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Wednesday, 5 August 2026

The Hon Chris Minns MP
Premier of New South Wales
52 Martin Place
SYDNEY NSW 2000

Dear Premier,

Re: Governance challenges affecting marine protected areas in the Sydney region

The Sydney Coastal Councils Group (SCCG) writes to raise significant concerns regarding ongoing difficulties in progressing the establishment of new marine protected areas (MPAs) in the Sydney region, as well as undertaking timely and effective reviews of existing aquatic reserves. The SCCG represents [nine member councils](#) across the Sydney region and has a long-standing role in supporting the protection, management and sustainable use of coastal and marine environments. Our member councils are increasingly concerned that current governance and decision-making arrangements for MPAs are acting as a material impediment to achieving ecologically sound and community-supported outcomes in metropolitan waters.

1. Difficulties with Establishing New Marine Protected Areas

Progress in establishing new marine protected areas in the Sydney region have stalled. Our Councils have consistently encountered the following challenges which have cumulatively resulted in policy inertia at a time when marine ecosystems are facing accelerating impacts from climate change, coastal development and recreational pressure:

- Uncertain processes for recommending new aquatic reserves with no clear pathway to decision-making;
- A lack of strategic leadership for marine conservation delivered by the Marine Estate Management Authority (MEMA)
- A strong emphasis on extractive and commercial considerations at the expense of biodiversity protection and ecosystem resilience
- Limited transparency and accountability around timelines, priorities and outcomes.

A clear example is the Hawkesbury Shelf marine bioregion, which is nationally recognised for its biodiversity values, unique oceanographic processes and role as a climate refuge for a range of species. While the Hawkesbury Shelf has been the subject of scientific assessment and extensive stakeholder discussion for many years, efforts to progress meaningful protection have repeatedly stalled, with no clear or timely pathway to implementation. MEMA's web-site even identifies the 2018 proposal for a Sydney marine park in the bioregion as still being under consideration stating to the community that *"The information you have provided will inform the final marine park*



proposal to be considered by the NSW Government later in 2018.⁴ Despite repeated attempts by SCCG to seek an update from MEMA, no response has ever been provided.

2. Delays in Reviewing Existing Aquatic Reserves

SCCG is deeply concerned about the ongoing failure to undertake timely and effective reviews of existing aquatic reserves within the Sydney region. Many of these reserves were declared decades ago following their transition from Intertidal Protection Areas to Aquatic Reserves, yet this transition occurred without the introduction of strengthened regulatory controls necessary to conserve marine biodiversity. As a result, most Sydney's aquatic reserves continue to permit recreational fishing, contributing to depleted fish stocks and, in several locations, the degradation of once-diverse rocky reef ecosystems into urchin barrens. These outcomes are fundamentally inconsistent with the conservation purpose of aquatic reserves and raise serious questions about their continuing effectiveness.

In 2025, [SCCG formally wrote to the Minister for Primary Industries](#) expressing concern that the existing rules applying to these reserves had been re-gazetted without any consultation and evidence by MEMA that the rules should be strengthened. While the Minister has subsequently advised that a review of aquatic reserves would occur in 2026, SCCG has received no clarity on the scope, timing or consultation process for that review.

It is particularly troubling that, unlike other regions in NSW which benefit from marine parks supported by advisory committees and statutory management plans, none of the aquatic reserves in the Sydney region has a final management plan in place. The absence of management plans inhibits effective governance, weakens accountability, and fails to define the collaborative roles of key land and sea managers, including local councils.

SCCG considers it unacceptable that Sydney's aquatic reserves continue to operate without contemporary zoning, updated conservation objectives or formal management frameworks. It is critical that these reserves be comprehensively reviewed to reflect current scientific evidence, escalating recreational pressure, cumulative urban impacts, and climate-driven ecological change. The continued absence of regular reviews and management plans not only undermines biodiversity conservation outcomes, but also erodes public confidence in the integrity of marine protection in New South Wales.

3. Emerging Barriers Further Restricting Marine Protected Areas

In addition to longstanding governance challenges, SCCG is increasingly concerned that new policy settings and institutional arrangements are actively compounding barriers to the establishment and effective management of MPAs. In particular, SCCG is concerned about the growing influence of recreational fishing interests in marine estate decision-making, without equivalent representation of environmental, scientific, local government or broader community perspectives. These concerns are outlined in SCCG's recent submission regarding the proposed establishment of a new peak body for recreational fishing in NSW.

That submission highlighted:

- The risk of duplication and disproportionate influence by recreational fishing interests, particularly where bodies have an explicit remit to maintain or increase access to marine areas
- The inherent tension between such objectives and the statutory requirement under the *Marine Estate Management Act 2014* to establish and manage a comprehensive, representative system of marine parks and aquatic reserves
- The absence of a clear role for independent scientific expertise, such as the Marine Estate Expert Knowledge Panel, in emerging governance models



- The likelihood that these arrangements will further delay or constrain the declaration of new MPAs and the strengthening of existing protections, particularly in areas such as the Hawkesbury Shelf where conservation gaps have already been clearly identified.

SCCG is concerned that these developments are creating an increasingly restrictive environment for marine conservation in NSW, where precautionary and biodiversity-focused outcomes are subordinated to short-term access considerations.

4. Governance Responsibility for Marine Protected Areas

We note that under a previous NSW Labor Government, responsibility for marine protected areas sat with the Minister for the Environment, rather than the Minister for Primary Industries. SCCG considers this arrangement to be better aligned with the primary purpose of MPAs which is for the conservation of marine biodiversity.

Having the Minister for Primary Industries as the lead portfolio for MPAs presents inherent structural challenges. The portfolio's core focus on fisheries and other extractive uses creates real and perceived conflicts with marine conservation objectives. In practice, this has made it significantly more difficult to progress new MPAs, including long-standing proposals such as the Hawkesbury Shelf, and to undertake objective and timely reviews of existing aquatic reserves. Importantly, this governance model is not consistent with arrangements in most other Australian states, where responsibility for MPAs is typically held within environment or conservation portfolios, providing clearer policy intent and public confidence.

Request for Government Consideration

In light of the above, SCCG respectfully requests that the NSW Government:

- Review governance arrangements for marine protected areas**, with a view to returning primary responsibility to an environment-focused portfolio
- Address emerging institutional and policy barriers** that are constraining the establishment and review of MPAs
- Provide clear strategic leadership** for progressing long-standing marine protection priorities in the Sydney region, including the Hawkesbury Shelf
- Commit to regular, transparent reviews of existing aquatic reserves**, supported by contemporary science and balanced stakeholder engagement.
- Provide adequate resourcing to the portfolio responsible for managing marine protected areas** to ensure the Department can adequately support Councils and their communities wanted to improve protections for marine biodiversity.

SCCG and its member councils are keen to work constructively with the NSW Government to advance a credible, coherent and effective marine protection framework for the Sydney region that reflects best practice nationally and responds to the mounting pressures on metropolitan marine environments. We would welcome the opportunity to meet with you or the relevant Ministers to discuss these matters further. If you have any queries, please contact me by email at sarah@sydneycoastalcouncils.com.au



Yours sincerely



Sarah Penny Joyce
Executive Director

