

Commonwealth marine parks review

20/9/2017



Sent via email: managementplanning.marine@environment.gov.au

Re: SOUTH-WEST REGION MARINE PARKS DRAFT MANAGEMENT PLAN

The Wilderness Society (TWS) is an independent, self-funded non-profit organisation that seeks to protect, promote and restore wilderness and natural processes across Australia for the survival and ongoing evolution of life on Earth.

The process to establish Commonwealth Marine Parks was one of the most consultative processes in Australia's history, including over 10 years of scientific assessment, years of consultation and almost 750,000 public and stakeholder submissions...with over 90% support (see Appendix 1 & 2).

The South-west region includes the cooler, temperate waters of southern Australia, home to an extremely high number of unique species restricted to our southern coastline including the Australian sea lion and the Western Rock Lobster. The SW region hosts two of only three known places in Australian waters where the largest animal ever, the blue whale, comes to feed. The Great Australian Bight wilderness is where many threatened species, such as the southern right whale and their calves seek sanctuary.

- **Regarding overall high level green/National Park Zone protection across the South-west region:** The Wilderness Society South Australia (TWS SA) is concerned that the Government proposes to cut NPZ protection in the South-west by 40%, despite the Review and the science community finding the need for more high level protection.
- Regarding **Geographe Bay Marine Park:** TWS SA is concerned with the Government's proposal to remove both the Marine National Park (green) zones in the Geographe Bay Marine Park, replacing them with weaker (yellow) Habitat Protection zones. These yellow zones have only been applied elsewhere in the region in waters more than 600m deep, a very different environment to the shallow, sheltered and heavily pressured Geographe Bay. The removal of the Marine National Park zones goes against recommendations from the Government's own Review. Acknowledging the level of consultation, the science evidence and the 'significant community

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interest', the Review recommended retaining the Marine National Park zones, while reconfiguring them slightly to better align with immediately adjacent green zones in the Ngari Capes Marine Park established by the Barnett Government, and to improve ease of navigation for fishers. These two Marine National Park zones recommended by the Review would take up only about 4% of the Geographe Marine Park, a balanced approach that would deliver improved outcomes for everyone and a great tourism opportunity for the region.

- Regarding **Perth Canyon Marine Park**: We are concerned about the proposal to move the Marine National Park Zone protection away from the key blue whale feeding grounds at the head of the Perth Canyon to an area of far less ecological importance. The blue whale is a protected species and this area is the only area of it's critical habitat feeding ground to be included in Australia's marine parks network.
- Regarding **Twilight Marine Park**: We are concerned about the proposal to reduce over 1,000km² of Marine National Park Zone in this park. For comparison, this is an area larger than the entire NSW state waters marine sanctuary network, with the maximum economic benefit to fisheries estimated by the Government commissioned ABARES report to be only \$82,500 per annum, or \$2,500 per annum to each license holder in Zone 2 of the WA Temperate Gillnet Fishery. This combined with the loss of critical continental shelf protection at Peaceful Bay (in the **SW Corner Marine Park**) and at the head of the **Bremer Marine Park** (western side) leads to an overall loss of shelf protection across the South-west marine reserve network when there was too little to start with, as per the 2011 Science Statement of Concern:
http://www.meeuwig.org/wp-content/uploads/2015/08/2011_ScienceStatement_SW-National-System-Reserves.pdf
- Regarding **SW Corner Marine Park/Diamantina Fracture Zone**: We are concerned about the loss of a very large area of Marine National Park Zone over the Diamantina Fracture Zone, a Key Ecological Feature whose ridges and seamounts are thought to act as 'stepping stones' for species dispersal and migration across the region and the wider abyssal plain (Wilson & Kaufman 1987, in Richardson et al. 2005). Further, its size, physical complexity and isolation indicate that it is likely to support deep-water communities

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characterised by high species diversity and uniqueness, see:
<https://www.environment.gov.au/sprat-public/action/kef/view/22;jsessionid=ACF4D013818E181DD36A2CF029BE5656> The zoning proposed is a downgrade to the lowest level of protection in the park system, Multiple Use (blue) zone. This will allow mining and most forms of fishing, despite its extremely remote, rough and deep location, making it unsafe for oil and gas drilling (with an adequate oil spill response most likely impossible) and highly unlikely to be a serious economic proposition for fishing.

