



**Comment on draft management plans: Australia's Commonwealth
Marine Reserves**

Submission written by dedicated volunteers of the Australia Marine
Conservation Society

September, 2017



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Australian Marine Parks Management Planning Comments
Department of the Environment and Energy
Reply Paid 787
Canberra ACT 2601

September 20th, 2017

Dear Director of National Parks,

Comment on draft management plans: Australia’s Commonwealth Marine Reserves

The Australian Marine Conservation Society (AMCS) is a leading Australian NGO working towards the conservation of Australia’s unique and diverse marine environment. We have a strong, committed base of hundreds of volunteers nation wide, each with a passion and love for the marine environment.

Thank you for the opportunity for a group of our dedicated volunteers to make their comment on the draft management plans for Australia’s Commonwealth Marine Reserves.

Please contact me if we can provide any further information in relation to this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Cordwell', is positioned below the text 'Yours sincerely,'.

James Cordwell
On behalf of the Australian Marine Conservation Societies Volunteers
Marine Campaigner, Australian Marine Conservation Society

Comment prepared by AMCS Volunteers on the benefits of Australia's Marine Protection

Marine Sanctuary protection is widely recognised as an effective management measure for preserving marine biodiversity and ecosystems. Science shows that the combination of marine sanctuaries with other management mechanisms can help the recovery of some species biomass. The establishment of strong marine sanctuaries can also improve socioeconomic conditions due to an increase in the fish biomass migrating out of the protected areas, complimenting fisheries revenue. The Aichi Biodiversity Target 11 set by the Convention on Biological Diversity addresses the goal that at least 10 per cent of coastal and marine areas are managed by well-governed and effectively managed protected areas or by other effective area-based conservation measures by 2020. To meet the target, it is not only important to ensure the size and number of the MPAs in Australia, but also necessary to seek for the representative and connectivity of the MPAs – a network of protection.

Studies show that effectively managed no-take marine sanctuaries have twice as many large (>250 mm total length) fish species per transect, five times more large fish biomass, fourteen times more shark biomass than fished areas. Increase in fish biomass can also benefit the socio-economic condition for the community. It is examined that the expansion of no-take marine sanctuaries to 10% and 30 % can have net benefits that exceed the costs with ratios in the range of 3.17-19.77. However, many marine sanctuaries around the world are too small and are not able to have effective management. There are key five features that are important for building successful Marine Protected Areas (MPAs): no take, well enforced, old (>10 yrs), large (>100 km²), isolated by deep water or sand. Meeting three to five of these features can increase the conservation value of a MPA exponentially.

Cutting down the marine sanctuaries means to challenge the potential of MPAs, what it can help in improving both ecological and socio-economic conditions in longer terms. While the government recognizes climate change is another big threat towards the marine life, the decrease in marine sanctuary protection also means to damage the resilience of marine life and their abilities to deal with climate-related extreme events, and an increase in pressure from fishing activities.

“Oceans are one of the most important ecosystems that we need to preserve and defend. Our seas provide oxygen, food and shelter for all the creatures in the world, including humans. Without oceans life wouldn't exist.

Climate changes, destructive fishing practice, extreme coastal development, just to mention few examples, are a serious threat to the delicate balance on our oceans.

As a scientist and scuba diver, I understand the fundamental roles that marine parks and sanctuaries play in preserving and defending our sea.

In Latin, the Mediterranean Sea was called *Mare Nostrum* that literally means “Our Sea”. We need to preserve and defend Our Sea by increasing the number of marine sanctuaries and marine parks and not by reducing them. We need to do it right now, for us and for the future generations.”

- Dr. Andrea Rabellino, AMCS Volunteer

“Marine Sanctuaries are critical for thriving oceans. They provide several benefits for marine ecosystems such as improving biodiversity and resilience, as well as providing economic benefits from improving fish stocks, nursery habitats and spill over effects.

