Report of the Director of National Parks

under

Environment Protection and Biodiversity Conservation Act 1999

Section 351

Concerning the proposed Proclamation to rename “Commonwealth marine reserves” to “marine parks”.

22 September 2017
## CONTENTS

1 Executive Summary ........................................................................................................................ 1
2 The matter to be dealt with by the proposed Proclamation ...................................................... 2
3 Regulatory Impact Statement ........................................................................................................ 2
4 Consultation ..................................................................................................................................... 2
   4.1 Comments in support of the renaming proposal ................................................................. 2
   4.2 Comments opposed to the renaming proposal .................................................................... 3
   4.2 Comments that were neutral, not clear or not relevant .................................................... 3
EXECUTIVE SUMMARY

This report has been prepared in accordance with the *Environment Protection and Biodiversity Conservation Act 1999* (the EPBC Act) for consideration by the Minister for the Environment and Energy in relation to the proposed Proclamation to rename 58 existing “Commonwealth marine reserves” to “marine parks”. Renaming these 58 reserves is the only matter to be dealt with by this Proclamation.

A Notice inviting public comment on the proposed Proclamation was published in accordance with the EPBC Act on 21 July 2017. The period for comment closed on 20 September 2017.

As required by the EPBC Act:

- all comments received in response to the statutory invitation were considered in preparing this report and are attached to it (Attachment B); and

- the Director of National Parks’ views about the comments received are included in this report.

Sixteen submissions were received. Five were in favour of the renaming, five were opposed, and six appeared to be either neutral, unclear or not relevant to the proposal. Those in favour supported the renaming for reasons such as ‘marine park’ being more common parlance and reducing confusion between state and federal level marine protection. Those opposed were concerned that the term ‘marine park’ could indicate reduced environmental protections for these areas.

The Director of National Parks’ broad view is that the term ‘marine park’ is more readily understood by users, and is more identifiable with Parks Australia. It more accurately conveys that these places, like national parks on land, are for people to use and enjoy as well as for protecting important marine habitats and species. The naming of the reserves as marine parks has no effect on the level of protection ascribed to them, which is set out in legislative management plans.

Public comments on the renaming proposal have been summarised in this report along with the Director’s views on these. All submissions received through the EPBC Act process are provided in full at Attachment B.
2 THE MATTER TO BE DEALT WITH BY THE PROPOSED PROCLAMATION

The proposed Proclamation amends 15 existing Proclamations to change the names of the reserves indicated “Commonwealth Marine Reserves” to “Marine Parks” as per the table in Attachment A.

3 REGULATORY IMPACT STATEMENT

Advice received from the Office of Best Practice Regulation indicates that as there is no additional regulatory burden imposed by changing the names of the reserves, there is no requirement for a regulatory impact statement (OBPR reference number 22665).

4 CONSULTATION

In accordance with subsection 351(2) of the EPBC Act, public comment was invited on the proposed Proclamation between 21 July 2017 and 20 September 2017.

The invitation to comment was published in the Australian Government Gazette, national and regional newspapers and on the Parks Australia website. An email invitation was sent to all of the individuals and organisations who had subscribed to relevant mailing lists or had recently been in contact with the Department about marine parks.

A total of 16 submissions were received in response to the invitation to comment. These submissions came from six individuals, five businesses and five other organisations. Five submissions were in favour of the renaming, five were opposed, and six appeared to be either neutral, unclear or not relevant to the proposal.

Some submissions commented on related but not directly relevant issues, such as the draft management plans for marine parks that were released for comment at the same time as the proposal to rename reserves.

4.1 COMMENTS IN SUPPORT OF THE RENAMING PROPOSAL

There were five submissions supportive of the proposal. Comments from these submissions have been summarised as follows:

- the term ‘marine parks’ is more common parlance, simpler and easier to remember;
- the change will help end confusion between state and federal level marine protection; and
- the proposed name change is synonymous with wide open spaces and the environment.

Director’s views

Noted. Agree that the term ‘marine park’ is more commonly used and recognisable, and that applying it to Commonwealth parks will help reduce confusion between state and Commonwealth protections for these areas.
4.2 COMMENTS OPPOSED TO THE RENAMING PROPOSAL

There were five submissions opposed to the renaming proposal. Comments from these submissions have been summarised as follows:

- the naming of a reserve as a park reduces its environmental status and implies that public use of the area will over-ride the conservation values in any future management reviews or plans;
- the name change is to appease vested interest groups who wish for lessened protections so current reserves can be commercially exploited; and
- Australia’s marine reserves are set aside for marine life, not human use or recreation.

Director’s views

Noted, but not agreed. The naming of the reserves as marine parks has no effect on their environmental status or level of protection now or in the future—protections for marine parks are enshrined in legislative management plans. Australia’s marine parks, like national parks on land, are for people to use and enjoy as well as for protecting important marine habitats and species.