- Regarding the **Western and Southern Kangaroo Island Marine Parks**: We are concerned that despite there being no oil and gas leases over these two parks, a strong desire in the local community for Kangaroo Island to be as protected as possible from debilitating oil spills and the long term effects of oil and gas industrialisation on pristine marine wilderness, this has not been recognised with an upgrade of zoning to 'Special Purpose Zone (Mining Exclusion)', as has been afforded the northern most section of the Great Australian Bight Marine Park. Oil exploration will put Kangaroo Island's important fishing and lucrative tourism industries at risk and greatly diminish the standing of marine parks in this community.

TWS SA:

1. **Supports the draft management plan where** the Marine National Park Zone (green no-take IUCN II) areas have not changed from what was declared in 2012, or where there are new and/or increased National Park zones:
 - a. The new National Park zones in the **Bremer Marine Park** (the transect and over the Bremer Canyon);
 - b. The new National Park zone transect over the Swan Canyon in **the SW Corner Marine Park**;
 - c. The increased National Park zone area in the **Two Rocks Marine Park**.
2. **Rejects the draft management plan where** the Marine National Park zones (no-take IUCN II) are reduced or removed:
 - a. In the **SW Corner Marine Park** (Diamantina Fracture Zone section), at the **Twilight Marine Park**, and over the western inner-shelf area in the Bay at **Bremer Marine Park**;

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- b. In the **Geographe Marine Park**, and the Peaceful Bay section of the **SW Corner Marine Park** where the Marine National Park Zones are removed entirely;
- c. In the **Perth Canyon Marine Park** where the National Park zone over the Head of the Canyon has been moved away from the critical habitat of a protected species, to an area of far less ecological importance.

3. **Recommends that the following increase in MNPZ be made:**

- a. Expansion of the MNPZ in the Great Australian Bight Marine Park westwards to the SA border. There is very little MNPZ protection on the continental shelf in the Commonwealth waters marine parks network. This proposal would create Australia's largest area of high level protection on the continental shelf, in an area with globally recognised values, with no displacement of mining and very little additional fishing displacement.
4. Supports the Draft's proposal to put in place a large no-mining zone 'Special Purpose Zone (Mining Exclusion)' in the **Great Australian Bight Marine Park**, and recommend that the **Western and Southern Kangaroo Island Marine Parks** are given the same zoning upgrade throughout. Further, we recommend that all Oil and Gas development within and adjacent to the marine parks in the Great Australian Bight region be prohibited.

We also recommend that other key coastal communities adjacent to commonwealth marine parks be given protection from mining at Esperance (the **SW Corner and Eastern Recherche Marine Parks**), Peaceful Bay (**SW Corner Marine Park**) and **Perth Canyon Marine Park**.

5. Recommends that the provision of permanent protection for Australian Sea Lions from gillnetting be provided in the relevant commonwealth marine parks by ensuring that the zoning does not offer less protection than existing fisheries closures.

For further information, contact: Peter Owen, Director, The Wilderness Society (South Australia), email: peter.owen@wilderness.org.au

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(Appendix 2)

Commonwealth Marine Reserves Review

11/10/2016

Sent via email: managementplanning.marine@environment.gov.au



Re: THE SOUTH-WEST MARINE REGION MANAGEMENT PLAN

The Wilderness Society (TWS) is an independent, self-funded non-profit organisation that seeks to protect, promote and restore wilderness and natural processes across Australia for the survival and ongoing evolution of life on Earth.

The process to establish the Commonwealth Marine Reserves was one of the most consultative processes in Australia's history, including over 10 years of scientific assessment, years of consultation and almost 750,000 public and stakeholder submissions – with over 90% support.

When the then Environment Minister Tony Burke announced the Marine Reserve Network on July 11 2012, he noted the reserves had not been designed to manage fisheries, but to help ensure the health and productivity of Australia's oceans.

In 2013 the newly declared marine parks were suspended from operation and a premature Review into the sanctuary zoning commissioned by the incoming Abbott Government. Now, three years later, the Review findings for the South-West Marine Region raise some serious concerns.

