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20 September 2017

To: Australian Marine Parks Management Planning Comments
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**Submission for Commonwealth Draft Temperate East Network Management Plan 2017:
Lord Howe Marine Park**

Intro/Background

The Lord Howe Island Marine Park is internationally significant, and contains the world's southernmost coral reef and the only fringing coral reef lagoon in NSW. The reef at Lord Howe Island is internationally recognised as a unique ecologically diverse marine ecosystem.

In 1982, Lord Howe Island and the surrounding waters were declared a UNESCO World Heritage site, the first in NSW and only one of 5 WHA listed marine sites within Australia. Ninety nine percent of the World Heritage area is the marine environment. The World Heritage status, is complemented by the Lord Howe Island Marine Park (state waters) that was declared in 1999 and the Lord Howe Island Marine Park (Commonwealth waters), declared in 2000 the was proclaimed .

The unique and isolated environments within the LHMP comprise a relatively untouched chain of unique seamounts off Australia, and as such they are valuable environmental assets for Australia and also the international community. This chain should be subject to stringent conservation regulations to ensure they remain ecologically intact. The "Proposed Rules for Activities" appears to be a generic with allocated activities allowed in all Temperate East Network Marine Parks, with potentially negative consequences for the LHMP.

Key issues regarding the draft Lord Howe Marine Park (LHMP)

Discharge of ballast water/industrial discharge

I do NOT support the allowance of ballast/industrial discharge in any NPZ within the proposed Marine Parks. I have concerns about discharge within the Lord Howe HPZ (LHHPZ) and feel that there needs to be a Biosecurity Zone around Lord Howe Island and its associated islands and islets (Balls Pyramid and Elizabeth and Middleton reefs) of at least 3 or 12nm from all reef and/or land habitats.

- Discharge should not be allowed within any NPZ's or within 3nm – 12nm of any of the reefs or islands within the LHMP.
- I am aware that discharge is currently allowed in all zones following MARPOL regulations but I do NOT support the proposed arrangements due to the significant biosecurity risk to the unique ecological communities within the LHMP.
- LHMP is currently free of marine pests and the introduction of marine pests, waste, pollution or disease through vessel ballast water, discharge and/or hull fouling is one of the Parks biggest threats.
- The plan undermines/negates all the proactive management arrangements of state Marine Estate Management Act & Regulations, biosecurity legislation and local management strategies to prevent introduction of marine and/or terrestrial pests and

also proactive waste management strategies with respect to waste reduction and minimising the spread of marine pests and disease.

- I am very concerned about the potential impacts to the Park's WHA values, biodiversity conservation and world's southern-most coral reef.
- The discharge of any waste within the NPZ is NOT supported and discharge within other zones needs to have legislative restriction such as being prohibited within a 3 or 12nm boundary around the reefs and islands within the LHMP.

Mining Operations, including construction of pipelines

I do NOT support the allowance of mining operations and construction of pipelines within the HPZ, HPZ Lord Howe (LHHPZ), RUZ and NPZ's. This activity should be prohibited in all zones.

- Mining activities and the construction of pipelines should be prohibited, due to large potential impacts to benthos and the ecology and ecological processes within the World Heritage listed LHIMP.
- These activities should not be allowed within any zone of the LHMP due to the negative impact on ecological processes and habitats – specifically the interconnectedness of the unique Lord Howe and Tasman seamount chain.
- These operations will be detrimental to the interconnectedness of both seamount chains and compromise habitats for endemic and threatened/vulnerable species that are found within the LHMP.
- These activities could put World Heritage status (and values) at risk – as has occurred within other marine parks around Australia.

Aquaculture

I do NOT support the allowance of aquaculture operations within the LHHPZ and HPZ zones

- Aquaculture should be prohibited in the LHHPZ and HPZ as this commercial activity is currently prohibited within LHIMP (state waters).
- I support the current prohibition of aquaculture within NPZ's and RUZ's
- I believe aquaculture should only be allowed by authority in GUZ
- This is due to the large potential negative impacts of these industries on benthos, organisms in the water column and ecological habitats and processes within and surrounding the LHMP and the World Heritage values of LHIMP.
- Aquaculture activities aren't allowed within the state LHIMP and the Commonwealth Lord Howe Marine Park management arrangements needs to complement these regulations/management arrangements – for consistent management arrangements, ease of enforcement and to ensure adequate protection of LH World Heritage values.

