



Reference: 025-2025-JM

Wednesday, 1 October 2025

Department of Primary Industries & Regional Development  
105 Prince Street  
ORANGE NSW 2800

By online submission form

**Re: Establishing a peak body for recreational fishing in NSW**

Dear Sir / Madam,

The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to provide a submission to the above proposal.

**Background**

The SCCG is a regional organisation of councils (ROC) established in 1989 to promote collaboration among member councils on environmental issues relating to the sustainable management of the urban coastal and estuarine environment. The group comprises nine councils in the Sydney region which together represents nearly 1.3 million residents.

We are guided by the SCCG's 2019-2029 Strategic Plan which includes six goals, with the relevant goals listed below:

1. People and places adapt to a changing climate and future shocks and stressors
2. Waterways and the foreshore are protected and healthier
3. Marine biodiversity is protected in the bioregion
4. There is a collaborative, effective and consistent approach to coastal and estuarine management.

The SCCG understands that NSW Government has committed to supporting the formation of an independent recreational fishing representative body in NSW, to complement the role of the existing Recreational Fishing NSW Advisory Council (RFNSW).

We have reviewed the information on the 'Have your say' page and find overall, it does not provide a rationale for the establishment of another peak recreational fishing body, in addition to RFNSW and the Recreational Fishing Alliance of NSW.

The SCCG provides the responses to questions in the submission form.

**Purpose and benefits**

1. *What would you like to see from an independent peak body for NSW recreational fishers and what benefits do you think it could provide to the recreational fishing community?*

The SCCG questions the creation of what appears to be an additional independent peak body, when there already exists the Recreational Fishing NSW Advisory Council (RFNSW). According to the NSW Government's web-site the RFNSW "has been established to provide advice to the

Minister for Primary Industries on key recreational fishing issues in NSW and to ensure the views of regional fishers from across the State are communicated". The RFNSW is also stated to be a modern representative model, with membership comprising both regional and specialist representatives of recreational fishers. We suggest that if the operation of RFNSW is not fulfilling the needs of recreational fishers, a review should be undertaken to identify impediments in its effectiveness and improvements made to the current model.

The establishment of the proposed new peak body could lead to duplication in roles and responsibilities and duplication of resources and funding. The RFNSW describes itself as "the peak representative body of recreational fishers in NSW". The Amateur Fishermens' Association of NSW is another existing body that also represents recreational fishers.

The Public Services Commission Guidelines raise concerns about the use of public funds to establish boards and committees without a clearly demonstrated need or where efforts may be duplicated. Redirecting these resources toward direct initiatives that enhance marine biodiversity (and therefore improving fish stock) could yield more tangible and impactful outcomes than funding an additional committee.

## Representation

2. *Do you have any suggestions to ensure the peak body is representative of all recreational fishers and that democratic processes function effectively? Are there any voices, groups or perspectives that are often overlooked and should be included?*

The SCCG is concerned that one of the proposed key focus areas for the body includes supporting the Government to "maintain and increase access to areas and fisheries resources." This appears to conflict with the objectives of the *Marine Estate Management Act 2014*, particularly objective (c), which aims to "provide for the declaration and management of a comprehensive system of marine parks and aquatic reserves." Achieving this objective inherently requires restricting access to certain areas and resources to ensure effective conservation. This issue is especially relevant in the Hawkesbury Shelf and Twofold Bay Marine Bioregions, where the 2012 Independent Scientific Audit of Marine Parks in NSW identified significant gaps in marine protection. The Marine Estate Management Authority subsequently committed to addressing these conservation shortfalls.

It is also concerning that the Marine Estate Expert Knowledge Panel (MEEKP), established under Section 9 of the *Marine Estate Management Act 2014*, appears to have no defined role in the proposed body. MEEKP plays a critical role in delivering a strategic, evidence-based approach to the management of NSW's marine and coastal environments, providing expert advice to the Ministers responsible for the marine estate. The inclusion of a MEEKP representative on the NSW Coastal Council further underscores the Panel's importance and credibility in guiding coastal and marine policy. Excluding MEEKP from this process risks undermining the integrity and scientific foundation of marine estate management.

## Draft government model submission

3. *Do you support the draft focus areas for the peak body? Are there any additional areas you believe should be included?*

The SCCG has concerns regarding the Focus area - Secure access to a productive marine environment, particularly with respect to increasing access to areas and fisheries resources. This is a contradiction to the identified need to increase the area of the marine estate that is protected - see previous issue.

