



Alliance to Save Hinchinbrook Inc

PO Box 2457, Townsville Q 4810

Mobile 0427 724 052

hinchinbrookforever@gmail.com

20 Sep 2017

Director of National Parks
Marine Reserves Management Planning Comments
Department of the Environment and Energy
By email: managementplanning.marine@environment.gov.au

re Draft Coral Sea Marine Park Management Plan

Dear Director,

The history of our public-interest association relates to the Cassowary Coast of the GBRWHA, coastal and marine development and legislation. Among our members are boat operators including those with tourism and fishing backgrounds (recreational, subsistence and commercial).

We are astonished and alarmed that the Commonwealth Government would act as proposed in this draft Coral Sea Marine Park Management plan.

ASH SUPPORTS

- **the proposed new MNPZ protection at the border with the Great Barrier Reef.**
- **Finalising the management plan to be operational within 12 months.**

ASH OPPOSES:

- **fragmentation of the whole Marine National Park Zone (MNPZ);**
- **loss of protection for Flinders, Holmes and Wreck Reef (the Review found these required protection);**
- **loss of protection at Osprey Reef (for which full protection is important to dive tourism, a valuable industry compatible with high level protection), Shark and Vema Reefs;**
- **exposing the Coral Sea to longlining, purse seining and mid-water trawl in the 'Area E' Coral Sea Zone of the Eastern Tuna Billfish Fishery;**
- **loss of MNPZ protection for Marion Reef, a crucial ecological feature of the Marion Plateau Reef and the only one so far protected;**
- **expansion within the Coral Sea of mid-water trawling, purse seining, demersal longlining, prawn trawling.**

ASH requests the Commonwealth government explain why, in putting forward this draft management plan, it proposes to act:

- **against the results of the recent formal public consultation,**
- **against the scientific advice on which the marine parks were established,**
- **against further scientific advice,**
- **against the principle of Ecologically Sustainable Development and the Precautionary Principle,**
- **to favour damaging extractive industries at the expense of the public good,**
- **to mislead the public that partial protection is the same as full protection.**

Please find comments below, prepared on behalf of ASH. They are brief because we are not convinced that the government is acting in ignorance, but rather, wilfully, against the best scientific advice and against the public good. Repeating at length facts and arguments already well known would be a waste of our time and of yours.

Yours faithfully



Margaret Moorhouse
ASH

GENERAL REMARKS

"The draft plans set out our approach to managing Australian Marine Parks (formally known as Commonwealth Marine Reserves) over the next ten years. In developing draft plans, we have worked hard to balance the need to protect important marine habitats and features, with supporting people to use and enjoy these special places.

The draft plans have benefitted from many inputs, including

- *feedback from the public,*
- *the independent review of Commonwealth marine reserves released in 2016,*
- *the advice and expertise of traditional owners on managing sea country,*
- *the best available science,*
- *and the Government's policies and approaches to supporting competitive and sustainable fisheries."*

(factsheet-coral-sea-draft-management-plan-july-2017)

To say *"we have worked hard to balance the need to protect important marine habitats and features, with supporting people to use and enjoy these special places"* does not in any way justify the promotion of private enterprise aspirations over the public good. This concept of "balance" has no scientific basis. There is no scientific support for the notion that extensive extraction of elements from an ecosystem can proceed without important and detrimental changes occurring within the ecosystem affected. Extraction and related damage has already caused countless subsystems of the natural world to have collapsed, yet the Commonwealth government now proposes to risk the ocean, on which all life ultimately depends.

Does the idea that "we" (the present generation) may not have to live with the consequences of unwise action make the unwise action acceptable to this government? If so, this government is not acting in the public interest.

How does the government reconcile this proposal with ESD and the Precautionary Principle? From the Commonwealth website:

4. Activities that have Environmental Impacts that Affect ESD Outcomes

This category includes activities which:

1. either contribute to or aim to minimise threats of serious or irreversible environmental damage;
2. aim to sustain or fail to sustain the long-term health, diversity and productivity of the environment; or
3. aim to conserve or fail to conserve biological diversity and ecological integrity.
While it may not be difficult deciding whether activities have negative or positive environmental impacts, it may be harder deciding whether or not those environmental effects qualify as ESD impacts, that is, whether they are likely to involve:
 - threats of serious or irreversible environmental damage;
 - threats to the quality of the environment available to future generations;
 - threats to biodiversity and ecological integrity.

As for the draft plans having “benefitted” from the inputs listed above (fact sheet dot points): the outcomes of the Independent Review, Traditional Owner advice, and the best available science have clearly been ignored.

This proposal is a thinly veiled argument for private economic gain at the cost of the public good. The fact that some people can make lots of money (for a while) by robbing and damaging the public good is no justification for giving in to their demands.

SPECIFIC POINTS

Marine park zoning must be science-based

The science was already settled in 2012 and has only been affirmed and strengthened since then. The findings of the Federal Government Expert Science Panel 2012 affirmed that the marine parks declared in 2012 were the result of sound science and consultation.

Leading marine scientists have since found that in addition to the 2012 marine sanctuary declarations, further protected areas were required (eg: Barr and Possingham 2013, *Are outcomes matching policy commitments in Australian marine conservation planning?*).

Science has also established that partial protection does not provide beneficial outcomes comparable to those of full protection.

Government must not misinform the public:

It is untrue and misleading to say that yellow zones (Habitat Protection Zones) are equivalent to green zones (high level Marine National Park zones / IUCNII). We ask the government to publicly correct this untrue statement.

Activities incompatible with marine park protection:

Other less damaging users (recreational fishers, tourism operators) whose practices may be compatible with protection in some marine parks will be adversely impacted by allowing the following practices as proposed.

Mining Exploration rights exist in some marine parks. These should be grandfathered and no new mining or exploration permitted. Mining and protection are incompatible.

Trawling, gillnetting, longlining - These practices are well studied and known to be destructive due to their gross extractive capabilities. They can also cause bottom damage which is highly destructive of habitat. Exposing thirty eight of these marine parks to these practices is not acceptable.

The Australian public has been sidelined: WHY?

In 2016 the people of Australia recognised the long term public interest in protecting these marine areas from damaging extractive industries. Public consultation strongly supported an increase in high level marine national park zone protection.

Given the strong scientific basis of the marine parks declared in 2012, we ask why this Government has chosen to fly in the face of a clear expression of public support for protection of the long term public interest.

##