



Australian Marine Parks Management Planning Comments  
Department of the Environment and Energy  
Reply Paid 787  
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Cc: Hon Ian Hunter MLC, Minister for Sustainability, Environment  
and Conservation  
Ms Sandy Pitcher, Chief Executive, Department of  
Environment, Water and Natural Resources

20<sup>th</sup> September 2017

## **RE: Commonwealth Marine Parks Review - SOUTH-WEST REGION MARINE PARKS DRAFT MANAGEMENT PLAN**

As an independent, non-profit and strictly non-party political organisation, the Conservation Council SA represents nearly 60 of South Australia's environment and conservation organisations and their 90,000 members.

We are proud to be a member of the Save our Marine Life Alliance.

### **General Comments**

Australia should be very proud of our network of Commonwealth waters marine parks: the world's first national network. The strong scientific consensus is that marine parks with large 'sanctuaries' are a key tool for keeping the world's oceans functioning well.

We are therefore deeply concerned about the big cutbacks to marine parks proposed around the country, as part of a premature review of the network. In particular, we strongly oppose the proposed reduction of almost 40m hectares of marine 'sanctuary' area (Marine National Park / IUCNII).

These reductions appear to be far in excess of those proposed by the Government's own independent Review, released last year. Despite finding that highly protected marine parks are vital as a key tool in marine management, the Turnbull Government has failed to act on the advice of the Review it commissioned, missing the opportunity to deliver a science based result in the South-west marine region.

### **General Comments on the National Network:**

- 1. We categorically reject the cut backs of Marine National Park 'sanctuary' zoning across the Network and call for the Turnbull Government to fully restore and increase the IUCN II zoning in Australia's Marine Parks without delay.** The Government's independent Review recognised the extensive science and consultation that led to the creation of the 40 parks in 2012. However, the Turnbull Government's draft management plans

recommend reducing, relocating and in most cases completely removing the MNPZ protection over key habitats, particularly in the globally important Coral Sea. In the face of devastating coral bleaching, mangrove dieback and vanishing kelp forests, MNPZ coverage in Australia's Marine Parks are even more important now than ever.

2. **The results of the statutory consultation are being ignored** - the vast majority of submissions to Parks Australia's first consultation round last year strongly supported the restoration and increase in high level marine national park zone protection. Yet, despite that, the Government is proposing the complete opposite to the consultation outcomes in all but 1 of the 44 marine parks.
3. **Partial protection zones are not a substitute for high level 'sanctuary' protection** – we reject the claim that Habitat Protection (yellow zones) are equal to Marine National Park zone (green zones). Protecting the sea floor provides only partial protection and does not protect the marine life living within the water column.
4. **We categorically reject the proposal to allow mining in parks** – industrial activities like mining and mining exploration are not compatible with marine parks.
5. **We categorically reject the proposal for destructive commercial fishing activities such as trawling, gillnetting and longlining in the marine parks** – by opening up 38 of the marine parks to destructive commercial fishing practices such as trawling, gillnetting and longlining, the Government is proposing to ignore the findings of the independent Fishing Gear Risk Assessments it commissioned, which found those types of fishing to be incompatible with many of the conservation values in the parks. Further, allowing in destructive forms of commercial fishing puts at risk the benefits that marine parks provide not only to marine life, but also more broadly to tourism, recreational fishing and other types of commercial fishing that can operate sustainably inside parks alongside high level MNPZ zoning.
6. **Poor economic argument** – the catch value returned to commercial fishing from the network-wide MNPZ cuts is worth only \$4m per annum – only 0.3% of the total revenue of Australia's wild catch fisheries. Contrast that with Australia's marine tourism industry, which is worth \$28b per year.
7. **The marine park zoning must be science-based** – the Government's own Expert Science Panel found that marine parks declared in 2012 were the result of sound science and consultation. Leading scientists believe the 2012 network need more marine sanctuary coverage, not less.

### **South West Region:**

The Conservation Council of SA is concerned about the lack of protection of the **Western and Southern Kangaroo Island Marine Parks** from debilitating oil spills and the long term effects of oil and gas industrialisation of pristine seas. While we welcome an upgrade of zoning to 'Special Purpose Zone (Mining Exclusion)' to the northern most section of the Great Australian Bight Marine Park. We are puzzled as why this protection has not been given to the KI parks. This is perplexing as the area around Kangaroo Island is considered to be highly prospective for oil and gas discovery, and therefore at significant risk of such operations being allowed in the foreseeable future. Creating an oil or gas field in these near-shore marine parks would put the Island's important fishing and lucrative tourism industries at risk. This will greatly diminish the reputation and facility of marine parks in this community.

We also concerned about:

- **high level green/National Park Zone protection across the South-west region** – 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, not less.

- 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.
- 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 proposal to reduce over 1,000km<sup>2</sup> of Marine National Park Zone in **Twilight Marine Park** 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).
- 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.

The following are our recommendations in relation to the Draft South West marine region management arrangements:-

1. **We support 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, ie -
  - 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. **We reject the draft management plans where** the Marine National Park zone (no-take IUCN II) are reduced or removed entirely, ie:-
  - 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** – all which have important areas of MNPZ removed;
  - 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. **We recommend that the following increase in MNPZ be made:-**
  - a. Expansion of the MNPZ in 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, and with no displacement of mining and very little additional fishing displacement.
4. **Mining** - We support 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 the 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. **Gillnetting** – We recommend 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.

I am happy to provide further information if required.

Yours sincerely,



Craig Wilkins  
Chief Executive