



PEARL PRODUCERS ASSOCIATION
Australian South Sea Pearls

SUBMISSION:
**Australian Marine Parks Draft Management Plans -
North West & North Bioregion Marine Park Network**

20 September 2017

via email:
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BACKGROUND

The Pearl Producers Association

The Pearl Producers Association (PPA) is the peak industry representative body for the *Pinctada maxima* pearling industry licensees regulated under the Western Australian Pearling Act (1990). PPA membership includes 100% of all pearl licensees, covering all licenses issued under the legislation that operate within the North-west Bioregion.

The Australian south sea pearl (*Pinctada maxima*) oysters that are harvested from Eighty Mile Beach are large sessile solitary oysters that are distributed randomly on the seabed. The Eighty Mile Beach is a unique environment where a number of different bio-geographical variables combine to produce unique living conditions that are ideal for *P. maxima* oysters. Some of these include strong tidal currents,¹ which enable oysters to feed even in a low productivity ecosystem, ideal water temperatures, a gently sloping topography, with a hard bottom and a gravelly/sandy substrate.² Such a substrate enables oysters to attach by byssus to the bottom in early stages of growth.³ Once attached to the seafloor the oyster will stay there unable to move for the rest of its life.

At the outset it is important to highlight that the Australian pearling industry:

- Requires pristine environmental conditions for the successful production of pearls;
- Is proven to be an industry with benign impacts on the environment⁴;
- Has a long history of responsible and beneficial environmental practices which can be demonstrated in the recent Marine Stewardship Council certification of the *P. maxima* fisheries of Western Australia & the Northern Territory; and
- Requires close integration between fishing activities and preliminary culture activities at various stages of the process of producing pearls.

P. maxima pearl oysters that are reared in Australia secrete higher quantities of pearl making pallial fluid (the natural substance which contains the constituent components of nacre), the pearl is grown in nutrient rich tropical waters of North-Western and Northern Australia, for at least two years, under reliable husbandry systems, from wild oysters that are harvested from Eighty Mile Beach. Cultured pearls that are grown in other parts of the world are not able to combine all these variables to produce pearls of comparable quality or rarity.

Today the *P. maxima* fishing grounds at Eighty Mile Beach provide the most efficient and cost effective supply of wildstock *P. maxima* pearl oysters in the world, providing a significant competitive advantage for the Australian pearling industry on the world's pearl markets.

¹ J.E. Jelbart, *et al.*, (2011) An investigation of benthic sediments and macrofauna within pearl farms of Western Australia. *Aquaculture*. Vol 319: 466-478 (October 2011) <http://dx.doi.org/10.1016/j.aquaculture.2011.07.011>

² CSIRO. GIS Datasets [Sediment Mobility Regime, Primary Productivity, Tidal Currents, Seabed Temperature, Ocean Renewable Energy (<http://www.marine.csiro.au/~dunn/cars2009/>); M.A. Hemer, D.A. Griffin (2010). The wave energy resource along Australia's southern margin. *Journal of Renewable and Sustainable Energy* 2, 043108 (2010); doi:10.1063/1.3464753); Geoscience Australia benthic maps (see <https://www.environment.gov.au/resource/benthic-maps>)

³ Paul C. Southgate , Elisabeth Strack , Anthony Hart , Katsuhiko T. Wada , Mario Monteforte , Micheline Cariño , Sandra Langy , Cedrik Lo, Hector Acosta-Salmón and Aimin Wang (2008) *Exploitation and Culture of Major Commercial Species*. In Southgate and Lucas (Eds) *The Pearl Oyster*. Elsevier. Oxford. UK. 2008:303-357.

⁴ J.E. Jelbart, *et al.*, (2011) An investigation of benthic sediments and macrofauna within pearl farms of Western Australia. *Aquaculture*. Vol 319: 466-478 (October 2011) <http://dx.doi.org/10.1016/j.aquaculture.2011.07.011>

The Commonwealth Marine Reserve Framework

The Pearl Producers Association acknowledges that the Government, in particular the National Representative System of Marine Protected Areas (NRSMPA) is committed to providing long-term ecological viability of marine processes and systems and the protection and conservation of Australia's marine biological diversity.

The PPA notes the goals of the NRSMPA of including large scale ecological systems, different depths, biological, geographical and biographical features and that support biological community structure and function.

However the PPA does not wholly support the Commonwealth Marine Reserve (CMR)/Australian Marine Park (AMP) methodology neither do we wholly support the outputs of this methodology as applied in 2012, nor its review in 2016.

