

Dear Minister Frydenberg,

It has come to my attention that the proposed rezoning of Marine parks plans to drastically reduce the Area of Marine protection as well as reduce the kind of protection available in changed zonings.

My company, Diversion Dive Travel, is specialised in Marine Tourism for scuba divers around the world. I've observed reefs globally for over 30 years. The Australian Reefs always stand out for their natural diversity and beauty and for the best practice management. With the science based recommendation in 2012 the current system of marine Parks was introduced which offers the Australian reefs a fighting chance to tackle the problems of rising sea temperatures, water acidity and coral bleaching.

The current proposal to cut the Marine Parks in size and protection is the last thing our reefs need. I'm not writing for sentimental reasons. As a member of the Dive Industry Association of Australia I fully support our submission (attached).

We are talking about a critical decision which will affect the bottom line of every business in the great tourism industry in Australia.

Given the overwhelming scientific evidence that Marine park protection of the best chance for the future of our reefs, I can only hope that your government will be able to prioritise reef health!

Kind regards

Dirk Werner-Lutrop

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To whom it may concern

My name is Richard Nicholls and I am the current president of the DIAA (Dive Association of Australia) The DIAA represents the recreational dive industry including but not limited to , Retail dive shops, resorts, charter vessels, equipment manufacturers and suppliers, training agencies, diving instructors. I am writing on behalf of all of them. Our industry employees more than 100,00 people with an estimated total economic contribution (as of 09/15 our last independent study) of \$4.2 billion dollars. As divers we more than any other user group see the direct result of management decisions on the marine estate both positive and unfortunately negative. We believe, along with the clear majority in the community that this decision is a poor one and we urgently ask you to reconsider.

Best regards,
Richard Nicholls

President DIAA

[DIAA submission on the draft management plans for Australia’s 44 suspended Commonwealth waters marine parks.](#)

Key points:

- 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.

DIAA Comment specific to 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 overall high level green/National Park Zone protection across the South-west region** – I am concerned that the Government proposes to cut NPZ protection in the South-west by 40%, despite the Review and the science community finding the need for more high level protection, not less.

- 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.
- 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.
- 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
- 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.
- 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.

DIAA 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;
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.
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**.

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.

DIAA Comment specific to the North-west Marine Park Network

The North-west region is home to iconic Australian marine species, including turtles, dugongs, sharks, sea snakes and sawfish. The whale shark – the world’s largest fish - aggregates every year off the World Heritage-listed Ningaloo Reef. The world's largest population of humpback whales - estimated to be made up of more than 29,000 individuals - migrates every year from their summer feeding grounds in Antarctica to breed in the warm tropical waters off the Kimberley coast. Many species in the North-west region face serious threats to their survival elsewhere in the world. With this in mind, the following are my concerns -

- **Regarding high level green/National Park Zone protection in the North-west region** – I am very concerned that the government is proposing to reduce green/Marine National Park Zone (MNPZ) protection across the 11 parks in the region by 49% when the Review and the science community is clear that there should be more, not less.

Further, I am concerned that the Government is proposing to leave 6 marine parks in the NW region without any high level MNPZ protection at all – at **Roebuck, Eighty Mile Beach, Montebello, Carnarvon Canyon, Ningaloo and Shark Bay Marine Parks** - despite the CSIRO recommendation that each marine park should have at least one MNPZ.

- **Regarding the Argo-Rowley Terrace Marine Park** – I am concerned that the Government is proposing to open-up the globally significant **Rowley Shoals** ecosystem to trawling and is not dealing with the risk of mining. The Rowley Shoals is an iconic area for marine life, a key Australian tourism asset (being one of the world’s greatest collections of coral Atolls, and one of the best dive sites in Australia) and contains recreational fishing values – yet the draft plan proposes compromising these values for a maximum economic benefit to fishers estimated by ABARES to be \$36,900 per annum or \$5,271 per annum to each license holder in the North-west Slope Trawl Fishery.

