only permit snorkelling at GNS aggregation sites.

Recreational fishing

Ban jigging at GNS aggregation sites.
Recreational fishers should be permitted to fish anywhere.

Appendix 12 – Additional management comments and suggestions (raised in less than 5 submissions)

Ban trolling.
Introduce larger size limits for species.
Permit the use of soft plastics at GNS aggregation sites.
All rules that apply to commercial fishing should apply to recreational fishing.
Ban burleying at GNS aggregation sites.
Ban gang hooks at GNS aggregation sites.
Ban steel trace at GNS aggregation sites.
Permit flyfishing at GNS aggregation sites.
Additional research on GNS interactions with recreational fishing methods is required.
Allow 'low impact fishing' at GNS aggregation sites.
Allow metal jigs at GNS aggregation sites.
Hook and line fishing is the greatest threat to GNS.
Allow single baited in line circle hooks no larger than 8/0 at GNS aggregation sites.
Allow the use of low risk, sustainable fishing at GNS aggregation sites.
Introduce a bag limit of zero sharks for recreational fishers.
Ban bait & lure fishing at GNS aggregation sites.
Ban barbed hooks at GNS aggregation sites.
Ban circle hooks at GNS aggregation sites.
Ban J-hooks and burleying within 500m of GNS aggregation sites.
Ban knife jigs at GNS aggregation sites.
Ban lead lines at GNS aggregation sites.
Ban lure fishing at GNS aggregation sites.
Ban plastic jigs at GNS aggregation sites.
Ban weighted baits at GNS aggregation sites.
Ban wire trace when bottom fishing at GNS aggregation sites.
Encourage J-hooks at GNS aggregation sites.
Encourage stainless steel hooks at GNS aggregation sites.
If increased restrictions are put in place, improve fishing facilities for recreational fishermen as a compromise.
Increase consultation with recreational fishers.
Instead of bag limits, introduce boat limits for species.
Involve experienced local fishers for future research.
Limit fishing permits in areas surrounding GNS aggregation sites.
Allow live bait fishing only at GNS aggregation sites.
Install more open ocean Fish Aggregating Devices to provide an alternative fishing area.
Conduct more research into the effects of recreational fishing on GNS.
People who fish from shore should be permitted to fish anywhere.
Permanent moorings will reduce the amount of illegal fishing in the protection zones.
Permit fishing while anchored at GNS aggregation sites.
Permit artificial lures at GNS aggregation sites.
Permit bait fishing at GNS aggregation sites.
Permit casting poppers at GNS aggregation sites.
Permit lead lining at GNS aggregation sites.
Permit the use of jigs, lures and flies with crushed barbs at GNS aggregation sites.
Set maximum trace size at GNS aggregation sites.
Implement an exclusion zone of 50 metres for recreational fishers using bait at existing GNS aggregation sites.
Permit trolling in some GNS aggregation sites only.
Use nylon or braid on tackle at GNS aggregation sites.
Ban bottom fishing within 200m of GNS aggregation sites (during peak months only).
Trolling puts divers at risk of harm.
Only close large GNS aggregation sites to bottom fishing (not all GNS aggregation sites).
Ban wire trace & live bait (except trolling) at GNS aggregation sites.
Apply a protection program at night when GNS are out feeding.
Put sustainable fishing practices in place.
Ban stainless steel hooks at Fish Rock only.
Ban wire trace at Fish Rock only.
Ban bait fishing at Fish Rock only.
Allow burleying within 500m of critical habitat zones.
Restrict the size of deployed baits.

Appendix 12 – Additional management comments and suggestions (raised in less than 5 submissions)

Ban fishing line or leader with a breaking strain above 20lb.
Develop a code of conduct for recreational fishers to adopt at GNS aggregation sites.
Recreational fishers should be banned from drift fishing (bottom/jigging) or while anchored (bottom/jigging) at GNS sites.
Encourage breakaway trace lines at GNS aggregation sites.
Permit low impact line fishing.

