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14th September 2017

National Parks Association of Queensland

Submission to the: Department of the Environment and Energy

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on

Australian Marine Parks Management Planning & Renaming of Marine Reserves to Marine Parks

Thank you for the opportunity to provide a submission to the Director of National Parks regarding the 2017 Draft Coral Sea Marine Reserve Management Plan and the renaming of Marine Reserves to Marine Parks.

The National Parks Association of Queensland (NPAQ) is dedicated to promoting the preservation, expansion, good management and presentation of national parks in Queensland.

Established in 1930, NPAQ is an independent, not-for-profit, membership-based organisation. The association has played a pivotal role in the establishment of many national parks in Queensland. NPAQ's purpose is achieved through advocating for the protection, expansion and good management of the protected area estate in Queensland; fostering the appreciation and enjoyment of nature through a bushwalking and outdoor activities program; undertaking on-ground conservation and monitoring work; educating the community about national parks and their benefits; and supporting the development and application of scientific and professional knowledge in advancing national parks and nature conservation.

Submission A – Marine Reserve Management Plans

Biodiversity hotspot

NPAQ rejects the severe rollbacks proposed in the draft 2017 management plan in favour of implementing the zoning recommendations of the Commonwealth Marine Reserves Review given the extensive stakeholder consultations and scientific input that informed the Review and the irreplaceable value of the Coral Sea as a biodiversity hotspot.

Referred to as the "Cradle of the Great Barrier Reef", the Coral Sea provides sea currents that brings new coral to the Reef.[i]

The waters of the Coral Sea are important in attracting aggregations of large pelagic fish species, either to feed or spawn, while also providing migratory corridors for numerous highly mobile species.

For all its vast isolation, the Coral Sea is undoubtedly important as one of the last pristine ecosystems on the planet, despite sharing in the worldwide despoliation of the seas with plastics. It is a biodiversity hotspot, with a vast array of sea creatures including the dwarf minke whale, the majestic whale shark and large ocean predators including rare deepwater sharks, tuna and billfish – a variety of species of marlin, sailfish and swordfish. The Coral Sea contains 49 different habitats and supports over 300 threatened species. At least 28 species of whales and dolphins are found, some in pods up to 400 strong. There are 52 species of deepwater sharks and rays, 18 of which are unique to the Coral Sea. [ii]

The Coral Sea is also the site of the world's only known black marlin spawning event.[iii] The islets and cays also support 14 species of seabird, including regionally important populations of red-footed booby, lesser frigatebird and great frigatebird. The green turtle regularly nests on undisturbed islets, particularly the Coringa-Herald and Lithou Reef national nature reserves – the two existing protected areas within the million square kilometres of the Coral Sea within Australian waters. The hawksbill turtle also uses these islets for foraging and, occasionally, nesting. Five other species of sea turtle are also found in the Coral Sea as its atoll beaches make secure nest sites. The Coral Sea hosts 341 species that are recognised by the International Union for the Conservation of Nature for their conservation significance.[iv] The Coral Sea sanctuary zones are "probably the only tropical pelagic environment not markedly impacted by fishing where an area of a very large scale can be established and effectively managed." [v]

The Coral Sea, as an irreplaceable biodiversity hotspot, deserves protection based on expert scientific advice.

The Value of National Marine Park Zones

In 2015, the Centre for Conservation Geography prepared an independent research paper on behalf of Save Our Marine Life Alliance.[vi] The research found that:

1. Marine National Park Zones are critical to the protection of the Coral Sea's marine life. The weight of scientific evidence showed that partially protected zones did not deliver broad ranging and significant benefits.
2. The net social and economic benefits of the Coral Sea Marine Reserve contribute $1.2 billion to the Australian community. Further, the positive impacts on nature-based tourism and recreational fishing outweigh any potential negative impacts on commercial fishing by at least $5 million annually.
3. Some minor changes are need to the zones, around some of the key coral reefs targeted for protection.

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4. Major concerns exist within the scientific community regarding the low level of protection for the unique habitats of the western and southern Coral Sea, particularly the deep water troughs, pelagic ecosystems and unique coral reefs.

Independent Scientific Panel

As part of the Commonwealth Marine Reserves Review, an independent Expert Scientific Panel (ESP) was appointed to provide advice to government. The ESP included recognised scientists selected for their capacity to provide independent scientific advice on the science supporting the Commonwealth Marine Reserves (CMR) including:

- Options for zoning, and zoning boundaries, and allowed uses consistent with Goals and Principles for the Establishment of the National Representative System of Marine Protected Areas in Commonwealth Waters;
- Future priorities for scientific research and monitoring relating to marine biodiversity within the marine reserves, especially any relating to the understanding of threats to marine biodiversity within the marine reserves; and
- Options for addressing the most significant information gaps hindering robust, evidence-based decision-making for the management of the marine reserves.

