



their importance to a healthy and balanced ecosystem.

Higher-order predators, such as sharks, will be particularly vulnerable to changes evidenced in lower trophic levels. HSI has therefore called for an end to targeted shark fishing in Australia and one of the most efficient ways of doing this is through the implementation of effective marine parks. Therefore we do not consider the current draft management plans which will allow for trawling, gillnetting and longlining to be adequate for the long-term sustainability of our marine ecosystems and species.

As well as fishing pressures, sharks and other marine species like turtles and whales are particularly susceptible to changes in environmental parameters. Climate change and the acidification of the oceans present further uncertainties for the future of our fisheries, and increases in water temperature, coupled with changes in oceanic chemistry, stratification and circulation patterns are predicted to result in significant alterations to marine ecosystems. Marine parks have been proven to offer these ecosystems resilience and the chance for recovery from these impacts.

Before moving forward with the Marine Park zoning the following issues need to be rectified where:

- National Park zone areas have been made smaller (eg: the Coral Sea Marine Park, Cape York West Marine Park, Gascoyne Marine Park, Argo Rowley Terrace Marine Park, the SW Corner Marine Park (Diamantina Fracture Zone section), Lord Howe Marine Park, Dampier Marine Park and Twilight Marine Park);
- or removed altogether (ie: the Wessels Marine Park, Geographe Bay Marine Park, the Peaceful Bay section of the SW Corner Marine Park);
- or where National Park zone areas have been moved to areas of far less ecological importance (eg: the Perth Canyon Marine Park, the Gulf of Carpentaria Marine Park);
- or where the Government has ignored the Review's recommendations for additional National Park zone areas (eg: in the Norfolk Island Marine Park).

HSI does support the following new and increased National Park zones added to the 2012 proposals:

- the new National Park zone transect and National Park zone areas over the canyon in the Bremer Marine Park;
- the new National Park zone transect over the Swan Canyon in the SW Corner Marine Park;
- the increased National Park zone area in the Two Rocks Marine Park;
- and the new National Park zone area at Oceanic Shoals.

HSI urges that new marine National Marine Park zones are declared:

- In the northern section of the Kimberley Marine Park;
- at west Holmes and South Flinders Reefs in the Coral Sea;
- in the Norfolk Island Marine Park as recommended in the Review;
- adjacent to the Great Barrier Reef Marine Park as recommended in the Review;
- that every marine park under Review be afforded an adequately sized and located National Park zone (currently 16 of the 44 of have none) and;
- that all marine parks on the completion of their management plans should be fully protected from oil and gas mining as has been achieved in the Great Barrier Reef MP and the Coral Sea MP.

## **Protecting critical marine habitats**

HSI would like to again reiterate to the Government the importance of critical habitats, especially in the face of climate change, marine debris and over-fishing, in helping to provide resilience and the recovery for marine species and ecosystems. Critical habitats are feeding, breeding and resting areas that are integral to the survival of a range of marine species including turtles, whales, fish and sharks.

Australia's performance with regards to protection for critical marine habitat under the EPBC Act is very poor. The identification of critical habitat, whilst better in the terrestrial environment is still inadequate in the marine environment and it is essential that these areas are sufficiently included within the proposed marine parks.

Hundreds of 'habitats that are critical to the survival' of many species and ecological communities have been identified by scientists in the field and in recovery plans, but only five have been listed on the EPBC Act Register of Critical Habitats and none are listed for the ecological communities. This means that most habitats critical for the survival and recovery of threatened species or ecological communities are not being afforded the highest level of protection, or any level of formal protection in cases where critical habitat occurs outside of conservation reserves. The new network of Marine Parks is one way to provide the essential protection of these critical areas. Unfortunately, destructive fishing practices in 38 of 44 marine parks, full protection of only 7 reefs out of 37 in the Coral Sea and claims by government that Habitat Protection zones (HPZs/yellow zones) are equal to National Park (IUCNII) shows that these proposals are severely lacking in affording critical habitats with standout protection. There is extensive scientific evidence shows that partial protection does not generate biodiversity benefits comparable to sanctuaries. Therefore, HPZs must not replace sanctuary zones especially for the Coral Sea.

### **The Coral Sea**

The Coral Sea remains one of the few areas on earth where large pelagic fishes such as tuna, billfish, marlin and sharks have not yet been severely depleted. The coral sea contains a diverse range of coral reefs, remote islands, sandy cays, underwater mountains, abyssal plains and deep-sea canyons.

The deep cuts that have been made to the Coral Sea's large National Park zone is a terrible loss for our marine environment. HSI urges that the Coral Sea Marine Park should remain zoned to protect all 37 reefs. Allowing the possibility of longlining, trawling and gillnetting taking place such a pristine area (recognised as such in May 2009 when the then Federal Minister for Environment, Heritage and the Arts, Peter Garrett MP, announced the Coral Sea Conservation Zone) goes against the chance of Australia creating a lasting environmental legacy.

Humane Society International has also called for the Coral Sea to be listed as a National Heritage place for its rich natural and cultural heritage. Humane Society International, along with several other conservation organisations, nominated the Coral Sea for a National Heritage Listing in 2010 and the Federal Environment Minister has repeatedly deferred decisions. The deadline for an Australian Heritage Council decision was June 2017, but HSI was displeased to see that this deadline has again been extended until 2019.

### **Submissions**

HSI would also like to remind the Government that in the 2016 round of consultations almost 55,000 people provided comment calling for a significant increase in marine National Park zones. HSI asks that you act on this and all other submissions equally,

whether they were done in an online facility or through other means.

The cutbacks to protection the Government has proposed in the current draft management plans for 44 marine parks need to be reinstated to ensure the National Network of Marine Sanctuaries can provide proper protection for marine species and ecosystems well into the future.

For any questions on this submission please contact [Jessica@hsi.org.au](mailto:Jessica@hsi.org.au) or phone (02) 9973 1728.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jessica Morris', with a stylized flourish at the end.

Jessica Morris  
Marine Scientist  
Humane Society International

CC: Josh Frydenberg MP, Minister for the Environment  
Tony Burke MP, Shadow Environment Minister