

Dear Director of National Parks,

**I am deeply concerned about cutbacks to National Park zone (IUCN II/ 'sanctuary') protection in Australia's marine parks network.** The network should be science based, and therefore deliver adequately sized and located National Park zones (IUCN II/ 'sanctuaries') on both the continental shelf and in deeper waters.

I am surprised that the government has ignored the findings of its own Independent Review, instead proposing diminished National Park zone protection than the Review recommended, and I am gravely disappointed that the government has failed to take into account the submissions coming out of last year's first round of consultation – where 54,000 people provided comment, the vast majority of whom called for a significant increase in marine National Park zones, not less. This diminishes my confidence in government and in particular in Parks Australia.

In the face of devastating coral bleaching, mangrove depletion, vanishing kelp forests and over-fishing worldwide, MNPZ coverage in Australia's Marine Parks are more important now than ever.

**1.) I support the draft management plans where the National Park zones have not changed from what was declared in 2012, or where there are new and/or increased National Park zones, i.e.:**

- the new National Park zone transect and National Park zone areas over the canyon in the Bremer Marine Park;
- the new National Park zone transect over the Swan Canyon in the SW Corner Marine Park;
- the increased National Park zone area in the Two Rocks Marine Park;
- and the new National Park zone area at Oceanic Shoals.

**2.) I reject, however, the draft management plans where National Park zone areas are made smaller** (eg: the Coral Sea Marine Park, Cape York West Marine Park, Gascoyne Marine Park, Argo Rowley Terrace Marine Park, the SW Corner Marine Park (Diamantina Fracture Zone section), Lord Howe Marine Park, Dampier Marine Park and Twilight Marine Park); **removed altogether** (ie: the Wessels Marine Park, Geographe Bay Marine Park, the Peaceful Bay section of the SW Corner Marine Park); **or where National Park zone areas have been moved to areas of far less ecological importance** (eg: the Perth Canyon Marine Park, the Gulf of Carpentaria Marine Park); **or where the government has ignored the Review's recommendations for additional National Park zone areas** (eg: in the Norfolk Island Marine Park).

**3.) I urge the government to make the following changes to the draft management plans:**

- a) That no marine National Park zone areas declared in 2012 are removed or reduced;
- b) That new marine National Park zones are declared in the following locations:
  - In the northern section of the Kimberley Marine Park;
  - at west Holmes and South Flinders Reefs in the Coral Sea;
  - in the Norfolk Island Marine Park as recommended in the Review;
  - adjacent to the Great Barrier Reef Marine Park as recommended in the Review;
  - that every marine park under Review be afforded an adequately sized and located National Park zone (currently 16 of the 44 of have none) and;
  - that all marine parks on the completion of their management plans should be fully protected from oil and gas mining as has been achieved in the Great Barrier Reef MP and the Coral Sea MP.

**Claims by 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.

**I am disappointed that the opportunity for marine tourism has been largely ignored by the**

**government**, with National Park zone protection reduced at one of Australia's premiere reefs and tourism destinations – Osprey Reef – and at other important tourism assets including Flinders and Holmes Reefs in the Coral Sea, and at Rowley Shoals in the NW marine region. I am shocked that only 7 of the Coral Sea's 37 reefs are fully protected and that deep cuts have been made to the Coral Sea's large National Park zone – Australia's largest fully protected area, and the only one of a size and nature that is able to protect both the giants of the sea and a series of unique and important deep water reefs. **This is a lost opportunity for the environment, for marine tourism and for the long-term sustainability of Australia's fishing.**

**I am dismayed that the government has gone against the findings of the independent Fishing Gear Risk Assessments it commissioned and allowed destructive fishing practices like trawling, gillnetting and longlining in 38 of 44 marine parks.** Australia's marine tourism industry is worth \$28b per year, whereas the catch value being returned to commercial fishing from the network-wide MNPZ cuts is worth only \$4m per annum – only 0.3% of the total revenue of Australia's wild catch fisheries.