The objectives of marine parks are:
- a) the protection and conservation of biodiversity and other natural, cultural and heritage values; and
- b) ecologically sustainable use and enjoyment of the natural resources within marine parks, where this is consistent with objective (a).

- marine governance in Australia is complex and requires clear signals to indicate who is responsible for managing each marine region; and
- rebranding will consume limited time and resources that could be spent elsewhere.

Director’s views

The Director works closely with state and territory counterparts to ensure marine park management in different jurisdictions is well coordinated and communicated clearly to marine users.

The benefits of renaming marine reserves to marine parks are expected to outweigh the effort required to implement and communicate the change.

4.2 COMMENTS THAT WERE NEUTRAL, NOT CLEAR OR NOT RELEVANT

There were six submissions that appeared to be either neutral, unclear or not relevant to the proposal. Comments from these submissions that were considered relevant to the renaming proposal have been summarised as follows:

- there should be only one name for marine parks and reserves; and
• no concerns with the renaming proposal as long as the focus is conservation, not commercial interests.

**Director's views**

*Noted. Agree that there should be a single name for marine parks. Changing the name of Commonwealth marine reserves to marine parks will bring their naming into alignment with the naming of state and Northern Territory marine parks.*

*The objectives of marine parks are:*

  *a) the protection and conservation of biodiversity and other natural, cultural and heritage values; and*
  
  *b) ecologically sustainable use and enjoyment of the natural resources within marine parks, where this is consistent with objective (a).*
<table>
<thead>
<tr>
<th>Current name</th>
<th>Proposed name</th>
<th>Proclamation to be amended</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>South-west Commonwealth Marine Reserves Network</strong></td>
<td><strong>South-west network of Marine Parks</strong></td>
<td></td>
</tr>
<tr>
<td>Southern Kangaroo Island Commonwealth Marine Reserve</td>
<td>Southern Kangaroo Island Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Western Kangaroo Island Commonwealth Marine Reserve</td>
<td>Western Kangaroo Island Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Western Eyre Commonwealth Marine Reserve</td>
<td>Western Eyre Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Murat Commonwealth Marine Reserve</td>
<td>Murat Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Great Australian Bight Commonwealth Marine Reserve</td>
<td>Great Australian Bight Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Twilight Commonwealth Marine Reserve</td>
<td>Twilight Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Eastern Recherche Commonwealth Marine Reserve</td>
<td>Eastern Recherche Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>South-west Corner Commonwealth Marine Reserve</td>
<td>South-west Corner Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Bremer Commonwealth Marine Reserve</td>
<td>Bremer Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Geographe Commonwealth Marine Reserve</td>
<td>Geographe Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Perth Canyon Commonwealth Marine Reserve</td>
<td>Perth Canyon Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Two Rocks Commonwealth Marine Reserve</td>
<td>Two Rocks Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Jurien Commonwealth Marine Reserve</td>
<td>Jurien Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Abrolhos Commonwealth Marine Reserve</td>
<td>Abrolhos Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td><strong>North-west Commonwealth Marine Reserves Network</strong></td>
<td><strong>North-west network of Marine Parks</strong></td>
<td></td>
</tr>
<tr>
<td>Shark Bay Commonwealth Marine Reserve</td>
<td>Shark Bay Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Carnarvon Canyon Commonwealth Marine Reserve</td>
<td>Carnarvon Canyon Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Ningaloo Commonwealth Marine Reserve</td>
<td>Ningaloo Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Gascoyne Commonwealth Marine Reserve</td>
<td>Gascoyne Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Montebello Commonwealth Marine Reserve</td>
<td>Montebello Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Dampier Commonwealth Marine Reserve</td>
<td>Dampier Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Eighty Mile Beach Commonwealth Marine Reserve</td>
<td>Eighty Mile Beach Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Roebuck Commonwealth Marine Reserve</td>
<td>Roebuck Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Mermaid Reef Commonwealth Marine Reserve</td>
<td>Mermaid Reef Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Argo-Rowley Terrace Commonwealth Marine Reserve</td>
<td>Argo-Rowley Terrace Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Kimberley Commonwealth Marine Reserve</td>
<td>Kimberley Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Ashmore Reef Commonwealth Marine Reserve</td>
<td>Ashmore Reef Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Cartier Island Commonwealth Marine Reserve</td>
<td>Cartier Island Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td><strong>North Commonwealth Marine Reserves Network</strong></td>
<td><strong>North network of Marine Parks</strong></td>
<td></td>
</tr>
<tr>
<td>Joseph Bonaparte Gulf Commonwealth Marine Reserve</td>
<td>Joseph Bonaparte Gulf Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Oceanic Shoals Commonwealth Marine Reserve</td>
<td>Oceanic Shoals Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Arafura Commonwealth Marine Reserve</td>
<td>Arafura Marine Park</td>
<td>F2013L02108</td>
</tr>
</tbody>
</table>


