

Comments on the draft management plans for marine parks a personal submission by Deborah Pergolotti P. O. Box 298 Mission Beach, Qld 4852 [address to be removed before the submission is published] Please confirm receipt.

Thank you.
Deborah P.

Dear Director:

Thank you for soliciting the comments of residents and stakeholders concerning marine parks. I will compliment you on the website as it is pretty to look at and simply laid out for the public. But as I learned while living in New York City, you have to read all the fine print and you even have to learn to read between the lines. I hope that this exercise is not merely to enable 'ticking the box' for consultation and actually results in serious consideration of the views of everyday Australians. While industrial stakeholders will push for reduced red tape and more opportunities to create profits (which mostly go overseas), there are some things that are more important than jobs. The ability of the planet to sustain life in a healthy manner is paramount.

In view of that previous sentence, I would like to stress that the Coral Sea and all the other marine parks need to remain biologically protected as the top priority and kept fully species-diversified - it is even more important than ever. We have already seen what so called "management" has done and continues to do to the Barrier Reef. In spite of the many rampant threats to the Reef, the government continues to throw unbridled support at the mining industry in Reef catchments and practically gives away our precious resources to entice more foreign corporations to do business here (pillage our country might be a more accurate description). Meanwhile, ocean-friendly, non-fossil fuel technologies (such as solar and wind) are treated as insignificant industries not worth official support. (Why do you continue to give subsidies to fossil fuel companies when you could be giving them instead to solar, wind and hydropower start-ups?)

It is also apparent - even if government refuses to acknowledge it - that SOLAR RADIATION MANAGEMENT is completely messing up weather systems and paradoxically contributing to climate change - not reversing it. It also seems apparent that government must be relying on a perceived 'compensation' from SRM which might be used as a justification for opening up new coal mines. Metal nanoparticles are being rained down on top of agricultural and urban areas including the Barrier Reef and this is neither acknowledged nor common knowledge (yet). However it is easily seen by everyone who observes (and documents) the spraying in progress. Additionally, the Australian government is polluting oceans with this so-called "ocean fertilisation program" where iron is being dumped in the ocean to encourage algal growth. What are all the downsides of interfering with the delicate and sensitive ocean chemistry? Was the ocean fertilisation program mentioned in the other marine park plans because I didn't see it in the draft plan for the Coral Sea marine park? Protection of marine parks includes stopping both the ocean fertilisation program and the 'experimental' Solar Radiation Management program. Neither will be beneficial and the latter in particular is clearly antagonistic to human health, environmental health and ocean health.

And last but certainly not least is the migrating radiation from the FUKUSHIMA incident in 2011. Radiation has drifted across the northern Pacific to the west coast of Canada and the USA (in only five years) and huge die-offs of marine life are in progress there. The ocean conveyor belt connects all oceans of the world and supports climate and marine life. This radiation will likely continue down the coast of South America, possibly cross the southern Pacific to New Zealand and could eventually make its way up the east coast of Australia. How long this will take is anybody's guess but since it only took five years to cross the northern Pacific, we might only have a couple decades before we are affected. As this radiation kills off the Pacific, it will render all of its myriad of values useless and dead. There will be no swimming in the empty Pacific and none of its remaining species will be edible. Until that

happens, marine parks must receive full protection with usage and exploitation very carefully considered. The commercially important fish stocks in Australian protected zones will be needed in full numbers as they will be the future breeding stock to satisfy the world's taste for marine protein. All waters around Australia must be prioritised for healthy fish stocks as we will be one of those countries who will be called upon to feed the world.

SPECIFIC COMMENTS about details presented in the draft plan, the public fact sheets and the website:

* **FRAGMENTED PIECES:** The map on the website entitled: Discover Australian Marine Parks shows the six regional collections of "parks" but the intro paragraph on the same page says there are 60 marine parks around Australia. Other than the Coral Sea park (which looks roughly the same size as it was under the Labour government), all the others are just fragmented pieces of what must have been previously contiguous protection zones (especially the Southeast and Southwest zones). Why have they been excised from the previous version and how is any vessel supposed to know when it is inside a marine park or outside one? With all these little disconnected pieces of ocean (which are still connected by currents), where is the continuity? What does this mean from a management and compliance point of view? Why is so much of the ocean off the Australian Bight not included? -- is this because you have already decided to allow future oil drilling there? If that is the case, I need to remind you that the planet doesn't need another "Deepwater Horizon" incident, nor does Australia need any of the other hundreds of oil spills that take place near extraction sites and transit pipelines. (There have been so many oil spills along the coast of the Gulf states - Gulf of Mexico - plus the Deepwater Horizon incident that there is now a "dead zone" in the northern Gulf that grows every year so it is not just the Pacific ocean that is dying.)