REVIEW FINDINGS

The South-west region includes the cooler, temperate waters of southern Australia, home to an extremely high number of unique species restricted to our southern coastline including the Australian sea lion and the Western Rock Lobster. The SW region hosts two of only three known places in Australian waters where the largest animal ever, the blue whale, comes to feed. The wild waters of the Great Australian Bight are where many threatened species, such as the southern right whale and their calves, seek sanctuary. With all this in mind, it concerns us that the Review:

- **Proposes the loss of all Marine National Park Zone protection for the key blue whale feeding grounds** at the head of the Perth Canyon;

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- **Proposes the loss of critical shelf protection in the Great Australian Bight with the loss of over a 1,000km² of Marine National Park Zone** in the Twilight Marine Reserve. For comparison this is an area larger than the entire NSW state waters marine sanctuary network, with the maximum economic benefit to fisheries estimated by ABARES to be \$82,500 per annum or \$2,500 per annum to each license holder in Zone 2 of the WA Temperate Gillnet Fishery. This combined with the loss of critical shelf protection at Peaceful Bay and Bremer Bay leads to an overall loss of shelf protection across the South-west marine reserve network;
- **Proposes to open up the South-west Marine Reserve network to trawling.** Just two fisheries will benefit from the proposals. ABARES estimates that the proposed opening up of the Bremer Marine Reserve to trawling would carry a maximum benefit to the WA South Coast Trawl Fishery of \$4,700 per annum or \$1,175 per licence holder per annum. Equally the proposed opening up of the Western Eyre Marine Reserve to trawling is estimated by ABARES to have no economic benefit to the Great Australian Bight Trawl Fishery.

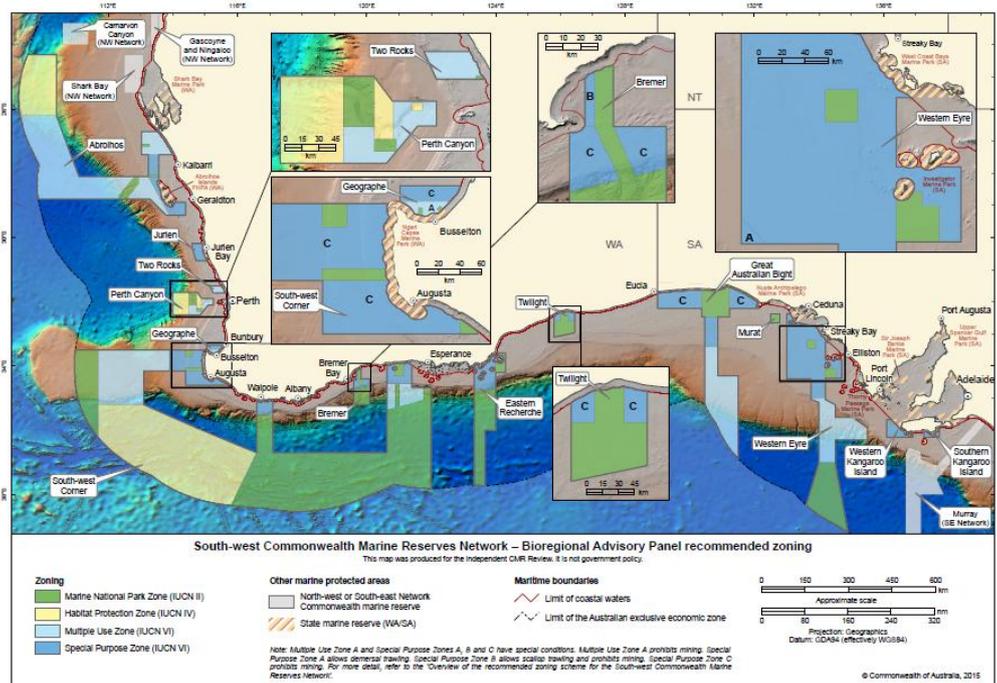
Recommendations

Despite finding that highly protected marine parks are vital as a key tool in marine management, the Review has failed to act on its own advice, missing the opportunity to deliver a science based result in the South West.

The following are our recommendations to the Government in relation to the redrafting of the South West marine region management arrangements. We:

1. accept the proposed extensions to the MNPZ in the **Two Rocks, Bremer, South-west Corner** and **Perth Canyon** CMRs;
2. recommend the expansion of the **Great Australian Bight** CMR's MNPZ westwards to the South Australian border. There is very little high level MNPZ protection in the CMR network. Where possible, more not less should be created in the management arrangements. This proposal would create Australia's largest area of high level shelf protection with very little additional displacement for commercial or recreational fishers;
3. reject the proposed removal of MNPZ protection within the **Bremer, Perth Canyon** and **Twilight** CMRs;

