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Commonwealth Marine Reserve System Draft Management Plans: 2017 Submission

Australian Marine Parks Management Planning Comments

Department of the Environment and Energy

Reply Paid 787

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The Wilderness Society welcomes the opportunity to provide comment on the 2017 draft management plans for the following Commonwealth Marine Reserve System. This submission also makes comment on the proposal to rename marine reserves.

This submission deals with top-line issues of concern for the Wilderness Society. For detailed comment and recommendations on draft plans for specific regions, we refer the reviewers to the detailed submissions by the *Save Our Marine Life Alliance*, of which The Wilderness Society is an active and supportive member.

Please find attached our submission and recommendations.

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About Our Organisation

The Wilderness Society is an Australian, community-based, not-for-profit, non-governmental environmental advocacy organisation, formed in 1976 by a small group of concerned Australians who came together to launch a campaign to protect the wild Franklin River in south west Tasmania.

Our shared organisational purpose is to protect, promote and restore wilderness and natural processes across Australia for the survival and ongoing evolution of life on Earth. We operate campaigns to safeguard our sources of clean water and air, to tackle dangerous climate change, to create a safe future for life on Earth, and to give a better world to our children. Our organisational vision is an Australian society that protects and respects the natural world to create a vibrant, healthy continent with positive connections between land, water, people and wildlife.

We enjoy a diverse membership of 34,000 Australians from across Australia, with over 10,000 in NSW. We represent the views and concerns of our members and a wide range of Australians on major environmental issues.

Background

In 2012 Australia declared the world's first National Network of Marine Parks, including the jewel in the crown of the network, the Coral Sea Marine Park. This was the culmination of many decades of science which found that marine parks with large sanctuaries at their core are a key tool for keeping the world's oceans functioning well.

The 44 marine parks declared in 2012 were the final tranche of the 60 in National Network of Marine Parks, a bipartisan process commenced by the Howard Government in the late 1990s, building on the iconic declarations of the 1970s and 80s which began with the Great Barrier Reef and Ningaloo Marine Parks – declared by the Whitlam, Fraser and Hawke Governments.

However, in 2013 the incoming Abbott Government suspended the newly created marine parks, ordering a premature Review. As a result, 95% of Australia's oceans have remained unprotected these last 4 years. Following completion and release of the Review late last year, dramatically revised management plans have been released for the suspended marine parks

which propose major cutbacks in protection, replacing zones of high level protection with partial, low level protection.

Submission

Previous consultations

The Wilderness Society is concerned that the results of previous statutory consultations are being ignored. Despite the vast majority of submissions to Parks Australia's first consultation round last year strongly supporting the restoration and increase in high level marine national park zone protection, the Government is proposing the complete opposite to the consultation outcomes in all but 1 of the 44 marine parks.

Our membership is both deeply engaged and concerned about the need to protect our marine treasures, and **The Wilderness Society urges the Department to have regard to their many submissions and expressions of interest over the years calling for increases in marine national park zone protection.**

National Park (green) zones

The Wilderness Society strongly believes that Marine National Park Zone [MNPZ] (green no-take/IUCN II) areas are vital to the protection of our oceans and marine biodiversity, and believes that Australia should enact the IUCN recommendation for 30% protection of marine bioregions in MNPZ zones.

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.

As such, The Wilderness Society recommends that 30% of all marine bioregions, including the continental shelf and slope, be protected under Marine National Park Zones.

The Wilderness Society supports those draft management plans 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.

The Wilderness Society strongly rejects those draft management plans where the Marine National Park Zone (green no-take/IUCN II) areas have been reduced or removed in all Marine Reserve Networks.

Habitat Protection (yellow) zones

The Wilderness Society strongly believes that partial protection zones are not a substitute for high level ‘sanctuary’ (Marine National Park / IUCNII) protection and **rejects those draft management plans where Habitat Protection zones are proposed to replace MNPZ zones.** Claims by the Government that Habitat Protection (HPZs/yellow zones) are equal to Marine National Park zone (MNPZ/green zones) are false and misleading. Protecting the sea floor provides only partial protection and does not protect the marine life living within the water column. Each marine park should have adequately sized and located zones of high level MNPZ protection, with partial protection zones used in an ancillary way. It is well established in the scientific literature that partial protection does not generate biodiversity benefits comparable to full protection.

Oil and gas exploration and extraction

The Wilderness Society strongly believes that oil and gas exploration and extraction has no place in our Commonwealth Marine Reserve System. The negative effects of both exploration and extraction on marine life have been well documented, from the destructive effect of spills and seismic testing, to the increasingly devastating effect that fossil-fuel caused climate change is having on marine environments such as the vitally important kelp forests of Tasmania.

As emphasised at the recent IUCN World Conservation Congress, industrial extractive activities are not compatible with marine parks. **Oil and gas exploration and extraction should be excluded from all zones in the CMRS without exemption,** as has been achieved in the Great Barrier Reef Marine Park.

Destructive fishing gear types

The Wilderness Society does not believe that destructive commercial fishing activities such as trawling, gillnetting and longlining should be allowed in the marine reserves, and rejects 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.

These destructive fishing types should be excluded from all zones in the CMRS without exemption.

Renaming marine reserves

The **Wilderness Society** supports the renaming Marine Reserves to Marine Parks, as we believe this will help end confusion between state and federal level marine protection.

Recommendations

The Wilderness Society recommends that the Department:

- Have regard to their many submissions and expressions of interest over the years calling for increases in marine national park zone protection.
- Seek to achieve Marine National Park Zones protection for 30% of all marine bioregions, including the continental shelf and slope;
- Maintain the Marine National Park Zone (green no-take/IUCN II) areas as declared in 2012, and retain draft plans where there are new and/or increased National Park zones;
- Rejects those draft management plans where Habitat Protection zones are proposed to replace MNPZ zones;
- Excludes oil and gas exploration and extraction from all zones in the CMRS without exemption;
- Exclude trawling, gillnetting and longlining from all zones in the CMRS without exemption; and
- Renames Marine Reserves as Marine Parks.