



Ms. Sally Barnes
Director of National Parks
51 Allara Street
GPO Box 787 |
Canberra ACT 2601

18 September 2017

Dear Ms Barnes,

I make this submission as the IUCN Council endorsed representative for Oceania on the IUCN World Commission on Protected Areas (WCPA). The Commission is the foremost expert global body on protected area issues. WCPA is guided by IUCN's vision of "a just world which values and conserves nature."

This submission does not address the proposals in detail but includes points from several Oceania marine experts of the Commission. We are aware that other conservation organisations have done very thorough reviews of the current proposals.

WCPA has a strong commitment to advancing marine conservation. Australian Members were key contributors to the *Conserving Australia's Marine Environment: Key Directions Statement* developed by the Australian Committee for IUCN in 2013. (Figgis & Koss, 2012). This statement contains many important directions on marine policy, but of significance to the current process the statement said, "All governments need to address these threats over the long term in a systematic and integrated manner and avoid short-term, politically-driven decision making."

IUCN as a whole and WCPA Oceania welcomed the declaration of Australia's Commonwealth marine reserves in November 2012. The declaration of the National Representative System of Marine Protected Areas in the third largest marine jurisdiction in the world was particularly important because it was a bipartisan commitment of various Australian governments. We understand the preparatory stage took over seven years of comprehensive scientific assessment and extensive public consultation to achieve.

After a change of government in 2013 the government suspended the parks' management plans and launched an independent Commonwealth Marine Reserves Review 2014 to review the zoning and underpinning science for the reserves. Although many reputable conservation organisations saw this as an unnecessary and politically driven step, most agree the Review was a very thorough process involving both further extensive public and stakeholder consultation through a Bioregional Advisory Panel and an assessment of the latest science by an Expert Scientific Panel.

In October 2016 WCPA Oceania put forward some detailed comments in response to the Report which stand.

Given this intensive process leading up to the declarations, and the comprehensiveness of the recent public consultation and scientific scrutiny which shaped the Review Report, WCPA, along with many other components of civil society, would have expected that the final management plan proposals would reflect the process in which so many had participated.

We would also have expected that the proposals would reflect the global consensus that humanity has reached a critical juncture and urgent action is needed to restore and conserve marine life and the ecological functioning of the world's oceans. These concerns have been reflected in the Convention on Biological Diversity 2020 Aichi Targets, the Agenda 2030 Sustainable Development Goal 14, *Life Below Water*, and the United Nations Ocean Conference earlier this year which included the powerful call for political and community leadership in *Our Ocean, Our Future: Call for Action* <https://oceanconference.un.org/callforactionreview>.

In particular such calls have reflected the growing scientific consensus that fully protected zones (marine sanctuaries) are critical in delivering broad ranging and significant benefits for marine life. At last year's IUCN World Conservation Congress in Hawaii Motion 053 called on all IUCN members to "*designate and implement at least 30% of each marine habitat in a network of **highly protected** MPAs and other effective area-based conservation measures, with the ultimate aim of creating a fully sustainable ocean at least 30% of which has **no extractive activities**, subject to the rights of indigenous peoples and local communities.*"

However, the draft management plans currently before the Australian public are substantially different to the recommendations of the Review and in some cases significantly reduce the level of protection proposed by both previous processes. The detailed critique of the Centre for Conservation Geography by Daniel Beaver, *The New Management plans for Australia's Marine Parks (July 2017)* highlights that these proposals clearly ignore the Expert Science Panel's well-argued recommendations and will have a detrimental impact. We understand the following figures are proposed:

24% in the Coral Sea (a 53% cut)
7% of the South-west region (a 40% cut)
5% in the North-west region (a 49% cut)
4% in the Temperate-east region (a 2% cut)
and, 1% in the North region (a 57% cut).

The Report says:

The Expert Science Panel found that all primary conservation features should have a significant sample included within National Park Zones. Instead the new management plans have chosen to leave 259 primary conservation features with no representation within National Park Zones.

And

The Expert Science Panel stressed the importance of increasing the protection of Australia's diverse shelf and upper slope habitats. The new management plans instead remove massive areas of shelf and upper slope National Park Zones. The total area of shelf and upper slope protection removed from protection by the new management plans (3.8 million hectares) is larger than the combined size of the New South Wales, Victorian, Tasmanian, South Australian, Western Australian and Queensland marine sanctuary networks combined. (Page 18).

While it is understood that the government has a difficult challenge to balance many factors in making decisions, the severity of these proposed reductions is regrettable and runs counter to the government's selected advisors and the recommendations made by IUCN global experts and endorsed by IUCN members for the world's oceans.

Therefore WCPA Oceania feels compelled to add its voice to those who conclude that, given the major divergence from the recommendations of the Scientific Panel, the current proposals are at least in part shaped by "politically driven decision making". We recommend that they be revised to more closely reflect the outcomes of the decade-long consultations and scientific assessments for this internationally significant network of marine parks.

Our nation is a prosperous democracy, we have well trained marine experts, our marine environment is outstanding, and therefore we have all the assets and every reason to excel in marine planning and management.

It is vital that we defend Life Below Water and send an important message globally that Australia is maintaining its leadership role in marine conservation.

A handwritten signature in black ink that reads "Penelope Figgis". The signature is written in a cursive, flowing style.

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