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To Whom It May Concern, which is all of us,

In partnership with **The Australian Marine Conservation Society** and the **Save Our Marine Life alliance** of 26 environment organisations the following are points and recommendations I would like to make to you –

- 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.



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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.

The North region – the world’s last remaining pristine tropical coastline - includes the warm, and shallow waters of the Timor and Arafura seas, a world biodiversity hot spot where the continental shelf is at its widest, and species travel freely from Australia up to Papua New Guinea and into Asia. The North region is host to some of Australia’s most plentiful reef fish stocks, a diverse range of shark species and a variety of marine mammals - including the illusive dugong. The North region is home to all seven species of marine turtles, which nest on the sandy beaches of the outer islands, and head to deeper waters to feed. Australia’s very own species of dolphin, the Australian Snubfin dolphin, also calls the North home. Affectionately known as ‘snubby’ this dolphin seeks refuge in the calmer shallow waters of North feasting on local barramundi stocks.

The following are:

- Regarding high level green/Marine National Park Zone protection in the North region – I am very concerned that the government is proposing to reduce green/Marine National Park Zone (MNPZ) protection across the 8 parks in the region by 57% - leaving only 1% of the region in high level protection - when the Review and the science community is clear that there should be more, not less.

More specifically - I am concerned that over half of the marine parks in the North region (Joseph Bonaparte, Arafura, Arnhem, Limmen and Wessel Marine Parks) do not have a green/Marine National Park zone – despite the CSIRO recommendation that each marine park have at least one MNPZ.



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- Regarding **West Cape York Marine Park** - I am concerned with the Government's proposal to reduce the size of the Marine National Park (green) zone by over 4600km² and split this zone into two isolated green zones. This reduction in green zone is the largest proposed in the North region, equivalent to twice the area of the ACT, and much larger than reductions proposed by the Government's own review. The Marine National Park (green) zone has been re-zoned as Habitat Protection Zone, a zone which still allows trawling, longlining and hand collection. A Government commissioned ABARES report shows that these changes to West Cape York Marine Park will decrease the potential displacement by just \$141,200.

I am also concerned about the removal of the Multiple Use Zone adjacent to QLD coastal waters - a change which opens the area within the Marine Park to gillnetting. Gillnetting has been designated as a destructive fishing by two Government reviews and is particularly dangerous for with local populations of dugong and marine turtles including those at Crab island- the worlds largest nesting population of flatback turtles.

- Regarding **Gulf of Carpentaria Marine Park** - I am concerned about the Government's proposal to reduce the size of the Marine National Park (green) zone in the Gulf of Carpentaria Marine Park, from 7400km² to 3600km², moving much of the remaining green zone further offshore. The removal of high value shelf habitat adjacent to the Wellesley Islands will compromise the protection of this biodiversity hotspot - and important nesting site for the endangered hawksbill turtle, the vulnerable olive ridley turtle as well as a known biologically important area for coastal dolphins. This is an area where the Traditional Owners declared one of Australia's first *marine* Indigenous Protected Areas/IPAs – over the Wellesley Islands. This speaks to the opportunity to enhance the conservation and cultural outcomes that a well zoned federal marine park in the southern Gulf should deliver. Further, the Review's advice to the Federal Government recommended increasing the size of this Marine National Park Zone to provide additional protection for this important ecosystem which is representative of several Key Ecological Features including the Gulf's famous submerged coral reefs.
- Regarding **Wessel Marine Park** - I am concerned about the Government's proposal to remove the Marine National Park (green) zone from the Wessel Marine Park. The Wessel Islands are known for their high level of endemism (uniqueness), a hotspot which supports a range of pelagic fish such as sharks, snapper, tuna and mackerel, as well as variety of unique sponge and coral communities. As recommended by the Government's own review this Marine National Park should be increased in size, to provide additional protection for this unique area.
- Regarding **Oceanic Shoals Marine Park** - I am concerned about the new Special Purpose Zone (trawling) that has been created within the Oceanic Shoals Marine Park. This new zone will open a large area of the Carbonate bank and terrace systems of the Van Diemen Rise to gillnets, and demersal trawling which would not have been permitted if they remained as Multiple Use Zones. Both gear types are of great concern to the NT community – consistently rallied against by recreational fishers, the general public and commercial fishers who use more sustainable gear types in this fishery. As a result of this concern, the NT Demersal Fishery's WTO accreditation remains under review. Further, these fishing techniques have been deemed incompatible with the aims of marine parks, by the Government's fishing gear review, and have the ability for further impact on already stressed reef fish stocks. The NT state government has already acknowledged the fragility of the reef fish stocks in the area, bringing in special Reef Fish Protection zones. Large offshore marine parks which protect these important fish stocks are required to compliment these Reef Fish Protection Zones.



