

I would like to make a brief submission on the current CMR review recommendations.

I fully agree with much of the scientific review and its recommendations with respect to undertaking robust inventory and monitoring programs, link that knowledge to management decision support, and evaluation of zoning arrangements. However, those recommendations just don't gell with those of the regional reviews. The vast majority of significant human impacts are on the waters of the continental shelf. This is where our coral reefs are found for example. Yet the review proposes to radically reduce the already low level of protection of these waters that was proposed in the original draft management plan. The no-take green zones, and even the no-benthic impact habitat protection zones, were under-represented in the original proposal relative to unfished abyssal plain regions, and the current review has made it a lot worse. While the overall statistics may not have changed much on paper, when this is broken down into protection given to areas with high human use/impact (where some protection would be of value and informative), and low-to-nil human impact, there were already very low levels of protection in the original proposal and now this is significantly worse. To undertake the recommendations of the scientific review panel (e.g. assess the effectiveness of different zones) you actually need some of these differing levels of protection in the network to assess them! I can list a number of areas on the shelf that have been made worse with respect to this protection, but as an example, all the proposed green zone areas have been removed from the Geographe CMR in WA, and a number of other SW CMRs have had significant reductions to green zone extent in shelf waters. This process has continued throughout the network, including in the Coral Sea. I cannot see a single example where a CMR on the shelf has actually had a green zone added, or enlarged to protect features, or to act as a scientific reference area. This is even the case in the Eastern CMR network where there are absolutely no green zones proposed within the new CMRs, yet such areas are urgently needed to assess impacts in a region with high population pressure. It would seem that a balanced and fair appraisal of representation/protection would at least have addressed such inadequacies.

Many states in Australia have implemented MPAs, and in all of the advanced states in this process, the amount of coastline in no-take zones is around 5% (Vic, SA, NSW). Such an area, particularly when coupled with larger habitat protection zones surrounding them in many cases, provides sound precautionary protection while also ensuring scientific studies can be undertaken to assess the merits of such levels of protection. The current level of no-take protection on the CMR network is well short of that in shelf waters and I would suggest that a similar target be set for these. With a series of well-planned no-take zones embedded in each representative CMR in shelf waters, we would have a network of scientific reference areas from which to really evaluate the effectiveness of differing levels of zoning. Importantly, and perhaps far more importantly, these would act as scientific reference areas to benchmark our human impacts on all of the off-reserve areas as well. That way, if significant impacts are detected in fished vs protected areas, we are well placed to inform management decisions such as improving off-reserve management practices, creating larger green zones, or some balance between these alternative spatial management options.

Clearly it is in the interests of the CMR network for management plans to be in place as soon as possible, and operational. A path forward may be to initially adopt the regional review recommendations for non-shelf waters while remaining with the original recommendation in shelf waters (i.e. inadequate representation is better than no representation in many areas). Concurrently a program needs to be initiated to work towards ensuring there is an effective network of green zone scientific reference areas on the shelf to be established within a decade, and that this is underpinned with the appropriate inventory-based research to ensure that each is adequate to act in this role as a regional benchmark for understanding the effectiveness of both on-reserve and off-reserve management practices. It is important that the community knows that this is just the beginning of the process and not the end of it, but also important to set realistic targets for green zones in shelf waters (as per states with 5%) to allay fears that the process may result in an indefinite loss of access.

Yours Sincerely,

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