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Australian Marine Parks Management Planning Comments.
Department of the Environment and Energy
Canberra ACT 2601
managementplanning.marine@environment.gov.au

Dear Sir or Madam,

**Australian Marine Parks Management Planning Comments;
Temperate East Marine Parks Network Management Plan.**

Thank you for the opportunity to comment upon proposed zoning and rules for the Lord Howe Marine Park.

Let me begin by saying that the Lord Howe Marine Park, (LHMP), since its inception and the subsequent years, has been an astonishing success, an asset to all Lord Howe Islanders, our all important visitors/tourists, the scientific community, local light-commercial operators and the multitude of day to day users of the our Marine Park. Equally, the LHMP underlines wonderfully the World Heritage recognition of the scenic and natural beauty of the Island and surrounding ocean. The LHMP embraces those World Heritage outlooks and cements further those characteristics for all users.

Whilst the simplification and slight realignment of some of the LHMP boundaries are a practical enhancement to the marine park **I would whole-heartedly support an extension of the marine park area north of Middleton Reef to encompass the seamounts in that area.**

I do have, however, some real concerns in regards to the “Proposed Rules For Activities” – this generic overview seems to lump the LHMP in with all Temperate East Network Marine Parks. This is in my view a broad-brush stroke replete with potentially dangerous consequences. Lord Howe Island is unique and the Lord Howe Marine Park should enjoy special consideration. The LHMP is geographically isolated, difficult to access, is uniquely split into several widely disparate areas (Lord Howe Island, Ball’s Pyramid and Elizabeth and Middleton Reefs), enjoys exceptional levels of species richness and diversity, is scientifically significant, enjoys low population pressure and is culturally important to a very tiny Island population. The rules for activities within the LHMP need to reflect, enhance and protect those unique, special Lord Howe qualities.

“Parks for people” is a wonderful sentiment and the rules associated with the LHMP should enhance the experience of all users. Below, please find a list of activities, (drawn from the generic overview), which I believe should be NOT allowed in the LHMP;

Ballast water discharge and exchange + disposal of waste from vessels –such discharge and disposal threatens the exceptional levels of species richness and diversity and the high level of endemism in the LHMP and is a direct threat to all users. **Both activities should be NOT allowed in the LHMP.**

Commercial Fishing – local commercial fishers do operate in the LHMP, however those are operations are more readily described as artisanal in nature and utterly orientated toward the local Island market. Hence, any commercial fishing activity leaning toward **large or industrial sized take should NOT be**

allowed in the LHMP, this includes; Danish seine, dropline, longline (demersal, auto-longline or pelagic), net (demersal or pelagic), purse seine, trap, pot, trawl (demersal or midwater) and trotline.

Commercial Aquaculture –Up to date no such industry has been undertaken on the Island and any such activity, regardless of scale, would diminish the scenic and natural beauty of the LHMP to the detriment of all other users. **Commercial Aquaculture should NOT be allowed in the LHMP.**

Commercial Tourism and Recreational Fishing – those 2 categories are the very life-blood of the water borne activities that underpins the local tourism industry and is of the utmost importance to the visitor and the local recreational fisher. However, “spear diving tours and or spearfishing” has, by unwritten tacit local agreement, been actively, but quietly, discouraged. Culturally, on the Island, spearfishing is an anathema. **Spearfishing should NOT be allowed in the LHMP.**

Mining – including exploration, the construction and operations of pipelines are incompatible with all other users of the LHMP. **Such mining activities should NOT be allowed in the LHMP.**

Structures and Works – specifically artificial reefs and fish aggregating devices. Such reefs and FAD’s are totally at odds with artisanal nature of the commercial fisher/tourism industry on the Island. The word “industry” requires some qualification: the entire tourism industry on the Island comprises, at maximum, 16000 visitors annually. Light commercial, local and visitor recreational fishing is important on the Island. The local market is culturally important and our visitors/tourist have a high expectation of access to locally caught fish. Local fishers are able to maintain the market for freshly caught fish without the requirement or the need for artificial reefs or more importantly FAD’s. The natural environment of the LHMP readily provides those services without the need of artifice. **Artificial reefs and FAD’s should NOT be allowed in the LHMP.**

Unfortunately, and mistakenly, the LHMP has been lumped generically within the Temperate East Marine Park Network.

Lord Howe Island is recognised by its World Heritage listing as special and unique, that listing of the Island specifically refers to the scenic and natural beauty of the Island; the LHMP embraces and enhances those qualities. The LHMP is already extremely effective and useable and the practical boundary realignments are welcome adjustments – the seamounts north of Middleton reef should also be included. The implementation of many of the proposed generic rules for activities within LHMP will denigrate the low-key, low impact, artisanal nature of the current marine park use. That list of proposed activities needs to be re-visited and re-calibrated in acknowledgement of the special and unique characteristics of the Lord Howe Marine Park.

Thank you for your time.

Leon Brice.

Lord Howe Island.

