

19 September 2017

Submission - Australian Marine Parks Draft Management Plans

We welcome the opportunity to provide further input into the Australian Marine Parks management plan development. We are two Canberra-based families of SCUBA diving enthusiasts. In general, we are eager to see sensible, balanced, well-informed management of the marine environment, recognizing the legitimate interests of recreational and commercial fishers, tourism, the oil and gas industry, environmentalists and those of other users, such as SCUBA divers. **We strongly believe in the value of marine protected areas (MPAs), and in particular in the creation and maintenance of *sufficiently large and numerous zones that prohibit fisheries and high impact activities, to aid biodiversity conservation and as reference points for scientific research, as well as 'insurance', as part of an integrated approach to fisheries management.*** (We recognize that input and output controls, such as gear restrictions and total allowable catch regimes etc are the best primary fisheries management levers, but we also believe 'no-take' areas can potentially assist by providing spillover and stock 'insurance' benefits.)

We recognise this current review process needs to take account of recreational and commercial fishing interests to achieve the right balance and to eventually engender a greater level of community support overall. Nevertheless, we are concerned about the diminished area of IUCN II zones ('no-take' zones) over the whole network under the draft plans as presented. We also wish to make the following specific observations:

1. We believe the interests of SCUBA divers, as an important stakeholder group, are not adequately reflected in the plans and zoning. Of course, it's important to note that SCUBA diving is a hobby of 'locals' and domestic and international tourists alike. The enjoyment of dive sites is directly proportional to the health of the marine environment in that location, for example, through the presence and diversity of fishes, including large predatory, or iconic species, such as sharks. We note the recent AIMS study, for example: http://www.aims.gov.au/docs/media/latest-releases/-/asset_publisher/8Kfw/content/study-uncovers-value-of-shark-dive-tourism
2. Insofar as particular zones are concerned, we suggest:
 - The IUCN II zone covering north Osprey in the Coral Sea should be extended further out to sea. We presume the south, south-west habitat protection zone (reefs) allows for fishing, owing to concerns expressed by recreational fishing interests over access to Osprey Reef. Pushing the Osprey IUCN II zone boundary further out to sea would confer greater protection for pelagic species in the area, but would still preserve access for fishers in the south, south-west, as foreseen in the draft management plan as it stands. It's important to note, the whole of Osprey Reef, including 'North Horn', is a world famous dive destination.
 - Similarly, we suggest expanding the IUCN II zone around Bougainville Reef to provide a larger, more robust 'buffer'. Bougainville is a dive site that is relatively accessible by larger boats and is visited by the dive charter vessels. An expanded area of coverage around this entire reef, would provide more sensible, unambiguous protection for one entire reef system – with benefits accruing to dive tourism, biodiversity conservation and scientific research. We suggest an extension of the IUCN II zone by an additional 5nm in all directions.
 - The extent of IUCN II areas, in some cases, now seem to be so small as to be almost tokenistic. Presumably, protections have been retained on the basis of

some particular bathymetric feature or biodiversity assemblage. In such cases, serious consideration should be given to extending out the zones, to ensure more robust protection to the surrounding environment.

- **We would be extremely concerned if IUCN II zones overall are decreased even further through the final stages of this process.** This would potentially damage Australia's international reputation, both in terms of conservation and tourism.
3. We strongly implore the government, through the management plans and funding to ensure final zoning delimitations are well promoted to relevant stakeholders and that reasonable surveillance and patrols are undertaken. Sensible inter-agency cooperation should be implemented to this end. Otherwise the Australian Marine Parks network risks becoming a 'paper park'. Any potential soft start to compliance in new zoning arrangements needs to be discretionary and strictly time-limited, after which real and deterrent penalties should apply to those disregarding the management zones.
 4. Finally, we respectfully, but emphatically reject the notion expressed in an online video on the Department's Parks website, that city dwellers are somehow more divorced from the marine environment and baselessly wish to see as much area 'locked up' as possible. The opinions of those living in the major centres are legitimate and should be taken into consideration as much as people living in the regions. One only has to see how many Sydneysiders enjoy their spectacular Harbour, beaches and offshore waters for example. Our two families are based in Canberra, two hour's drive inland, yet are on the water off the NSW coast roughly every third weekend on average – from Nelson Bay to the Victorian border. We dive elsewhere in right around the country during longer holiday periods, including in many offshore locations.

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