The draft fails to protect the Rowley Shoals from mining even though the Federal Environment Minister (when the Federal Resources Minister) last year rejected proposals to mine the area for oil and gas, by cancelling new acreage inside the park near the Shoals. No protection is afforded the tourism and recreation sector, despite the Shoals’ standing

Further, I am concerned that a large area - 29,730km² - of the Argo Rowley Tce Marine Park would be downgraded from high level MNPZ protection to the lowest level zoning – Multiple Use Zone. This represents a loss of 42% of the MNPZ in the park. The canyons at the north of the MNPZ feed the ecologically important Scott Plateau. These canyons are thought to be some 50 million years old and are responsible for creating upwellings of colder nutrient rich water from the abyssal plain onto the plateau. These upwellings create nutrient rich cold-water habitats, important food sources for predatory fish, sharks, toothed whales and dolphins. The Scott Plateau is an important breeding ground for sperm and

beaked whales. The canyons linking the Argo Abyssal Plain to Scott Plateau are also considered a National Key Ecological Feature, and are fed by the ecological processes that occur in the Argo Abyssal Plain that would lose its protection under the draft plan.

- **Regarding the Gascoyne Marine Park** adjacent to **Ningaloo** – I am concerned that another large area in the NW marine region - 24,305km² – would be downgraded from high level MNPZ protection to sea floor protection only, representing a loss of 73% of the MNPZ in the park. The large deep water MNPZ in the Gascoyne Marine Park is located over the Cuvier Abyssal Plain. This abyssal plain feeds a series of canyons, linking the nutrient rich deep waters to the Cape Range Peninsula. These deep waters support the rich diversity of marine life around the Cape Range peninsula, and Ningaloo Reef. The canyons that link the Cuvier Abyssal Plain with the Cape Range Peninsula are considered a National Key Ecological Feature (a feature that is considered to be important for regional ecosystems function and integrity). The upwelling at the heads of the canyons are known to support species aggregations of humpback whales and the highest recorded aggregations of whale sharks in the world. These deep waters are the life blood of Ningaloo Reef - the only extensive coral reef in the world that fringes the west coast of a continent, extending over 260 kms, with over 200 species of coral and 460 species of reef fish.

Both the cases of MNPZ loss above demonstrate a key issue – ecological processes are crucial for ecosystem function and as such should receive adequate high-level protection in marine parks.

- **Regarding the Dampier Marine Park** – I am concerned at the loss of two thirds of the original Marine National Park Zone (MNPZ) at the Dampier Archipelago and opening up 84% of the marine park to mining. The Government's proposal to replace the original MNPZ with a smaller area not contiguous with the Archipelago and offering less continuity with the Marine Park being planned by the WA Government is a poor outcome for one of Western Australia's highest conservation value marine environments.
- **Regarding the Kimberley Marine Park** – I am concerned about the proposal to remove 2,860km² of MNPZ over critical tropical shelf habitats in this park. For scale, this single loss of MNPZ equates to an area almost equivalent in size to all the marine sanctuaries in the New South Wales, Victorian, Tasmanian and Northern Territory state waters combined. This park is important not just for its conservation values but its economic value to the growing tourism industry. It will also play an important role as a buffer to the increasing mining activity in the Browse Basin and therefore should have its zoning upgraded in general. Like at the Bremer Marine Park, there are no mining permits or leases over the park, and very limited commercial fishing activity.

I am disappointed that the Federal Government is not proposing protection of the globally significant values of **Adele Island** within a MNPZ in the Kimberley Marine Park or to match the proposed MNPZs in the North Kimberley's state waters marine parks. The Government misses a key opportunity to improve the protection of one of Australia's most globally significant marine environments including around **the Lacepede Islands** which are one of the most important seabird and turtle breeding colonies in Australia - they receive no protection from mining development in this plan. Seabirds forage over a large area around the islands and any mining accidents would be particularly devastating to this important colony.

