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Submission on Australia's Commonwealth Marine Reserves Review

The North Queensland Conservation Council welcomes the opportunity to make a submission on Australia's Commonwealth Marine Reserves Review and provide feedback on what kind of protection we want for Australia's 40 marine parks.

NQCC is the regional conservation council for the area from Cardwell to Bowen, and from the Reef to the Northern Territory border. Established in 1974, it falls under the broad umbrella of the Queensland Conservation Council and focuses on education, advocacy and policy development.

This submission will primarily focus on the Coral Sea Commonwealth Marine Reserve, given our close geographical proximity and our previous campaign work relating to the Coral Sea.

The recently released Commonwealth Marine Reserves Review recognises the extensive science and consultation that led to the creation of the 40 parks in 2012, but recommends reducing, relocating and in some cases removing the high level Marine National Park Zone protection declared over key habitats, particularly in the globally important Coral Sea.

Our position is that marine parks should be managed for conservation, like National Parks are on land. We uphold that a key tool for keeping the world's oceans healthy is to set aside a portion of marine habitat from extractive use and maintain the marine environment in its natural state.

On behalf of our members and supporters, we urge you to improve and fully restore Australia's Commonwealth Marine Reserves (CMRs), with no loss of their Marine National Park 'sanctuary' IUCN II Zoning.

Australia's marine reserves are as important as ever, as unprecedented reports of mass coral bleaching, mangrove die off and record ocean temperatures come to light. Marine reserves are necessary in helping our marine environment build resilience to the multifaceted threats it faces.

NQCC urges you to ensure that the five management plans are as science-based as possible.

Concerns about the Review Findings

We applaud that the Review recognised the Coral Sea as a significant biodiversity hotspot, the value of its reefs, and its position as one of the few remaining areas on earth not significantly impacted by humans.

We have serious concerns about the following recommendations of the Review:

1. Reducing the size of the largest Marine National Park Zone and fragmenting it such that the remaining area is reduced in size by over a quarter (26%).

The Marine National Park Zone in the Coral Sea was Australia's major contribution to the protection of intact tropical pelagic marine life at a large scale. At over 115,000km², the size of the Marine National Park Zones proposed to be removed from the Coral Sea is equivalent to the size of every Marine National Park Zone in the Great Barrier Reef Marine Park combined.

The vast majority of the areas removed contain no recreational fishing and there is minimal commercial fishing in this area. The Eastern Tuna and Billfish Fishery (ETBF) is the fishery for which the review provides the greatest changes with two thirds (66%)¹ of all the predicted benefits for fisheries from the review flowing to this particular fishery. ABARES predicts that the maximum annual economic benefit to the fishery from these changes is \$2.4 million per annum or \$26,376 per annum to each of the 92 longlining statutory fishing rights in the ETBF. However, the Review recognises that the current extent of commercial fishing and reported catches are considerably lower than in the past and dropping. If the policy aim was to return value to this fishery, it could clearly be more effectively and efficiently achieved through other management initiatives.

2. Undermining the economic viability of dive tourism

Dive tourism in the Coral Sea contributes \$30 million to the economy and protected zones safeguard the industries future. Fully protecting reefs will protect fish and shark populations that are highly valuable to the dive industry and build resilience in the face of climate change in particular coral bleaching events. This is not only to the benefit of the biodiversity but also delivers economic security to dive operators who rely upon the diversity of reefs protected in the face of cyclones and bleaching events.

The Osprey Group of Reefs has significant proposed changes. These reefs have some of the world's premier dive locations. By removing a quarter of

¹ And an additional 25% of the fisheries benefits flowing to the Norther Prawn Trawl Fishery meaning 91% of the predicted benefits flow to just two particularly well connected wealthy fisheries.

the Marine National Park Zone protection as recommended by the Review, the iconic and economically critical shark populations are vulnerable to the 90% depletion that has been documented on other unprotected coral reefs in the Coral Sea. We support the Review's recommendation to improve protection in the north-west section of Osprey Reef.

Bougainville Reef is also proposed to lose its Marine National Park Zone protection. This Reef is unique in the Coral Sea and vital to dive tourism because of the healthy shark population it supports and iconic fish species like the potato cod.

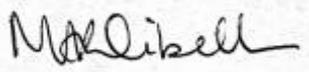
We support and commend the Review for recommending an increase in reef protection at East Holmes and South Flinders Reefs.

NQCC's Recommendations

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 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 value;

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.

Yours faithfully,



Maree Dibella
Coordinator