After extensive research and stakeholder consultation, the ESP Report[vii] included the following:

- A recommended matrix of marine activities by zone which should be followed.
- Identification of additional available research to addressed gaps in the assessment of commercial fishing operational risks to biodiversity and ecosystems. For example, fishing gear types (demersal automatic long line), impact of recreational fishing, effectiveness of different zone types need to be incorporated into existing risk assessment processes.
- A recognition that significant gaps in the coverage of protected areas "should be addressed in due course to ensure a more comprehensive and adequate inclusion of a representative sample of Australia's marine biodiversity in the national CMR estate". (This is **before** the size of the Marine Reserve National Park zones were reduced in the 2017 draft plans.)
- A statement that "demersal longline fishing (including auto-longlines) should remain a method that is incompatible with the conservation values of the … Coral Sea Commonwealth Marine Reserves, particularly those relating to seamounts" unless independent scientific research indicates otherwise.
- Recognition that "the significant body of scientific literature … demonstrates the effectiveness of Marine National Park Zones (no-take zones) in achieving conservation outcomes and for their role as scientific reference areas. The ESP notes the emerging consensus that, to attain and preserve natural condition, no-take, size, configuration, enforcement and length of time the area has been protected all need to be considered."
- A statement that "different management regimes across reef systems should not be applied across small reefs (less than 20 km across)."

Unfortunately, the Director of Parks in preparing the 2017 draft plans appears to have deviated significantly from the Government's own ESP's advice. Sanctuary protections for large areas of the Coral Sea, as well as other regions, are being abandoned to allow for an expansion of fishing, including long-line fishing and seafloor trawling. The 'sensible balance' sought by the 2014-2015 'science based review', [viii] has been largely ignored and subsequently, the draft management plans propose a drastic reduction in protection.

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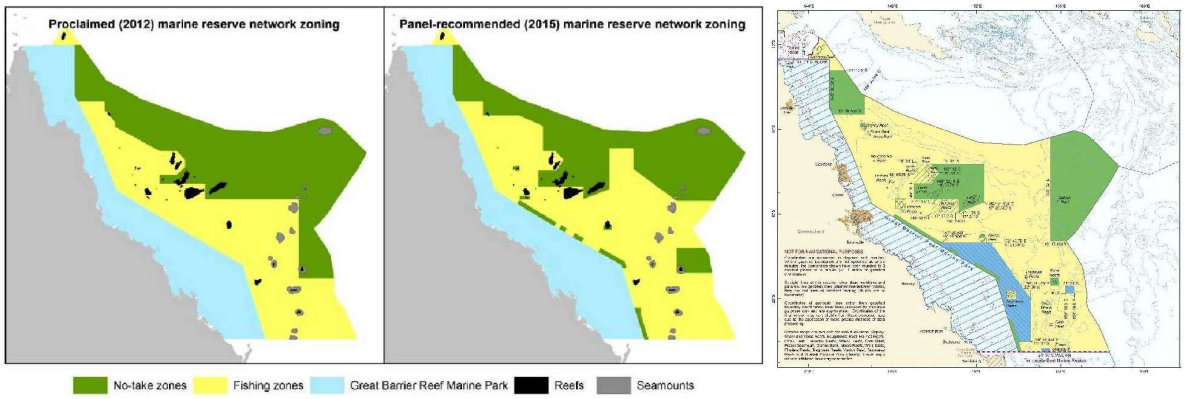
Under the proposed 2017 draft plans, "the amount of green zones will be almost halved, from 36% to 20%"[ix] - with the biggest reductions in the Coral Sea - arguably where we need it most given the existing threats to the Great Barrier Reef.

The following figure shows the original national park zoning proclaimed in 2012; the ESP's revised zoning from 2015; and the proposed 2017 draft plan's dramatically reduced zones.

Comparison of zoning images - Proclaimed (2012), Panel-recommended (2015), and Draft Management Plan (2017) marine reserve network zoning

Images: (left and centre) The Conversation, (right) Coral Sea Marine Park Draft Management Plan 2017.



The Minister for the Environment and Energy, Josh Frydenberg, said that this approach will "allow sustainable activities like commercial fishing while protecting key conservation features"[x]. However, the severe reduction in the Marine Reserve National Park area will leave the more accessible part of the Coral Sea with little protection. Effective protection requires aligning no-take areas to areas under threat.

