

Dear Sally and the Parks team,

Below are my comments on the *Draft North Commonwealth Marine Reserves Network Management Plan 2017* ('Plan'). I have lived in the Northern Territory for 13 years, and am an active fisher, diver, spear fisher, and recreational boat owner. I have also worked in a professional capacity throughout this time with Traditional Owners across the Northern Territory coast, including five years working on sacred site protection under the *Northern Territory Aboriginal Sacred Sites Act*, and three years working on coastal management projects for Indigenous sea country ranger groups. My views are informed by both my recreational interests, and the issues Traditional Owners (TOs) have raised with me over that time. However, my feedback should be taken as my own views: I do not have any authority to speak on behalf of any Traditional Owner or Indigenous ranger group, and do not wish to do so. Further feedback should be sought directly from TOs and ranger groups. My comments are limited to those Parks adjacent to Northern Territory waters.

Indigenous recognition and involvement

I acknowledge that the current Plan includes increased recognition of Indigenous sea country ranger groups, Indigenous Protected Areas (IPAs), and Indigenous-driven management plans. I also congratulate Parks for the stronger wording in the current Plan regarding partnering with Indigenous ranger groups when undertaking management activities. To achieve the Indigenous engagement goals stated in the Plan, it will be critical to include sufficient Indigenous representation in the Advisory Committee to ensure that 1) the objective of 'complementing and respecting Indigenous governance arrangements, plans, capacities and activities' is realised, and 2) representation of Indigenous interests is structurally integrated into management planning/decision making (not just management implementation). Although this is a complex topic, in essence if some support is provided to them, it is likely that the existing capacity of Indigenous sea ranger groups can be utilised to communicate between Traditional Owners (TOs) and Parks Australia to inform decision making. Parks is advised to draw on relevant expertise within ranger groups as well as other institutions, as it navigates the development of an appropriate governance framework. Many in the industry will be happy to offer advice and support to Parks given the importance of this issue. Please feel free to contact me if you wish to discuss this further.

It is unclear what the relationship between the Advisory Committee and authorisation processes will be. Given the Plan recognises Indigenous interests in sea country, there should be a formal mechanism for involving TOs in certain authorisations. What kinds of authorisations require TO involvement, and how TOs will be engaged, should be clarified through consultations with TO groups via sea country ranger groups.

Although I am reluctant to comment of TO views (TOs themselves should be consulted), I suspect that the following issues are likely to be amongst TOs' concerns:

- identification and protection of culturally significant sites
- most of the North Network's zones allow commercial fishing and mining: these are often cited by TOs as key threats, and marine parks which do not address these may be seen as not worth the paper they are written on
- appropriate funding should be provided to ranger groups who undertake research, monitoring, surveillance or other joint management activities within the Parks.

I note that existing and planned IPAs, and their IUCN categories, are not shown anywhere in the Plan. Where Marine Parks overlap with existing internationally recognised protected areas (such as IPAs), this seems a significant feature of those Parks. These overlapping protected areas should be appropriately described in the outlines of individual Parks in s2.2 (North Network Values).

Zoning: disregard for the Review process

It is deeply disappointing that the zoning recommendations of the Review have been sidelined. Although I disagree with some of the Review's recommendations, I recognise the diligent consultation process undertaken through the Review process (with the exception of consultations with TOs). I acknowledge the interests of other stakeholders, and that the Review's recommendations reflect the need to balance stakeholder concerns with conservation outcomes. The Review was transparent, and included publicly available information about stakeholder concerns and how these had been reconciled in terms of the zoning recommendations made. That this process has been ignored, without the equivalent levels of transparency to explain the changed zonings as they appear in the Plan, is a significant breach of public trust.

Zoning: further erosion of conservation measures

I am further deeply concerned with the zone categories contained in the current Plan. Firstly, the area within IUCN Cat II (National Park) zones has been greatly diminished (Wessel, West Cape York, Limmen, Gulf of Carpentaria Parks). The area of Habitat Protection Zones has also been decreased in the Arafura and Gulf of Carpentaria Parks. This is contrary to substantial scientific evidence regarding the need for highly protected zones. The zoning scheme put forward in the Review should be adopted.

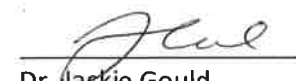
Secondly, although I am an avid fisher and a supporter of commercial fisheries, the increase in Special Purpose Trawl Zones is disappointing. The current zoning will allow a particularly damaging form of fishing in areas beyond the reasonable compromise achieved by the Review recommendations.

The absence of any National Park or Habitat Protection zones within the Arnhem Park is contrary to the conservation needs of that area. This area also contains a number of highly significant cultural sites. The environmental and cultural values of this Park should be protected through a zoning scheme which protects the seabed from disturbance (i.e. mining activity in particular should not be permitted, but bottom trawling should potentially also be restricted). I believe there are also cultural values which will be compromised by the removal of the National Park from the Wessel Marine Park, and the Habitat Protection Zone from the Arafura Park. Parks Australia should address these issues in consultation with TOs via the relevant sea country ranger groups.

As noted above, if the vast majority of the North Parks allow trawling and mining, there seems little to be gained by the designation of these area as marine parks. The changes to the zoning scheme seems to be politically motivated and is frustrating to those of us who respected the due process embodied by the independent Review, and contributed time and expertise to it. It also undermines the conservation outcomes of the Parks; does not provide sufficient high level protection across the North Networks' bioregions; nor sufficient high level protection to the North Networks' key ecological features.

Thank you for taking the time to consider my views and feedback. I look forward to seeing the outcomes of the consultation process and the final Plan in due course.

Kind regards



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