<table>
<thead>
<tr>
<th>Current name</th>
<th>Proposed name</th>
<th>Proclamation to be amended</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arnhem Commonwealth Marine Reserve</td>
<td>Arnhem Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Wessel Commonwealth Marine Reserve</td>
<td>Wessel Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Limmen Commonwealth Marine Reserve</td>
<td>Limmen Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Gulf of Carpentaria Commonwealth Marine Reserve</td>
<td>Gulf of Carpentaria Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>West Cape York Commonwealth Marine Reserve</td>
<td>West Cape York Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Coral Sea Commonwealth Marine Reserve</td>
<td>Coral Sea Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Temperate East Commonwealth Marine Reserves Network</td>
<td>Temperate East network of Marine Parks</td>
<td></td>
</tr>
<tr>
<td>Gifford Commonwealth Marine Reserve</td>
<td>Gifford Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Norfolk Commonwealth Marine Reserve</td>
<td>Norfolk Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Lord Howe Commonwealth Marine Reserve</td>
<td>Lord Howe Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Central Eastern Commonwealth Marine Reserve</td>
<td>Central Eastern Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Solitary Islands Commonwealth Marine Reserve</td>
<td>Solitary Islands Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Cod Grounds Commonwealth Marine Reserve</td>
<td>Cod Grounds Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Hunter Commonwealth Marine Reserve</td>
<td>Hunter Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>Jervis Commonwealth Marine Reserve</td>
<td>Jervis Marine Park</td>
<td>F2013L02108</td>
</tr>
<tr>
<td>South-east Commonwealth Marine Reserves Network</td>
<td>South-east network of Marine Parks</td>
<td></td>
</tr>
<tr>
<td>East Gippsland Commonwealth Marine Reserve</td>
<td>East Gippsland Marine Park</td>
<td>F2007L01913</td>
</tr>
<tr>
<td>Beagle Commonwealth Marine Reserve</td>
<td>Beagle Marine Park</td>
<td>F2007L01911</td>
</tr>
<tr>
<td>Flinders Commonwealth Marine Reserve</td>
<td>Flinders Marine Park</td>
<td>F2007L01914</td>
</tr>
<tr>
<td>Freycinet Commonwealth Marine Reserve</td>
<td>Freycinet Marine Park</td>
<td>F2007L01916</td>
</tr>
<tr>
<td>Huon Commonwealth Marine Reserve</td>
<td>Huon Marine Park</td>
<td>F2007L01917</td>
</tr>
<tr>
<td>South Tasman Rise Commonwealth Marine Reserve</td>
<td>South Tasman Rise Marine Park</td>
<td>F2007L01920</td>
</tr>
<tr>
<td>Macquarie Island Commonwealth Marine Reserve</td>
<td>Macquarie Island Marine Park</td>
<td>F2012C00793</td>
</tr>
<tr>
<td>Tasman Fracture Commonwealth Marine Reserve</td>
<td>Tasman Fracture Marine Park</td>
<td>F2007L01921</td>
</tr>
<tr>
<td>Franklin Commonwealth Marine Reserve</td>
<td>Franklin Marine Park</td>
<td>F2007L01915</td>
</tr>
<tr>
<td>Boags Commonwealth Marine Reserve</td>
<td>Boags Marine Park</td>
<td>F2007L01912</td>
</tr>
<tr>
<td>Apollo Commonwealth Marine Reserve</td>
<td>Apollo Marine Park</td>
<td>F2007L01910</td>
</tr>
<tr>
<td>Zeehan Commonwealth Marine Reserve</td>
<td>Zeehan Marine Park</td>
<td>F2007L01922</td>
</tr>
<tr>
<td>Murray Commonwealth Marine Reserve</td>
<td>Murray Marine Park</td>
<td>F2007L01918</td>
</tr>
</tbody>
</table>
To Whom it may concern,

I am writing to object to the proposed change of renaming Marine Reserves to Marine Parks. My reasons for opposing this are simple, the naming of a Reserve as a Park, reduces the environmental status of the Reserve area as reserved for environmental purposes and changing it to a Park implies that, as it is a Park rather than a reserve, the public use of the area will over-ride the conservation values in any future management reviews or plans. It is quite clear that this is the primary objective of this name change and that the changes are being proposed to appease vested interest groups who wish for lessened protections so that current Reserves can be commercially exploited.

It has become clear to the majority of Australian citizens that the current Federal Government is lessening environmental protections for both land and marine protected areas, this will add to the certainty of it's demise following the next Federal Election.

Yours sincerely Thomas Davidson Dip.C&LM
I agree with the name change to "Marine Parks". It's simpler, and easier to remember; it's also common parlance.

Kind Regards,

Salomè
Park - An area set aside for recreation.
Reservation - An area set aside for a special purpose.
Australia's Marine Reservations are set aside for marine life, not human recreation.
The name 'Reservation' must stay the same to avoid ambiguity. The purpose for which they were created must stay the same, reserves for marine life.
There is plenty more water outside the reserves to play in.

John Bowman
108 Orton St
Ocean Grove 3226
To Whom It May Concern,

Re: Renaming the Commonwealth Marine Reserves

I am writing to advise that our organisation agrees with the Department’s proposed name change of the Commonwealth Marine Reserves to Australian Marine Parks.

