

Australian Marine Parks Management Planning Comments
Department of the Environment and Energy
By email: managementplanning.marine@environment.gov.au

Dear Director of National Parks

Coral Sea Marine Park Draft Management Plan – Comments

Please accept our submission following in respect of your draft Management Plans for Australian Marine Parks and especially your Coral Sea Marine Park Draft Management Plan.

The North Queensland Conservation Council is a community organisation committed to protecting the natural environment in North Queensland. For 40 years we have had a particular responsibility to protect the region's environment from ecologically unsustainable development, including the Great Barrier Reef and the broader Coral Sea and oceans of which it is a dependent part.

At a time when marine ecosystems and species are under great threat and pressure from a myriad of directions, including unsustainable fishing and mass coral bleaching such as occurred in the Great Barrier Reef and broad parts of the tropical Pacific Ocean from warming waters in 2015 and 2016, now is the time for significantly increasing marine park protections not winding them back. This is particularly the case in the more remote Coral Sea which has avoided many of the impacts associated with development closer to the Australian coast.

We should be extending protections, both in area and level, beyond those achieved in the Government's 2012 declarations of marine parks. To the extent that the science has changed since that which was accepted by government in 2012, it suggests greater protections now, not less, particularly for marine sanctuary coverage (e.g.,: Barr and Possingham, *Are outcomes matching policy commitments in Australian marine conservation planning?* Marine Policy 42, 39-48 2013).

Now is not the time for retreating from the government's own commissioned and rigorous science, its acceptance of which underpinned its own 2012 declaration of marine parks. This science supported the expansion of protected areas in the Coral Sea, particularly the highest protection green zones or sanctuaries - and particularly in those areas identified as having high environmental values.

We note recent reports of sharks being under threat globally through commercial fishing and increasing illegal and unsustainable taking of sharks, including arrests in Timor Leste (News: Chinese fishing boats with 'thousands of sharks' caught in Timor-Leste waters, ABC News on-line 15/09/2017). We note also a report this week of a massive increase (10 fold) of hooking of protected turtles since 2014 in the Australian longline fishery and using methods proposed to be expanded under your proposed marine park management plans (News: Spike in protected turtles hooked by fishing lines off Australia as government relaxes marine protections, SMH 16/09/2017). In this context extending the protection of globally significant shark, large fish and turtle habitat in the Coral Sea from unsustainable fishing including longlining, beyond that present in the 2012 declarations is recommended.

These introductory comments are further detailed and extended in the following.

Marine Park Network/Australia wide comments

We reject the cut backs to National Park 'sanctuary' IUCN II zone protection and call for the full restoration and increasing of IUCN II zoning in Australia's Marine Parks with no further delay. The Government's independent Review recognised the extensive science and consultation that led to the creation of the 40 parks in 2012. Your draft management plans however recommend reducing, relocating and in most cases completely removing the Marine National Park Zone (MNPZ) protection over key habitats, particularly in the globally important Coral Sea. With devastating coral bleaching, mangrove dieback and vanishing kelp forests, MNPZ coverage in Australia's Marine Parks are even more important now than ever.

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. Also, 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).

We support the draft management zones where the National Park zone areas have not changed from what was declared in 2012, or where there are new and/or increased National Park zones. We reject the draft management plans where National Park zones are made smaller or removed or where National Park zones have been moved to areas of far less ecological importance or where the Government has ignored the Review's recommendations for additional National Park zone areas (e.g.,: in the Norfolk Island Marine Park).

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.

We reject the proposal to allow mining in parks – the Government proposes to allow mining and pipelines in the vast majority of the parks. 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 and Coral Sea Marine Park.

We reject all 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.

There is no economic justification for the proposed changes. 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.

We are very concerned that the submissions from last year's first round of statutory consultation - where 54,000 people provided comment and the vast majority called for a significant increase in marine National Park zones - have not been taken account of. Despite the vast majority of submissions 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.

Coral Sea Specific Comments

The Coral Sea Draft Management Plan fails the science test

The Government's Expert Science Panel recognised the Coral Sea as a significant biodiversity hotspot for sharks and tuna and marlin. It acknowledged it as one of the few remaining areas globally that hasn't been impacted significantly by humans. It also recognised the value of its unique reefs and acknowledged that they warrant higher protection.

However, the Government proposes:

- Large cuts of 53% and fragmentation of Marine National Park Zone (MNPZ) coverage in the park - the large offshore oceanic Marine National Park Zone in the Coral Sea is Australia's major global contribution to the protection of intact tropical pelagic marine life at a large scale. With such values and little if any fishing, this area is intact and therefore an important, achievable and rare opportunity for inclusion in the marine parks network as a large area of high level protection. Under the government's proposals, most of the park would be opened up to longlining – a commercial fishing activity that the Government's independent Fishing Gear Risk Assessment, concluded posed an unacceptable risk to the conservation values of the Coral Sea Marine Park.
- Reducing protection at a number of ecologically important reefs (Osprey, Shark, Vema, Flinders, Holmes, Marion and Wreck). The Government's Expert Science Panel recognised the need to increase protection at key reefs. However the draft plan fails to do so, proposing MNPZ protection for only 7 of the Coral Sea's 40 or so reefs. Fully protecting reefs protects fish and shark populations that are highly valuable to the dive tourism industry and will help build reef resilience in the face of climate change. This is not only to the benefit of marine life but also delivers economic certainty to dive operators who need a diversity of reefs protected against extreme weather events such as cyclones and coral bleaching. Recent research in the Coral Sea shows that reefs not in Marine National Park Zones see their shark populations depleted by 90% of their original biomass, with populations of other large predators halved and fish populations depleted by 70%. 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”.