By leaving the north section of the Kimberley Marine Park without a MNPZ, the Government is missing an important opportunity to enhance the conservation outcome of this park – the WA Government has

placed a green zone (MNPZ equivalent) in the adjacent North Kimberley Marine park, over Long Reef and the East Holothuria Reef. The **Holothuria Banks** in the federal park important for flatback turtles, should also be protected with a MNPZ.

- **Regarding the 80 Mile and Roebuck Marine Parks** – as well as their ecological values, these parks are critical to the Pearling industry, are both adjacent to Ramsar-listed wetlands of international importance and host migrating humpback whales – a species recovering from the threat of extinction and increasingly important to the Kimberley’s \$68m tourism industry. As well as established impacts on cetaceans, new evidence suggests that seismic testing can kill pearl oyster larvae and any decline in water quality will be devastating to the economically important Kimberley pearling industry.

DIAA 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 its own advice, missing the opportunity to propose a science based result in the North-west.

The following are my recommendations to the Turnbull Government in relation to the North-west marine region draft management arrangements:-

1. I strongly reject the proposed removal of MNPZs in the **Kimberley, Argo-Rowley, Gascoyne and Dampier Marine Parks**;
2. I reject the proposed trawling zone close to the **Rowley Shoals** in the **Argo Rowley Terrace Marine Park**, and recommend the protection of Rowley Shoals from mining by the establishment of Habitat Protection Zones (HPZs);
3. With respect of the **Kimberley Marine Park**, I recommend:-
 - a. the replacement of the proposed HPZ for **Adele Island** with a MNPZ,
 - b. the upgrading of the Multiple Use Zone around the **Lacepede Islands** to a higher level zoning,
 - c. the upgrading of the MUZ throughout the Kimberley marine park to either HPZ or Special Purpose Zone (mining exclusion);
 - d. the establishment of a new large MNPZ in the north section of the Kimberley Marine Park to match the protection declared by the WA Government in state waters in the adjacent ‘**Great Kimberley Marine Parks network**’. This would protect globally significant values including the **Holothuria Banks** – an important breeding area for flatback turtles and tourism.
4. I recommend that adequately placed and sized MNPZs be placed in the 6 marine parks that do not currently have any high level/IUCN II protection – **Roebuck, 80 Mile Beach, Montebello, Shark Bay, Ningaloo and Carnarvon Canyon**, so that the management arrangements for the NW marine region marine parks meet **CSIRO recommendations for each marine park to contain at least one MNPZ**;
5. I recommend that as well as appropriately placed MNPZs that do not displace pearling operations, that the remainder of the **80 Mile Beach and Roebuck Marine Parks** are made Special Purpose (mining exclusion) Zones;

6. I seek an increase in protection for the **Ningaloo Marine Park** by matching the protection provided in the adjacent WA state waters marine park (which has a network of IUCN II zones) with matching zoning in Commonwealth waters - as has been proposed for the boundary between the Coral Sea Marine Park and the Great Barrier Reef Marine Park.

DIAA Comment specific to the TEMPERATE EAST region's marine parks:-

The Temperate East marine region is recognised as an area of global significance for a number of protected marine species including the critically-endangered east coast population of grey nurse shark and the vulnerable white shark. The network includes: important offshore reef habitat at Elizabeth and Middleton Reefs (one of Australia's longest standing highly protected marine parks), Lord Howe Island and at Norfolk Island that support the threatened black cod; the southernmost extent of many reef-building coral species; as well as important breeding, foraging and feeding areas for several species of seabird including the little tern.

- **Regarding Lord Howe Marine Park** – I am concerned about the Government's proposal to remove protection over part of the seamount ecosystem of Middleton Reef – one of Australia's longest and most highly protected remote coral reef habitats, declared 30 years ago 1987. The returned catch value returned to the fishing industry from the loss of this important ecosystem is estimated by ABARES to be just \$31,000 per annum, or \$770 per annum to each of the 40 active longlining vessels in the Commonwealth's Eastern Tuna and Billfish Fishery. Therefore there is no economic justification for the loss of such an important legacy area of Australia's marine parks network.