The proposed name change takes advantage of the way in which our country’s name is synonymous with wide open spaces and the environment, to better describe that the title refers to the proposed network of federal Marine Reserves.

Many thanks,

Sophie Teede
Operations Supervisor (Marine)

23rd August 2017
To:

Australian Marine Parks Management Planning Comments  
Department of the Environment and Energy  
Reply Paid 787  
Canberra ACT 2601

Email: managementplanning.marine@environment.gov.au and renaming.marine@environment.gov.au

14th September 2017

National Parks Association of Queensland

Submission to the: Department of the Environment and Energy

on

Australian Marine Parks Management Planning & Renaming of Marine Reserves to Marine Parks

Thank you for the opportunity to provide a submission to the Director of National Parks regarding the 2017 Draft Coral Sea Marine Reserve Management Plan and the renaming of Marine Reserves to Marine Parks.

The National Parks Association of Queensland (NPAQ) is dedicated to promoting the preservation, expansion, good management and presentation of national parks in Queensland.

Established in 1930, NPAQ is an independent, not-for-profit, membership-based organisation. The association has played a pivotal role in the establishment of many national parks in Queensland. NPAQ’s purpose is achieved through advocating for the protection, expansion and good management of the protected area estate in Queensland; fostering the appreciation and enjoyment of nature through a bushwalking and outdoor activities program; undertaking on-ground conservation and monitoring work; educating the community about national parks and their benefits; and supporting the development and application of scientific and professional knowledge in advancing national parks and nature conservation.
Submission A – Marine Reserve Management Plans

Biodiversity hotspot

NPAQ rejects the severe rollbacks proposed in the draft 2017 management plan in favour of implementing the zoning recommendations of the Commonwealth Marine Reserves Review given the extensive stakeholder consultations and scientific input that informed the Review and the irreplaceable value of the Coral Sea as a biodiversity hotspot.

Referred to as the “Cradle of the Great Barrier Reef”, the Coral Sea provides sea currents that brings new coral to the Reef.¹

The waters of the Coral Sea are important in attracting aggregations of large pelagic fish species, either to feed or spawn, while also providing migratory corridors for numerous highly mobile species.

For all its vast isolation, the Coral Sea is undoubtedly important as one of the last pristine ecosystems on the planet, despite sharing in the worldwide despoliation of the seas with plastics. It is a biodiversity hotspot, with a vast array of sea creatures including the dwarf minke whale, the majestic whale shark and large ocean predators including rare deepwater sharks, tuna and billfish – a variety of species of marlin, sailfish and swordfish. The Coral Sea contains 49 different habitats and supports over 300 threatened species. At least 28 species of whales and dolphins are found, some in pods up to 400 strong. There are 52 species of deepwater sharks and rays, 18 of which are unique to the Coral Sea. ²

The Coral Sea is also the site of the world’s only known black marlin spawning event.³ The islets and cays also support 14 species of seabird, including regionally important populations of red-footed booby, lesser frigatebird and great frigatebird. The green turtle regularly nests on undisturbed islets, particularly the Coringa-Herald and Lithou Reef national nature reserves – the two existing protected areas within the million square kilometres of the Coral Sea within Australian waters. The hawksbill turtle also uses these islets for foraging and, occasionally, nesting. Five other species of sea turtle are also found in the Coral Sea as its atoll beaches make secure nest sites. The Coral Sea hosts 341 species that are recognised by the International Union for the Conservation of Nature for their conservation significance.⁴ The Coral Sea sanctuary zones are “probably the only tropical pelagic environment not markedly impacted by fishing where an area of a very large scale can be established and effectively managed.”⁵

The Coral Sea, as an irreplaceable biodiversity hotspot, deserves protection based on expert scientific advice.

The Value of National Marine Park Zones

In 2015, the Centre for Conservation Geography prepared an independent research paper on behalf of Save Our Marine Life Alliance.⁶ The research found that:

1. Marine National Park Zones are critical to the protection of the Coral Sea’s marine life. The weight of scientific evidence showed that partially protected zones did not deliver broad ranging and significant benefits.

2. The net social and economic benefits of the Coral Sea Marine Reserve contribute $1.2 billion to the Australian community. Further, the positive impacts on nature-based tourism and recreational fishing outweigh any potential negative impacts on commercial fishing by at least $5 million annually.

3. Some minor changes are need to the zones, around some of the key coral reefs targeted for protection.
4. Major concerns exist within the scientific community regarding the low level of protection for the unique habitats of the western and southern Coral Sea, particularly the deep water troughs, pelagic ecosystems and unique coral reefs.

