

11th September 2017

The Surfrider Foundation Australia is concerned at the Government's Draft management plans for Australia's 44 suspended Commonwealth waters marine parks. We reject the big cut backs to high level protection proposed around the nation that will make way for destructive forms of commercial fishing and mining. Inexplicably, reductions in protection proposed by the Government far exceed those proposed by the Government's own independent Review, released last year.

We cannot afford to lose any areas of marine sanctuaries; Australia cannot be seen to go backwards on marine protection issues as this would set a damaging precedent when globally, the research is proving that the world's ocean need increasing protection.

The Surfrider Foundation Australia has a national network of 17 branches across Australia and we serve as the first response to local threats in coastal communities across Australia. We have over 9.5 thousand members on Facebook and Instagram and 10 thousand people engaged on our mailing lists. Our members and volunteers collaborate on both the local and national level to carry out our mission through campaigns, programs and educational initiatives in their local communities through C.A.R.E. (Conservation || Activism || Research || Education). As part of the Save Our Marine Life, we reject any proposals to reduce the areas of marine parks and sanctuaries for the following reasons:

- 1. Reject the cut backs of Marine National Park 'sanctuary' IUCN II zoning (MNPZ) across the Network and call for the Turnbull Government to fully restore and increase the IUCN II zoning in Australia's Marine Parks without delay.** 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.
- 2. The marine park zoning must be science-based** – the Government's own Expert Science Panel found that marine parks declared in 2012 were the result of sound science and consultation. Further, leading scientists found that the 2012 network would need more marine sanctuary coverage, not less (eg: Barr and Possingham, *Are outcomes matching policy commitments in Australian marine conservation planning?* Marine Policy 42, 39-48 2013).
- 3. Partial protection zones are not a substitute for high level National Park 'sanctuary' (IUCN II) protection** – 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.
- 4. Reject the proposal to allow mining in parks** – 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.

5. **Reject the proposal for destructive commercial fishing activities such as trawling, gillnetting and longlining in the marine parks** – by 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.

6. **There is no justifying economic argument** – 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.

The results of the statutory consultation are being ignored - it is deeply concerning that 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.

What is most alarming to us is the Turnbull Government's draft plans released last month with regard to the TEMPERATE EAST region of Marion Parks. We list our concerns below:

The Temperate East marine region is recognised as an area of global significance for a number of protected marine species including the critically-endangered east coast population of grey nurse shark and the vulnerable white shark. The network includes: important offshore reef habitat at Elizabeth and Middleton Reefs (one of Australia's longest standing highly protected marine parks), Lord Howe Island and at Norfolk Island that support the threatened black cod; the southernmost extent of many reef-building coral species; as well as important breeding, foraging and feeding areas for several species of seabird including the little tern.

- **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 Meinse 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. 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**.

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

The following are the Surfrider Foundation Australia's recommendations to the Government in relation to the redrafting of the Temperate East marine region management arrangements: -

1. We support the Government's proposal to increase protection from mining in the **Central Eastern, Jervis and Hunter Marine Parks**;
2. We reject the proposal removal of MNPZ protection at the long standing highly protected **Middleton Reef in the Lord Howe Marine Park**;
3. We reject the proposal to remove the new MNPZ over the Vening Meinsez Fracture Zone in the **Norfolk Marine Marine Park** which was recommended for MNPZ protection by the Government's Review;
4. We 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. **We 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.

We call on the Government to act in the best interest of our members and volunteers, and of the ocean lovers in Australia, but most importantly, for the protection of our oceans and marine wildlife and ecosystems.

Yours Sincerely,
Susie Crick

Director.