Commercial fishing

The increase in commercial fishing effort for large sharks will likely impact on GNS.
Ban all commercial bait fishing.
Commercial fishing has little or no impact on GNS.
An ongoing monitoring program of commercial fishing activities is required.
The present restrictions on commercial fishers are working well and they continue to pose no threat to GNS.
Ban commercial and charter fishing in GNS aggregation sites.
An observer survey should monitor incidental capture of GNS by commercial fishers when targeting other species such as wobbegongs.
Downsize and close the NSW inshore shark fishery.
Tighter restrictions on commercial bycatch are needed.
Open GNS areas to commercial fishing.
Close the Macleay River to netting.
Collaborate with commercial fishermen when conducting further research.

Spearfishing

Spearfishing should be banned if line fishing is banned in GNS aggregation sites.
Balance areas to protect sharks and to permit spearfishing, snorkelling & SCUBA.
No further restrictions to be placed on SCUBA divers or spearfishers in GNS aggregation sites.
Recreational free divers should have a further 200m extension to the existing sanctuary zones (free divers anchor the boat outside sanctuary zones and swim into the zone to target fish).
Permit spearfishing in GNS aggregation sites with limitations such as limited hours and sites, limited number of persons per site, limited species to be taken etc.
Permit spearfishing in marine parks with special regulations.

SCUBA Diving

Create a key governing body for SCUBA divers.
Introduce limitations on the frequency and time of daily dives.
Allow at least 2 hours between SCUBA dives.
An accredited guide should accompany a; SCUBA divers at GNS aggregation sites.
SCUBA diving increases public awareness & conservation status of GNS.
Inexperienced SCUBA divers should not be permitted to dive in GNS aggregation sites.
Establish and maintain mooring facilities for dive boats at GNS aggregation sites.
Keep SCUBA divers at a safe distance away from GNS.
Limit or ban flash photography near GNS.
Introduce seasonal closures for SCUBA divers.
An entry fee for SCUBA divers should be introduced at GNS aggregation sites and marine reserves, where this fee goes primarily to conservation, research and enforcement of fishing closures. Part of this fee could also be used to create artificial reefs.
An accredited SCUBA diving operator registration system could be developed that monitors SCUBA diving in GNS areas.
If artificial reefs are introduced to offset fishing closures. They should be closed to SCUBA divers.
SCUBA divers put hooks in GNS mouths and blame fishermen.
Do not introduce a SCUBA diving permitting system.
Only SCUBA divers should be permitted in GNS aggregation sites.
More enforcement of SCUBA diving regulations is required.
No more SCUBA dive schools should be permitted to open at South West Rocks.
Offset SCUBA divers from Fish Rock by diving at Ship Reef (between Grassy Head and Smokey Cape) instead.
Only permit snorkelling and SCUBA diving at GNS aggregation sites.
Regulate and prevent damage done by SCUBA divers to GNS habitat.
Data collected by SCUBA divers are biased.

Appendix 12 – Additional management comments and suggestions (raised in less than 5 submissions)

Continued monitoring of GNS populations are supported, but not by the SCUBA diving community.

No further restrictions to be placed on SCUBA divers or spearfishers in GNS aggregation sites.

Socio-economics

Conduct a long term social & economic assessment of recreational, commercial fish & SCUBA diving activities in relation to GNS closures.

GNS aggregation sites

Make Fish Rock and/or Green Island a Commonwealth marine reserve.

Implement 1500 m no fishing zones around Fish Rock/Green Island.

Erect two more Fish Aggregating Devices at Fish Rock/Green Island.

Ban all fishing within 500 m of Fish Rock/Green Island.

Make Fish Rock a marine park.

Implement a marine sanctuary corridor between Green Island and Fish Rock to connect the two sites.

Fish Rock closures should only be put back in place after thorough scientific research by marine scientists.

Implement a seasonal closure of Fish Rock to support GNS breeding; permit drift fishing at Fish Rock in the open season.