We note that Draft Management Plans do as a whole, better incorporate fisheries management, fisheries access and user based risk management; however from a pearling industry perspective the draft plans do very little for pearling. With the high level of engagement by the Pearling Industry throughout the Commonwealth Marine Reserve Review process, results showing a 'no change and no acknowledgement' with respect to areas of high interest for the Pearling Industry, arguably puts the industry in a less favourable position.

The PPA notes reference in the Management plans to the EPBC Act and in particular section 3 and subsections b, c and ca which provide for the:

- [Promotion of] ecologically sustainable development through the conservation and ecologically sustainable use of natural resources;
- [Promotion of] the conservation of biodiversity;
- [Provision] for the protection and conservation of heritage

With respect to the CMR at Eighty Mile Beach CMR, and its designation as an IUCN VI Multi-purpose zone, we submit that the sustainable future and the conservation of the pearling industry has not been provided for in the EMB Marine Park Management Plan, this includes the protection of the of pearling as an 'ecologically sustainable' industry, the robust protection of EMB Bio-diversity and of course the protection on an iconic industry that has been afforded heritage protection under the same Act.

PPA Responses: 2017 CMR Management Plan Consultation Round

The PPA acknowledges the release of the Australian Marine Park management plans, which will form the basis of the management of the Commonwealth Marine Reserve Network.

While the pearling industry supports marine biodiversity and conservation initiatives, including marine reserves in the North-west CMR and North CMR bioregions and the movement towards an improved balance between resource access and biodiversity conservation; we stress that this support is not unconditional, it hinges on these biodiversity and conservation initiatives recognizing, the sustainable future and the conservation of the eco-system based industries (such as the Australian South Sea Pearling Industry) that the marine environment supports.

The PPA submission will cover four main issues:

1. Disagreement with the outcomes of the review with respect to the Wessel CMR and the Eighty Mile Beach CMR.
2. The case for rezoning the Eighty Mile Beach CMR as an IUCN Category VI Special Use Zone (Pearling),
3. CMR Management Plan issues which include the express clarification of the definition of 'Joint Management', consultation and engagement with affected parties such as pearl producers and the

inclusion of measures to minimise the duplication of costs, compliance and administration on Marine Users (such as pearl producers),

4. Clarification of the definition of pearling activity to expressly include pearling activities that are ancillary to pearl oyster fishing.

While the PPA will make submissions that affect the pearling industry in the context of a number Commonwealth Marine Reserves in the North-West region (primarily the Eighty Mile Beach CMR) and in the North region (primarily the Wessel CMR), the PPA also supports the submissions of WAFIC (who as the representative peak body of all Western Australian fisheries) and NTSC (who as the representative body for Northern Territory fisheries), speak to those interests that are common to all of the fisheries operating within the CMR network.

PPA SUBMISSIONS

(1) Disagreement with Draft Management Plans with respect to the Wessel CMP and the Eighty Mile Beach CMP.

1.1 Wessel CMR (North CMR Region)

The PPA does not support the re-classification from the IUCN Category VI Multiple Use Zone (MUZ) to an IUCN category Habitat Protection Zone (HPZ) within the Wessel CMR. It is the PPA submission that in the lack of robust rationale (e.g. the representative biodiversity, ecological systems, biological, geographical and biographical features that support biological community structure and function) the change is unjustified.

There is no justification as to why the entire ~4,250 km² was re-classified as an HPZ, given that this zonation category prohibits any activity that contacts the bottom. These prohibited activities include aquaculture and pearling activities. The PPA notes the presence of a complex of pearling leases that extend from Elizabeth Bay eastward to the vicinity of Truant Island. The PPA notes that as a result of this re-zoning, pearling interest holders are precluded from applying to extend their leases seaward into commonwealth waters, as pearl culture is prohibited in an HPZ.

Furthermore the PPA notes that this re-zonation occurred without the outputs of a risk assessment, that would have provided a characterisation of risks and impacts and the nature and scale of each impact and risk, and thereby providing mitigation strategies, which may have included re-zoning to an HPZ.

On its face, this determination to change 72% of the Wessel AMP from a MUZ category to an HPZ category AMP, seems arbitrary and in response to no apparent risk some areas of conservation significance in the south of the region.

