

4 September 2017

Submission on The Turnbull Government Draft Plan for Australia's 44 Suspended Commonwealth Waters Marine Parks

I strongly oppose the draft plans released for the Coral Sea Marine Park and the Temperate East Region Marine Park, each entailing large cut backs to high level protection of the Marine Parks to be replaced with only partial, low level protection.

Network/Australia-wide Comments

1. I reject the removal of the Marine National Park 'sanctuary' IUCN II zoning (MNPZ) across the marine park network

I call on the Turnbull Government to restore the Marine Park Network back to the IUCN II zoning as soon as possible, to honour the extensive scientific research and consultation that led to the UUCN II zoning initially. Further, with the impacts of climate change leading to potentially irreversible damage to this ecosystem, I believe protection of the ecosystem using the IUCN II zoning is more important now than ever before.

2. I call for the marine park zoning to be based on science.

The creation of the marine parks in 2012 by the Government was a product of science and consultation. Further, it was found by expert scientists that the marine park requires more marine park coverage (see Barr and Possingham, *Are outcomes matching policy commitments in Australian marine conservation planning?* Marine Policy 42, 39-48 2013), not less as has now been proposed.

3. I reject the notion that partial protection zones are an appropriate or suitable substitute for the high level 'sanctuary' IUCN II.

It is widely reported within the literature that partial protection is not a substitute for full protection, and that partial protection produces inferior biodiversity outcomes than that from full protection. Protecting the sea floor alone does not safeguard the marine life within the water column. Each marine park should have appropriately sized and located zones with high level MNPZ protection.

4. I oppose the Government's proposal to allow the addition of mining and pipelines in marine parks.

The recent World Conservation Congress stated that mining and mining exploration is damaging and highly inconsistent with the conservation values of a marine park. Like the Great Barrier Reef Marine Park, all marine parks should be protected from the damaging impacts of mining activity.

5. I oppose the Governments proposal to allow commercial fishing including trawling, gillnetting and longlining inside marine parks.

These activities have been found to be incompatible with the conservation values of marine parks by the independent Fishing Gear Risk Assessments, which the Government itself commissioned. The damage that the above mentioned commercial fishing methods would cause are incompatible not only with the conservation values of marine parks, but also the economic benefits associated with tourism, recreational fishing and other forms of commercial fishing that are able to operate in a sustainable manner within the marine park in conjunction with high level MNPZ zoning.

6. I oppose the notion that allowing commercial fishing within the marine park makes sound economic sense.

While Australia's marine tourism industry is worth \$28billion annually, the catch value returned from allowing commercial fishing within the marine park will be only \$4 million annually – that is 0.3% of the total revenue of Australia's wild catch fisheries.

7. Parks Australia's first consultation round last year showed very strong support for not only restoration, but in fact an increase in high level MNPZ protection. Despite this, I am very concerned that the Government is choosing to ignore the results of this consultation process, and propose the complete opposite in all but 1 of the 44 marine parks.

Coral Sea Comments

I believe the proposed Coral Sea Draft Management Plan fails the science test.

The Government's own Expert Science Panel found that the Coral Sea, a biodiversity hotspot for species including tuna, marlin and sharks, is one of the few remaining locations on Earth that remains untouched by humans. Further, the Panel found that the Coral Sea's unique reefs, which are of significant conservation value, warrant a higher level of protection.

Despite this, I am disappointed that the Government has proposed:

- **A reduction in protection of the park by 53%, and a consequent increase in park fragmentation.**

The independent Fishing Gear Risk Assessment, commissioned by the Government itself, found that longline fishing poses as unacceptable risk to the conservation value of the Coral Sea Marine Park. Despite this, the Government has proposed large cuts, and in turn fragmentation, to the marine national park which is Australia's major global contribution to the protection of intact tropical pelagic marine life, in turn opening it up to the damaging impacts of longline fishing.