Remove GNS protection at the Tollgate Islands.

Remove GNS protection at Brush Island.

Remove GNS protection at Mermaid Reef.

Remove GNS protection at Julian Rocks.

Solitary Islands should be reopened to fishing.

Mackerel Boulder should be reopened to fishing.

Crowdy Head should be reopened to fishing.

Increase protection at Nine Mile Reef off Tweed Heads.

Increase protection at Black Rock.

Increase protection at The Bait Grounds, Forster.

Increase protection at The Barge, Forster.

Increase protection at Batemans Bay Marine Park.

Increase protection at Big and Little Seal Rocks.

Increase protection at Broughton Island.

Increase protection at Cape Byron Marine Park.

Increase protection at Drum and Drumsticks, Jervis Bay Marine Park.

Increase protection at Edith Breaker.

Increase protection at Evans Reef.

Increase protection at Foggy's Cave.

Increase protection at Grouper Island.

Increase protection at Jervis Bay.

Increase protection at Little Broughton Island.

Increase protection at Long Reef, Sydney.

Increase protection at North Rock.

Increase protection at North West Solitary Island.

Increase protection at NW Solitary bommies.

Increase protection at Pimpernel Rock.

Increase protection at Port Stephens Great Lakes Marine Park.

Increase protection at Sawtooth Rocks.

Increase protection at Shelley Beach.

Increase protection at Skeleton Rocks.

Increase protection at Solitary Islands.

Increase protection at Split Solitary Island.

Increase protection at Spot A off Forster.

Increase protection at Spot X off Byron Bay.

Increase protection at Status Island.

Increase protection at the E Gutters at NW Solitary.

Increase protection at The Patch.

Increase protection at The Pinnacle.

Increase protection at The Wash.

Appendix 12 – Additional management comments and suggestions (raised in less than 5 submissions)

Increase protection at Tollgate Islands.
Increase protection at White Top Rock.
Increase protection at Woody Head, Iluka NSW.
Increase protection at Wrights Reef.
Increase protection at Charlotte Head (northern Headland of Boomerang Beach) at Pacific Palms.
Increase protection at additional sites reported in the Cardno report.
Those aggregation sites that are not in a marine park should be recommended for listing as a Commonwealth Marine Reserve.
Implement a 200m Habitat Protection Zone around Julian Rocks from 1 May-30 July to coincide with the GNS recorded annual aggregation pattern at the Cod Hole.
Continue protection at Bass Point.
Review protection at Bass Point.
Put limits in place on commercial dive operators visiting Magic Point.
Revise protection at the NE corner of North Solitary Island.
Decrease protection at Montague Island.
More direct research into the GNS population at Montague Island is required.
Implement seasonal closures at Montague Island.
Permit bait fishing at Montague Island.
Deploy extra buoys around the protection zones at Montague Island.
Review GNS protection at Montague Island.
Protect some GNS breeding areas and critical habitats from any type of development, activity or encroachment, even if there are community issues and economic impacts.
Balance areas to protect sharks and to permit spearfishing, snorkelling and SCUBA diving.

