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**Submission of comments on the  
Draft Coral Sea Commonwealth Marine Reserve - Management Plan 2017.**

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Mike Ball Dive Expeditions (MBDE) believes the proposed changes in the Draft Management Plan (DMP) released on Friday 21st July 2017, disparage non-extractive commercial tour operators.

MBDE were at the forefront of consultation for reef protection in the Cairns region during the GBRMP 'Representative Areas Program' (RAP), culminating with plans implemented in 2004. MBDE spent many years of consultation similar to that which Parks Australia are currently undertaking with stakeholders. The GBRMP recognised and gleaned expertise from MBDE during this process.

Below is the brief overview of this program which we believe Parks Australia are trying to emulate.

*"In the mid 1990s concerns were raised that the levels of protection provided by the zoning at the time were inadequate to protect the range of biodiversity that existed in the Marine Park. This was recognised as important to ensure that the Great Barrier Reef remained a healthy, productive and resilient ecosystem that would continue to support a range of industries. Between 1999 and 2004, the Great Barrier Reef Marine Park Authority undertook a systematic planning and consultative program to develop new zoning for the Marine Park. The primary aim of the program was to better protect the range of biodiversity in the Great Barrier Reef, by increasing the extent of no-take areas (or highly protected areas, locally known as 'Green Zones'), ensuring they included 'representative' examples of all different habitat types - hence the name, the Representative Areas Program or RAP. Whilst increasing the protection of biodiversity, a further aim was to maximise the benefits and minimise the negative impacts of the rezoning on the existing users of the Marine Park. Both these aims were achieved by a comprehensive program of scientific input, community involvement and innovation."*

MBDE believe Parks Australia and the proposed DMP have missed this opportunity.



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In its current form, the DMP appears to have sacrificed the protection of biodiversity in a trade for commercial gain that favours extractive industry and extractive recreational users. Conservation of species and habitat will not be achieved over large sections of reef that have only been offered the proposed Habitat Protection Zone (Reefs) (IUCN IV).

### **Osprey Reef –**

We reject the paring back of IUCN II to the southern sector of Osprey Reef and request it be reinstated to Lat 13.54.190S; Long 146.33.752E. As reiterated on several occasions during consultation and in submissions, “The resident shark population is known to migrate along the reef edge which will obviously expose them to fishing pressure. We believe this compromise and reef splitting serves to appease extractive stakeholders only”.

### **Bougainville Reef –**

We welcome the increase to IUCN II from IUCN IV. As an isolated sea mount, which is small yet has significant species variety, including the iconic potato cod; to offer any lesser protection or proposals to ‘split’ this system would be at its detriment. It must be noted that isolated sea mounts without adjacent/close reefs will either take longer of will not have the ability to repopulate extracted species.

### **Holmes Reef & Flinders Reef –**

We reject the removal of IUCN II protection. Both reef systems are large enough to accommodate current use stakeholders both extractive and passive with the previous recommendations of the Bio Regional Advisory Panel (BAP) and the Expert Scientific Panel (ESP) in place. There is no guarantee that extractive practices are sustainable over the longer term; being isolated and without adjacent protected ‘no take’ reef systems, there are NO sanctuaries for fish stocks to aggregate.

### **Shark Sanctuary –**

Whilst the DMP recognises the importance of the region around North Horn, no such protection has been offered to the shark populations at Holmes and Flinders Reefs. Previous submissions and round table discussions with BAP and ESP acknowledged these reefs significance to the shark population and non-extractive commercial tourism. Another reiteration from a previous statement and as sharks are supposedly ‘not targeted by commercial recreational or recreational fishers’ - “It would be to no one’s detriment for sharks to be given complete protection in all IUCN II and IUCN IV (Reefs) zones; should such protection be awarded, a real sanctuary for sharks could in actual fact be proclaimed”.

There have been many scientific papers produced proving that ‘green’ or ‘no take zones’ work with regards to the repopulation of species and the improved general health and biodiversity of reefs. Current climate change and the resultant increase in frequency of bleaching events requires a robust and healthy eco system to assist withstand these pressures; every opportunity must be afforded to achieve this.



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Without an increase IUCN II zones across the above reefs, there is no barometer to facilitate proper scientific research; without direct comparison, this will inhibit 'proper management' into the future.

As a 'best practice' sustainable operator it is incumbent upon MBDE to continue to argue against the proposed DMP. We do not feel sufficient credence has been given to previous submissions or round table meetings and bias has been offered elsewhere.

Yours faithfully,



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