To the PPA it seems ironic that a risk assessment which would more than likely have provided better justification for the lack of a zone re-determination in the Wessel MP, might very well have provided the opposite at the Eighty Mile Beach Reserve in the North-west CMR region; noting that the Northern portion of the Wessel AMP has been designated a special purpose zone trawl, to provide for a dominant economic activity in that portion of the Park. It was not lost on the PPA that the Eighty Mile beach which has supported 150 years of continuous pearling activity, which remains the dominant social-economic activity of the area and which houses the last commercial *Pinctada maxima* fishery in the world was not afforded a similar designation.

1.2 Eighty-Mile Beach (EMB) AMP (North-west CMR Region)

“The west Kimberley continues to hold a special place in the minds of Australians for the region’s colourful pearling history.”⁵

The PPA does not support the designation of the Eighty Mile Beach marine Park as an IUCN Category VI Multiple Use Zone.

The significance of the EMB area as a RAMSAR site, a turtle breeding offset and the last fishery of native *Pinctada maxima* in the World, a multiple use CMR designation that allows and expressly provides for EVERY activity save demersal trawling (that never really occurred there anyway) makes absolutely no sense.

The case for rezoning the Eighty Mile Beach MP as an IUCN Category VI Special Use Zone (Pearling)

The Eighty Mile Beach marine reserve contains the principal fishing grounds for the iconic silver lipped (*P. maxima*) pearl oyster. The Western Australian pearl oyster fishery [at Eighty Mile Beach] is the only remaining significant wild-stock fishery for [wild *Pinctada maxima*] pearl oysters in the world.”⁶ Furthermore, the *P. maxima* fishery at EMB is the only *P. maxima* fishery to be certified sustainable by the Marine Stewardship Council in accordance with its Fishery standard.

In addition to being the sole global location in the World to support a wild harvest pearl oyster fishery, the fishing for *P. maxima* oysters is one of the longest continuing fisheries in Australia, and has been a socio-economic mainstay of the Kimberley region for well over a century. This continuity and iconic status in the Kimberley area has resulted in the Pearling Industry being afforded Australian heritage status and as such is included in the [West Kimberley Heritage List](#). Attached is a [NW Kimberly Heritage boundary Map](#) that includes not only the entire West Kimberley Region, but also the Pearling areas (including the Lacepedes Islands) and the areas around Broome and Roebuck Bay.

The [West Kimberley Heritage List](#) webpage briefly explains the inclusion of pearling in the Heritage area:

*“Long before the arrival of Europeans, Aboriginal people along the west Kimberley coast collected the large, luminous pearl shell (*Pinctada maxima*) for use in rituals and ceremonies. It is the most widely distributed item in Aboriginal Australia, traded across two-thirds of the continent. The first European report of pearl shell on the west coast of Australia was by William Dampier, who in 1699 noted its occurrence at Shark Bay, south of the Kimberley.*

From 1850, European pearlery began to collect small shells in the area. When the world’s largest pearl oyster shell was discovered in Roebuck Bay in 1861, it caused an international sensation. People flocked from many nations, hoping to make their fortune. By 1870, European pearling was becoming well established on the Kimberley coast. The west Kimberley continues to hold a special place in the minds of Australians for the region’s colourful pearling history.”

The Pearling Industry is demonstrably environmentally responsible, its actual impacts are benign and its management is sustainable and precautionary. These long standing environmental credentials of the Australian South Sea pearling industry as a result of the ‘harvest by hand’ fishing methods, environmental stewardship, demonstrable sustainable fisheries management and low risk ecosystem

⁵ Department of the Environment (2011) *National Heritage Places - West Kimberley* (including pearling National Heritage List on 31 August, 2011). [<http://www.environment.gov.au/heritage/places/national/west-kimberley>].

⁶ A. Hart, D. Murphy and R. Jones. (2015). Pearl Oyster Managed Fishery Status Report. In: *Status Reports of the Fisheries and Aquatic Resources of Western Australia 2014/15: The State of the Fisheries* eds. W.J. Fletcher and K. Santoro, Department of Fisheries, Western Australia, p211.

and habitat effects demonstrate how well placed the pearling industry is to co-exist with the objectives of the Australian Marine Parks in the North-West and North CMR regions. As already mention the Australian *P. maxima* industry has already achieved Marine Stewardship Council (MSC) certification, and is recognised as the producer of the world's first certified sustainable pearls.

