



Australian Marine Parks Management Planning Comments
Department of the Environment and Energy
Reply Paid 787
Canberra ACT 2601

By email: managementplanning.marine@environment.gov.au

Dear Sir/Madam

Comments on the Coral Sea Marine Park Draft Management Plan

I have been directed by the State Council of the Wildlife Preservation Society of Queensland (Wildlife Queensland) to forward comments on the Coral Sea Marine Park Draft Management Plan. Wildlife Queensland is one of the longest established and most respected wildlife-focused conservation groups in Queensland. With over 6500 members and supporters spread across branches and networks throughout the State, Wildlife Queensland is a strong voice for our wildlife and its habitat.

Wildlife Queensland is apolitical. Our aims include;

- **Preserve** the flora and fauna of Australia by all lawful means
- **Educate** the community in an understanding of the principles of conservation and preservation of the natural environment
- **Discourage** by all legal means, the possible destruction, exploitation and unnecessary development of any part of the natural environment.
- **Encourage** rational land use and proper land planning of existing and future development, and the use of the natural environment and its management.

Wildlife Queensland welcomes the opportunity to make comment. Wildlife Queensland has actively campaigned for enhanced management of the Coral Sea since 2011. To see the progress achieved set aside by the Turnbull Government, ignoring the advice of its own review, advocating massive cutbacks in protection, relacing high level protection with partial or low level protection is extremely disappointing. In hindsight such action by the Turnbull Government should not have been unexpected based on their demonstrated care for the environment and its wildlife.

Wildlife Queensland will focus on those sections of the draft management plan of particular interest or concern to Wildlife Queensland. Furthermore if Wildlife Queensland elects not to comment on a topic or aspect, this should not be construed necessarily as support for the view presented. Wildlife Queensland's primary focus is directed at the Coral Sea Draft Management Plan. However prior to providing comment on that plan Wildlife Queensland offers observations on the entire network of Marine Conservation Reserves. Wildlife Queensland strongly supports science based decision making and it would appear that concept has been discarded. That assumption is based on the Government ignoring the findings of its own Expert

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Science Panel that the marine conservation reserves declared in 2012 were the results of extensive consultation and sound science. While not accepted by the then Government back in 2012, there were several leading scientists advocating the need for additional protected marine park areas not less. Such a request is more relevant today than ever before. Wildlife Queensland is obviously under a misunderstanding that it was clearly established back in the 1960s that mining and marine parks are not compatible. It beggars belief that this Government proposes to allow mining in marine parks. Similarly the proposal to permit certain commercial fishing activities with destructive outcomes in marine parks is in direct conflict with the findings of risks that commercial fishing methods may pose to conservation values identified in the Areas for Further Assessment of the East Marine Region prepared by Morison aquatic sciences in 2010. With coral bleaching on the increase and mangrove dieback at unprecedented level in north Queensland the cut backs of national park sanctuaries across the entire marine conservation reserve surely must be rethought particularly if any consideration is given to the economic windfall derived from tourism and the employment opportunities generated by the marine park reserves.

Considering the Coral Sea Draft Management Plan it would appear that science based decision making has been set aside without sound reason. There is no other conclusion that can be drawn. The Government's own Expert Science Panel recognised the Coral Sea's biodiversity significance not only for Australia but globally. The significant cuts of over 50% and fragmentation of the marine national park zone certainly threatens the protection that was given to the intact tropical pelagic marine life. The government proposal to open up the area to longlining commercial fishing is not supported by Wildlife Queensland as it poses too much of a risk to the conservation values of the Coral Sea- an area that has not been ravaged by human activity to any significant degree.

Dead zones affect dozens of coral reefs around the world and threaten hundreds more according to a new study by Smithsonian scientists published in *Proceedings of the National Academy of Sciences*. Such information lends support to increasing the protection for reefs in the Coral Sea. Yet again decision making is not underpinned by facts and science. The appropriate action in this situation is to increase protection of the ecologically significant reefs. Again only 7 of 40 plus reefs enjoy the Marine National Park Zone protection. It is not only the wildlife that benefits from such protection being applied to an increased number of reefs but gives some assurity to the tourism industry that relies on healthy reefs and a bountiful presence of a broad range of marine life.

The proposed move to partial protection is no alternative for full protection. Partial Protection Zones may act as an appropriate buffer for Marine National Park Zones but are certainly no replacement. It is Wildlife Queensland's understanding that the primary purpose of partial protection zones is to satisfy social and economic outcomes not affording the necessary protection to our marine wildlife.

Wildlife Queensland is of the view that this Coral Sea Draft Management Plan is a retrograde step and is found lacking in many areas. It certainly weakens the environmental protection that was afforded to marine wildlife. It also runs the risk of impacting the economic return from tourism in particular the dive industry. The alleged gains from the proposed introduction of damaging fishing techniques by the commercial fishing industry through vast areas of the Coral Sea are not adequately

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substantiated. It will be not only the marine wildlife that loses out but recreational fishing will also be impacted.

Wildlife Queensland urges that in finalising this draft management plan the Government reverts to science based decision making underpinned by hard data and recommendations from acknowledged scientific experts.

At this point in time all is not lost. By considering the various submissions and adapting the Coral Sea Draft Management Plan accordingly the final outcome can be not only beneficial for our marine wildlife but would clearly demonstrate that the Government does care for our environment and its wildlife. In order to achieve that the major fragmentation and significant loss of the outstanding Marine National Park Zones proposed must be set aside. The proposed new Marine National Park zone bordering the Great Barrier Reef be accepted as this is one of the few positives arising from the draft management plan from Wildlife Queensland's perspective. The number of reefs afforded Marine National Park Zone protection must be increased many fold. The reintroduction of longline, mid-water trawl and other damaging fishing techniques must be rejected. Finally the draft management plan must be finalised and become operational in a timely fashion preferably within 12 months and certainly prior to January 2019.

Thank you for the opportunity to comment.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Des Boyland', with a stylized flourish at the end.

Des Boyland, Secretary and Policies and Campaigns Manager

13th September 2017