



Ms. Sally Barnes
Director of National Parks
Australian Marine Parks Management Planning Comments
Department of Environment and Energy
Reply Paid 787
Canberra ACT 2601

20th September 2017

Dear Ms. Barnes,

Submission - Australian Marine Parks Draft Management Plan Revised Zoning

This Submission is made by NPF Industry Pty Ltd (NPF) on behalf of the Commonwealth Statutory Fishing Rights (SFR) holders operating in the Northern Prawn Fishery (NPF) which includes the North and North West zones of the proposed Australian Marine Park. The NPF is comprised of a combination of individuals, small businesses and corporate fishing companies, many of whom are from intergenerational fishing families who have been involved in the NPF since the 1970's.

The Northern Prawn Fishery is the Commonwealth's most valuable fishery, and Australia's largest and most valuable prawn fishery, with a current Gross Value of Production (GVP) of approximately \$120 million. The NPF has been recognized by the United Nations FAO as a global example of 'best practice' fisheries management and has achieved independent third party accreditation under the Marine Stewardship's Certification program. The MSC program is recognized globally as the 'gold standard' of independent environmental fishery certification programs. The program is designed to give consumers confidence that MSC certified product is harvested in a sustainable manner from a sustainable marine eco-system. As an export fishery, the NPF has also been assessed against best practice sustainability criteria and accredited under the EPBC Act 1999 as environmentally sustainable.

The NPF makes a significant contribution to Australia's export and domestic economies and to rural and regional employment. The NPF has been an active participant in the consultations on the development of the Commonwealth's marine park network since planning began in 2009. NPF remains committed to working with Government and other stakeholders to achieve balanced marine planning outcomes that achieve appropriate necessary conservation objectives whilst allowing for economically sustainable use of the marine resources within the Parks.

As such, NPF welcomes the proposed zoning changes to the North and North West marine

parks which reflect the socio-economic importance of the commercial trawl fishery in the Northern Prawn fishery, at the same time protecting key conservation features in those zones.

NPFI commends the Turnbull government on focusing on marine planning to protect key conservation features and allowing for sustainable use in the overall Park, noting that:

- 36% of all of Australian Commonwealth waters will be Marine Parks – the most of any country in the world with significant marine areas
- the area under high-level green and yellow protection zones has been increased from 60 to 63% with the advantage that there appears to be less impact on public usage
- the proposed zoning allows usage in areas where the seafloor is 2,000-5,000m deep and the usage will have no seafloor impact
- that compared to the 2012 draft plans, a higher scientific rigour has been applied to the ecological features covered by habitat protection zones which has resulted in an increase in protection of ecological features from 192 to 265 – a 40% increase
- that the zoning as proposed minimizes impacts on Northern Prawn Fishery operators in recognition of the environmental and economic importance of this fishery

The NPFI makes the following specific points on the current Australian Marine Parks (Commonwealth Marine Reserve) zoning and management plans;

1. NPFI supports the name change from Commonwealth Marine Reserves to Australian Marine Parks
2. NPFI notes that that Marine Parks are not a fisheries management tool and are designed to protect marine ecological features
3. It would be unacceptable for fisheries management levies to be used to cover marine park management costs, given the clear separation between the aims and activities of the Australian Marine Parks and Commonwealth and state/territory fisheries management objectives, and that fact that the marine parks have a broader public good activity involving a reallocation of resources to the community
4. The commercial fishing industry should not bear the costs of compliance enforcement, monitoring or reporting activities within the marine parks – this is a government responsibility which should be fully funded by government
5. Compliance enforcement, monitoring and reporting activities pertaining to the management of marine parks should be conducted in the most cost-effective and efficient way. Duplication should be minimised and existing frameworks in State/Territory and Commonwealth fisheries agencies should be used wherever possible, and draw on the practical experience of fishing operators when assessing options
6. NPFI believes that the requirement for gear to be stowed while anchored or when in non-trawl/fish zones may be problematic. NPFI recommends that the management plans include provisions for exemptions to this requirement if an operator of a boat that is fishing near a non-trawl/fish area and is required to transit through in rough weather deems it unsafe to rack and stow their gear. An exemption must be granted to transit the area without stowing their gear if unsafe to do so to ensure the safety of the crew. Similarly, management plans should provide a process for exemptions to allow for anchoring in national park zones, if it's the only safe anchorage available due to bad weather or other unforeseen circumstances (eg accidents or injuries)
7. It is acknowledged that the final authorisation of permits and class approvals is the responsibility of the Director of National Parks however NPFI recommends that there

should be an established 'consultation and agreement process' between government departments and industry to ensure transparency should any issues arise

8. The process of assessing and managing displaced effort must be clearly defined *and*
9. The fishing industry is already subject to high levels of regulation and zoning must not increase regulatory burden and/or red tape making it difficult for industry to operate effectively.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'A. E. Jarrett', written in a cursive style.

Annie Jarrett

CEO NPF Industry Pty Ltd