Unlike other fisheries in Australia, the entire pearling resource is now encapsulated within either a State Marine Park or a Commonwealth [Australian] Marine Park, making access to our resource subject to permitting conditions and vulnerable to changes in policy, political fluctuation and lobbying, as well as other users who are permitted to undertake activities within the IUCN VI multi-purpose zone which are less benign with respect to their ecological profile than pearling.

To these ends the PPA and all pearling licensee's are very concerned about the lack of protection around the critical recruitment and settlement areas at Eighty Mile Beach south of Broome. The PPA is concerned that oil and gas seismic exploration, drilling and other activities adjacent to the harvest grounds which could irrevocably and critically reduce the habitat/ecosystem structure and function of this iconic Australian species and important natural resource.

The PPA notes the vulnerability of the Eighty Mile Beach AMP (and the Roebuck Bay AMP) to seismic exploration and subsequent drilling, dredging and other activities undertaken by the oil and gas industry. Noting that the hydrocarbon reserves (especially natural gas) of Canning Basin are well known. It is the PPA submission that not only does this Marine Reserve contain the almost the entire *P. maxima* fishery; it also provides a buffer to the Eighty Mile Beach State Marine Reserve, which is of particular ecological significance to a number of species. The Eighty Mile Beach State Marine Park Plan (Sept 2011. Page iv) notes:

"Flatback turtles are endemic to northern Australia. The waters of the proposed park are important to support foraging flatback turtles, and nesting occurs on Eighty Mile Beach in November-December. Eighty Mile Beach is also regarded as one of the most significant areas in Australia for migratory shorebirds within the East Asian-Australasian flyway and is listed as a wetland of significance under the Ramsar Convention. Birds in the flyway migrate from breeding grounds in northeast Asia and Alaska to Australia and New Zealand. Ninety-seven different species of shorebirds have been recorded, including 42 species listed under international conventions for the protection of migratory species. Many of these feed almost exclusively in the vest intertidal flats of the proposed marine park. The plan proposes management actions focusing on key biodiversity values, including marine turtles, shorebirds, and intertidal sand and mudflat communities."

Given the ecological significance of the region, it would seem that the designation of the EMB (& Roebuck) AMPs as IUCN VI multiple use zones is inconsistent not only with the objectives of biodiversity and habitat protection, but also with the risk assessment framework that unpinned their establishment. IUCN category VI Multiple Use Zone AMPs prohibit demersal fishing but provide for seabed mining and oil and gas extraction. The PPA notes that where the former was never a feature of any of the NW Region AMPs and therefore of low consequential risk, Oil and gas activity poses substantial risk to the biodiversity of the AMPs and yet is expressly provided for. This would seem counter-intuitive.

The PPA notes the following:

- The Commonwealth Marine Reserves / Australian Marine Park framework was implemented to protect representative habitat and biodiversity, and at the same time support the "sustainable flow of natural products and services to meet community needs."
- The Australian South Sea pearling industry relies almost exclusively on the sustainable harvest of pearl oysters from the Eighty Mile Beach south of Broome; there are no alternative sources of wild stock to support the Australian Pearling Industry.
- The current Eighty Mile Beach Commonwealth Reserve provides only partial protection for the *Pinctada maxima* harvestable resource, with the most significant component of the grounds

currently without protection and vulnerable to high-risk activities such as oil and gas activities, mining and other demersal activities.

- The current Eighty Mile Beach Commonwealth Reserve is designated as an IUCN Category VI multiple use zone, which allows any activity to take place in the marine reserve other than demersal fishing (e.g. oil and gas drilling and mining is permitted).
- To date, the process of engagement between the Oil & Gas industry and commercial stakeholders hasn't accounted for the significance and the enormity of the potential problem, and has failed to recognise that the pearling industry is potentially at the point of no return if the unproven activities were to continue without sufficient regulation that accounts for Mollusca and habitat impact, and express protection.

Proposed Solution: For the Eighty Mile Beach AMP):

The implementation of one small amendment to the Eighty Mile Beach AMP would better align the Commonwealth Marine Reserve framework objectives of biodiversity and habitat protection and sustainable utilisation, by preserving and protecting Eighty Mile Beach biodiversity, minimising habitat reduction and concurrently providing for the continuation of low-risk activities like pearling.

