

CULLEN WINES

WILLYABRUP & MARGARET RIVER



Director of National Parks

cc Nola Marino MP

September 12th 2017

Dear Director,

As a local resident, I am very proud of the oceans and environment of the South West and believe more, not less should be done to protect them. As a business person, I run my company with the utmost care for the environment and protecting the land upon which the winery sits.

The South West is one of the most important regions in Australia in terms of attracting both local and overseas visitors, and produces some of the finest food and wine in the country. The appeal of this region is due in no small part to the pristine waters and abundant marine life we are lucky enough to have exposure to. It is important that we do everything we can to protect the Marine Parks that are so important to the region.

Please find below my submission in to the public consultation on the South West Marine Park Draft Management Plan.

- 1. Reject the cut backs of Marine National Park 'sanctuary' IUCN II zoning (MNPZ) across the Network and call for the Turnbull Government to fully restore and increase the IUCN II zoning in Australia's Marine Parks without delay.** The Government's independent Review recognised the extensive science and consultation that led to the creation of the 40 parks in 2012. However, the Turnbull Government's draft management plans recommend reducing, relocating and in most cases completely removing the MNPZ protection over key habitats, particularly in the globally important Coral Sea. In the face of devastating coral bleaching, mangrove dieback and vanishing kelp forests, MNPZ coverage in Australia's Marine Parks are even more important now than ever.
- 2. The marine park zoning must be science-based** – the Government's own Expert Science Panel found that marine parks declared in 2012 were the result of sound science and consultation. Further, leading scientists found that the 2012 network would need more marine sanctuary coverage, not less (eg: Barr and Possingham, *Are outcomes matching policy commitments in Australian marine conservation planning?* Marine Policy 42, 39-48 2013).
- 3. Partial protection zones are not a substitute for high level 'sanctuary' (Marine National Park / IUCNII) protection** – claims by government that Habitat Protection (HPZs/yellow zones) are equal to Marine National Park zone (MNPZ/green zones) are false and misleading. Protecting the sea floor provides only partial protection and does not protect the marine life living within the water column. Each marine park should have adequately sized and located zones of high level MNPZ protection, with partial protection zones used in an ancillary way. It is well established in the scientific literature that partial protection does not generate biodiversity benefits comparable to full protection.
- 4. Reject the proposal to allow mining in parks** – the Government proposes to allow mining and pipelines in the vast majority of the parks. Marine parks not currently containing mining exploration rights should be considered for full protection from mining. As emphasised at the recent World Conservation Congress, industrial activities like mining and mining exploration are not compatible with marine parks. Marine parks should be fully protected from mining as has been achieved in the Great Barrier Reef Marine Park.

5. **Reject the proposal for destructive commercial fishing activities such as trawling, gillnetting and longlining in the marine parks** – by opening up 38 of the marine parks to destructive commercial fishing practices such as trawling, gillnetting and longlining, the Government is proposing to ignore the findings of the independent Fishing Gear Risk Assessments it commissioned, which found those types of fishing to be incompatible with many of the conservation values in the parks. Further, allowing in destructive forms of commercial fishing puts at risk the benefits that marine parks provide not only to marine life, but also more broadly to tourism, recreational fishing and other types of commercial fishing that *can* operate sustainably inside parks alongside high level MNPZ zoning.
6. **There is no justifying economic argument** – Australia’s marine tourism industry is worth \$28b per year, whereas the catch value being returned to commercial fishing from the network-wide MNPZ cuts is worth only \$4m per annum – only 0.3% of the total revenue of Australia’s wild catch fisheries.
7. **The results of the statutory consultation are being ignored** - it is deeply concerning that despite the vast majority of submissions to Parks Australia’s first consultation round last year strongly supporting the restoration and increase in high level marine national park zone protection, the Government is proposing the complete opposite to the consultation outcomes in all but 1 of the 44 marine parks.

Regarding the SOUTH-WEST region’s marine parks:

The South-west region includes the cooler, temperate waters of southern Australia, home to an extremely high number of unique species restricted to our southern coastline including the fascinating Ruby seadragon, the Australian sea lion and the Western Rock Lobster. The SW region hosts two of only three known places in Australian waters where the largest animal ever – the blue whale – comes to feed from vast distances away. The mysterious, wild waters of the Great Australian Bight is where many threatened species – such as the southern right whale and their calves – seek sanctuary at important stages of their life cycles.

- Regarding **Geographe Bay Marine Park** – I am concerned with the Government’s proposal to remove both the Marine National Park (green) zones in the Geographe Bay Marine Park, replacing them with weaker (yellow) Habitat Protection zones. These yellow zones have only been applied elsewhere in our region in waters more than 600m deep – a very different environment to our shallow, sheltered and heavily pressured Geographe Bay. The removal of the Marine National Park zones goes against the science recommendations from the Government’s own Review. Acknowledging the level of consultation, the science evidence and the ‘intense community interest’, the Review recommended retaining the Marine National Park zones, while reconfiguring them slightly to better align with immediately adjacent green zones in the Ngari Capes Marine Park established by the Barnett Government, and to improve ease of navigation for fishers. These two Marine National Park zones recommended by the Review would take up only about 4% of the Geographe Marine Park – a balanced approach that would deliver improved outcomes for everyone and a great tourism beacon for the region.
1.
 - Regarding **Perth Canyon Marine Park** - I am concerned about the proposal to move the Marine National Park Zone protection away from the key blue whale feeding grounds at the head of the Perth Canyon to an area of far less ecological importance. The blue whale is a protected species, still a long way from recovering from being threatened with extinction – and this area is the only area of it’s critical habitat feeding ground to be included in Australia’s marine parks network.
 2.
 - Regarding **Twilight Marine Park** - I am concerned about the proposal to reduce over 1,000km² of Marine National Park Zone in this park. For comparison, this is an area larger than the entire NSW state waters marine sanctuary network, with the maximum economic benefit to fisheries estimated by the Government commissioned ABARES report to be only \$82,500 per annum, or \$2,500 per annum to each license holder in Zone 2 of the WA Temperate Gillnet Fishery. This combined with the loss of critical continental shelf protection at Peaceful Bay (in the **SW Corner Marine Park**) and at the head of the **Bremer Marine Park** (western side) leads

