



Australian Coral Reef Society Inc.

A society promoting scientific study of Australian Coral Reefs

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Submission to the Australian Marine Parks Network (AMPN) Draft Management Plans

20 September 2017

Ms Sally Barnes
Director of National Parks
Australian Marine Parks Management Planning Comments
Reply Paid 787
Canberra ACT 2601

Dear Ms Barnes:

On behalf of the Australian Coral Reef Society (ACRS), we appreciate the opportunity to comment on the Australian Marine Parks Network (AMPN) Draft Management Plans released on 21 July 2017. The ACRS is the world's oldest coral reef society (established 1922) and is the professional organisation for Australia's coral reef scientists and managers. We are concerned with the study and protection of coral reefs, and have played a prominent role in bringing major conservation issues to the attention of governments and the general public. The society regularly draws on the expertise of its 300+ members to provide advice to governments and agencies on a range of marine issues (see <http://www.australiancoralreefsociety.org/>).

The 2012 AMPN expansion made progress towards an evidence-based network of marine parks and indicated Australia's global leadership in marine conservation. In its 2016 submission, ACRS expressed its support for the July 2012 expansion of the AMPN into four marine regions and the Coral Sea following decades of research and extensive community consultation. However, in consideration of the reports from the Bioregional Advisory Panel (Buxton and Cochrane 2015) and the Expert Scientific Panel (Beeton *et al.* 2015) we found that their recommendations were a significant step backwards relative to the 2012 management plans that were suspended in 2013. We are particularly shocked that the draft management plans released on 21 July 2017 is an even greater step backwards, incompatible with available scientific evidence, and with apparent disregard to the submissions put forward by key organisations representing marine scientists, including the ACRS (Oct 2016). Here, we briefly note our objections to the draft plan for Australia's Commonwealth marine estate, then in more detail describe our concerns that relate to the draft plan for the Coral Sea.

Australian Marine Parks Network

Despite the many proven environmental, social and economic benefits of IUCN II+ zoning and its critical role in buffering the impacts of climate change, implementation of the draft management plans

would remove 400,000 km² of IUCN II+ protection across the AMPN, or 46% of the network. This means that in:

- 2007, 10% of Australia's EEZ was in marine parks, with 4% of the EEZ protected in IUCN II or higher.
- 2012, 36% of Australia's EEZ was in marine parks, with 14% of the EEZ in IUCN II or higher.
- 2017, 36% of Australia's EEZ remains as "protected" but **only 9%** of the EEZ in IUCN II or higher. This is below the most minimum of benchmarks

The proposed down-grading of existing protection from IUCN II and I to IUCN IV (Habitat Protection Zones) will not only compromise the conservation outcomes of the AMPN, but also undermine the provision of ecosystem goods and services, and current long-term scientific endeavours investigating the impact of human activities on the ocean. By allowing extractions, IUCN IV zones do not afford the same level of protection as IUCN II+ zones, and their reduced levels of protection result in markedly reduced conservation outcomes (Denny and Babcock 2004; Sciberras *et al.* 2015).

Finally, there is a considerable and growing body of scientific evidence that suggests that partial protection, as would occur if IUCN II+ zoning was replaced with IUCN IV in the AMPN, would accrue increased management costs while adding much less in the way of meaningful, measurable conservation outcomes than MNPZ (Sciberras *et al.* 2015).

The draft management plans allow for trawling, gill netting and long-lining to occur in 38 of the 44 new marine parks, mining in 33 marine parks, and the construction and operation of oil and gas pipelines in 42 marine parks. By allowing extractive activities to continue throughout most of the AMPN, Australia is overlooking the primary role of marine parks: biodiversity conservation and all this entails in terms of resilience and knowledge building. Of concern is that the Government's own risk assessments have concluded that a number of these activities are incompatible with conservation outcomes, an outcome largely supported by the Review in its assessment of a subset of these activities. As such, their presence in "habitat protection zones" is not consistent with the goals of these zones.

The Government's justification for its significant reductions in IUCN II+ protection is to reduce its impact on commercial fishers, but the impact of the IUCN II+ zones as proclaimed in 2012 would have been very small. In the case of Middleton Reef Seamount, a part of which would have its protection removed, ABARES estimates such a change would annually return \$335 to each of the 92 holders of statutory fishing rights in the area's main fishery, the Eastern Tuna and Billfish Fishery (Larcombe and Marton 2016).

Australia's marine tourism industry is worth \$28b per annum (*AIMS Index of Marine Industry 2016*) whereas the value of the returned catch from cuts to IUCN II+ protection across the AMPN is only \$4m per annum (*ABARES Potential displacement of commercial fisheries by a Commonwealth marine reserve zoning scheme. Revision 1 July 2017*), representing just 0.3% of the total revenue from Australia's wild catch fisheries.