- **The reduction of protection of ecologically valuable reefs including the Osprey, Shark, Vema, Flinders, Holmes, Marion and Wreck Reefs.**

MNPZ protection has been recommended for only 7 of the 44 reefs, despite the Government's Expert Science Panel acknowledging the importance of increasing protection at key reefs. By designating reefs as a MNPZ, this works to protect fish and shark populations valuable to the dive industry, and will assist in boosting the resilience of the reef in the face of climate change. This not only assures the future viability of the reef, but the viability of the dive industry who rely on healthy, biodiverse reefs which are robust in the face of coral bleaching and increasing extreme weather events such as cyclones.

Moreover, recent research within the Coral Sea, which has been identified by the Expert Science Panel as a "globally significant hotspot for reef sharks", has identified that reefs not protected under MNPZs have experienced a 90% reduction in original shark biomass, a reduction of other large predator biomass by 50%, a 70% depletion of fish biomass.

- **Partial protection, through habitat protection zones as a suitable substitute for full protection.**

Partial protection should be used to achieve predetermined social or economic outcomes, or as a buffer to MNPZs, which drive biodiversity conservation outcomes. The Government's Expert Science Panel found that areas in the Coral Sea that are not covered by a MNPZ experienced a 90% depletion in shark abundance. Further, partial protection zones (Habitat Protection Zones), permit highly damaging commercial fishing activities including longline, mid-water trawl and purse seining, which the independent Fishing Gear Risk Assessment, commissioned by the Government, found as posing an unacceptable risk to conservation values of Australia's marine parks. Consequently, it is clear that partial protection zones are *not a substitute* for MNPZs.

I believe the Coral Sea Draft Management Plan fails the economics test.

- **The draft plan fails to consider the lucrative dive tourism industry in the Coral Sea.** Dive tourism within the Coral Sea is believed to contribute around \$6million annually to the economy. Removing marine park protection from the Coral Sea will threaten the future of the reef, and the future of the lucrative dive industry which relies upon its existence.

- **Removal of the Marine Protected Area threatens the future of the lucrative dive industry, and its potential for future expansion.**

The current \$6 million in reef tourism direct sales to the Coral Sea Marine Park alone, far outweighs the \$4 million projected gain to commercial fishers across all 44 of Australia's marine park.

- **Removal of the Marine National Park Zone over the Osprey Group of Reefs will threaten the future of the iconic and economically critical shark populations.**

A shark population depletion rate of 90% has been recorded at other, unprotected coral reefs within the Coral Sea. The Review suggested an increase in protection of other key reefs including Holmes and Flinders Reef, due to ecological and economic value to the lucrative dive industry. Despite this, the Government has ignored this recommendation in the Draft Management Plan.

- **The notion that marine national parks heavily compete with and reduce the available catch for commercial fishers is not supported by evidence**

It has been found that the total maximum potential impact of marine national parks on commercial fishing from the 2012 plans, without taking into account the cumulative potential positive impacts, is less than 1% across the marine national park network. Further, commercial fishers who have reported as being heavily impacted by marine national parks in the Coral Sea, have been found to be negatively impacted by as little as 0.1%.

I believe Coral Sea Draft Management Plan fails recreational fishers.

- **I oppose the draft management plan to reintroduce damaging commercial fishing methods into what was effectively Australia's most prized recreational fishing zone.** This economically valuable recreational fishing zone is also home to the only known black marlin spawning area, hence the 2012 removal of longline commercial fishing. Reintroducing longlining into this zone is a direct threat to the viability of the valuable recreational fishing, the broader conservation values, and the only known black marlin spawning ground found in this zone.

Temperate East Comments

- **Temperate East region generally**

I am very concerned that the Government has not proposed to increase high level protection in the Temperate East marine region as a whole, despite the fact that 96% of the region has no high level MNPZ protection, and 85% of the region has no protection at all. If the proposed plan goes ahead, the plan will fail to adhere to the CSIRO's recommendation for all marine reserves to contain at least one MNPZ, given the proposed draft plan includes no MNPZ for the Gifford, Hunter and Jervis Marine Parks.