* **MARION REEF: WHY ONLY HALF NP?** According to the map, only the northern half of Marion Reef is considered National Park. Why not the whole reef? In fact, why aren't ALL the reefs in the Coral Sea National Parks? They should be in far more pristine condition than anything on the Barrier Reef so they should be given the level of protection NP status would provide.

* **PURSE SEINE NETS** Purse seine nets do not constitute 'sustainable' fishing unless they are restricted to only being used ONE DAY per year, include turtle exclusion devices, do not catch unintended species like dugongs, whales, dolphins, etc. and use all the bycatch. Realistically, purse seine nets do not belong in ANY marine park in any zone (including the trawl zone. To allow purse seine nets at all opens the door to mega-scale industrial vessels which can completely empty a fished zone of ALL fish within days. They catch everything that moves and are not a targeted fishery, causing massive waste of unintended species. They do not belong in Australian waters. Neither do long-lines which also catch too many non-target and probably endangered species.

* **MINING** The plan itself says flatly that mining and mining exploration is simply not allowed. However the fact sheet says, "While there is no oil and gas production in our marine parks at present, there may be potential for it in some 'blue' zoned areas in the future. Any proposed oil and gas activities will always be subject to the appropriate environmental assessments and approvals." That is a very big difference and opens a very definite back door to mining interests. While it is said that such proposals will be subject to "appropriate assessments", I'm sorry to say that I have no confidence in the current 'evaluation' system under an LNP government. Let's look at what happens now:

- opening up the Galilee Basin despite strong scientific warnings not to;
- intending to give away \$1 billion dollars of taxpayers' money so that Adani can make a fortune at our expense;

- forcing fracking (in QLD at least) down residents' throats by taking away their water rights, their health rights, and their property rights and allowing unaddressed damage to the environment such as the methane seepage coming out of the Condamine river (and the occasional well that explodes).
- Then there's the so-called 'protection' from the EPBC Act which (at least since the LNP came in) basically allows nearly all developments to proceed regardless of their damage to classified species. A case in point is the EPBC Unit's treatment of referrals which would further push the Spectacled flying-fox down the road to extinction while refusing to upgrade the species status to Endangered after 15 nominations and scientific evidence to support it.

Perhaps it is a growing cynicism but I believe the current evaluation system to be little more than a stalling tactic to LOOK like serious evaluations are occurring when it is intended to approve all development applications anyway. Perhaps the EPBC Act would be properly implemented for the benefit of classified species - as was originally intended - better under Labour

I conclude this point by saying that mining applications should NEVER be considered within any marine park, now or in the future.

* DEFENCE ACTIVITIES: Under national security, it lists defence activities by Commonwealth agencies but does not list cooperative defence activities with other nations (such as the coastal Talisman Sabre at Shoalwater Bay). While there is plenty of wide open space in the outback for training activities to occur, they seem to favour areas of conservation value involving the ocean. Sadly, these are not exercises 'pretending' to use weapons but "live" exercises with "live-ammo". This year, there was a fatal crash at Shoalwater Bay with an American helicopter; I recall a previous year where an American soldier accidentally dropped a bomb on the Barrier Reef which had to be located and retrieved. Live ammo exercises do not belong anywhere near coral reefs or any other special conservation zone (e.g., the habitat of Grey nurse sharks, Shark Bay in WA, etc.).

What is far more worrying is that foreign military have now developed high-tech weapons which are far more insidious such as sonic and laser weapons. The US military plans to do a "live" training exercise soon using such weapons in the Atlantic ocean. Since the military tends not to be forthcoming about their activities or results, there is no way of knowing how much marine life will be destroyed in the massive Atlantic exercise they are planning. Should any future 'collaborative' training exercises be held between Australia and any other countries, the use of such "high tech" weapons (including depleted isotopes) should be banned in Australian waters and especially all marine parks and the Barrier Reef.