The Coral Sea Marine Park

The Coral Sea Draft Management Plan protects ~24% of the region in IUCN II or greater, equating to **a 53% reduction and loss of some 264,000 km² of marine estate** protected within IUCN II or greater. The downgrading of protection of the Coral Sea indicates the Government's lack of foresight and willingness to appropriately protect large iconic areas that are amongst the world's last remaining intact systems. The reduction of protection by 53% is not supported by science, contradicts current scientific recommendations, and is incumbent on the Government to justify. This is particularly important given the proposed allowance of high risk fishing activities in this region. ACRS sees the proposed reduction in IUCN II+ coverage within the Coral Sea as a significant retrograde step. The Government's Expert Science Panel noted the uniqueness of the region's coral reefs and emphasised the **importance of increasing their protection**. Recent research in the Coral Sea shows that reefs not in IUCN II+ protection see their shark populations depleted by 90% of their original biomass, with populations of large predators halved and fish populations depleted by 70% (Edgar *et al.* 2015). The importance of protecting the Coral Sea's reef sharks was highlighted by the Expert Science Panel which identified that "Coral Sea reefs comprise a globally significant hotspot for reef sharks".

The draft management plan for the Coral Sea Marine Park would decimate the large IUCN II+ zone covering the eastern side of the marine park, cut by half the IUCN II+ zones at Osprey and Marion reefs, and convert Vema Reef's IUCN II zone to IUCN IV. These draft changes would only leave IUCN II zones at Coringa-Herald Islets and Bougainville, Lihou, Mellish and Kenn reefs, while Shark, Flinders, Holmes, Moore and Suamarez reefs, and Diane Bank and Willis Islets, would be zone IUCN IV – allowing ongoing exploitation and the potential collapse of these ecosystems.

These significant losses and the fragmentation of the IUCN II zoning included in the 2012 management plans have no scientific basis. The intact IUCN II zone covering the Coral Sea was to be Australia's major contribution to the global protection of intact pelagic marine life at a large scale, consistent with the scale of newly established highly protected marine parks being established globally (e.g., in Chile, New Zealand, Palau, the UK and the USA). Moreover, France is in the process of creating a large marine reserve over its Coral Sea Territory, adjacent to Australia's Exclusive Economic Zone, and the combined protection would be globally significant. The 53% reduction in the IUCN II zoning would represent a major strategic failure with no scientific basis.

The ability of the science community to demonstrate the benefit of marine protection relies on the establishment of IUCN II+ zones as reference areas, noting the substantial review by McCook *et al.* (2010) of the zoning benefits on the Great Barrier Reef Marine Park as a highly relevant example of demonstrating management effectiveness.

Deloitte Access Economics has valued the Great Barrier Reef at A\$56 billion, with an economic contribution of A\$6.4 billion per year (<https://www2.deloitte.com/au/en/pages/economics/articles/great-barrier-reef.html>), but this has been challenged as grossly undervaluing the Reef (<https://theconversation.com/whats-the-economic-value-of-the-great-barrier-reef-its-priceless-80061>). The protection of the Coral Sea reefs is also critical to the dive tourism industry, which has direct sales of \$6 million each year that are predicted expand to \$15 million if the reefs are highly protected (KPMG 2010). These figures contrast significantly with the \$4.1 million the Government claims will be gained by the commercial fishing

industry across the entire AMPN should the 2017 draft management plans be implemented. The economic returns to commercial fishing from reduced MNPZ protection are at best marginal and to only a small number of license holders.

Conclusion

The draft management plans represent a retrograde step by Australia's government and is a matter of both national and international significance. Australia has been a world leader in marine conservation for decades, beginning with the establishment of the Great Barrier Reef Marine Park in the 1970s and its expanded protection in 2004. At a time when oceans are under increasing pressure from overexploitation, climate change, industrialisation, and plastics and other forms of pollution, building resilience through a strong backbone of adequate protection (i.e., IUCN II zoning and above) is well supported by decades of science. Further, the establishment of a network of IUCN II zoning is consistent with the move by many countries, including Chile, France, Kiribati, New Zealand, Palau, Russia, the UK and US that are establishing very large no-take (IUCN II and above) marine reserves. In stark contrast, the implementation of the Government's draft management plans would see **Australia become the first nation to retreat on oceans protection**. At a time of rapid environmental change, including large impacts of climate-change on the Great Barrier Reef there is a great need for responsive management underpinned by strong science (ACRS 2017).

We implore the Australian government to set a target of protecting at least 30% of each marine habitat in IUCN II zones; a target that is supported by Australian and international marine scientists and affirmed by the World Parks Congress in Sydney in 2015 and the IUCN Members Assembly at the World Conservation Congress in Hawaii in 2016. The draft Plans, especially in comparison with 2012, sees a drop from 14% to 9% in IUCN II zones, and this sends a clear message to the global community that Australia's government has placed exploitative interests ahead in value over conservation of our fragile marine ecosystems for future generations. What is worse, it appears that the "party line" from the Federal Government is to claim that these changes are scientifically-defensible when to all knowledge of Australian marine scientists they are not. The ACRS requests to review this scientific evidence from the Federal Government. We demand the Turnbull Government reconsider the Plan and expand the levels of IUCN II+ zoning, referred to as Marine National Park Zoning (MNPZ protection) in the Plan, thereby upholding the goals and principles of the National Representative System of Marine Protected Areas.

Sincerely,



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