I have had the privilege of visiting Heron Island, a coral cay included in the Great Barrier Reef Marine Park. Here, I witnessed an incredible array of marine life, free of added pressures from heavy fishing or boat traffic. Marine Sanctuaries are very important for coral reef ecosystems, such as Heron Island which act as nurseries for many economically important fish species.

It would be an international shame for Australia to backtrack on such great progress and protection for our oceans. There are enough pressures facing our oceans, let's cut them some slack and help them out."

- *Hannah McQuitty, AMCS Volunteer*

“I moved to Cairns from London 15 years ago. I had scuba dived here quite a few times before moving here permanently. Now firmly settled with two young children my dive days are very few and far between. I was lucky enough to be invited on a trip a few months ago and went diving for the first time in 8 years.

I dived and I cried (lots).

The devastation and degradation of the environments I went to on the two day trip was stark and a huge wake up call to me and my partner (a former dive instructor here).

Now is the time to do more (so much more) not less.

Personally, we have dramatically altered our lifestyle as a result of this trip. We have installed solar for all our electrical needs. We have reduced our waste significantly. We have switched financial institutions to ones that actively support ethical investment and, as a family, we have actively campaigned to protest against the Adani coal mine which, simply, should not be allowed to happen.

I expect the government, elected politicians, corporations and general public to do the same. By that I mean to make an effort to change, to invest in my children's future, to invest in our planets future.

The reef and its marine parks are out back yard. They are already damaged beyond belief. We need to look after them and try to nurture them back to health not destroy them further.”

- *Dianne Willcocks, AMCS Volunteer*

“To Minister Frydenburg and the Turnbull government,

I am both devastated and disappointed in the decision your government has made to make massive cutbacks to our marine sanctuaries around Australia. The National Network of Marine Sanctuaries is based on scientific studies that consistently show the enormous benefits of protecting these areas, with an ever growing abundance of marine life and diverse ecosystems. To downsize these zones, means risking the health of these ecosystems, and potentially exposing them to destructive commercial fishing, and oil and gas exploration. I have personally snorkeled and dived in areas of the Coral Sea, and these spaces are absolutely incredible, and totally incomparable to other places around the world. As a recent marine science graduate, my absolute dream has to been to work within

the Coral Sea, in protecting and conserving our reefs and oceans. The thought that these places could become lifeless, oceanic deserts terrifies me, as it should you. We truly have an oceanic wonderland right on our doorsteps, and I so strongly urge your government to reinstate these marine sanctuaries, if not enlarge them! We should be cherishing such a natural beauty, before it is too late to recover.”

- Taylah Bruce, AMCS Volunteer

“Marine parks are so important because they are saving lives. This is only one of the many facts that make marine parks so important: they give sea life the opportunity to rehabilitate before being completely destroyed or creating a greater decline in our marine life. All the harm and devastation brought to the given area is usually brought upon by humans so when the protection of the marine parks is given, it helps to prevent humans from doing any more damage.”

Tiara Jay, AMCS Volunteer

“As a recent graduate from the University of Queensland with a bachelor of Marine Science, it is heart breaking to witness a step backwards for Australia’s marine environment. The Downsizing of Australia’s marine reserves would render our oceans vulnerable to overfishing.

Over 75% of wild fish stocks have now been depleted by more than 50% below their original biomass. Large predatory fish such as cod, groupers, Bluefin tuna and sharks are just a few marine species that are now ecologically extinct (i.e. failing to perform their original ecological function) as a direct result of overfishing. In order to maintain and restore our fisheries, marine parks must be protected. The benefits of marine parks are widely accepted in the scientific literature. They allow the maintenance and growth of fish stocks, the protection of threatened species and allow ecosystems improved resilience against climate change. I urge you to consider the long-term economic, social and environmental benefits of our marine protected areas, rather than short-term benefits at the expense of future generations and our marine environment.”

Patrick Hughes, AMCS Volunteer

Australia-wide points specific to the proposed changes to Australia’s Commonwealth Marine Reserves:

- 1. Reject 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).
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.
7. **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.