The detrimental impacts of large scale commercial fishing are well known. In 2011, Professor David Booth, professor of Marine Ecology from the University of Technology Sydney, stated that it was "well supported scientifically that fisheries extraction is a major threat to world fish populations". As "the selective removal of top predators – such as sharks, gropers and mackerels – may also indirectly affect whole ecosystems", fishing needed to be managed closely.[xi]

With science showing Marine National Park Zones as "the engine room of conservation"[xii], the reduction in the extent and placement of Marine National Park Zones will seriously undermine the effectiveness of the Marine Sanctuaries. Given the strong connection of the Coral Sea as the "Cradle of the Great Barrier Reef", reducing protection will likely undermine the integrity of the Coral Sea and therefore Great Barrier Reef. Scientists suggest that 30-40% of the seascape should ideally be fully protected[xiii], rather than the 20% proposed under the 2017 draft plans (and even less for the Coral Sea).

NPAQ therefore reject the severe rollbacks proposed in the draft 2017 plan and call for implementation of the more extensive and stakeholder balanced Commonwealth Marine Reserve Review zoning and recommendations.

Submission B – Renaming Marine Reserves to Marine Parks

NPAQ has no concerns with renaming marine reserves to marine parks so long as the focus is conservation rather than sacrificing their underlying short and long-term integrity/sustainability by prioritising commercial interests. We have a duty to protect Australia's Commonwealth Marine ecosystems for future generations.

Thank you for considering NPAQ's submission.

Yours sincerely

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[i] Pedder, A. (2017). 'Protecting the Coral Sea – the Cradle to the Great Barrier Reef', Vol LIV, 1 & 2, My 2017. *UN Chronicle, the Magazine of the UN.*
[ii] Ibid.
[iii] Domeier M.L., and Speare P. (2012). 'Dispersal of Adult Black Marlin (*Istiompax indica*) from a Great Barrier Reef Spawning Aggregation.' *PLoS ONE* 7(2): e31629. https://doi.org/10.1371/journal.pone.0031629.
[iv] Ceccarelli, D. M. (2011). *Australia's Coral Sea: A Biophysical Profile.* Protect our Coral Sea Coalition.
[v] Ibid, pg 3.
[vi] Beaver, D., Turner, J.,Keily, T. and Douglass, L. (2015). *The coral sea marine reserve: centre for conservation geography report to the Australian Government's marine reserves review,* version 1.0, Independent research paper commissioned by the Save Our Marine Life Alliance.
[vii] Beeton, R. J. S., Butxon, C. D., Cochrane, P., Dittmann, S., Pepperell, J. G. (2015). *Commonwealth Marine Reserves Review Report of the Expert Scientific Panel*, December 2015, Department of the Environment, Canberra.
[viii] The Hon. Greg Hunt MP Minister for the Environment and Senator the Hon. Richard Colbeck Parliamentary Secretary to the Minister for Agriculture (2014). JOINT MEDIA RELEASE, 11 September 2014, *Review of Commonwealth marine reserves begins.* http://www.environment.gov.au/minister/hunt/2014/pubs/mr20140911a.pdf.
[ix] Meeuwig, J. and Booth, D. (2017). '**Australia's new marine parks plan is a case of the Emperor's new clothes. The Conversation' 24 July 2017.** https://theconversation.com/australias-new-marine-parks-plan-is-a-case-of-the-emperors-new-clothes-81391
[x] The Hon. Josh Frydenberg, Minister for the Environment and Energy, MEDIA RELEASE, 21 July 2017, *Marine park draft management plans released*. http://www.environment.gov.au/minister/frydenberg/media-releases/mr20170721a.html.
[xi] Booth, D. (2011). '**Does the Coral Sea marine park proposal provide enough protection?' *The Conversation*, 26 November, 2011.** https://theconversation.com/does-the-coral-sea-marine-park-proposal-provide-enough-protection-4474**; citing Food and Agriculture Organisation of the United Nations** *FAO Fisheries and Aquaculture Department* [online]. Rome. Updated 28 December 2015. www.fao.org/fishery/ecosystems/en
[xii] Meeuwig, J. and Booth, D. (2017). '**Australia's new marine parks plan is a case of the Emperor's new clothes. The Conversation' 24 July 2017.** https://theconversation.com/australias-new-marine-parks-plan-is-a-case-of-the-emperors-new-clothes-81391 **dup - how shorten/refer above**
[xiii] O'Leary, B., Winther-Jason, M., Bainbridge, J., Aitken, J., Hawkins, J. and Roberts, C. (2016) '**Effective Coverage Targets for Ocean Protection', Journal of the Society for Conservation Biology 21 April 2016.**