

**Director General Department of Planning and Infrastructure (DoPI)**

Please accept this submission as a formal objection and questioning of the proposed Marine Aquaculture lease, in Providence Bay, Port Stephens.

Lets Go Adventures (LGA) is a SCUBA diving facility based in Port Stephens which has been in operation for over 30 years (The business was formerly known as Pro Dive Nelson Bay). The business now also operates a fishing charter vessel, snorkeling and freediving courses and tours as well as boat and jetski license training.

As a director of LGA, I have reviewed the Environmental Impact Statement (EIS) for the proposed research lease, and considered the impact that this proposal may have on LGA with co-director, Adam Shorter. Furthermore, I have met with NSW Manager Aquaculture, Mr Ian Lyall and NSW DPI Policy Officer Aquaculture, Mr Graeme Bowley, regarding initial concerns about the proposal.

While we do not object to the concept of providing sustainable fisheries, it is our belief that the proposed area of this lease will have detrimental impact on our business, the local environment, and the broader tourism sector on which the majority of Port Stephens resident rely.

**RISK ASSESSMENT**

The risk assessment provided is based on risk to the research lease, not to other commercial operators that have conducted business in the vicinity of the proposed lease for many years.

Of note, the risk assessment does identify that the likelihood of Migratory pathways, behavioural changes and predatory interactions as Occasional (5) with a moderate consequence (2) leading to a 'moderate' risk level requiring further management or research.

- LGA notes that while the need for a full management plan is identified, no comprehensive management plan is provided or outlined for the lease.
- The EIS notes that the proposed lease is in a known great white shark residency regions. The EIS notes that "the occurrence, timing, behaviour and/or duration of occupation will be monitored at the Research lease...using a range of sampling methods such as visual census techniques, passive and active acoustic tracking studies and recording incidental sightings and behaviours" yet in discussion with Mr Lyall and Bowley there was no definite plan for monitoring of the great whites able to be shown. It was suggested that the lease may be able to 'piggy back' off the research of Mr Bruce, however the length and scope of his research were unknown and only assumed.
- LGA objects that no comprehensive assessment has been conducted regarding the risk to commercial operators already using the areas surrounding the proposed site.
- Furthermore, LGA notes that the cost of such an assessment and the associated implementation and costs involved in a suitable management plan to mitigate the risk assessment is also not addressed.
- LGA questions where the burden of liability lay if there were an event where a diver or snorkeler were involved in a shark attack, which may be attributed to the 'occasional' changes of predatory patterns identified.
- LGA notes that risk assessments and associated management plans for commercial operators as a result of the proposed lease, need to be in place prior to the commencement of a lease in order to ensure effectiveness.

