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To whom it may concern,

Almost 40m hectares of marine 'sanctuary' area (Marine National Park / IUCNII) is proposed to be cut from Australia's marine parks network – an area twice the size of Victoria – and equivalent to removing almost every second national park on land.

If this proceeds, Australia will be the first nation in the world to go backwards on marine protection – setting a damaging international precedent at a time when the world's oceans need more, not less protection.

As such SEA LIFE Trust ANZ specifically advocate:

- 1. Rejecting the cut backs of Marine National Park 'sanctuary' IUCN II zoning (MNPZ) across the Network and call for the Turnbull Government to fully restore and increase the IUCN II zoning in Australia's Marine Parks without delay.** The Government's independent Review recognised the extensive science and consultation that led to the creation of the 40 parks in 2012. However, the Turnbull Government's draft management plans recommend reducing, relocating and in most cases completely removing the MNPZ protection over key habitats, particularly in the globally important Coral Sea. In the face of devastating coral bleaching, mangrove dieback and vanishing kelp forests, MNPZ coverage in Australia's Marine Parks are even more important now than ever.
- 2. The marine park zoning must be science-based** – the Government's own Expert Science Panel found that marine parks declared in 2012 were the result of sound science and consultation. Further, leading scientists found that the 2012 network would need more marine sanctuary coverage, not less (eg: Barr and Possingham, *Are outcomes matching policy commitments in Australian marine conservation planning?* Marine Policy 42, 39-48 2013).

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3. Partial protection zones are not a substitute for high level ‘sanctuary’ (Marine National Park / IUCNII) protection – claims by government that Habitat Protection (HPZs/yellow zones) are equal to Marine National Park zone (MNPZ/green zones) are false and misleading. Protecting the sea floor provides only partial protection and does not protect the marine life living within the water column. Each marine park should have adequately sized and located zones of high level MNPZ protection, with partial protection zones used in an ancillary way. It is well established in the scientific literature that partial protection does not generate biodiversity benefits comparable to full protection.

4. Reject the proposal to allow mining in parks – the Government proposes to allow mining and pipelines in the vast majority of the parks. Marine parks not currently containing mining exploration rights should be considered for full protection from mining. As emphasised at the recent World Conservation Congress, industrial activities like mining and mining exploration are not compatible with marine parks. Marine parks should be fully protected from mining as has been achieved in the Great Barrier Reef Marine Park.

5. Reject the proposal for destructive commercial fishing activities such as trawling, gillnetting and longlining in the marine parks – by opening up 38 of the marine parks to destructive commercial fishing practices such as trawling, gillnetting and longlining, the Government is proposing to ignore the findings of the independent Fishing Gear Risk Assessments it commissioned, which found those types of fishing to be incompatible with many of the conservation values in the parks. Further, allowing in destructive forms of commercial fishing puts at risk the benefits that marine parks provide not only to marine life, but also more broadly to tourism, recreational fishing and other types of commercial fishing that *can* operate sustainably inside parks alongside high level MNPZ zoning.

6. There is no justifying economic argument – Australia’s marine tourism industry is worth \$28b per year, whereas the catch value being returned to commercial fishing from the network-wide MNPZ cuts is worth only \$4m per annum – only 0.3% of the total revenue of Australia’s wild catch fisheries.

THE RESULTS OF THE STATUTORY CONSULTATION ARE BEING IGNORED - it is deeply concerning that despite the vast majority of submissions to Parks Australia’s first consultation round last year strongly supporting the restoration and increase in high level marine national park zone protection, the Government is proposing the complete opposite to the consultation outcomes in all but 1 of the 44 marine parks.

“Australia is surrounded by magnificent oceans and a marine environment that’s the envy of the world.” (<https://parksaustralia.gov.au/marine/>). I suggest the Minister and his department watch the latest documentary ‘Blue’ to see what decades of exponential growth, human impacts, associated damage and inaction have done to our marine environment. We are heading down an uncertain path

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where doing nothing, or less than is advocated by the scientific experts, will lead to a diminished and potentially barren future for the next generations. We're already bearing witness to this with the mass coral bleaching experienced this and last year as a result of rising sea temperatures.

SEA LIFE Trust and its supporters urge you to restore the original management plans in their entirety, which will go some way to securing a sustainable future for our fisheries and tourism industries, as well as enable natural systems, under extreme pressure from a suite of human activities, a chance to rebound.

As custodians and primary managers of this precious and increasingly fragile resource you must do what is needed, not what is politically motivated or expedient.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rechterik'.

Claudette Rechterik
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