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Australian Marine Parks Management Planning Comments
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To the Department of the Environment and Energy,

Thank you for this opportunity to comment on your 2017 draft management plans for our network of marine parks. I have read through the documents and am disappointed to see a substantial reduction in protection for little apparent or documented benefit.

I note that the headline objective of the revisions is ‘... to balance the need to protect the marine environment with supporting people’s livelihoods and the Australian lifestyle.’ But there is little evidence in the documentation to support these changes and I submit that the originally proposed 2012 zonings provided a far better balance. The 2017 ABARES Technical Report¹ on displacement of industrial fisheries notes that the total savings of the weakened 2017 proposed zonings is estimated at only approximately 500 tonnes of catch, or \$4 million, when compared to originally proposed 2012 zonings - but at what cost to biodiversity and other values? The report only considers the impacts on the gross value of production (GVP) but provides no consideration of the impacts on broader biodiversity. GVP does not consider ecosystem or biodiversity values, or the increased productivity benefits resulting from high biodiversity.

Like the study, the 2017 review does not adequately consider the commercial benefits of either of the proposed 2012 or 2017 zonings to the industrial fisheries in question, as it does not consider the economic benefits of increased productivity in adjacent areas due to the increased protections for biodiversity.

There is substantial evidence demonstrating the benefits of marine protected areas that prohibit industrial fishing activities. This is widely referenced in multiple studies and can easily be documented through any search of online databases. For example, the Ocean Science Council of Australia has provided many of these references in their own submission and identified multiple studies demonstrating that partial protection (i.e. allowing some forms of fishing) provides less benefit than full protection.² Most recently, Nature just published a study by Duffy et al³ that further

¹ J. Larcombe and N. Marton. 2017. Potential displacement of commercial fisheries by a Commonwealth marine reserves zoning scheme: Report on draft management plan zoning, ABARES technical report, Canberra, July, CC BY 4.0

² <http://oceansciencecouncil.org/statement/>

demonstrated the need to manage our ocean activities at an ecosystemic level. Their study comprehensively demonstrated that biodiversity has ‘a major role in sustaining the productivity of Earth’s ecosystems.’ As our planetary biodiversity is increasingly impacted by industrial activities and climate change, with potentially irreversible losses, they too note the urgent need for policies to address these threats. MPAs that protect biodiversity, through prohibitions on industrial fishing, provide important protections not just for conservation values, but fundamentally for the productivity of our oceans.

The 2017 draft management plans for the Australian network of MPAs will substantially weaken these protections by allowing broader impacts on biodiversity through increased opportunities for industrial fishing. For example, the 2017 proposed zoning for the Coral Sea now allows longline and purse seine fishing to occur in 73% of the Coral Sea Marine Park, as compared to 29% in the original 2012 proposal. The impacts of these broader impacts have not been addressed in the 2017 weaker zoning, and may ultimately cost the industry far more than the stronger 2012 proposal.

While the weakened 2017 zonings may provide industry with more access, the 2012 zonings would have provided them with a more valuable resource. There is significant evidence that marine parks provide fisheries with significant spill-over benefits,⁴ in addition to the biodiversity enhancement for productivity.

Next I note that the revisions have ‘... taken on board where you told us of important current or future fisheries...’ What new future fisheries? The review claims that ‘... new commercial fishing technologies and information will come to light during the life of the plans...’ Existing fisheries such as the East Coast Tuna and Billfish fisheries cannot catch current quotas because of CPUE and economic concerns that go far beyond technological limitations.

This raises a concern that the review has ruled out the 2012 proposed zones on the basis that hypothetical future changes in Australian regulations may enable fishing fleets to reduce business costs and fish further from port, and longer at sea, and thereby squeak out new fishing opportunities in previously economically marginal zones. This scenario would depend on changes in regulatory and policy frameworks that would allow cheap foreign crews and foreign vessels to operate in Australian waters at cheaper cost, thereby reversing decades of prohibitions on foreign vessels, and undermining domestic protections and safeguards. If this is the case, then economic modelling would demonstrate that cheap foreign crews and foreign vessels would cause far more economic harm to coastal fishing towns than any marine park or conservation measure. Recent experience in the USA and NZ has demonstrated that such measures result in significant labour concerns, increased management and compliance costs, and increased environmental impacts – with little or no benefit for fishing communities whose salaries and benefits are undermined by cheap foreign labour.⁵ Foreign registered vessels that do not meet Australian registry and labour requirements are not permitted to fish in Australia for good reason.

³ J. E. Duffy et al. 2017. Biodiversity effects in the wild are common and as strong as key drivers of productivity. *Nature*. 549, 261-264. 14 September 2017

⁴ Selected examples include: RQ Grafton, T Kompas, P Van Ha, (2006) The Economic Payoffs from Marine Reserves: Resource Rents in a Stochastic Environment. *The Economic Record* 82(259):469-480. FR Gell, CM Roberts (2003) Benefits beyond boundaries: the fishery effects of marine reserves. *Trends in Ecology & Evolution* 18:448-455. BS Halpern, SE Lester, JB Kellner (2009) Spillover from marine reserves and the replenishment of fished stocks. *Environmental Conservation* 36:268-276.

⁵ For example, the Hawaiian longline fishery was exposed for employing foreign crews under poor conditions that did not meet USA labour requirements. <https://apnews.com/39ae05f117c64a929f0f8fab091c4ee1/hawaiian-seafood-caught-foreign-crews-confined-boats> -- New Zealand amended its regulations to require that all vessels must once again be flagged in NZ and follow NZ law after controversies over inhumane labour practices and poor compliance. <http://www.stuff.co.nz/business/industries/79487729/Crackdown-on-slave-fishing-crews-foreign-charter-vessels-must-reflag-to-New-Zealand>

If the review was serious about enabling Australian industry to become more economically efficient, they would recommend strengthening the 2012 zonings with improved protections for biodiversity and increased productivity.

Instead, the 2017 draft management plans substantially weaken the originally proposed protections, ostensibly in response to short sighted industry concerns that they would impact unreasonably on current or future fisheries. But at what cost to productivity and other values and management needs? If the Government is serious that is attempting to balance all needs, then where is the methodology for assessing the costs of the weaker 2017 draft and how did the Government balance these costs to tourism, cultural and biodiversity values against the flawed analysis of fisheries displacement?

I submit that the biased and weakened 2017 draft management plans should be discarded, and the government should adopt a truly science-based balanced approach that actually implements a Comprehensive, Adequate and Representative network, and implements full protection for each marine habitat against all forms of extractive activities consistent with Australian and global standards.⁶

Yours sincerely,



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⁶ IUCN World Parks Congress Sydney 2015 <http://worldparkscongress.org/downloads/approaches/ThemeM.pdf> -- ANZECC Guidelines for Establishing the National Representative System of Marine Protected Areas, 1998 <http://www.scew.gov.au/system/files/resources/378b7018-8f2a-8174-3928-2056b44bf9b0/files/anzecc-glguidelines-establishing-national-representative-system-marine-protected-areas-199812.pdf>