I am also concerned that the Government is ignoring the advice of its expert Review, in downgrading the zoning in the northern half of the Lord Howe marine park outside the pre-existing Elizabeth and Middleton Reef area, from the recommended Habitat Protection Zone (yellow) to the very low level Multiple Use Zone (blue) which will in particular allow mining.

- **Regarding Norfolk seamount protection** – I am concerned that the government does not propose high level MNPZ protection for any of the Norfolk Seamounts despite being identified by the Howard Government as one of Australia's 11 most unique habitats for marine life. The Government's proposals are contrary to the recommendation of the Government's own Review, which found that **the Vening Meinsez Fracture Zone** some way south of Norfolk Island should be given MNPZ status. Research trips have found it to be covered with a thick manganese crust and a community of benthic organisms using as substrate. The biological samples found included: Gorgonians, black coral, soft coral, crinoids, bryozoans, bivalves, gastropods, silica sponges, brittle stars, ascidians, tunicates and polychaete worms.
- **Regarding protection levels in the Norfolk Marine Park overall** – I am concerned that the Government is again ignoring the advice of its own expert Review, by not upgrading the zoning outside the MNPZs and the Island's extended MOU Box, from the very low level Multiple Use Zone (blue) to Habitat Protection Zone (yellow). In doing so, the Government is opening up much of the marine park to the possibility of becoming an oil field, and/or the possibility of highly destructive seabed mining. Geoscience Australia reports consider the region to be somewhat prospective for oil and gas finds.
- **Regarding high level protection levels in the Temperate East region overall** – I am concerned that the Government is not proposing to increase high level protection in the Temperate East marine region despite 96% of the region having no high level MNPZ protection, and 85% of the region having no protection at all. Further, the proposed zoning fails to implement the CSIRO recommendation for all marine reserves to contain at least one Marine National Park Zone, with the draft plan proposing no MNPZ for the **Gifford, Hunter and Jervis Marine Parks**.

DIAA Recommendations:

Despite finding that highly protected marine parks are vital as a key tool in marine management, the Government has failed to act on its own advice, missing the opportunity to deliver a science-based result in the Temperate East.

The following are my recommendations to the Government in relation to the redrafting of the Temperate East marine region management arrangements: -

1. I support the Government's proposal to increase protection from mining in the **Central Eastern, Jervis and Hunter Marine Parks**;
2. I reject the proposal removal of MNPZ protection at the long standing highly protected **Middleton Reef in the Lord Howe Marine Park**;
3. I reject the proposal to remove the new MNPZ over the Vening Meinez Fracture Zone in the **Norfolk Marine Marine Park** which was recommended for MNPZ protection by the Government's Review;
4. I reject the proposal to downgrade protection from mining in **Norfolk and Lord Howe Marine Parks** which the Review recommended be protected as yellow Habitat Protection Zone.
5. **I call on the Government to adopt the CSIRO recommendations for each marine reserve to contain at least one MNPZ**, with a particular focus on ensuring that the shelf, continental slope and seamounts are better represented with MNPZ coverage.

DIAA Comment specific to the Coral Sea:

The Coral Sea Draft Management Plan fails the science test

The Government's Expert Science Panel recognised the Coral Sea as a significant biodiversity hotspot for sharks and tuna and marlin. It acknowledged it as one of the few remaining areas globally that hasn't been impacted significantly by humans. It also recognised the value of its unique reefs and acknowledged that they warrant higher protection.

