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Saturday, 5 September 2026

Ms Emily Thompson
A/Executive Officer
Fisheries Scientific Committee
c/- NSW DPIRD, Fisheries
Port Stephens Fisheries Institute,
Locked Bag 1, Nelson Bay NSW 2316

Submission by email to fsc@dpird.nsw.gov.au

Saturday, 5 September 2026

Re: Proposed determination on Key Threatening Process – Block and Chain Moorings Threatening *Posidonia australis*

Dear Ms Thompson,

Thank you for the opportunity to make a submission on the proposed determination of the Fisheries Scientific Committee to list Block and Chain Moorings threatening *Posidonia australis* as a Key Threatening Process in Schedule 6 of the *Fisheries Management Act* 1994.

The Sydney Coastal Councils Group (SCCG) is a regional organisation of councils, 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 eight councils adjacent to Sydney marine and estuarine environments and associated waterways and represents nearly 1.3 million Sydneysiders. We are guided by the SCCG's 2019-2029 Strategic Plan which includes six goals, of which the following are highly relevant to the determination:

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

Reasoning for the proposed determination

The SCCG notes that the Fisheries Scientific Committee has reviewed information and assessed the threat of block and chain moorings to *P.australis* meadows under the criteria set out in the Fisheries Management (General) Regulation 2019. Threats have been assessed to both listed species, population or ecological community considered to be adversely affected and other native species, population or ecological community that may become threatened as a result of the threatening process. This includes endangered populations of *P.australis* and non-listed *P.australis* populations.

We note that block and chain moorings cause substantial damage to *P. australis* meadows (as well as other seagrasses) via chains that drag across the sea floor when moored vessels or buoys swing with tides and weather. The physical damage the moorings cause to leaves, rhizomes and roots is particularly detrimental to the slow-growing *P.australis*, which spreads primarily through vegetative growth. Impacts intensify as new moorings are installed and existing ones are relocated within seagrass meadows, causing unnecessary loss and fragmentation of *P.australis* meadows. There are



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also multiple indirect impacts to other native species that depend on it for habitat. These species include endangered White's seahorse (*Hippocampus whitei*), abalone, algae, bacteria, crustaceans, dugong, invertebrates, molluscs, mullet and other fish, octopus, rays, sea dragons, seals and turtles.

SCCG advocacy

The impacts of block and chain moorings on seagrass are indisputable and were identified in Australia 35 years ago. Statistics outlining block and chain mooring impacts are presented in the 2023 CSIRO report: *Literature Review of Environmentally Friendly Moorings – Environmental and Engineering Performance*. The SCCG has been advocating for some years on the impacts of boat mooring and anchorage on sensitive inshore habitats, including seagrass meadows. Our advocacy has included the following:

- Seagrass maps to guide mooring and anchorage locations being made available on Transport Maritime's Deckee app; achieved in collaboration with DPI Fisheries and Transport for NSW.
- Promoting the replacement of block and chain moorings with Environmentally Friendly Moorings (EFMs) through projects under the NSW Marine Estate Management Strategy, NSW Government's Project Restore and Transport for NSW Moorings Action Plan.

SCCG comments

The proposed determination is wholly supported and long overdue. We offer the following comments specific to improved initiatives for the protection and recovery of *P.australis*.

Existing initiatives

Research is currently being led by CSIRO on developing optimal EFM designs in partnership with Transport for NSW. We understand this research is yet to be finalised and outcomes delivered to inform the practical implementation of EFMs. The research supports delivery of the Marine Estate Management Strategy Initiative 7 'Enabling Safe and Sustainable Boating' to reduce threats to seagrass and Transport for NSW Moorings Action Plan.

These initiatives are not given any context in the determination and should be taken into account in consideration of how the outcomes of the determination would be implemented.