**Independent Scientific Panel**

As part of the Commonwealth Marine Reserves Review, an independent Expert Scientific Panel (ESP) was appointed to provide advice to government. The ESP included recognised scientists selected for their capacity to provide independent scientific advice on the science supporting the Commonwealth Marine Reserves (CMR) including:

- Options for zoning, and zoning boundaries, and allowed uses consistent with Goals and Principles for the Establishment of the National Representative System of Marine Protected Areas in Commonwealth Waters;

- Future priorities for scientific research and monitoring relating to marine biodiversity within the marine reserves, especially any relating to the understanding of threats to marine biodiversity within the marine reserves; and

- Options for addressing the most significant information gaps hindering robust, evidence-based decision-making for the management of the marine reserves.

After extensive research and stakeholder consultation, the ESP Report included the following:

- A recommended matrix of marine activities by zone which should be followed.

- Identification of additional available research to addressed gaps in the assessment of commercial fishing operational risks to biodiversity and ecosystems. For example, fishing gear types (demersal automatic long line), impact of recreational fishing, effectiveness of different zone types need to be incorporated into existing risk assessment processes.

- A recognition that significant gaps in the coverage of protected areas “should be addressed in due course to ensure a more comprehensive and adequate inclusion of a representative sample of Australia’s marine biodiversity in the national CMR estate”. (This is **before** the size of the Marine Reserve National Park zones were reduced in the 2017 draft plans.)

- A statement that “demersal longline fishing (including auto-longlines) should remain a method that is incompatible with the conservation values of the ... Coral Sea Commonwealth Marine Reserves, particularly those relating to seamounts” unless independent scientific research indicates otherwise.

- Recognition that “the significant body of scientific literature ... demonstrates the effectiveness of Marine National Park Zones (no-take zones) in achieving conservation outcomes and for their role as scientific reference areas. The ESP notes the emerging consensus that, to attain and preserve natural condition, no-take, size, configuration, enforcement and length of time the area has been protected all need to be considered.”

- A statement that “different management regimes across reef systems should not be applied across small reefs (less than 20 km across).”

Unfortunately, the Director of Parks in preparing the 2017 draft plans appears to have deviated significantly from the Government’s own ESP’s advice. Sanctuary protections for large areas of the Coral Sea, as well as other regions, are being abandoned to allow for an expansion of fishing, including long-line fishing and seafloor trawling. The ‘sensible balance’ sought by the 2014-2015 ‘science based review’, has been largely ignored and subsequently, the draft management plans propose a drastic reduction in protection.
Under the proposed 2017 draft plans, “the amount of green zones will be almost halved, from 36% to 20%” - with the biggest reductions in the Coral Sea - arguably where we need it most given the existing threats to the Great Barrier Reef.

The following figure shows the original national park zoning proclaimed in 2012; the ESP’s revised zoning from 2015; and the proposed 2017 draft plan’s dramatically reduced zones.

The Minister for the Environment and Energy, Josh Frydenberg, said that this approach will “allow sustainable activities like commercial fishing while protecting key conservation features”. However, the severe reduction in the Marine Reserve National Park area will leave the more accessible part of the Coral Sea with little protection. Effective protection requires aligning no-take areas to areas under threat.

The detrimental impacts of large scale commercial fishing are well known. In 2011, Professor David Booth, professor of Marine Ecology from the University of Technology Sydney, stated that it was “well supported scientifically that fisheries extraction is a major threat to world fish populations”. As “the selective removal of top predators – such as sharks, gropers and mackerels – may also indirectly affect whole ecosystems”, fishing needed to be managed closely.

With science showing Marine National Park Zones as “the engine room of conservation”, the reduction in the extent and placement of Marine National Park Zones will seriously undermine the effectiveness of the Marine Sanctuaries. Given the strong connection of the Coral Sea as the “Cradle of the Great Barrier Reef”, reducing protection will likely undermine the integrity of the Coral Sea and therefore Great Barrier Reef. Scientists suggest that 30-40% of the seascape should ideally be fully protected, rather than the 20% proposed under the 2017 draft plans (and even less for the Coral Sea).

NPAQ therefore reject the severe rollbacks proposed in the draft 2017 plan and call for implementation of the more extensive and stakeholder balanced Commonwealth Marine Reserve Review zoning and recommendations.

**Submission B – Renaming Marine Reserves to Marine Parks**

NPAQ has no concerns with renaming marine reserves to marine parks so long as the focus is conservation rather than sacrificing their underlying short and long-term integrity/sustainability by prioritising commercial interests. We have a duty to protect Australia’s Commonwealth Marine ecosystems for future generations.
Thank you for considering NPAQ’s submission.

Yours sincerely

Laura Hahn
Conservation Officer
National Parks Association of Queensland

(07) 3367 0878
cconservation@npaq.org.au


2 Ibid.


5 Ibid, pg 3.


dup - how shorten/refer above


Dear Sir/Madam

Comments on the Coral Sea Marine Park Draft Management Plan

I have been directed by the State Council of the Wildlife Preservation Society of Queensland (Wildlife Queensland) to forward comments on the Coral Sea Marine Park Draft Management Plan. Wildlife Queensland is one of the longest established and most respected wildlife-focused conservation groups in Queensland. With over 6500 members and supporters spread across branches and networks throughout the State, Wildlife Queensland is a strong voice for our wildlife and its habitat.