However, the Government proposes:

- **Large cuts of 53% and fragmentation of Marine National Park Zone (MNPZ) coverage in the park** - the large offshore oceanic Marine National Park Zone in the Coral Sea is Australia's major global contribution to the protection of intact tropical pelagic marine life at a large scale. With such values and little if any fishing, this area is intact and therefore an important, achievable and rare opportunity for inclusion in the marine parks network as a large area of high level protection. 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.
- **Reducing protection at a number of ecologically important reefs (Osprey, Shark, Vema, Flinders, Holmes, Marion and Wreck)**. The Government's Expert Science Panel recognised the need to increase protection at key reefs. However the draft plan fails to do so, proposing MNPZ protection for only 7 of the Coral Sea's 40 or so reefs. Fully protecting reefs protects fish and shark populations that are highly

valuable to the dive tourism industry and will help build reef resilience in the face of climate change. This is not only to the benefit of marine life but also delivers economic certainty to dive operators who need a diversity of reefs protected against extreme weather events such as cyclones and coral bleaching. Recent research in the Coral Sea shows that reefs not in Marine National Park Zones see their shark populations depleted by 90% of their original biomass, with populations of other large predators halved and fish populations depleted by 70%. The importance of protecting the Coral Sea's reef sharks was highlighted by the Expert Science Panel which identified that: "Coral Sea reefs comprise a globally significant hotspot for reef sharks".

- **Partial protection (Habitat Protection Zones) as a substitute for full protection.** The role of partial protection zones (yellow or blue on the map) is to achieve particular social or economic outcomes, or to act as a buffer to the marine national park zones which drive the biodiversity conservation outcomes in the parks. Scientific evidence clearly shows that full protection is one of five key factors in effective conservation of marine life. For example, the Government's Expert Science Panel found that areas within the Coral Sea outside fully protected areas have suffered a 90% depletion in their shark populations. Furthermore, almost all the Habitat Protection Zones allow destructive commercial fishing activities such as longlining, mid-water trawl, and purse seining. These are commercial fishing activities that the Government's independent Fishing Gear Risk Assessment, concluded posed an unacceptable risk to the conservation values of Australia's marine parks.

The Draft Plan fails the economics test

- **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. Coral Sea dive tourism is estimated to contribute \$6m to the economy per year.
- **The Draft recommends significant losses in protection at the Osprey Group of Reefs** - some of the world's premier dive spots with Marine National Park Zones completely removed for Shark and Vema Reefs and a very large section of the Marine National Park Zone protection of Osprey Reef also removed, leaving the iconic and economically critical shark populations vulnerable to the 90% depletion that has been documented on other unprotected coral reefs within the Coral Sea. The Review recommended increased protection for other key reefs like Holmes and Flinders due to their ecological and economic value to the dive industry but the Government has ignored this recommendation in the Draft Management Plan.
- **The proposed management plan undermines the security of the existing dive industry and its potential to expand.** For scale, the current \$6 million in reef tourism direct sales in the Coral Sea Marine Park alone, is much larger than the total \$4 million projected gain for commercial fishers across all 44 of Australia's marine parks, let alone the small set of commercial fishers operating in the Coral Sea.
- **Commercial fishers also consistently argue that marine national parks are having too great an impact on their activities - this position is not supported by the evidence.** The total maximum potential negative impact on commercial fishers from the 2012 plans, before taking into account the variety of potential positive impacts, is less than 1% of commercial fishing activities across the network. In the Coral Sea some of the commercial fisheries that have been promoted as being heavily affected are estimated to be displaced by as little as 0.1%.

The Draft Plan fails recreational fishers

- **The draft management plan proposes the reintroduction of longlining, mid-water trawl and purse seining into what was effectively Australia's largest and most prized recreational fishing zone.** The removal of longlining in the 2012 declaration was to protect the world's only known black marlin spawning area and the highly valuable recreational fishing in this area.
- **The draft plan proposes the introduction of damaging fishing techniques like mid-water trawl, bottom trawling and demersal longlining** throughout vast sections of the Coral Sea marine park. These fishing practices not only have a significant impact on the conservation values of the park but the recreational fishing values of this globally iconic location of the world's oceans.

DIAA 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 its own advice, missing the opportunity to deliver a science based result in the Coral Sea.

The following are our recommendations to the Government in relation to the finalisation of the Coral Sea Marine Park Management Plan: -

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.