

Sally Barnes
Director of National Parks
Department of the Environment and Energy
Canberra ACT 2601
managementplanning.marine@environment.gov.au
renaming.marine@environment.gov.au

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Dear Ms Barnes,

Australian Marine Parks Renaming Comments
Australian Marine Parks Management Planning Comments

- 1) Regarding the proposal to rename Commonwealth marine reserves to 'marine reserves'

This change is neither necessary, nor sensible. Marine governance in Australia is complex and confusing and requires clear signals to indicate who is responsible for managing each of our marine regions. Renaming and rebranding will also consume limited time and resources which could be better spent.

- 2) Response to the draft management plans

The 2012 National Representative Network of Marine Protected Areas had room for improvement (such as in the poor level of protection for at-risk areas on the continental shelf [1]), and it was my hope that this revision would address those limitations. It does not.

As a professional ecologist and conservation planner, as well as a scuba diver and proud advocate of Australia's unique environments, I am very keen that we get this right.

It was a Liberal government who championed the rezoning of the Great Barrier Reef Marine Park, through courageous leadership and a commitment to long term social and environmental outcomes. The same kind of leadership is required again for this much larger planning effort. Such leadership has not been displayed to date and an important opportunity for the coming decade of marine management risks being seriously compromised.

I am currently researching the legacy effects of the Great Barrier Reef Representative Areas Program and associated compensation packages in the 2000s as part of a PhD on impact evaluation and spatial planning at the University of Oxford. Following interviews with senior decision makers and representatives from all sectors involved at the time, strengths and weaknesses of this influential planning process have become apparent.

Unfortunately, during the planning for the revised Australian Marine Parks, several key lessons from the Great Barrier Reef Representative Areas Program [2] appear to have been forgotten;

- The use of transparent and quantified representation targets for each of the 72 bioregions in the Great Barrier Reef focused debate about how best to meet those targets and the nature of associated trade-offs. Through my interviews, senior representatives on all sides of the debate stated that this commitment to specific levels of protection was an essential element in the plan's success.
 - The absence of quantified targets for protection of specific habitat types leaves the current plans exposed to vague commitments which make the likely effectiveness of the plans difficult to assess. Furthermore, bioregions need to be described at appropriate scales, for example, the use of ten bioregions for the entire Temperate East is completely inadequate.

- Carefully planned, long term monitoring programs are essential to trace the effectiveness of marine protected areas [3], and must be implemented at the outset.
 - In the Temperate East Management Plan for example, a series of ambitious objectives for adaptive management are provided (section 1.12) but the necessary strategy for achieving these is missing. Now is the time to start implementing measures to “evaluate the effectiveness of this plan in achieving its objectives” (p 16), especially as the general nature of the objectives e.g. “the protection and conservation of biodiversity and other natural, cultural and heritage values of marine parks in the Temperate East Network” (p 9) make them particularly difficult to account for.
- Failure to adequately address the impacts of recreational fishing can have consequences for the commercial fishing industry as well as the environment.
 - The impacts of recreational fishing also appear to have been sidestepped in these management plans.
- Compensation packages can be mishandled, like the Structural Adjustment Package in the GBR [4], however this does not mean that revisions to allowances for extractive uses should be avoided altogether, as appears to be the general trend in these plans.

It is now over a decade on from the historic period of protected area designation in Australia in the 2000s and the science on marine reserves has improved dramatically. In fact, Australian scientists are world leaders in marine planning and protected area design, something we should be very proud of.

Unfortunately, the proposed plans do not reflect the best available science as you state, and do not reflect learnings from experiences such as the Great Barrier Reef Representative Areas Program and Structural Adjustment Package, nor scientific advances which have emerged since that period.

I would be happy to discuss the outcomes of my research as they apply to the design of these management plans, and welcome revisions to the management plans as they currently stand.

Yours sincerely,



Emma J McIntosh
 PhD Candidate, School of Geography and the Environment
 University of Oxford, United Kingdom
 BHP John Monash Scholar, Australia 2014
 emma.mcintosh@ouce.ox.ac.uk
 +44 (0)7923 587 887

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