Wildlife Queensland is apolitical. Our aims include:

- **Preserve** the flora and fauna of Australia by all lawful means
- **Educate** the community in an understanding of the principles of conservation and preservation of the natural environment
- **Discourage** by all legal means, the possible destruction, exploitation and unnecessary development of any part of the natural environment.
- **Encourage** rational land use and proper land planning of existing and future development, and the use of the natural environment and its management.

Wildlife Queensland welcomes the opportunity to make comment. Wildlife Queensland has actively campaigned for enhanced management of the Coral Sea since 2011. To see the progress achieved set aside by the Turnbull Government, ignoring the advice of its own review, advocating massive cutbacks in protection, relacing high level protection with partial or low level protection is extremely disappointing. In hindsight such action by the Turnbull Government should not have been unexpected based on their demonstrated care for the environment and its wildlife.

Wildlife Queensland will focus on those sections of the draft management plan of particular interest or concern to Wildlife Queensland. Furthermore if Wildlife Queensland elects not to comment on a topic or aspect, this should not be construed necessarily as support for the view presented. Wildlife Queensland’s primary focus is directed at the Coral Sea Draft Management Plan. However prior to providing comment on that plan Wildlife Queensland offers observations on the entire network of Marine Conservation Reserves. Wildlife Queensland strongly supports science based decision making and it would appear that concept has been discarded. That assumption is based on the Government ignoring the findings of its own Expert
Science Panel that the marine conservation reserves declared in 2012 were the results of extensive consultation and sound science. While not accepted by the then Government back in 2012, there were several leading scientists advocating the need for additional protected marine park areas not less. Such a request is more relevant today than ever before. Wildlife Queensland is obviously under a misunderstanding that it was clearly established back in the 1960s that mining and marine parks are not compatible. It beggars belief that this Government proposes to allow mining in marine parks. Similarly the proposal to permit certain commercial fishing activities with destructive outcomes in marine parks is in direct conflict with the findings of risks that commercial fishing methods may pose to conservation values identified in the Areas for Further Assessment of the East Marine Region prepared by Morison aquatic sciences in 2010. With coral bleaching on the increase and mangrove dieback at unprecedented level in north Queensland the cut backs of national park sanctuaries across the entire marine conservation reserve surely must be rethought particularly if any consideration is given to the economic windfall derived from tourism and the employment opportunities generated by the marine park reserves.

Considering the Coral Sea Draft Management Plan it would appear that science based decision making has been set aside without sound reason. There is no other conclusion that can be drawn. The Government’s own Expert Science Panel recognised the Coral Sea’s biodiversity significance not only for Australia but globally. The significant cuts of over 50% and fragmentation of the marine national park zone certainly threatens the protection that was given to the intact tropical pelagic marine life. The government proposal to open up the area to longlining commercial fishing is not supported by Wildlife Queensland as it poses too much of a risk to the conservation values of the Coral Sea- an area that has not been ravaged by human activity to any significant degree.

Dead zones affect dozens of coral reefs around the world and threaten hundreds more according to a new study by Smithsonian scientists published in Proceedings of the National Academy of Sciences. Such information lends support to increasing the protection for reefs in the Coral Sea. Yet again decision making is not underpinned by facts and science. The appropriate action in this situation is to increase protection of the ecologically significant reefs. Again only 7 of 40 plus reefs enjoy the Marine National Park Zone protection. It is not only the wildlife that benefits from such protection being applied to an increased number of reefs but gives some assurity to the tourism industry that relies on healthy reefs and a bountiful presence of a broad range of marine life.

The proposed move to partial protection is no alternative for full protection. Partial Protection Zones may act as an appropriate buffer for Marine National Park Zones but are certainly no replacement. It is Wildlife Queensland’s understanding that the primary purpose of partial protection zones is to satisfy social and economic outcomes not affording the necessary protection to our marine wildlife.

Wildlife Queensland is of the view that this Coral Sea Draft Management Plan is a retrograde step and is found lacking in many areas. It certainly weakens the environmental protection that was afforded to marine wildlife. It also runs the risk of impacting the economic return from tourism in particular the dive industry. The alleged gains from the proposed introduction of damaging fishing techniques by the commercial fishing industry through vast areas of the Coral Sea are not adequately
Comments on the Coral Sea Marine Park Draft Management Plan

substantiated. It will be not only the marine wildlife that loses out but recreational fishing will also be impacted.

Wildlife Queensland urges that in finalising this draft management plan the Government reverts to science based decision making underpinned by hard data and recommendations from acknowledged scientific experts.