- Partial protection (Habitat Protection Zones) as a substitute for full protection. The role of partial protection zones (yellow or blue on the map) is to achieve particular social or economic outcomes, or to act as a buffer to the marine national park zones which drive the biodiversity conservation outcomes in the parks. Scientific evidence clearly shows that full protection is one of five key factors in effective conservation of marine life. For example, the Government’s Expert Science Panel found that areas within the Coral Sea outside fully protected areas have suffered a 90% depletion in their shark populations. Furthermore, almost all the Habitat Protection Zones allow destructive commercial fishing activities such as longlining, mid-water trawl, and purse seining. These are commercial fishing activities that the Government’s independent Fishing Gear Risk Assessment, concluded posed an unacceptable risk to the conservation values of Australia’s marine parks.

The Draft Plan fails the economics test

- The draft plan undermines the economic viability of one of the Coral Sea’s biggest industries - dive tourism, by removing protection of some reefs most critical to the industry’s future. Coral Sea dive tourism is estimated to contribute \$6m to the economy per year.
- The Draft recommends significant losses in protection at the Osprey Group of Reefs - some of the world’s premier dive spots with Marine National Park Zones completely removed for Shark and Vema Reefs and a very large section of the Marine National Park Zone protection of Osprey Reef also removed, leaving the iconic and economically critical shark populations vulnerable to the 90% depletion that has been documented on other unprotected coral reefs within the Coral Sea. The Review recommended increased protection for other key reefs like Holmes and Flinders due to their ecological and economic value to the dive industry but the Government has ignored this recommendation in the Draft Management Plan.
- The proposed management plan undermines the security of the existing dive industry and its potential to expand. For scale, the current \$6 million in reef tourism direct sales in the Coral Sea Marine Park alone, is much larger than the total \$4 million projected gain for commercial fishers across all 44 of Australia’s marine parks, let alone the small set of commercial fishers operating in the Coral Sea.
- Commercial fishers also consistently argue that marine national parks are having too great an impact on their activities - this position is not supported by the evidence. The total maximum potential negative impact on commercial fishers from the 2012 plans, before taking into account the variety of potential positive impacts, is less than 1% of commercial fishing activities across the network. In the Coral Sea some of the commercial fisheries that have been promoted as being heavily affected are estimated to be displaced by as little as 0.1%.

The Draft Plan fails recreational fishers

- The draft management plan proposes the reintroduction of longlining, mid-water trawl and purse seining into what was effectively Australia’s largest and most prized recreational fishing zone. The

removal of longlining in the 2012 declaration was to protect the world's only known black marlin spawning area and the highly valuable recreational fishing in this area.

- The draft plan proposes the introduction of damaging fishing techniques like mid-water trawl, bottom trawling and demersal longlining throughout vast sections of the Coral Sea marine park. These fishing practices not only have a significant impact on the conservation values of the park but the recreational fishing values of this globally iconic location of the world's oceans.

Recommendations

Against its own scientific advice and its own acknowledgement that highly protected marine parks are particularly important in marine management the Government's proposed plans are reducing protections for our oceans and particularly for high conservation value sites and important large areas where scale is important for protection of the well identified values. The Turnbull Government has failed to act on its own advice, missing the opportunity to deliver a science based result in the Coral Sea.

The following are our recommendations to the Government in relation to the finalisation of the Coral Sea Marine Park Management Plan: -

1. Reject the proposed major loss and fragmentation of the large Marine National Park Zone (MNPZ);
2. Reject the loss of protection at Osprey Reef, Shark and Vema Reefs. Osprey Reef needs high level MNPZ protection in order to deliver economic security to the valuable dive industry;
3. Reject the proposed loss of protection for Flinders, Holmes and Wreck Reef – reefs the Review found required protection;
4. Accept the proposed new MNPZ protection at the border with the Great Barrier Reef;
5. Reject the proposed opening up of the Coral Sea to longlining, purse seining and mid-water trawl in the 'Area E' Coral Sea Zone of the Eastern Tuna Billfish Fishery. Removal of these damaging commercial fishing techniques should be achieved in this area to ensure protection of the Queensland Plateau, Queensland Trough and the world's only known spawning ground for Black Marlin and their recreational fishing, economic and social values;
6. Reject the proposed loss of MNPZ protection for Marion Reef. Marion Reef is the only location where protection is proposed for the coral reefs, cays and herbivorous fish of the Marion Plateau which is a key ecological feature of the Coral Sea;
7. Reject the proposed expansion of mid-water trawling, purse seining, demersal longlining and prawn trawling within the Coral Sea.
8. Finalise the management plan and make it operational within the next 12 months.

Yours sincerely

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