**I am even more outraged that the government proposes to allow mining and pipelines in the vast majority of the parks.** Marine parks not currently containing mining exploration rights should be considered for full protection from mining. As emphasised at the recent World Conservation Congress, industrial activities like mining and mining exploration are not compatible with marine parks. Marine parks should be fully protected from mining as has been achieved in the Great Barrier Reef Marine Park.

**Regarding Lord Howe Marine Park, I am concerned about the government's proposal to remove protection over part of the seamount ecosystem of Middleton Reef** – one of Australia's longest and most highly protected remote coral reef habitats, declared 30 years ago 1987. The returned catch value returned to the fishing industry from the loss of this important ecosystem is estimated by ABARES to be just \$31,000 per annum, or \$770 per annum to each of the 40 active longlining vessels in the Commonwealth's Eastern Tuna and Billfish Fishery. Therefore there is no economic justification for the loss of such an important legacy area of Australia's marine parks network. **I am also concerned that the government is ignoring the advice of its expert Review, in downgrading the zoning in the northern half of the Lord Howe marine park outside the pre-existing Elizabeth and Middleton Reef area**, from the recommended Habitat Protection Zone (yellow) to the very low level Multiple Use Zone (blue) which will in particular allow mining.

**Regarding Norfolk seamount protection, I am concerned that the government does not propose high level MNPZ protection for any of the Norfolk Seamounts despite being identified by the Howard Government as one of Australia's 11 most unique habitats for marine life.** The Government's proposals are contrary to the recommendation of the Government's own Review, which found that the Vening Meusez Fracture Zone some way south of Norfolk Island should be given MNPZ status. Research trips have found it to be covered with a thick manganese crust and a community of benthic organisms using as substrate. The biological samples found included: Gorgonians, black coral, soft coral, crinoids, bryozoans, bivalves, gastropods, silica sponges, brittle stars, ascidians, tunicates and polychaete worms.

**Regarding protection levels in the Norfolk Marine Park overall, I am concerned that the government is again ignoring the advice of its own expert Review, by not upgrading the zoning outside the MNPZs and the Island's extended MOU Box, from the very low level Multiple Use Zone (blue) to Habitat Protection Zone (yellow).** In doing so, the government is opening up much of the marine park to the possibility of becoming an oil field, and/or the possibility of highly destructive seabed mining since Geoscience Australia reports consider the region to be somewhat prospective for oil and gas finds.

**Regarding high level protection levels in the Temperate East region overall, I am concerned that the government is not proposing to increase high level protection in the Temperate East marine region despite 96% of the region having no high level MNPZ protection, and 85% of the region having no protection at all.** Further, the proposed zoning fails to implement the CSIRO recommendation for all marine reserves to contain at least one Marine National Park Zone, with the draft plan proposing no MNPZ for the Gifford, Hunter and Jervis Marine Parks.

**In summary, relating to the Temperate East region overall:**

- 1.) I support the Government's proposal to increase protection from mining in the Central Eastern, Jervis and Hunter Marine Parks;**
- 2.) I reject the proposed removal of MNPZ protection at the longstanding highly protected Middleton Reef in the Lord Howe Marine Park;**
- 3.) I reject the proposal to remove the new MNPZ over the Vening Meinez Fracture Zone in the Norfolk Marine Marine Park which was recommended for MNPZ protection by the Government's Review;**
- 4.) I reject the proposal to downgrade protection from mining in Norfolk and Lord Howe Marine Parks which the Review recommended be protected as yellow Habitat Protection Zone.**
- 5.) I call on the Government to adopt the CSIRO recommendations for each marine reserve to contain at least one MNPZ, with a particular focus on ensuring that the shelf, continental slope and seamounts are better represented with MNPZ coverage.**

I hope you take this and all other submissions seriously and not ignore them like the government did in the last public comment period. The future of our oceans and all its creatures as well as the recreation, tourism, and well-being of future generations of Australians is on the line. Now is the time to stand up against special interests and make the responsible and economic choice for Australia's future.

Yours sincerely,

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