



Reference: 014-2025-JM

Thursday, 12 June 2025

The Hon. Penny Sharpe, MLC
Minister for the Environment
52 Martin Place
SYDNEY NSW 2000

The Hon. Tara Moriarty, MLC
Minister for Agriculture
52 Martin Place
SYDNEY NSW 2000

By online contact form

Re: Aquatic reserves within the Sydney region

Dear Ministers,

I write to you on behalf of the Sydney Coastal Councils Group (SCCG) regarding aquatic reserves within the Sydney region and the recent Notification gazetted in April 2025. We seek to raise concerns regarding the lack of consultation prior to the gazettal and the urgent need to strengthen environmental protections for these important marine areas.

Background to the SCCG

The SCCG is a regional organisation of councils (ROC) established in 1989 to promote collaboration among member councils on the sustainable management of the urban coastal and estuarine environments in the Sydney Region. The group comprises nine councils which together represent nearly 1.3 million Sydney-siders.

In line with our [2019-2029 Strategic Plan](#), the SCCG aims to protect and enhance marine biodiversity within our bioregion and continues to advocate for improvements to marine biodiversity as outlined in our [2025 Operational Plan](#) which could be achieved through increased protections in aquatic reserves.

Recent renewal of Aquatic Reserves

The SCCG was recently advised by the Department of Primary Industries & Regional Development (DPIRD) that the management arrangements for the 12 aquatic reserves in NSW, including the 10 reserves in SCCG member council areas, have been formally renewed. A new Aquatic Reserve Notification was published in the [NSW Government Gazette on 11 April 2025](#) and will remain in effect for up to five years. DPIRD advised that no changes have been made to the boundaries or the current rules for the 12 aquatic reserves under the new Notification.

We understand there is no formal requirement to consult with stakeholders when issuing renewed aquatic reserve notifications. However, the SCCG believes that the renewal requirement would ideally be underpinned by a review of the appropriateness of arrangements and consultation with the community and stakeholders as to whether the current arrangements are satisfactory.

MEMA acknowledges that the aquatic reserve rules are inadequate for conserving marine biodiversity

The SCCG is disappointed that the NSW Government, and particularly the Marine Estate Management Authority (MEMA) did not use the five-year review of the aquatic reserves as an opportunity to consult with stakeholders and seek feedback to improve protections for marine biodiversity. MEMA is governed by the *Marine Estate Management Act 2014* which, according to [MEMA](#), seeks to update marine park planning and management to more contemporary practices using evidence-based decision-making.

In 2018, MEMA acknowledged that the aquatic reserves in the Sydney region are inadequate and under-represented following the release of the [NSW Government's Discussion Paper – Hawkesbury Shelf Marine Bioregion Suggested Management Initiatives](#). This report identified that the aquatic reserves in the Sydney region do not meet the international principles of CAR (Comprehensive, adequate and representative) and recommended aquatic rules be strengthened to improve marine biodiversity protections and new sanctuary zones be created.

The previous NSW Government chose to pull consultation on a Sydney marine park proposal prior to its close. The SCCG has advocated strongly for the Sydney Marine Park in the [Hawkesbury Shelf Marine Bioregion – Marine Park Proposal submission](#). The proposal for the marine park has still not progressed.

In 2020, the Marine Estate Expert Knowledge Panel, which provides technical support to MEMA, released a paper evaluating the performance of NSW Marine Protected Areas¹. It concluded that *“the strongest evidence for significant, positive effects by MPAs in NSW on biological and ecological parameters are for Sanctuary Zones”* and further noted that *“their modest total area is potentially concerning in this regard, as it may reduce their effectiveness”*.

The majority of aquatic reserves in the Sydney region are not sanctuary zones as they allow some form of fishing. This significantly diminishes the value they provide for enhancing marine biodiversity.

Strong evidence for the establishment of sanctuary zones

The SCCG supports MEMA's analysis that more sanctuary zones should be created. As population increases, there will be greater pressure to extract marine species from our oceans and estuaries. Also, the impact of climate change in increasing water temperatures and harming marine habitats through increased storm activities heightens the importance of refuges for marine flora and fauna.

This is also supported by the Australian Marine Science Conservation Society in its recent report entitled [Creating a world class Marine Protected Area System](#). The report identified the downgrading of sanctuary zones in 2013 and 2019 as a backward step without scientific input despite sanctuary zones being conclusively shown to enhance biodiversity and provide social and economic values. The report recommends establishing a Sydney Marine Park (Hawkesbury Shelf) which should contain significant sanctuary zones to ensure connectivity and allow local biodiversity to flourish. The notion to convert all NSW Aquatic Reserves to sanctuary zones is also put forward.

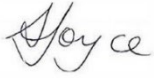
There is also a push to improve marine protected areas by the Australian Government. It has a national target to conserve 30% of Australia's marine areas by 2030 to align with the Global Biodiversity Framework. Whilst around one third of the NSW marine estate is covered under a marine park, these are multiple use marine protected areas rather than all sanctuary zones.

¹ [Marine-Protected-Areas-technical-report-biological-and-ecological-review-MEEKP-2020.pdf](#)

Request for a meeting

The evidence presented above indicates that the rules governing aquatic reserves in the Sydney region should be reviewed in consultation with the community and stakeholders. We would greatly appreciate meeting with both of you to discuss this matter. A meeting can be arranged by contacting me via email at sarah@sydneycoastalcouncils.com.au

Yours sincerely,



Sarah Penny Joyce
Executive Director