



Protecting Our Ocean Planet -
One Dive at a TimeSM

Sally Barnes
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Department of the Environment and Energy
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Dear Director Barnes;

Project AWARE is an international marine conservation nonprofit organization with offices in Australia, United Kingdom and the United States. Our work is focused on addressing key threats to the ocean where scuba divers, primarily, are uniquely positioned to address: the loss of sharks and rays and onslaught of marine debris. As a longtime member of the Save our Seas Alliance and a consistent participant in the consultation process on Australia's marine parks, we deeply appreciate the Australian Government's consideration of our comments on the draft management plans for the 44 Australian Marine Parks.

The Government's independent Review recognised the extensive science and consultation that led to the creation of the world's largest, and potentially best managed, network of marine protected areas in 2012. However, the Turnbull Government's draft management plans recommend reducing, relocating and in most cases completely removing the Marine National Park 'sanctuary' IUCN Category II zoning (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. We are deeply concerned 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.

We respectfully reject the cut backs of Marine National Park 'sanctuary' IUCN Category II zoning (MNPZ) across the Network and call for the Turnbull Government to fully restore and increase the MNPZ in Australia's Marine Parks without delay. Our core position and the comments that have informed the region specific recommendations below are rooted in the following arguments:

- **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).

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- **Partial protection zones are not a substitute for high level ‘sanctuary’ (Marine National Park / IUCNII) protection.** Arguments that Habitat Protection (HPZs/yellow zones) are equal to Marine National Park zone (MNPZ/green zones) are misleading. Protecting the sea floor provides important but 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.
- **Marine parks not currently containing mining exploration rights should be considered for full protection from mining** – the Government proposes to allow mining and pipelines in the vast majority of the parks. As emphasised at the 2016 IUCN World Conservation Congress and at the 2017 UN Ocean Conference, 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.
- **Destructive commercial fishing activities such as trawling, gillnetting and longlining in the marine parks should not be allowed** – 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.
- **The draft plans undermine the economic viability of one of the marine parks biggest industries - dive tourism.** For example, Coral Sea dive tourism is estimated to contribute \$6m to the economy per year yet the draft management plan aims at removing protection of some areas most critical to the industry’s future. 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. The Government’s Expert Science Panel recognised the need to increase protection at key reefs. 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”.

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Coral Sea Marine Reserve Recommendations:

- Reject the proposed major loss and fragmentation of the large Marine National Park Zone (MNPZ);
- 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;
- Reject the proposed loss of protection for Flinders, Holmes and Wreck Reef – reefs the Review found required protection;
- Accept the proposed new MNPZ protection at the border with the Great Barrier Reef;
- 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;
- 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;
- Reject the proposed expansion of mid-water trawling, purse seining, demersal longlining and prawn trawling within the Coral Sea.
- Finalise the management plan and make it operational within the next 12 months.

North Marine Region:

- Reject the large loss of green/Marine National Park zone in the North region – which reduces the coverage in the region to 1%. The proposal ignores the Government's own Review, which recommended the coverage to be increased by 10% and CSIRO advice which recommends that each marine park include at least one MNPZ green zone.
- Reject the draft management plans where the green/Marine National Park zones are reduced or removed entirely, ie:-
 - in the West Cape York Marine Park- where the Marine National Park has been reduced by over half;
 - in the Wessel Marine Park, where the Marine National Park Zones has been removed entirely;
 - In the Gulf of Carpentaria Marine Park where the Marine National Park over the high value shelf habitats have been removed and replaced by lower value deeper habitats. The overall size of this National Park zone has decreased by over 60% of its original size.
- Increase the MNPZ in the Oceanic Shoals Marine Park; and around the north Wellesley Islands within the Gulf of Carpentaria Marine Park (notwithstanding the large loss of MPNZ in that park overall).

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Recommend the following increases in MNPZ:

- Introduction of a new Marine National Park zone MNPZ in the western half of the Limmen Bight Marine Park, as suggested by the Government's own Review. This would complement the Northern Territory state waters marine park, providing much needed protection to the shallow waters of Limmen Bight.
- Marine National Park Zones in those marine parks without any, being the Arafura, Arnhem and Joseph Bonaparte Gulf Marine Parks as well as reinstatement in those parks where the Government proposes to remove them altogether – Wessel and Limmen Marine Parks.
- Accept the proposal to put in place no mining 'Habitat Protection Zones' in the West Cape York, Oceanic Shoals, Limmen and Wessel Marine Parks. These zones do not go far enough, though, still permitting mining infrastructure and pipelines to be constructed. Further, recommend that the other key coastal communities adjacent to commonwealth marine parks be given protection from mining – at Tiwi Islands (the Oceanic Shoals Marine Park), Port Keats and Wyndham (the Joseph Bonaparte Gulf Marine Park), Maningrida (the Arnhem Marine Park), and Minjilang (the Arafura Marine Park).

North-west Marine Region:

- Reject the proposed removal of MNPZs in the **Kimberley, Argo-Rowley, Gascoyne and Dampier Marine Parks**;
- 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);
- With respect of the **Kimberley Marine Park**, replace the proposed HPZ for Adele Island with a MNPZ; upgrade the Multiple Use Zone around the Lacepede Islands to a higher level zoning; upgrade the MUZ throughout the Kimberley marine park to either HPZ or Special Purpose Zone (mining exclusion); and establish 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.
- Adequately place and size MNPZs in the 6 marine parks that do not currently have any high level/IUCN Category 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;
- Increase 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.

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South-west Marine Region

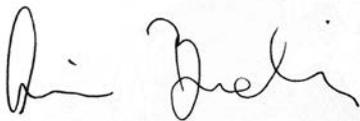
- **Support the draft management plan** where the Marine National Park Zone (green no-take IUCN II) areas have not changed from what was declared in 2012, or where there are new and/or increased National Park zones, ie -
 - the new National Park zones in the **Bremer Marine Park** (the transect and over the Bremer Canyon);
 - the new National Park zone transect over the Swan Canyon in the **SW Corner Marine Park**;
 - the increased National Park zone area in the **Two Rocks Marine Park**.
- Reject the draft management plans where the MPNZ are reduced or removed entirely, ie:-
 - 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;
 - 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;
 - 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;
- Recommend increase in MNPZ in the **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.
- Support the 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. In addition, 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**.
- Recommend providing permanent protection for Australian Sea Lions from gillnetting in the relevant commonwealth marine parks by ensuring that the zoning does not offer less protection than existing fisheries closures.

Temperate East Marine Region

- Support the Government's proposal to increase protection from mining in the **Central Eastern, Jervis and Hunter Marine Parks**;
- Reject the proposal removal of MNPZ protection at the long standing highly protected **Middleton Reef in the Lord Howe Marine Park**;
- 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;
- 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.
- **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.

Thank you for considering our views. As a member of the Save our Marine Life Alliance, Project AWARE is looking forward to your actions to ensuring a healthy, vibrant, and sustainable future of Australia's marine parks so essential to the future of the ocean that sustains us all.

Yours sincerely,



Ania Budziak
Associate Director, Programs

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