At this point in time all is not lost. By considering the various submissions and adapting the Coral Sea Draft Management Plan accordingly the final outcome can be not only beneficial for our marine wildlife but would clearly demonstrate that the Government does care for our environment and its wildlife. In order to achieve that the major fragmentation and significant loss of the outstanding Marine National Park Zones proposed must be set aside. The proposed new Marine National Park zone bordering the Great Barrier Reef be accepted as this is one of the few positives arising from the draft management plan from Wildlife Queensland’s perspective. The number of reefs afforded Marine National Park Zone protection must be increased many fold. The reintroduction of longline, mid-water trawl and other damaging fishing techniques must be rejected. Finally the draft management plan must be finalised and become operational in a timely fashion preferably within 12 months and certainly prior to January 2019.

Thank you for the opportunity to comment.

Yours faithfully

Des Boyland, Secretary and Policies and Campaigns Manager
13th September 2017
Thank you for your explanation.

From: Renaming Marine [mailto:Renaming.Marine@environment.gov.au]  
Sent: Friday, September 15, 2017 1:13 PM  
To: 'Jennifer Earle'  
Subject: RE: Feedback [SEC=UNCLASSIFIED]

Dear Ms Earle,

In 2016 Parks Australia undertook research and people told us they think the name Commonwealth Marine Reserves sounds more like a defence training area, than an amazing place to fish, dive and snorkel. Marine Parks more accurately conveys that these areas are special places, like our national parks on land, that are for people to use and enjoy, as well as for protecting important marine habitats and species.

That’s why we are proposing to change the names from Commonwealth marine reserves to marine parks. For example, the Coral Sea Commonwealth Marine Reserve will become the Coral Sea Marine Park. We think this will help build public awareness and reinforce that our marine parks, like state and territory marine parks, are for people to use and enjoy.

Thank you for your question.
Parks Australia

Subject: Feedback

Can you please tell me what is the difference between a Marine Reserve or a Marine Park?

Regards

J. D. Earle  
Morbank Pastoral
Hi there
There should be one name for marine parks and reserves. If they are the same thing and have the same rules name them as such.

Regards
Sally Budge
I am writing to register my opposition to proposed changes in the management plan that would result in the weakening of protection for fish in marine national parks.

From the information I have seen, the zoning of large sections of the parks as Yellow will not provide sufficient protection for fish ecosystems.

The proposed changes do not have my support. I want to see stronger protections applied over larger regions of the marine parks against commercial fishing.

Sincerely,

Ben Hutchison
1 Royal Court,
Ivanhoe, Victoria
I am happy with the proposed name change from marine reserves to marine parks.

Yours sincerely,

Brian R Busteed
Howea Divers Pty Ltd
Lord Howe Island
NSW
The Ningaloo Coast World Heritage Advisory Committee supports the renaming of the Commonwealth Marine Reserves to Australian Marine Parks.

yours sincerely

Simon Woodley
Chair
Ningaloo Coast World Heritage
Advisory Committee
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.

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.
Australian Marine Parks Management Planning Comments
Department of the Environment and Energy
Canberra ACT 2601

Thank you for the opportunity to provide my views as comments on the proposed management plans, including zoning, of the Commonwealth Marine Reserves network. Further to my comments to the Marine Reserve planning review made to the marine.planning email address, I submit the following comment on the renaming issue:

The failings of the reductions in general protection apparent in the management plans as proposed are also evident in the renaming from ‘reserves’ to ‘parks’, and in the telling reasoning for ‘marine parks’ given by the Director in a statement made upon the release of the current review: “Marine parks provide places for people to watch wildlife, dive, and go boating, snorkelling and fishing. Importantly, they create jobs in industries like fishing and tourism, and provide us with food and energy.”

As I understand it, marine reserves are designed to be a standard for protection, recreation and limited sustainable use, rather than primarily recreation and commercial use, and include zonings as Marine National Park for the highest protection I line with accepted criteria. The primary reason worryingly being ignored or perhaps apparently cynically left out in the director’s statement, and would be apparent in the renaming from Marine Reserves to Marine Parks should it occur.

Kind regards,

Nathan McQuoid
Landscape Ecologist
20 Short Beach Rd Bremer Bay WA 6338
P: 0439 936 591
E: nathanm@westnet.com.au
Dear Ms Barnes,

**Australian Marine Parks Renaming Comments**

**Australian Marine Parks Management Planning Comments**

1) Regarding the proposal to rename Commonwealth marine reserves to ‘marine reserves’

This change is neither necessary, nor sensible. Marine governance in Australia is complex and confusing and requires clear signals to indicate who is responsible for managing each of our marine regions. Renaming and rebranding will also consume limited time and resources which could be better spent.

2) Response to the draft management plans

The 2012 National Representative Network of Marine Protected Areas had room for improvement (such as in the poor level of protection for at-risk areas on the continental shelf [1]), and it was my hope that this revision would address those limitations. It does not.

As a professional ecologist and conservation planner, as well as a scuba diver and proud advocate of Australia’s unique environments, I am very keen that we get this right.

