

To whom it may concern,

Thank you for the opportunity to review the draft management plan for the Coral Sea Marine Park and provide comments. Please accept this email as my submission.

While I am currently based in Canada, I spent four years as a research fellow at James Cook University, carrying out research related to marine conservation planning in Australia.

Comments about Australia's Marine Parks:

- The cut backs of Marine National Park 'sanctuary' IUCN II zoning (MNPZ) across the Network go against the best available science and should be rejected. The Turnbull Government should fully restore and increase the IUCN II zoning in Australia's Marine Parks without delay.
- Marine park zoning should be science-based to assist recovery of depleted species and protection of biodiversity.
- Partial protection zones are not a substitute to no-take areas. My own research and many other studies have shown that no-take areas are the most effective tool for protecting biodiversity and recovering depleted marine species.
- Mining in parks is not compatible with biodiversity conservation and should be rejected.
- No activities that destroy habitats should be allowed within marine parks. This includes not just mining (see previous point), but also commercial fishing gear such as trawling.
- Do not ignore the results of statutory consultation, which strongly supported restoration and increasing high level marine national park zone protection.

Comments about the Coral Sea Draft Management plan

- Under the government's proposals, most of the park would be opened up to longlining – a commercial fishing activity that the Government's independent Fishing Gear Risk Assessment, concluded posed an unacceptable risk to the conservation values of the Coral Sea Marine Park. This is not acceptable.
- Reducing protection at a number of ecologically important reefs (Osprey, Shark, Vema, Flinders, Holmes, Marion and Wreck) will undermine the ecological importance of the park. These areas need to be fully protected.
- Partial protection (Habitat Protection Zones) is not a substitute for full protection. This change is unacceptable.
- The draft plan undermines the economic viability of one of the Coral Sea's biggest industries - dive tourism, by removing protection of some reefs most critical to the industry's future.

My recommendations are as follows:

1. Reject the proposed major loss and fragmentation of the large Marine National Park Zone (MNPZ);
2. Reject the loss of protection at Osprey Reef, Shark and Vema Reefs. Osprey Reef needs high level MNPZ protection in order to deliver economic security to the valuable dive industry;
3. Reject the proposed loss of protection for Flinders, Holmes and Wreck Reef – reefs the Review found required protection;
4. Accept the proposed new MNPZ protection at the border with the Great Barrier Reef;
5. Reject the proposed opening up of the Coral Sea to longlining, purse seining and mid-water trawl in the 'Area E' Coral Sea Zone of the Eastern Tuna Billfish Fishery. Removal of these damaging commercial fishing techniques should be achieved in this area to ensure protection of the Queensland Plateau, Queensland Trough and the world's only known spawning ground for Black Marlin and their recreational fishing, economic and social values;
6. Reject the proposed loss of MNPZ protection for Marion Reef. Marion Reef is the only location where protection is proposed for the coral reefs, cays and herbivorous fish of the Marion Plateau which is a key ecological feature of the Coral Sea;

7. Reject the proposed expansion of mid-water trawling, purse seining, demersal longlining and prawn trawling within the Coral Sea.
8. Finalise the management plan and make it operational within the next 12 months.

Thank you for the opportunity to provide input.

Sincerely,

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