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- Regarding **Arafura Marine Park** - I am concerned about the Government's proposal to introduce a large Special Purpose Zone (Trawl) into this marine park allowing the use of bottom trawling and over the unique tributary canyons. These canyons support a diversity of large predatory fish, endangered saw fish, marine turtle and whale sharks, species that may be significantly affected by increased destructive fishing techniques. The lack of Marine National Park (green) zone within this Marine Park is also concerning. The Government's own expert science panel highlighted the importance of all marine parks having at least one Marine National Park (green) zone. The Arafura Marine Park is one of four Marine Parks in the North without a Marine National Park zone.
- Regarding **Limmen Marine Park** - I am concerned with the continued lack of a Marine National Park (green) zone within the Limmen Marine Park – an iconic marine area off the Top End and one of only two areas in the NT state waters to be a marine park. The Government's own Review recommended the addition of a Marine National Park (green) zone in the North-west of the Limmen Marine Park, to compliment the Northern Territory state marine park and provide additional protection for threatened Dugong populations which feed around the labyrinth of shoals and sand banks in these shallow waters. It is representative of the near-pristine Gulf of Carpentaria Key Ecological Feature. It is important to also note here that the federal and state waters of the Limmen Marine Park are at risk from seabed mining (the moratorium runs out in 2018) and continued attempts to barge iron ore through the park, as a cheaper option than land transport to Port Darwin – something which the Traditional Owners and AFANT have been very public in their concern over.
- Regarding **Joseph Bonaparte Gulf Marine Park and Arnhem Marine Parks** - I am concerned with the continued lack of Marine National Park (green) zone within the Joseph Bonaparte Gulf and Arnhem Marine Park. The Government's own expert science panel highlighted the importance of all marine parks having at least one Marine National Park (green) zone. The Joseph Bonaparte Gulf and Arnhem Marine Parks are two of four Marine Parks in the North region without a Marine National Park zone.
- Specifically, a green/Marine National Park Zone in the **Joseph Bonaparte Marine Park** would satisfy the Government's long-standing commitment to create a Marine National Park Zone within the Anson Beagle, Cambridge-Bonaparte and Bonaparte Gulf bioregions.
(source: ANZECC TFMPA 1998. *Guidelines for Establishing the National Representative System of Marine Protected Areas*. Australian and New Zealand Environment and Conservation Council, Task Force on Marine Protected Areas. Environment Australia, Canberra).
- It would also provide the first ever protection within Marine National Park Zones of the feeding habitats for endangered green turtles within the Bonaparte Gulf and the inter-nesting habitats of one the world's largest populations of flatback turtles nesting at Cape Dommet.



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- With respect of Arnhem Marine Park – a green/Marine National Park Zone in the Arnhem Marine Reserve is recommended by the CSIRO and would satisfy the Government's long standing commitment to create a Marine National Park Zone within the Arnhem-Wessel bioregion.(source: ANZECC TFMPA 1998). It would provide protection for known feeding grounds of a number of migratory seabirds nesting in Boucat Bay (Crested Tern/ Roseate Tern, Bridled Tern) and for Flatback turtles known to nest on the Cobourg peninsula and feed in these waters. Further, there are currently no oil and gas rights in the park – so a Special Purpose Zone (mining exclusion) should be declared as a complimentary measure to a MNPZ.

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 North marine region.

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

1. I reject the large loss of green/Marine National Park zone in the North region – which reduces the coverage in the region to 1%. This ignores the Government's own Review, which recommended it be increased by 10% and CSIRO advice which recommends that each marine park include at least one MNPZ green zone.
2. I support the two increases of MNPZ -
 - a. in the Oceanic Shoals Marine Park; and
 - b. the increase in protection around the north Wellesley Islands within the Gulf of Carpentaria Marine Park (notwithstanding the large loss of MPNZ in that park overall).
3. I reject the draft management plans where the green/Marine National Park zones are reduced or removed entirely, ie:-
 - a. in the West Cape York Marine Park- where the Marine National Park has been reduced by over half;
 - b. in the Wessel Marine Park, where the Marine National Park Zones has been removed entirely;
 - c. 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 it's original size.
4. I recommend that the following increase in MNPZ be made:-
 - a. 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.



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- b. 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.

5. Mining - I support the Draft's 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, I 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).

I hope we can come to a successful resolution regarding these issues and hope for a better future for our sacred and beautiful coast line. I doubt that the waters we swam in as children will be the same for ours or our grandchildren, but we can ensure that the damage is diminished and we protect what we can for our future generations.

Please do not hesitate to contact me regarding any of the attached points or any additional information or support.

Best Regards

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