

**SUBMISSION ON DRAFT TEMPERATE EAST COMMONWEALTH MARINE RESERVES
NETWORK MANAGEMENT PLAN.**

Comments on the “Overview of the proposed rules for activities”

1. I believe there should be **no** ‘Ballast water discharge and exchange’ and **no** ‘Disposal of waste from vessels’ in any Habitat Protection Zone (Lord Howe) (IUCN IV) or Green Zone (IUCN II). If this is not achievable I would be happy if any discharge was limited to 3 nautical miles from the State Marine Park boundary and not in any Green Zone (IUCN II). This threatens World Heritage values and allows for the possibility of introduced species. This will make the Commonwealth Marine Park consistent with the State Marine Park, as well as providing a buffer zone around the Middleton and Elizabeth Marine Park and around Lord Howe Island where our predominant ocean currents come from the north in the summer and the south in the winter.
2. I believe there should be **no** ‘Mining operations including exploration’ and **no** ‘Construction and operation of pipelines’ in any zone within the State or Commonwealth Marine Park as this threatens World Heritage values.
3. I believe there should be **no** “Aquaculture” in the Commonwealth Marine Park as this activity is environmentally risky and compromises World Heritage values.
4. I believe there should be **no** “Spearfishing” in the Commonwealth Marine Park, this would be consistent with the State Marine Park. If allowed at Middleton and Elizabeth Reefs it would be almost impossible for compliance.
5. I believe there should be **no** FAD’s allowed in the Commonwealth Marine Park unless it is the correct system that won’t break free and cause ocean debris.

Comments on the proposed zones within the Commonwealth Marine Park.

1. I believe the proposed Lord Howe Commonwealth Marine Park covering Middleton and Elizabeth reefs should be extended with a Habitat Protection Zone (Lord Howe) (IUCN IV) surrounding it. This would include the seamount to the north of Middleton reef currently outside the proposed National Park Zone (IUCN II). This will create a buffer zone, protect World Heritage values and give protection to the biodiversity of the seamount while still allowing current commercial fishing activities to continue in this area. Please see attached map indicating proposed extension.
2. I believe the Habitat Protection Zone (Lord Howe) (IUCN IV) around Lord Howe Island should be extended to the south and west of the proposed zoning. This will create a buffer zone, protect World Heritage values and make compliance easier. Please see attached map indicating proposed extension

I believe the LHIMP Advisory Committee should be the key contact for the Commonwealth Marine Park which keeps it in line with the State Marine Park.

General comments supporting why I believe these suggestions should be considered and adopted into the final Commonwealth Marine Park Zoning Plan.

Due to our isolation and our combination of Tropical and Temperate Marine Life around Lord Howe Island and Middleton and Elizabeth Reefs which has created a unique biodiversity not found anywhere else in the world, these suggestions will make the Commonwealth Marine Park consistent with the State Marine Park and will make it easier for the Marine Park users as well as for compliance.

These suggestions also meet objectives A and B of 1.3 in the Draft Temperate East Commonwealth Marine Reserves Network Management Plan 2017 and provides a balance between biodiversity, conservation and sustainable use within the Commonwealth Marine Park without changing current uses.

Yours sincerely,

Brian R Busted
Howea Divers Pty Ltd
Lord Howe Island

Attachment: Please see attached map including my proposed extensions to the Commonwealth Marine Park surrounding Lord Howe Island and Middleton and

Elizabeth Reefs.