We would also like to comment on the following Objects of the proposed new peak body and the need for greater consideration of marine biodiversity protection:

3. To be recognised as a major stakeholder in aquatic ecosystem management and participate in fisheries management so as to ensure the sustainability of fish species and their habitat;

4. To ensure an adequate and equitable share of the available resource and the opportunity to optimise the social and economic benefits of accessing and harvesting that share;

While these Objects acknowledge the importance of sustainable fisheries management, they fall short of recognising the broader imperative of protecting marine biodiversity. It is particularly concerning that they emphasise social and economic benefits without reference to environmental benefits, which is inconsistent with the principles of Ecologically Sustainable Development (ESD) – a key objective of the *Marine Estate Management Act 2014*. This omission suggests a lack of environmental consideration and risks undermining efforts to achieve balanced and long-term ecological outcomes.

## Membership

4. *What would encourage recreational fishers to become members of the peak body?*

The SCCG does not support the establishment of the proposed new peak body and questions the rationale behind its creation, particularly given its limited stakeholder representation, comprising solely recreational fishers. The exclusion of broader marine estate stakeholders raises concerns about transparency and inclusivity. Notably, the SCCG was not invited to participate in the initial workshop, and there remains a lack of clarity regarding the purpose, formation process, and how the proposal aligns with the NSW Public Service Commission's requirements for government boards and committees.

## Governance and board structure

5. *How should the peak body's board be set up and operate?*

The NSW Public Service Commission's guidelines for establishing government boards and committees emphasize the importance of:

- A clear and demonstrated need for the body.
- Broad stakeholder representation.
- Transparency in governance and funding.
- Accountability for the use of public funds.

However, the SCCG is significantly concerned that the majority of these PSC requirements are not being met. As identified previously, the SCCG does not believe there is a clear and demonstrated need for the body and believes that there should be broader stakeholder representation that just those with a recreational fishing interest. There is also a lack of transparency in governance, funding and accountability.

The SCCG questions how this body will be held accountable for the effective use of public funds, with over \$1 million proposed to be provided by the NSW Government for its establishment. Limited details have been provided regarding governance, reporting mechanisms, or performance measures. In contrast, if a Local Government were to receive such a significant amount of funding, it would be subject to rigorous reporting and accountability requirements set by the State to ensure appropriate use of taxpayer money.

## Further comments

6. *Do you have any additional comments, concerns, or issues you would like to raise regarding the peak body?*

The SCCG does not support the establishment of the proposed new peak body and questions its necessity, particularly given its narrow representation, limited to recreational fishers, and the lack of inclusion with broader marine estate stakeholders. The SCCG was not invited to participate in the initial workshop, and there remains significant uncertainty around the purpose, formation

process, and how this initiative aligns with the NSW Public Service Commission's requirements for government boards and committees.

The SCCG has made formal representations to the NSW Government, including correspondence to the Minister for the Environment and the Minister for Agriculture, emphasising the urgent need to strengthen protections for marine biodiversity. Our letter, available on our website, outlines specific recommendations, including the expansion of Sanctuary Zones, which offer the highest level of environmental protection. Scientific evidence, acknowledged by MEMA, clearly demonstrates that current fishing restrictions in the Hawkesbury Shelf marine bioregion are inadequate, and that additional Sanctuary Zones are essential to enhance biodiversity. These zones have also been shown to improve fish stocks, benefiting all marine estate users including fishers, snorkellers, and divers.

We seriously question the long-term effectiveness of the proposed peak body and whether its establishment represents a legitimate use of public funds. With over \$1 million allocated to its creation, and no clear accountability mechanisms or conservation outcomes delivered for the Hawkesbury Shelf marine bioregion, despite commitments from MEMA, we are concerned this initiative duplicates existing recreational fishing bodies without addressing critical environmental needs.

As the representative body for nine Councils in the Sydney region on coastal and marine matters, the SCCG formally requests a briefing to address these concerns and to better understand the rationale, governance, and expected outcomes of the proposed peak body.

I trust our submission will be useful in your deliberations for the proposed new peak recreational fishing body.

If you have any queries, please do not hesitate to contact me on 0407 733 075 or at [sarah@sydneycoastalcouncils.com.au](mailto:sarah@sydneycoastalcouncils.com.au).

Yours sincerely



Sarah Joyce  
**Executive Director**