4. reject the proposal to open the South-west CMRs to trawling, including the loss of MNPZ protection over the inner-shelf area of the **Bremer** CMR for scallop dredging;
5. accept the proposed extensions to protection from mining in the South-west CMRs and seek the expansion of protection from mining for other key coastal communities adjacent to CMRs including at Kangaroo Island (**Western Kangaroo Island** CMR), Esperance (the **SW Corner** and **Eastern Recherche** CMRs), Peaceful Bay (**SW Corner** CMR) and Perth (**Perth Canyon** CMR), and the **Great Australian Bight**;
6. recommend the provision of permanent protection for Australian Sea Lions from gillnetting by ensuring that the zoning of the CMRs doesn't offer less protection than existing fisheries closures; and
7. recommend that all Oil and Gas development within and adjacent to the marine reserves of the Great Australian Bight region be prohibited (see Appendix 1 below).



For full-sized map visit <http://www.parksaustralia.gov.au/marine/review/reports.html>

For further information, contact: Peter Owen, Director, The Wilderness Society (South Australia), email: peter.owen@wilderness.org.au

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(Appendix 1)

Commonwealth Marine Reserves Review
cmrreview@environment.gov.au

31/3/2015



Sent via email: haveyoursay@marinereservesreview.com.au

Re: THE SOUTH-WEST MARINE RESERVE NETWORK

The Wilderness Society (TWS) is an independent, self-funded non-profit organisation that seeks to protect, promote and restore wilderness and natural processes across Australia for the survival and ongoing evolution of life on Earth.

The process to establish the Commonwealth Marine Reserves was one of the most consultative processes in Australia's history, including over 10 years of scientific assessment, years of consultation and almost 750,000 public and stakeholder submissions – with over 90% support.

When the then Environment Minister Tony Burke announced the Marine Reserve Network on July 11 2012, he noted the reserves had not been designed to manage fisheries, but to help ensure the health and productivity of Australia's oceans.

<http://theconversation.com/marine-reserves-not-about-closing-fisheries-but-about-preserving-ocean-health-8936>

The prime purpose of no take Marine National Park Zones is the conservation of species, communities, habitats and ecosystems. The link below is a recent study that highlights the benefits, now well established in the scientific literature.

<http://theconversation.com/study-vindicates-the-benefits-of-no-fishing-zones-on-the-great-barrier-reef-39366>

As a member of the Save Our Marine Life Alliance, we support the Centre for Conservation Geography Report – The South West Marine Reserve Network, submitted to this Review.

We also emphasise the following:

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1. **Retain the existing zoning** in all Marine Reserves - at a bare minimum;
2. **Improve and expand the Marine National Park Zones** (marine sanctuaries) as suggested by the science community;
3. **Prevent Oil and Gas development within and adjacent to the marine reserves** of the Great Australian Bight region;
4. **Implement the marine reserves immediately**, with Marine National Park Zones retained and improved.

The Great Australian Bight is a unique ecosystem of international conservation importance. It is a nursery for southern right whales and a sanctuary for blue whales, humpback whales and Australian sea lions.

We believe the marine reserves of the Great Australian Bight region need to exclude all oil and gas development. This type of industrialisation should not be allowed within or adjacent to a marine reserve.

There is a real and immediate threat to the region with oil companies currently engaged in seismic exploration and possible exploration drilling within a year.

BP is pushing for approval to potentially drill within the Great Australian Bight Marine Reserve in early 2016. It is important to remember that this is when it all went wrong in the Gulf of Mexico – the worst oil disaster in history, devastating marine life, fisheries, tourism and local communities.

Maintaining and maximising opportunities for connectivity between Australian Government and South Australian Government marine reserves is critically important. It is well documented that a lack of connectivity can exacerbate biodiversity loss and species extinction.

All of the marine reserves across the Great Australian Bight maximise opportunities for connectivity between jurisdictions. An important example is the **Investigator and Pearson Island Group**, within the Western Eyre Marine Reserve.

Marine National Park Zones are critical as they are the only zones scientific research shows are capable of delivering significant benefits

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for marine life and furthering our understanding of Australia's oceans. All other zones only offer partial protection and are designed to achieve social or economic outcomes, or to act as buffers to the Marine National Park Zones.

Surveys of Australian recreational fishers indicate that the majority support no take Marine National Park Zones, citing perceived benefits for sustainability and conservation.

Marine National Park Zones provide key regional economic infrastructure for nature based tourism, to maintain ecosystem services and to realise the economic value of community aspirations for healthy oceans.

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