

20 September 2017

Australian Marine Parks Management Planning Comments
Department of the Environment and Energy
Reply Paid 787
Canberra ACT 2601
managementplanning.marine@environment.gov.au

Dear Department of the Environment and Energy

Australian Marine Parks draft management plans

We welcome the opportunity to comment on the draft management plans for Commonwealth Marine Reserves (proposed to be renamed Australian Marine Parks).

The Nature Conservancy has been an active participant in the balanced use and management of marine resources. In Australia, The Nature Conservancy is currently restoring the lost shellfish reefs of east and southern Australia with the fishing community and government agencies, advancing the science and policy of blue carbon to enable landholders to get paid to protect and restore saltmarsh and mangroves and improving the resilience of our coastline to climate change.

In order to respect the more than 600,000 submissions provided in good faith over many consultation periods, the final zoning for the Commonwealth Marine Reserve networks should more closely reflect the 2012 zoning and the suggested boundary amendments proposed in the Independent Review.

Marine Protected Areas (MPAs) are a critical component of ocean and coastal management, for biodiversity and for fisheries alike. Australia is considered a leader in the designation of marine protected areas¹. This leadership position is based on two fundamental elements – strong science and strong public consultation processes.

Unfortunately, the release of the draft management plans for the Commonwealth Marine Reserve Networks, and the associated proposed zoning changes compromises both of those principles.

¹ Fitzsimons, J. & Wescott, G. (eds) *Big, Bold and Blue: Lessons from Australia's Marine Protected Area Networks*. CSIRO Publishing, Melbourne.

The draft management plans reduce the area of high level protection ('green zones') proposed in the 2012 proclamation from 36% to 20%. This is a significant reduction. Disappointingly, the media release associated with the draft plans conflates green and yellow zones (where some fishing is allowed) by stating that the current draft contains "63 per cent of marine parks covered by green and yellow zones compared to 60 per cent in 2012". Implying high level protection while allowing harvesting in the water column is misleading and fundamentally goes against internationally-accepted protected area policy and science². Further the media release misleadingly implies diving is not permitted in green zones.

The Independent Commonwealth Marine Reserves Review, initiated by the current government in 2014 and completed in 2015, undertook extensive further public consultation, negotiating boundary changes to reduce impact on fishing sector while maintaining the scientific integrity of the system. That review process recommended a highly protected MPA network of 33%.

Substantial reductions in highly-protected zones post the recommendations of the Independent Review process, especially in the South-west and the Coral Sea, **have not** been informed by science nor by a robust public consultation process.

The National Representative System of Marine Protected Areas is built on the nationally-agreed concepts of comprehensiveness, adequacy and representativeness (CAR). The draft management plan zoning suggests the same number (331) of conservation features are protected in green zones in the 2012 and draft management plans. While this seems encouraging from a representation perspective, it is not clear how many conservation features are not represented. The nationally-agreed *Guidelines for Establishing the National Representative System of Marine Protected Areas* states clearly "the NRSMPA will aim to include some highly protected areas (IUCN Categories I and II) in each bioregion"³. In the 2012 zoning, 17 of Australia's 85 bioregions had no high-protection MPAs, and a further 22 had 1% or less in high-protection MPAs⁴. Further reductions in the area high protection is likely to impact this representation, while the significant reduction in green zone area is likely to impact the adequacy of the network.

Again, in order to respect the more than 600,000 submissions provided in good faith over many consultation periods, the final zoning should more closely reflect the 2012 zoning and the suggested boundary amendments proposed in the Independent Review.

Large-scale changes to zoning boundaries and uses, as proposed at this late stage in the process (and outside formal consultation processes), is likely to create further uncertainty for the fishing industry due to the likely unacceptability of the changes to the general public and the parliament. This is an unfortunate situation, considering the process for identifying declaring these Commonwealth MPAs has taken approximately 10 years. Consultation-

² Fitzsimons, J.A. (2011) Mislabeling marine protected areas and why it matters – a case study of Australia. *Conservation Letters* 4, 340-345.

³ p. 6

⁴ Beaver, D. (2016) Halfway there? Gaps and priorities in the development of Australia's marine protected area network. In: Fitzsimons, J. & Wescott, G. (eds) *Big, Bold and Blue: Lessons from Australia's Marine Protected Area Networks*. Pp. 289-303. CSIRO Publishing, Melbourne.

fatigue and insecurity around fishing licences and associated buy-outs has been identified as a significant problem for the commercial fishing sector⁵.

On the issue of renaming Commonwealth Marine Reserves as Australian Marine Parks, we agree the new naming provides greater clarity and support this change.

I trust the above comments will be taken into account when revising these draft management plans for Australian Marine Parks, to ensure both healthy and sustainable fisheries as well as the strong protection of our unique biodiversity.

Do not hesitate to contact me on 0410 567 695 or jfitzsimons@tnc.org if you need further clarification on the above.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'James Fitzsimons', written in a cursive style.

Dr James Fitzsimons
Director of Conservation

⁵ Boag, S. (2016) Has south-eastern Australia's marine reserve network reduced risk and allowed the commercial fishing industry to create value? An industry perspective. In: Fitzsimons, J. & Wescott, G. (eds) *Big, Bold and Blue: Lessons from Australia's Marine Protected Area Networks*. Pp. 365-378. CSIRO Publishing, Melbourne.