Environmentally Friendly Moorings

The SCCG maintains strong support for the previously identified key management-related conservation and recovery action for seagrass populations, to promote replacement of moorings in seagrass habitats with EFMs. The proposed determination acknowledges there has been little action on promoting the use of EFMs and progress on the replacement of block and chain moorings with EFMs, has been slow. We appreciate the challenges of EFM design to meet requirements for safety, functionality, maintenance and reasonable cost. However, until there is a final EFM design and the design is mandated on mooring contractors, block and chain moorings will continue to be installed and their impacts will persist. Stronger mechanisms such as mooring regulation are required and should be a key action in the Threat Abatement Plan.

The Kamay Wharves project being led by Transport for NSW is an important initiative. As part of the Marine Biodiversity Offset Strategy, plans have been finalised to convert or relocate at least 20 standard boat moorings and marine navigational aids to designs that are less impactful to seagrass, with a stretch target of achieving 30 sites. This project is a critical demonstration project for other priority sites in NSW.

Planning and development controls

Requirements for improved protections of *P.australis* seem to be restricted to development related Marine Biodiversity Offset strategy. We also note that *P.australis* has already been listed as an endangered ecological community, under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*, making it already illegal to take actions that significantly impact *P.australis* without federal approval. This listing commenced on 7 May 2015 and encompasses ecological communities from Wallis Lake to Port Hacking, including those in Sydney Harbour and Botany Bay. It is concerning that nothing has been done on block and chain moorings being listed as a key threatening process over the last 10+ years and once listed, we would query how this would accelerate protection measures and replacement of block and chain moorings with EFMs.



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Also, swing moorings do not require development consent from councils. We would query how listing as a Key Threatening Process will impact the approval process and whether Crown Lands/Transport for NSW will still be permitting these, such as under Part 5 Assessments.

Interagency collaboration

The proposed determination also acknowledges that the primary reason for the ongoing threat from moorings is the different priorities of the agency responsible for managing seagrasses vs. the agency responsible for providing access to boat moorings. The SCCG strongly supports the assertion that the Threat Abatement Plan would be the ideal mechanism for developing and implementing an inter-agency plan to minimise impacts from moorings.

Importantly, the SCCG also notes that seagrass restoration would enhance recovery of seagrass meadows and should be deployed in priority areas targeted for replacement of block and chain moorings with EFM.

Other impacts on seagrasses

In addition, minimising the impacts of boat anchorage on marine habitats needs to occur in tandem with implementing requirements for EFM, for management to be fully effective.

There is also the issue of mooring pens which shadow seagrasses and have associated impacts. We would query how the determination would address these related impacts.

Recommendations

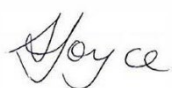
To support the management response to the proposed determination, the SCCG makes the following recommendations for actions in the Threat Abatement Plan:

1. Coordinating strategic context and current initiatives for implementation of EFM, including finalisation of CSIRO research, review of the Marine Estate Management Strategy and updating Transport for NSW Moorings Action Plan.
2. An inter-agency plan for minimising impacts from moorings.
3. Monitoring of current EFM initiatives to capture learnings to inform best practice and design.
4. An Australian Standard for the design and installation of boat moorings, consistent with EFM design principles that minimise impacts on marine habitats.
5. Regulating boat mooring installations to meet the Australian Standard, once developed.
6. Clarifying how planning controls will be made more prescriptive for mooring installations, including requirements for development consent.
7. Regulating mooring pens and boat anchorage to minimise impacts on seagrass habitats.
8. Increasing investment in seagrass restoration projects in priority areas with the greatest potential to contribute towards recovery of *P.australis* and progressively replace block and chain moorings with EFM.
9. Regular review and updating of seagrass maps and/or seagrass habitat zones to guide decisions on mooring and anchorage locations.

I trust that the feedback provided above will be helpful in support of the proposed determination and subsequent preparation of the Threat Abatement Plan.

If you have any queries, please contact me by email at sarah@sydneycoastalcouncils.com.au

Yours sincerely,



Sarah Penny Joyce
Executive Director



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