Therefore the PPA proposes that within the Eighty Mile Beach AMP management plan framework - the Eighty Mile Beach AMP IUCN 'protection' category is changed from an IUCN Category VI Multiple Use Zone (that offers protection ONLY from demersal fishing) to an IUCN Category VI Special Purpose Zone (Pearling), which recognizes the importance and sustainability of pearling (and other low risk activities), but exclude all high-risk activities that are inconsistent with the reserves objectives (e.g. oil and gas drilling and mining activities)

IUCN Category VI Special Purpose Zone (Pearling) Proposal

An IUCN Category VI Special Purpose Zone (Pearling) designation is consistent with the objectives of the Marine Reserves for this area, as it would minimise any consequential risk as result of adverse effects from more 'extractive' activities. Furthermore because the proposal only excludes high impact extractive activities, a special Purpose Zone (Pearling) would not affect other users such as those taking resources according to customary, recreational or low impact fisheries.

The above situation contrasts with the a IUCN Category IV Habitat Protection Zone, which would provide no extra protection than a Special Purpose Zone (Pearling) from a risk based framework point of view. What is more an IUCN category IV HPZ designation would impinge (without benefit to CMR objectives) on the rights currently enjoyed in the current IUCN Category VI designation (all of which are low impact and low consequential risk to the representative habitat and biodiversity).

An IUCN Category VI Special Purpose Zone (Pearling) would provide robust protection against high Impact and high consequential risk activities, but at the same time provide for the continuation of activities that have already demonstrated responsible environmental stewardship and low consequential risk to the representative habitat and biodiversity.

Such a designation would both protect and provide for the continuation of the native *P. maxima* fishery because it recognizes it as the predominant activity within those AMPs.

The PPA notes the existence of a number of IUCN VI Special purpose zones throughout the AMP management plan framework, including the aforementioned trawl SPZ in the Wessel AMP, and the Scampi trawl SPZ in the Wessel AMP in the vicinity of Mermaid Reef, in the North Western and Northern Bio-regions.

Given the cultural, historical and sustained socio-economic significance of the *P. maxima* fishery, coupled with the Industry's ecological and sustainability credentials, the argument to afford an IUCN category VI special purpose zone to Eight Mile Beach (and Roebuck) AMPs is a sound one.

What is more, having special purpose zones as areas where pearling is expressly provided for affords considerable protection against policy creep and political expediency. And while the pearling industry readily demonstrates responsible environmental practice (which will be soon be assessed by the Marine Stewardship Council) which is consistent with CMR objectives of Habitat and biodiversity protection, a Special Purpose Zone (Pearling) will also provide the requisite social and economic considerations, which so far are still outstanding.

(2) Issues: NW & N Region AMP Management Plans (Pearling)

AMP Management Plan issues which include the express clarification of the definition of 'Joint Management', consultation and engagement with affected parties such as pearl producers and the inclusion of measures to minimise the duplication of costs, compliance and administration on Marine Users (such as pearl producers)

The PPA notes a number of concerns with respect to the content of Management Plans. It is our submission that effective planning should result in minimal administrative burden, minimal duplication of costs and clarity with respect to permitted activities which are administered under the management plan.

This submission referred to the formal recognition and the formalized permissibility of ancillary pearling activities, and the interface between harvesting shell and farming practices (both of which need to feature in management plans).

Furthermore this submission proposed that AMP Management Plans in addition to the recognition of extant pearl farms as a legitimate pearling activity, explicitly allow for the establishment of new ones pursuant to the multiple use characteristics or indeed special purpose characteristics associated with 'pearling.' We note that this option is diminished with respect to the Wessel CMR.

2.1 Joint management

There is still very little clarity around what joint-management means and what it actually entails? Will management dovetail in with the State framework (this would make sense considering the proximity of State marine reserves, and state jurisdiction over the activities permitted within the commonwealth marine reserves)? Will management be inclusive? Exclusive?

As affected parties and licence holders the Pearling Industry would expect to be consulted and engaged in the development and finalisation of any management plan, which would includes joint administrative strategies with the State Government, Indigenous communities and other stakeholders.

The PPA proposes the establishment *AMP Management Committee* or a *AMP Users Forum* for each region or AMP, comprised of affected parties and stakeholders, as the vehicle for developing and implementing management plans. This Committee could be tasked with agreeing on specific management actions, ascertaining government commitment to resourcing management measures for success of the network and laying the administrative platform for each AMP.

Currently, with respect to the finalisation of AMP Management Plans, the PPA is concerned with the following:

- Uncertainty as to the make up and representation of management authorities
- Uncertainty as to the definition of "joint management" and the effects of the definition
- CMR Review processes and the vulnerability of the "fully encapsulated" pearl oyster resource to policy creep and political risk.
- Lack of protection for a representative pearling 'voice' within the CMR management framework.

