



AQIS Registered Establishment No. 2911
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Australian Marine Parks Management Planning
Comments
Department of the Environment and Energy
Reply Paid 787
Canberra ACT 2601

20th September, 2017

Commonwealth Marine Reserve Submission

To the Department of the Energy and Environment

Thank you for the opportunity to provide comment on the Australian Marine Parks draft management plans released on 21 July 2017.

De Brett Seafood is a stakeholder in the Commonwealth ETBF. Our export processing facility has been in operation for 20+ years.

We care about fish stocks and a healthy marine environment as our families and communities depend on it.

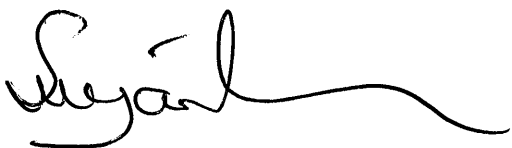
We would like to make the following points on the current Commonwealth Marine Reserve zoning and management plans:

1. De Brett Seafood supports the name change from Commonwealth Marine Reserves to Marine Parks.
2. We are happy the new plans ensure that Marine Parks in Australia meet or exceed IUCN and United Nations aspirational targets and maintain Australia as a leader in Marine Conservation.
3. It is pleasing that the government has maintained the amount of conservation areas in Green zones identical to the 2012 proposal whilst increasing conservation areas from 192 to 265 in habitat protection.

4. We are however concerned with the strip abutting GBRMPA and north of Fraser Island as this particular area has already been impacted by the existing GBRMPA boundary and is heavily relied on by several smaller vessels operating from Mooloolaba. This area was identified in the very first plan and removed after extensive consultation because of its direct impact on local vessels.
5. We acknowledge that the final authorization of permits and class approvals is the responsibility of the Director of National Parks however it would be better if there was a consultation and agreement process between government departments and industry ensuring transparency should any issues arise.
6. Longline fishing can be challenging due to gear drift. This may result in fishing operations and gear accidentally entering areas where it is prohibited. We seek the development of practical prosecution guidelines.
7. Any National Marine Park zoning means loss of fishing area. The process of assessing and managing displaced effort must be clearly defined including impact on local onshore operations such as ours.
8. These plans must not increase the regulatory burden on industry.
9. Australia has world leading sustainably managed fisheries. Marine Parks are not a fisheries management tool but are designed to protect marine ecological features.
10. Tuna and Billfish are managed ecologically sustainably in Australia and there is no clear reason for large "green" – no take areas to protect the pelagic environment as the fish are highly migratory.

Seafood is an important part of the Australian way of life and it is fishermen that produce it. We believe the governments proposed plans have almost achieved a balance in meeting the expectation of all stakeholders of the marine environment.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Gary', with a long, sweeping horizontal line extending to the right.

Gary Heilmann
Managing Director