to an overall loss of shelf protection across the South-west marine reserve network when there was too little to start with, as per the 2011 Science Statement of Concern - http://www.meeuwig.org/wp-content/uploads/2015/08/2011_ScienceStatement_SW-National-System-Reserves.pdf

3.

- Regarding **SW Corner Marine Park/Diamantina Fracture Zone** – I am concerned about the loss of a very large area of Marine National Park Zone over the Diamantina Fracture Zone – a Key Ecological Feature whose ridges and seamounts are thought to act as ‘stepping stones’ for species dispersal and migration across the region and the wider abyssal plain (Wilson & Kaufman 1987, in Richardson et al. 2005). Further, its size, physical complexity and isolation indicate that it is likely to support deep-water communities characterised by high species diversity and uniqueness – ref: <https://www.environment.gov.au/sprat-public/action/kef/view/22;jsessionid=ACF4D013818E181DD36A2CF029BE5656> The zoning proposed is a downgrade to the lowest level of protection in the park system – Multiple Use (blue) zone – which will allow mining and most forms of fishing, despite its extremely remote, rough and deep location – making it unsafe for oil and gas drilling (with an adequate oil spill response most likely impossible) and highly unlikely to be a serious economic proposition for fishing.

4.

- Regarding the **Western and Southern Kangaroo Island Marine Parks** – I am concerned that despite there being no oil and gas leases over these two parks, the strong desire of the local community for their island to be as protected as possible from debilitating oil spills and the long term effects of oil and gas industrialisation of pristine seas, has not been heeded with an upgrade of zoning to ‘Special Purpose Zone (Mining Exclusion)’, as has been afforded the northern most section of the Great Australian Bight Marine Park. This is perplexing as the area around Kangaroo Island is considered to be highly prospective for oil and gas discovery, and therefore at significant risk of such operations being allowed in the foreseeable future. Creating an oil or gas field in these near-shore marine parks would put the Island’s important fishing and lucrative tourism industries at risk. This will greatly diminish the reputation and facility of marine parks in this community.

Recommendations

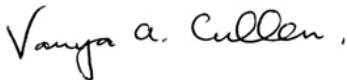
Despite finding that highly protected marine parks are vital as a key tool in marine management, the Turnbull Government has failed to act on the advice of the Review it commissioned, missing the opportunity to deliver a science based result in the South-west marine region.

The following are my recommendations to the Government in relation to the Draft South West marine region management arrangements:-

1. **I support the draft management plan where** the Marine National Park Zone (green no-take IUCN II) areas have not changed from what was declared in 2012, or where there are new and/or increased National Park zones, ie -
 - a. the new National Park zones in the **Bremer Marine Park** (the transect and over the Bremer Canyon);
 - b. the new National Park zone transect over the Swan Canyon in **the SW Corner Marine Park**;
 - c. the increased National Park zone area in the **Two Rocks Marine Park**.
 2. **I reject the draft management plans where** the Marine National Park zone (no-take IUCN II) are reduced or removed entirely, ie:-
 - a. in the **SW Corner Marine Park** (Diamantina Fracture Zone section), at the **Twilight Marine Park**; and over the western inner-shelf area in the Bay at **Bremer Marine Park** – all which have important areas of MNPZ removed;
 - b. in the **Geographe Marine Park**, and the Peaceful Bay section of the **SW Corner Marine Park** where the Marine National Park Zones are removed entirely;
 - c. In the **Perth Canyon Marine Park** where the National Park zone over the Head of the Canyon has been moved away from the critical habitat of a protected species, to an area of far less ecological importance;
- 5.

3. I recommend that the following increase in MNPZ be made:-
 - a. Expansion of the MNPZ in Great Australian Bight Marine Park westwards to the SA border. There is very little MNPZ protection on the continental shelf in the Commonwealth waters marine parks network. This proposal would create Australia's largest area of high level protection on the continental shelf, in an area with globally recognised values, and with no displacement of mining and very little additional fishing displacement.
- 6.
4. **Mining** - I support the Draft's proposal to put in place a large no-mining zone 'Special Purpose Zone (Mining Exclusion)' in the **Great Australian Bight Marine Park**, and recommend that the **Western and Southern Kangaroo Island Marine Parks** are given the same zoning upgrade throughout. Further, I recommend that the other key coastal communities adjacent to commonwealth marine parks be given protection from mining – at Esperance (the **SW Corner and Eastern Recherche Marine Parks**), Peaceful Bay (**SW Corner Marine Park**) and **Perth Canyon Marine Park**.
- 7.
5. **Gillnetting** – I recommend that the provision of permanent protection for Australian Sea Lions from gillnetting be provided in the relevant commonwealth marine parks by ensuring that the zoning does not offer less protection than existing fisheries closures.

Yours sincerely,



Vanya Cullen

Chief Winemaker and Managing Director
Cullen Wines