(3) Ancillary Activities.

As established above, the Eighty Mile Beach AMP continues to be designated an IUCN category VI Multiple Use Marine Park.

The PPA notes that the permitted activities within the IUCN category VI Multiple Use NW & N AMPs include pearling (and **pearling-related activities**), noting that 4.2.4 provides for:

“Commercial pearling and related activities are managed under Western Australian laws relating to those activities (Pearling Act 1990). These laws apply to the extent that they can operate consistently with the EPBC Act and EPBC Regulations and [the] plan.”

Adding that 4.2.4.4 provides for:

“Vessels engaged in commercial pearling activities may transit through, and stop and anchor in, the North-west Network, except in the Sanctuary Zone (1a), subject to compliance with the prescriptions in Section 4.2.1 (General use and access).”

These provisions are welcomed by the pearling industry, who has for sometimes held some real concern for the disposition of ‘ancillary’ or ‘pearling-related activities’ within the CMR / Australian Marine Park Framework.

The pearling Industry notes that in a number of spatial planning instruments the definition of “pearling” and whether it includes activities other than harvesting or farming has never really been that clear, given that there are a number of ‘ancillary’ activities critical to pearl oyster fishing including seeding, shell holding activities and support activities, including by not limited to:

- Resting pearl oysters immediately after fishing within the vicinity of the fishing grounds,
- Bringing the seeding technicians to the fishing grounds at EMB to seed the rested pearl oysters (as opposed to transporting the oysters vast distances to pearl farms to be seeded)
- Implementing additional resting and turning periods on EMB after seeding to avoid further stress and maximise acceptance of the nucleus by the oyster.
- Transporting seeded pearl oysters to holding farms in the Kimberley. This stage takes place several months after the first capture of the pearl oyster
- The disposition of pearling support vessels, which could include the landing of amphibious aircraft

The inclusion of provision for ‘pearling-related activities’ represents formal recognition of activities ‘ancillary to pearl oyster fishing’ as falling within the ambit of ‘Pearling’ for the purposes of the Australian Marine Park network processes. The Pearling industry acknowledges the optimal importance that this express recognition is provides with respect to the Management of the NW AMPs.

The PPA notes that from 2018 the Pearling Act 1990 will be repealed in favour of the (WA) Aquatic Resources Management Act (ARMA) 2016, which is to become the enabling legislation with respect to Pearling Activity within Western Australia. It is therefore the PPA’s submission that reference to this new Act be incorporated into the NW and N AMP Management Plan in addition to references to the Pearling Act 1990.

SUMMARY

The PPA appreciates the opportunity to make a submission on the CMR review reports and on issues that affect pearling activities within the CMRs with respect to Management Plans

PPA asks that our following submissions be provided with due consideration:

- The Wessel CMR to be re-designated an IUCN Category VI Multiple Use Zone (its former designation) [at least in the area in the vicinity of and north of Truant Island, in recognition of the lack of ecological risk, and to provide for future activity (including pearl culture)]
- The Eighty-Mile Beach CMR, be re-designated IUCN Category VI Special Purpose Zone (Pearling) rather than IUCN Category VI Multiple Use Zone (its current designation). Such a designation would afford considerable protection against erosion of interests from policy creep and political expediency. Furthermore while the pearling industry readily demonstrates responsible environmental practice, which is consistent with CMR objectives of habitat and biodiversity protection, a Special Purpose Zone (Pearling) would also provide the requisite social and economic considerations, which so far are still outstanding, while excluding high impact and ecologically harmful activities.
- Designate this IUCN Category VI Special Purpose Zone (Pearling) as inclusive of all activities (as assessed according to a risk based framework) save the high risk and impact activities of demersal fishing, oil and gas and mining, which are expressly excluded. A Special Purpose Zone (Pearling) would provide robust protection against high Impact and high consequential risk activities, but at the same time provide for the continuation of activities that have already demonstrated responsible environmental stewardship and low consequential risk to the representative habitat and biodiversity.
- Make express provision for the recognition of 'pearl oyster farming' and the necessity of pearling operations to have access to pristine conditions for the purpose of farming pearl oysters prior to the promulgation of Management Plans for relevant Commonwealth Marine Reserves Network.
- Each AMP management plan should require the establishment of a formal Marine Park Management Committee or MP Users Forum inclusive of all relevant persons and affected stakeholders.