* IS SUSTAINABLE DEFINED? References to commercial fishing state that licences/permits/approvals will only be granted to 'sustainable' fishing but where is that defined?

* RULES ABOUT BYCATCH? I don't see how any fishery can be considered 'sustainable' if bycatch is discarded. There need to be rules which control the use of bycatch because no marine life that is accidentally caught should be wasted. There also need to be rules about the use of turtle excluder devices and the ability to return living animals (such as dolphins, sharks, etc.) live to the water (or retained and used if already expired). Out of respect to the rights of all species to exist, unnecessary death of non-target species needs to be minimised and monitored/enforced.

* RULES ABOUT SHARK FINNING? I didn't see any references to the banning of shark finning in all Australian waters (especially in marine parks) and there should be.

* 'DELICIOUS' SEAFOOD: There were comments in some of the public fact sheets about how wonderful Australian seafood is and that is a true statement but some of it is toxic because of pollution, especially from the airborne particulates from coal-fired power plants. I have had to pay

for my own seafood testing (because I have mercury poisoning) and the levels of mercury in the QLD fish I tested were three times the government's legal limit. There is no regular monitoring of mercury levels in Australian fish so the public has no idea what they are buying and how much mercury they could be taking in. If you're going to allow fishing in marine parks, it should at least be a product that is not toxic to the public and you need to find a means of incorporating random mercury testing without sending the price of fish through the roof.

* AQUACULTURE, CHARTER FISHING, SPEARFISHING: In the chart, these three activities are allowed in the Reef Protection Zone. I question what kind of aquaculture would need to be allowed around reefs and would prefer it not be allowed in the Reef Prot. zone to avoid any unintended biological problems with what is being farmed. Charter Fishing as well has plenty of ocean to fish in without disturbing the reefs and should be kept away from the coral reefs. Spearfishing is the best way to attract a shark attack and a quick scan of several years' worth of shark attacks along the QLD coast will reveal that the majority were spearfishing. It is a dangerous sport to engage in and not very friendly to all the wildlife that is injured and not collected for consumption. I'd rather see spearfishing banned entirely but at least kept out of the NP and Reef Protection zones.

* TRAWL ZONE PROXIMITY TO MARION AND SUAREZ REEFS According to the map, the Trawl zone extends to the very edge of both these reefs. Trawling is a very destructive process that scoops up all unintended species that happen to live in the same habitat as their desired prawns. Such a process should not be allowed close to the reefs, especially if it is conducted upstream (up-current) of them. These reefs need much larger buffer zones around them to protect them from the impacts of trawl disturbance.

* BALLAST WATER DISCHARGE: Ballast water discharge is notorious for introducing foreign species into new areas but it is listed in the chart as allowed in all zones. This is not appropriate to at least the NP and Reef Protection Zones and should be disallowed. Additionally, disposal of waste from vessels is also allowed in both the NP and Reef Protection Zones and should be disallowed.

* DECISIONS OUTSIDE THIS PLAN: While the entire exercise of consultation is about what is proposed in this draft management plan, the end of the plan itself says, "The Director may take actions that are not covered by specific prescriptions in this plan, including actions covered by ss.354 and 354A of the EPBC Act." (Page 49) Doesn't this basically throw the consultation on its head by opening the door to all sorts of other developments that are not described in this plan or in the prescriptions? Just because they would be considered under the EPBC Act does not mean they would be acceptable or reasonable (see my comments about EPBC Unit decisions under the topic of MINING). It is bad enough that remediation is seldom enforced with land based developments (especially mining) but developments in the ocean might not be able to be remediated at all. I am greatly concerned by this last section in the draft plan as it leaves the door open to potential 'nasties' which were not made available for public consideration.

There are likely many more details I would have liked to provide comment on for the other regional marine parks but my available time is not unlimited. I have concentrated most of my examination on the Coral Sea plan although a few of my comments are general to all marine parks (e.g., mining and defence) and even to Australian waters in general..

Thank you for reading.

Sincerely,

Deborah Pergolotti
winner: Centenary Medal, Cassowary Award