



2 November 2016

Marine Reserves Management Planning Comments
Department of the Environment and Energy
By email: managementplanning.marine@environment.gov.au

Submission: Commonwealth Marine Reserves Management Plan Review

The Australian Conservation Foundation (ACF) is Australia's national environment organisation. We are 300 000 people who speak out, show up and act for a world where forests, rivers, people and wildlife thrive. We are proudly independent, non-partisan and funded by donations from Australians. ACF has a long and proud legacy of protecting Australia's oceans and has been a key player in the creation of Australia's Commonwealth Marine Reserves Network (the Network).

ACF does not support any weakening or wind back of protection in the Management Plans for the Network declared in 2012, and is particularly opposed to any reduction or loss of Marine National Park 'sanctuary' zones. Rather than weaken the Network, the Independent Commonwealth Marine Reserves Review (the Review) should be used to fully restore and indeed expand and enhance it.

Despite a recognition of the extensive science and consultation that led to the creation of the 40 individual reserves in the Network, the Review appears to go against this science and instead recommend decreasing, moving and in some cases abolishing the Marine National Park zones declared to protect marine life and their habitat, particularly in the globally important Coral Sea.

Despite finding that highly protected marine parks are vital as a key tool in marine management, the Review has failed to act on its own advice, missing the opportunity to deliver a science-based improvement the Network.

The Review is unprecedented and premature – conducted before the Network could become operational and thus before their performance could even be assessed. It therefore appears to be politically rather than scientifically motivated.

With devastating recent episodes of coral bleaching, mangrove dieback and kelp forest loss, Australia's marine environment is already suffering the impact of global warming. Despite this, the Review seems to ignore the increasing evidence that demonstrates how marine reserves build resilience in the face of increasing impacts of climate change. Australia should be increasing the size and number of our marine sanctuaries at this time, not reducing them.

Commonwealth Marine Reserves provide important economic opportunities for regional communities and reducing their effectiveness by weakening the level of protection they provide undermines that. Marine sanctuaries are also strongly supported by the Australian public. Any moves to weaken and abolish them will be not popular nor widely supported.



The Review misses a valuable opportunity to build on and improve the existing Network and Management Plans, particularly the opportunity to fully meet the requirements of a truly Comprehensive, Adequate and Representative (CAR) reserve system. Instead the Review at best maintains, but in many cases, reduces protection by:

- Proposing no overall increase of high level/IUCN I & II protection on Australia's continental shelf;
- Proposing a decrease in the overall protection (IUCN I & II) for the slope and deep ocean within Australian waters;
- Proposing a decrease of high level/IUCN I & II protection for the SW region, and in the other 4 regions high level/IUCN I & II protection for the shelf remains below 3%, with the Temperate East at 0%.

ACF therefore makes the following series bioregional specific recommendations to strengthen, rather than weaken, the Commonwealth Marine Reserve Network and management arrangements.

Recommendations: Coral Sea Marine Reserve

1. Reject the proposed major loss and fragmentation of the large Marine National Park Zone (MNPZ) including the fragmentation of the MNPZ between Mellish and Kenn Reefs and the removal of protection between Diane Bank and Osprey Reef;
2. Accept the increased protection in the north-west of Osprey Reef but reject the proposed loss of protection for the rest of the Reef. Osprey Reef needs high level MNPZ protection in order to deliver economic security to the valuable dive industry. If there is an interest in conducting an experiment into partial protection in the Osprey Group of Reefs the experiment should be conducted on Shark or Vema Reefs, not Osprey;
3. Reject the proposed loss of protection for Bougainville Reef, and seek expanded protection at Bougainville to over 100km² by expanding the MNPZ to include the east coast's only identified whale shark aggregation site to deliver security to the dive industry;
4. Accept the proposed changes to the MNPZ around Wreck Reefs, South Flinders Reef, Eastern Holmes Reef, Coringa Islets and at the border with the Great Barrier Reef;
5. Reject the proposed opening up of the Coral Sea to longlining in Area E/Coral Sea Zone of the Eastern Tuna Billfish Fishery. A high level of protection should be achieved in this area to ensure protection of the Queensland Plateau, Queensland Trough and the world's only known spawning ground for Black Marlin and their recreational, economic and social values;
6. Reject the proposed loss of MNPZ protection for Marion Reef. Marion Reef is the only location where protection is proposed for the coral reefs, cays and herbivorous fish of the Marion Plateau which is a key ecological feature of the Coral Sea;
7. Reject the proposed expansion of mid-water trawling, demersal longlining and prawn trawling within the Coral Sea.



