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26th May, 2004

The Honourable Ian MacDonald, MLA  
Minister for Department of Primary Industries  
Level 30 Governor Macquarie Tower  
1 Farrer Place  
Sydney, NSW, 2000

Dear Minister

David Lockwood in his fishing column in the Sun Herald of 23/5/2004 spoke of the exceptionally good mullet run that's being experienced this autumn, and of it "being billed as the best in decades". He then goes on to say:

"NSW Fisheries director-general Steve Dunn attributes the amazing mullet run to the creation of marine-protected areas where the mullet can breed and grow before running to sea".

I would like to refer you to FRDC 94/024: "Assessment of the Stocks of Sea Mullet in New South Wales and Queensland waters" by John Vergonia, Kerrie Deguara, Darryl Sullings, Ian Halliday and Kath Kelly and also to Fishery Resource Assessment Series N0 12: "Review of biological information and stock assessment for the NSW sea mullet resource" by K Smith and K Deguara (2002). Both of these papers refer to the spawning of sea mullet, which is thought to occur in the marine environment, and larvae and juveniles travel with currents to estuaries. In fact, more detail is given by Smith and Deguara who states "The fact that ripe gonads are resorbed by estuarine fish when denied access to the sea suggests that a marine environment may be a requirement for spawning and that spawning does not typically occur in estuaries (Wallace 1975b). The distribution of larvae in ocean waters suggests particular conditions of temperature and salinity may be required for spawning (Ditty and Shaw 1996). Avoidance of estuarine plume water may prompt adults to spawn further offshore in regions of high freshwater runoff (eg Florida) than in regions of low runoff (eg NSW)".

The populations of fish species can vary greatly from year to year and this variability is a result of the complex interactions of currents, wind and weather, predators, food

availability and many other factors. As an example, for those fish that rely on the ocean currents to carry the larvae and juveniles from the spawning to the nursery areas, variations will occur in the number of young recruits each year as food supply and currents varies from year to year, resulting in variations of juveniles that reach the nursery areas. Unfavorable prevailing winds for extended periods can decimate a species recruits for a year as the food supply, or even the larvae themselves, may be blown elsewhere. Conversely, favourable conditions can result in a larger than normal recruits for a particular year. Natural variability in the marine ecosystem can be responsible for major fluctuations in fish populations from year to year, and this is more to do with variations of the natural environment than with marine-protected areas.

David Lockwood's article raises some concerns regarding the Director General's comments, namely mullet breeding before running to sea, and that the current good mullet season is due to the establishment of marine-protected areas. The issues that need answering are:

- Does the Director General actually attribute the current good run of sea mullet to marine-protected areas? Does he actually believe they breed before they run to sea? If not, then is he going to seek a correction as remaining quiet is giving support to the notion that the good mullet run is attributed to marine parks?
- If he does consider the marine-protected areas to be responsible for the good mullet run, then what evidence is there for this conclusion and specifically which marine protected areas is he referring to? Why does he not consider this to be due to past favourable conditions that resulted in a high number of recruits into the system for that particular year?

It seems that if the Director-General was not misrepresented, then we would like to know the reasons, with supporting evidence, that the Director General attributes this good run of mullet to marine protected areas. Otherwise, this statement will be seen as an exercise in spin doctoring favouring marine-protected areas. In-fact the suggestion that the sea mullet breed in estuaries is also misleading. If the Director-General was in fact misrepresented then he needs to state that an error has occurred and that that there is no evidence to suggest that marine-protected areas are accountable for the current good run of mullet.

Yours Sincerely

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