Commercial Fishing

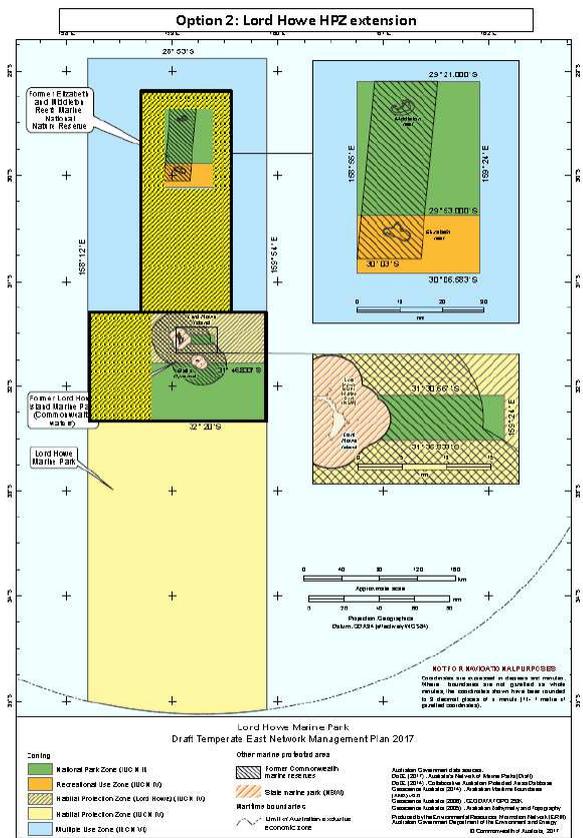
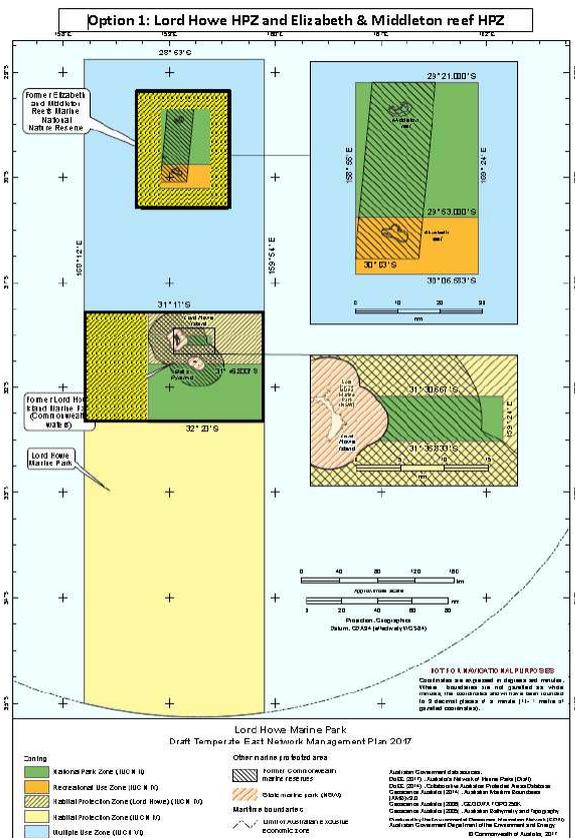
I support the prohibition of the following commercial activities within the LHHPZ - hand collecting, hand netting, pelagic long lining, per seine fishing and mid water trawl. All which are currently allowed in the HPZ.

- These commercial fishing activities (above) are prohibited within the LHIMP (state waters) to minimise potential over-harvesting of the local artisanal fishery, to minimise potential impacts from gear loss/entanglement and to reduce the impact of the local fishery and shark populations.
- The zone activities surrounding the existing state LHIMP needs to complement these management arrangements.
- A proposed extension of the LHHPZ will ensure adequate protection of the LHIMP values and local artisanal fishery.
- I support the prohibition of all forms of commercial fishing within the NPZ and RUZ

I propose an extension of LHPHZ in waters surrounding LHI and Elizabeth & Middleton reefs, to increase adequate protection of ecological values, while allowing for sustainable use.

An extension of the LHPHZ would ensure the above listed commercial activities are prohibited from waters surrounding LHI and E&M reefs.

- This will ensure an adequate ecologically sound 'buffer zone' around LHI state MP and proposed NPZ and ensure destructive commercial fishing activities such as trawling are prohibited and not allowed around this World Heritage listed marine site.
- These commercial fishing activities (aquaculture, demersal setline and dropline, trawling, dredging, netting and trapping are all prohibited within the LHIMP (state waters) to minimise potential over-harvesting of the local artisanal fishery, to minimise potential impacts from gear loss/entanglement and to reduce the impact of the local fishery and shark populations.
- The LHPHZ needs to complement the NSW state regulations, hence the extension of the LHPHZ will achieve this.
- The extension of the LHPHZ to surround Elizabeth and Middleton Reefs will be an ecological buffer and should be extended to include the seamount to the north of Middleton Reef, while still allowing for commercial minor handlining and the existing Blue Fin Tuna Fishery that operates north of Middleton Reef.
- The extension of LHPHZ will ensure an adequate buffer zone for marine biosecurity protection and prohibition from mining operations
- I propose 2 options – Option 1 has a slight extension of the LHPHZ and Option 2 has a larger extension of the LHPHZ. These options will ensure adequate ecological buffer zones around the WHA LHMP.



Middleton Reef NPZ

The seamount north of Middleton Reef needs adequate protection.

- The proposed NPZ should be extended to the north of Middleton Reef to include the seamount as per original 2012 draft management plan
- Alternatively, an extension of LHPZ, as above, would ensure adequate protection while allowing certain small scale commercial fisheries that currently exist in the area. I note that the Independent Review Report suggested to include the northern seamount in NPZ so there is a strong case for increasing the NPZ to the north of Middleton reef or to implement the proposed LHPZ around Elizabeth and Middleton Reefs.

Prohibition of spearfishing

I support the prohibition of spearfishing in the LHPZ

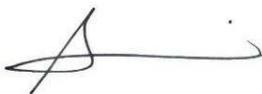
- This supports the prohibition of the existing NSW state Marine Estate Management (Management Rules) Regulation 1999 that prohibit the use of spears, spear guns and spearfishing related activities within all areas of the current LHIMP. This regulation was established, due to the fact that a large number of fish species within LHIMP are vulnerable to spearfishing and this activity is not compatible with many of the aquatic activities that are significant to the tourism based economy of the Island
- Allowing spearfishing at Elizabeth Reef would make compliance challenging due to its remote location and, as it is prohibited within LHIMP state waters and most / all vessels stop at LHIMP on their way to/from Elizabeth and Middleton Reefs, the conflict of use with these activities would be a risk.

In Summary

The UNESCO World Heritage listed LHMP contains significant and unique ecological, social and economic values and importance and special consideration is required for all the proposed activities within the draft Lord Howe Marine Park.

I hope my viewpoints and suggestion are taken into consideration before final management arrangements are made.

Kind regards,



Sallyann Gudge

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