

Spirit of Freedom

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Submission of comments on the Draft Coral Sea Commonwealth Marine Reserve - Management Plan 2017

Spirit of Freedom is supportive of a comprehensive management plan incorporating robust strategies and

objectives backed by new and sufficient funding to enact the management plan. Spirit of Freedom is supportive of sustainable industry and equitable use by all current users of the Coral Sea area.

3.1 Zone Categories and allowed activities

The 'balance' in this Draft Management Plan (DMP) is flawed in that the Director has agreed to apply a zone to the highest percentage of the proposed CSMR as **IUCN IV**. In the DMP, IUCN IV is described as:

Habitat Protection Zone (IUCN category IV)—managed to allow activities that do not harm or cause destruction to seafloor habitats while conserving ecosystems, habitats and native species in as natural a state as possible.

Where in the DMP are the actions which 'conserve' ecosystems, habitats and native species as per the above description? By allowing all types of fishing except auto long-line, commercial net, bottom trawl or cyanide, the Director cannot claim to have 'protected' any ecosystem or habitat when there is no protection assigned to the water column or the pelagic species in the water column or those species which

are reef associated in a Habitat Protection Zone IUCN IV.

The DMP does not describe any actions which will require AFMA to change the focus of its Ecological Risk Management to place greater emphasis on Habitat and Community assessments and not predominantly on the effects of fishing on ecological sustainability.

The most immediate threat to all oceans is that of climate change. The pressures of increased sea temperatures affects not only coral but the whole marine ecosystem, including fish fecundity. To provide the Coral Sea region with its best chance of recovery and regeneration, the marine park requires sufficient

IUCN II zone to provide sanctuary. There is proven science as to the benefit of strategic zone use that not only benefits the immediate 'no take' area but which also increases the fish stock and fish size in the adjoining areas.

Alexandra CARTER et al 2003; Emslie et al., 2015,

By allowing split zoning on a small reef area such as Osprey, and ignoring the 2016 BAP and ESP reports

and recommendations of split zoning over larger reef areas such as Holmes and Flinders, the proposed zoning maps in this DMP have ignored both EPBC and IUCN principles, and leaves +75% of the reef systems in the Coral Sea without sufficient protection for future regeneration.

The bulk of the zonings and generous allowance to all aspects of fishing from commercial to recreational

does not constitute a fair balance or 'protection' to declare a Marine Park. There is room for all sustainable

fishing activities alongside increased areas of IUCN II. This DMP should also include a robust species and quota limit across all extractive activities into the future as per EPBC r.12.35(3). It is not sufficient to leave it to AFMA or state regulation.

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4.2.6 – Commercial Tourism (including charter fishing tours)

In order to fulfil the Draft Management Plan requirements, the Director needs to be more specific in the definitions and initiate classes to differentiate between non-extractive and extractive activities.

Recreational Fishing and Charter fishing, including guests who are classed as recreational fisherman (spear and game fishermen), should be assessed according to the extractive impact of their activities. These impacts are far more intrusive than the impacts of passive tourism and recreational activities such

as snorkelling, scuba diving and whale watching.

By classing charter fishing and recreational fishing in the same category as passive tourism and recreational activities, the Director is in conflict with the EPBC Regulation.

Non-extractive Commercial Tourism – Scuba Diving/Snorkelling

As a dive operator visiting Coral Sea reefs weekly, we have a frequency of use in excess of most other users of the Coral Sea reefs. We are disappointed that the Director has not acknowledged in this DMP

the benefits to both the environment and to socio-economic values that we, as marine tourism operators, contribute.

Osprey Reef is a very important part of the marine ecosystem for both its coral diversity and the iconic site specific shark population and manta ray cleaning station. The shark population at Osprey is unique and isolated. Osprey sharks have been the focus of scientific studies into both location and value.

Barnett A, Abrantes KG, Seymour J, Fitzpatrick R (2012); Charlie Huveneers^{1}, Mark G. Meekan², Kirin Apps³, Luciana C. Ferreira^{2,4}, David Pannell⁵, Gabriel M.S. Vianna^{2,4}*

We ask the Director to declare a fishing ban on sharks and rays at Osprey Reef. Our shark attraction activities are well documented, extremely low-risk, have not significantly affected the behaviour of the sharks and has been a proven method in the public education and appreciation of a much maligned species. The sharks are in much more danger from recreational fishing and charter fishing activities – as

evidenced by divers in the image below.

Recreational scuba divers from a CHARROA vessel attempt to rescue a shark found at 'North Horn' dive site at Osprey Reef 2012. The tracer line had been cut and the shark left to struggle. The shark did not survive.

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4.2.7 – Recreational Fishing

The Director must make a determination under EPBC Regulation 12.35 on the conduct of recreational fishing. The relevant laws of Queensland are not sufficient for a 'protected' marine park. Recreational catch figures can easily match or exceed commercial catch quotas.

Bioregional Advisory Panel/Expert Scientific Panel – CMR Review - 3.2.9

Taking Queensland as an example, in that state an individual recreational fisher is permitted to have considerable numbers of fish in his or her possession at any point in time. For example, an angler fishing on an offshore reef would be permitted to possess up to 20 coral reef finfish. This could include, for example, seven coral trout, eight snappers, and/or combinations of other species, including emperors, parrotfish, tuskfish, sweetlips and fusiliers. The same angler, using trolling techniques in the same area, could also catch and have in his or her possession 23 mackerels (*Scomberomorus* spp.), five mahi mahi, two wahoo, various combinations of other species and an unlimited number of tuna or billfish of any species ([QLD DAF 2015](#)).

Since there are no boat limits in Queensland, these numbers could be multiplied by the number of anglers on a given vessel, including a charter boat. Thus, a boat with, say, five anglers could legally have on board 100 coral reef finfish, 115 mackerels, 50 shark mackerel, 25 cod/grouper, 25 mahi mahi, 10 wahoo, five sharks or rays and unlimited numbers of tuna and billfish.

Furthermore, the possession limit for coral reef finfish per angler on a charter boat would increase from 20 to 40 if the charter is longer than 72 hours, and to 60 if the charter is longer than seven days ([QLD Government 2008](#)).

Current use by charter fishing and recreational fishing may be at sustainable levels, but the DMP does not account for increasing numbers in the future to maintain a sustainable level of recreational catch quotas.

By not requiring recreational fishing to have a permit or licence issued by the Director, how will the Director

manage this activity and monitor its extractive actions? Or does the Director not believe that recreational fishing has any effect or impact on the Coral Sea Marine park?

In conclusion we urge the Director and the government to ensure generous allocation of funds towards regular scientific monitoring in particular regard to the key ecological features of the Coral Sea being the reefs, cays and herbivorous fish; the impact and quota of all extractive practices and the benefits (or not)

of the zoning the Director has moved within this DMP.

Christopher J Eade

Director