- **Norfolk Marine Park generally**

I am disappointed that the Government has failed to follow the advice of its own expert Review, by failing to upgrade the regions surrounding the MNPZ's and the Island's extended MOU Box to a Habitat Protection Zone instead of a Multiple Use Zone. Multiple Use Zones do nothing to prevent mining within these areas, which is particularly concerning as Geoscience Australia has reported these areas to be prospective oil and gas regions.

- **Norfolk seamount protection**

I oppose the Government's failure to propose MNPZ protection for any of the Norfolk Seamounts, despite being identified at one of Australia's 11 most unique marine habitats by the Howard Government.

Further, failure to propose MNPZ protection over the Norfolk Seamount is contradictory to the Government's own Expert Review, which recommended the Norfolk Island be given MNPZ status.

- **Lord Howe Marine Park**

I oppose the proposal delivered by the Government to downgrade the zoning of the northern half of the Lord Howe marine park outside the pre-existing Elizabeth and Middleton Reef area, from Habitat Protection zone to the very low level Multiple use zone, which permits mining activity to occur. This comes despite the advice handed down by its own expert Review, which recommend the area be protected under the Habitat Protection Zone.

Further, I am concerned about the Government's proposed removal of protection over part of the seamount ecosystem of Middleton Reef, one of Australia's longest and most highly protected coral reef habitats. The estimated return catch value from the removal of protection over this portion of the Middleton Reef is calculated to be just \$31,000 annually, or \$770 per annum when divided across the 40-active longlining vessel in the region. Clearly, there is no economic justification for the potential destruction caused by the removal of protection over this remote coral reef.

Recommendations

I am disappointed that despite the findings of the Government's expert Review, and the findings of the independent Fishing Gear Risk Assessment, commissioned by the Government itself, the Turnbull Government has failed to propose a science based draft plan, instead failing to act on its own advice.

Based on the reasons stated above, I make the following recommendations for the amendments to the **Coral Sea Marine Park Draft Management Plan**:

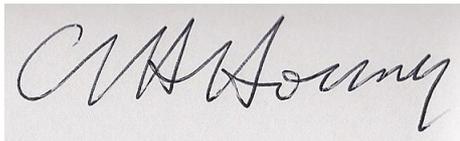
1. I reject the proposed major loss and fragmentation of the large MNPZ.
2. I reject the loss of protection at Osprey, Shark and Vema Reef.
3. I reject the proposed loss of protection to Flinders, Holmes and Wreck Reef.
4. I approve of the proposed new MNPZ protection at the border with the Great Barrier Reef.
5. I reject longlining, purse seining and mid-water trawling in the 'Area E' Coral Sea Zone of the Western Tuna Billfish Fishery in the Coral Sea.
6. I reject the proposed loss of MNPZ protection for Marion Reef.
7. I reject the proposed expansion of damaging commercial fishing practises in the Coral Sea, including mid-water trawling, purse seining, demersal longlining and prawn trawling.

8. I call on the Government to finalise the management plan, inclusive of all above recommendations, and have it operational within the next 12 months.

Further, based on the reasons stated above, I make the following recommendations for amendments to the **Temperate East Region Marine Park Draft Management Plan:**

1. I support the Government's proposed increase to protection from mining in the Central Eastern, Jervis and Hunter Marine Parks.
2. I oppose the proposed removal of MNPZ protection at the Middleton Reef in the Lord Howe Marine Park.
3. I oppose the proposed removal of the MNPZ over the Vening Meinsez Fracture Zone in the Norfolk Marine Park.
4. I oppose the proposed downgrade of protection from mining in Norfolk and Lord Howe Marine Parks, from a Habitat Protection Zone to a Multiple Use Zone.
5. I urge the Government to adopt the CSIRO recommendations for each marine reserve to contain at least one MNPZ. More specifically, I encourage the Government to pay particular focus to ensuring the shelf, continental slope and seamounts are better represented with MNPZ coverage.

This document was prepared by Laura Cannon on behalf of Surfrider Foundation Gold Coast Tweed Branch



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