SYDNEY COASTAL COUNCILS GROUP Inc.

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Reference: 028-25 JM

Tuesday, 28 October 2025

The Hon. Chris Minns, MP Premier GPO Box 5341 SYDNEY NSW 2001

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

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

Dear Premier and Ministers,

#### Re: Proposed new NSW recreational fishing peak body

I am writing on behalf of the Sydney Coastal Councils Group (SCCG) to express our concerns regarding the proposal to establish a new peak body for recreational fishing in NSW, which we understand was an election commitment.

The SCCG recently participated in the consultation process and provided a formal <u>submission</u>. We wish to reiterate several key points from our submission regarding the rationale, governance and potential environment implications of this proposal, particularly in relation to the urgent need to strengthen marine protected areas.

### 1. Purpose and justification

We question the creation of an apparent additional independent peak body, given the existing Recreational Fishing NSW Advisory Council which is described as "the peak representative body of recreational fishers in NSW". The establishment of a new entity risks duplicating roles, creating inefficiencies and misallocating public resources.

The NSW Public Services Commission (PSC) Guidelines caution against forming new boards or committees without a clearly demonstrated need, especially where functions may overlap with existing bodies. In this case, the rationale for a separate, additional body remains unclear.

#### 2. Conflict with Marine Conservation Objectives

The proposed focus of the new peak body to "maintain and increase access to areas and fisheries resources" conflicts with the objective of the *Marine Estate Management Act 2014* which seeks to establish and manage a comprehensive system of marine parks and aquatic reserves. It also



















contradicts the findings from the 2012 Independent Scientific Audit of Marine Parks in NSW which identified significant gaps in marine protection that remain unresolved.

Furthermore, the proposed body's stated objectives, such as securing an equitable share of resources and recognition in aquatic ecosystem management, do not adequately reflect the broader imperative of marine biodiversity protection. The emphasis on social and economic benefits, without corresponding environmental considerations, is inconsistent with the principles of Ecologically Sustainable Development (ESD), a cornerstone of marine estate legislation.

### 3. Governance and Accountability

We are deeply concerned that the majority of PSC requirements for establishing government boards and committees are not being met. These include:

- A clear and demonstrated need for the body
- Broad stakeholder representation
- Transparency in governance and funding
- Accountability for public expenditure

The proposed body appears to represent only recreational fishing interests, excluding other key stakeholders in the marine estate. There is a lack of transparency regarding governance structures, funding arrangements and performance measures. By contrast, local government entities receiving similar levels of funding are subject to rigorous reporting and accountability standards.

## 4. Financial and Strategic Concerns

With over \$1 million allocated to the creation of this body, we question whether this represents a responsible use of public funds, given a similar organisation already exists. We believe these resources would be better directed toward specific initiatives that enhance marine biodiversity, which in turn support sustainable fish stocks and long-term ecological health.

# 5. Request for Engagement

As the representative body for nine coastal councils in the Sydney region, the SCCG formally requests a briefing to discuss the rationale, governance and expected outcomes of the proposed peak body. We also seek clarity on how this initiative aligns with PSC requirements and broader marine estate objectives.

We urge the NSW Government to reconsider the establishment of this body and instead prioritise inclusive, transparent and environmentally responsible approaches to marine estate management.

If you have any queries or would like to arrange a briefing, please contact me at <a href="mailto:sarah@sydneycoastalcouncils.com.au">sarah@sydneycoastalcouncils.com.au</a>

Yours sincerely,

Sarah Penny Joyce

**Executive Director** 

