Recommendations: North Marine Region

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1. Accept the proposed new MNPZs in the West Cape York, Gulf of Carpentaria, Limmen, Wessel and Oceanic Shoals CMRs;
2. Reject the proposed removal of MNPZs in the West Cape York, Gulf of Carpentaria and Wessel CMRs;
3. Reject the proposed expansion of trawling and gillnetting within the North marine region's CMRs;
4. Accept the establishment of new MNPZs in the Arnhem and Joseph Bonaparte Gulf CMRs providing the first MNPZ protection for four additional bioregions.
5. Accept the proposed substantial expansions in protection from mining for three reserves: the Limmen, Wessel and West Cape York Marine Reserves; and
6. Recommend the establishment of a new MNPZ over the Timor Canyons, providing the first MNPZ protection for inter alia:
 - a. a key ecological feature of the North Region,
 - b. the Timor Transition bioregion,
 - c. the slope habitats of the North Region, and
 - d. the Arafura Marine Reserve.

Recommendations: North-west Marine Region

1. Accept the proposed new MNPZs in the Kimberley, Dampier and Argo-Rowley Terrace CMRs;
2. Reject the proposed removal of MNPZs in the Kimberley and Dampier CMRs;
3. Reject the proposed opening up of the Rowley Shoals area to trawling in the Argo Rowley Terrace CMR, and recommend the protection of Rowley Shoals from mining by the establishment of new MNPZs or Habitat Protection Zones (HPZ)s
4. Recommend the replacement of the proposed HPZ for Adele Island in the Kimberley CMR with a MNPZ;
5. Recommend the establishment of a new large MNPZ in the north section of the Kimberley CMR to match the protection proposed by the WA Government in state waters in the adjacent 'Great Kimberley Marine Parks network';
6. Recommend the management arrangements for the NW marine region CMRs meet CSIRO recommendations for each marine reserve to contain at least one MNPZ;
7. Seek an increase in protection for the Ningaloo CMR by matching the protection provided in the adjacent WA state waters marine park (which has a network of IUCN II zones) with matching zoning in Commonwealth waters - as has been proposed for the boundary between the Coral Sea CMR and the Great Barrier Reef Marine Park.

Recommendations: South-west Marine Region

1. Accept the proposed extensions to the MNPZ in the Two Rocks, Bremer, South-west Corner and Perth Canyon CMRs;



2. Recommend the expansion of the Great Australian Bight CMR's MNPZ westwards to the South Australian border. There is very little high level MNPZ protection in the CMR network. Where possible, more not less should be created in the management arrangements. This proposal would create Australia's largest area of high level shelf protection with very little additional displacement for commercial or recreational fishers;
3. Reject the proposed removal of MNPZ protection within the Bremer, Perth Canyon and Twilight CMRs;
4. Reject the proposal to open the South-west CMRs to trawling, including the loss of MNPZ protection over the inner-shelf area of the Bremer CMR for scallop dredging;
5. Accept the proposed extensions to protection from mining in the South-west CMRs and seek the expansion of protection from mining for other key coastal communities adjacent to CMRs including at Kangaroo Island (Western Kangaroo Island CMR), Esperance (the SW Corner and Eastern Recherche CMRs), Peaceful Bay (SW Corner CMR) and Perth (Perth Canyon CMR), and the Great Australian Bight; and
6. Recommend the provision of permanent protection for Australian Sea Lions from gillnetting by ensuring that the zoning of the CMRs doesn't offer less protection than existing fisheries closures.

Recommendations: Temperate East Marine Region

1. Reject the proposed removal of MNPZ protection at Middleton Reef in the Lord Howe CMR;
2. Accept the proposed new MNPZ in the Norfolk Marine CMR and recommend the expansion to include the Norfolk Island Seamounts;
3. Accept the proposals of substantial expansions of protection from mining to include the Norfolk, Lord Howe and Gifford Marine Reserves and large parts of the Central Eastern, Jervis and Hunter Marine Reserves; and
4. Meets 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.

If you have any further questions regarding comments or recommendations in this submission, please do not hesitate to contact ACF Healthy Ecosystem Campaigner Jess Abrahams on j.abrahams@acfonline.org.au

Yours sincerely,

A handwritten signature in blue ink that reads "Paul Sinclair".

Dr. Paul Sinclair
Director of Campaigns
Australian Conservation Foundation