Research

A complete review of GNS management across both State and Commonwealth managed waters is required.
More scientific research is required and the population estimates need further studies, along with mortality/extinction modelling.
Conduct periodic surveys of GNS in 5 & 10 years to establish if protection measures are working.
Encourage the use of aquariums for shark rehab. They provide a repository for genetic resources and site for potential culture for the augmentation of natural stocks if genetic variability falls to critical levels.
Have control GNS aggregation sites (areas without SCUBA divers or snorkellers) for research purposes.
Initiate a tagging/satellite tracking research program.
Introduce GNS from other populations.
Research should be undertaken to develop floating signs similar to FADs that can be placed at the four compass points around the perimeter of each GNS aggregation site.
All future management decisions should be based on consultation with scientists with GNS expertise.
Arrangements should be sufficiently flexible to allow them to be extended to cover any newly-identified critical aggregation sites.
The artificial breeding program should not be continued rather the conservation effort should focus on the protection of habitat & the mitigation of high risk human activities.
Artificial levels of exhaled CO₂ to confined geographic areas is of important environmental significance and should not be overlooked.
Before making any new management decision, consider the recommendations proposed in the 2010 Commonwealth GNS Recovery Plan.
Close areas to SCUBA diving and fishing for 6 months, then recount GNS in these areas.
Consider an updated website that includes all GNS aggregation sites and shows an estimated population distribution based on diver reports of local numbers at each location.
Develop a risk assessment matrix to understand levels of GNS interactions, fatalities and number showing signs of existing or past retained gear.
Develop strategies for the recovery of shark species and populations.
More research into how the sharks move between reef areas is needed and scientists should be funded to do more habitat mapping and acoustic tagging to better understand GNS.
Replicate the same research conducted at Fish Rock/Green Island to other aggregation sites and implement restrictions accordingly.
Research the percentage of total GNS mortality from recreational fishing.

Appendix 12 – Additional management comments and suggestions (raised in less than 5 submissions)

Start a captive breeding program (in aquariums etc).
Use Australia's second National Plan of Action for the Conservation and Management of Sharks as a guide when developing future management arrangements.
Develop a national database for GNS interactions.
Regulate visitation at GNS sites, have a period of no visitation during the year to allow sites to recover from fishing and SCUBA diving pressures.
Conduct a realistic assessment of the impacts of ingested hooks causing GNS mortality.
Research should be conducted on the impacts of all recreational fishing methods on GNS before any further fishing restrictions are put in place.
Establish better ways of counting GNS.
De-list GNS as critically endangered.
Include DPI shark biologists in all stages of the review and implementation process.

Compliance

Ensure GNS protection measures are accompanied by sufficient funds to ensure compliance with new regulations.

Education/Community

Supply conservation/closure information with each new boat registration or re-registration and fishing licence.
Funding to assess the ongoing effectiveness of new management arrangements on NSW should be available.
Send a brochure to all people with recreational fishing licences explaining how to identify sharks and what to do if you catch one.
Education about eco-tourism in place of fishing dollars is necessary for coastal towns.
Provide more support for community programs such as Spot-a-Shark and Reef-Watch.

NSW Shark Meshing (Bather Protection) Program

Review the NSW beach meshing program with the intention of preventing further GNS capture in nets.
Stop shark meshing during certain months from sites that GNS are frequently captured.
Stop shark meshing in September and October.
Ban the Shark Meshing (Bather Protection) Program.

Indigenous

The cultural significance of GNS to the Biripi people should be reflected in the conservation & management of GNS.
More Aboriginal engagement in this issue is required.

Discussion Paper

The discussion paper does not encourage positive and constructive input from recreational fishers.
No reference to juvenile GNS in discussion paper.
It was hard to research this subject as some of the references made in the discussion paper were not easily available to the public and the photos used were not referenced by date and location.
Discussion paper did not present options for discussion.
The discussion paper does not mention the role of spear fishing in the historical reduction of GNS.
The discussion paper does not fully address other causes of GNS mortality and does not adequately inform the public of the significant socio/economic benefits provided by fishing to coastal communities.
The discussion paper does not mention the trophic impacts of removal of key prey species such as rock lobsters.
The impact of SCUBA divers to GNS are not adequately addressed in the discussion paper.
The discussion paper doesn't emphasise the urgency to protect GNS.
DPI public consultation should also occur with animal rights and animal welfare groups.
The discussion paper does not identify the economic contribution by recreational fishing compared to other user groups.

Other

Protect all shark species

Appendix 12 – Additional management comments and suggestions (raised in less than 5 submissions)

Ban commercialization, exchanges, purchases and sale of any goods harvested from sharks.
Higher numbers of shark hookings are reported at sites dived more often than others not dived as regularly.
Will not travel to NSW/Australia if closures are not put in place.