It was a Liberal government who championed the rezoning of the Great Barrier Reef Marine Park, through courageous leadership and a commitment to long term social and environmental outcomes. The same kind of leadership is required again for this much larger planning effort. Such leadership has not been displayed to date and an important opportunity for the coming decade of marine management risks being seriously compromised.

I am currently researching the legacy effects of the Great Barrier Reef Representative Areas Program and associated compensation packages in the 2000s as part of a PhD on impact evaluation and spatial planning at the University of Oxford. Following interviews with senior decision makers and representatives from all sectors involved at the time, strengths and weaknesses of this influential planning process have become apparent.

Unfortunately, during the planning for the revised Australian Marine Parks, several key lessons from the Great Barrier Reef Representative Areas Program [2] appear to have been forgotten;

- The use of transparent and quantified representation targets for each of the 72 bioregions in the Great Barrier Reef focused debate about how best to meet those targets and the nature of associated trade-offs. Through my interviews, senior representatives on all sides of the debate stated that this commitment to specific levels of protection was an essential element in the plan’s success.
  - The absence of quantified targets for protection of specific habitat types leaves the current plans exposed to vague commitments which make the likely effectiveness of the plans difficult to assess. Furthermore, bioregions need to be described at appropriate scales, for example, the use of ten bioregions for the entire Temperate East is completely inadequate.
• Carefully planned, long term monitoring programs are essential to trace the effectiveness of marine protected areas [3], and must be implemented at the outset.
  o In the Temperate East Management Plan for example, a series of ambitious objectives for adaptive management are provided (section 1.12) but the necessary strategy for achieving these is missing. Now is the time to start implementing measures to “evaluate the effectiveness of this plan in achieving its objectives” (p 16), especially as the general nature of the objectives e.g. “the protection and conservation of biodiversity and other natural, cultural and heritage values of marine parks in the Temperate East Network” (p 9) make them particularly difficult to account for.
• Failure to adequately address the impacts of recreational fishing can have consequences for the commercial fishing industry as well as the environment.
  o The impacts of recreational fishing also appear to have been sidestepped in these management plans.
• Compensation packages can be mishandled, like the Structural Adjustment Package in the GBR [4], however this does not mean that revisions to allowances for extractive uses should be avoided altogether, as appears to be the general trend in these plans.

It is now over a decade on from the historic period of protected area designation in Australia in the 2000s and the science on marine reserves has improved dramatically. In fact, Australian scientists are world leaders in marine planning and protected area design, something we should be very proud of.

Unfortunately, the proposed plans do not reflect the best available science as you state, and do not reflect learnings from experiences such as the Great Barrier Reef Representative Areas Program and Structural Adjustment Package, nor scientific advances which have emerged since that period.

I would be happy to discuss the outcomes of my research as they apply to the design of these management plans, and welcome revisions to the management plans as they currently stand.

Yours sincerely,

Emma J McIntosh
PhD Candidate, School of Geography and the Environment
University of Oxford, United Kingdom
BHP John Monash Scholar, Australia 2014
emma.mcintosh@ouce.ox.ac.uk
+44 (0)7923 587 887

20 September 2017

Australian Marine Parks Management Planning Comments
Department of the Environment and Energy
Reply Paid 787
Canberra ACT 2601

RE: Comment on North Network Draft Management Plan

The NT Seafood Council commends the Australian Government on taking future growth of the seafood industry into account in its revision of zoning for the Commonwealth Marine Reserve Network (North Network). It is critical that future growth of the NT seafood industry is taken into account because the industry is still developing and will bring further economic growth and opportunities for the Northern Territory.

NT Seafood Council acknowledges that the Government is committed to the broader public good of marine biodiversity conservation through its Marine Bioregional Planning process. NT Seafood Council is supportive of marine protected areas and has a policy paper outlining this support¹.

Safeguarding seafood industry prospectivity is a critical element and it is pleasing to see this recognised in the Draft Management Plan through the revised zoning. NT has great potential for further development within both wild catch fisheries and aquaculture. The wild catch and aquaculture sector has experienced rapid growth in the past ten years and this growth continues today.

The draft management plan has minimised the impacts on the seafood industry, compared to the 2012 plans and provides certainty and security for the industry.

Positive attributes of the Draft Management Plan

1. The allowance of trawling and netting in the network via Special Purpose Zones to reduce the overall economic impacts on industry.

2. A mechanism for authorising commercial fishing gear not allowed in a zone after a satisfactory assessment that supports an adaptive management approach.

3. The development of an advisory committee for the North Network to support collaborative management and achieve the vision for marine parks.

4. The capacity to develop management programs, including communication, education and awareness; indigenous engagement; marine science; assessments and authorisations; marine park protection and management; and compliance.

5. Introduction of a class approval system that recognises existing commercial fishing licences.

¹ NT Seafood Council Policy Position Paper No. 6: Marine Protected Areas, available on request
Changes and/or further information required

1. Habitat Protection Zones are amended to allow the use of commercial mud crab pots to prevent unnecessary impact on the NT Mud Crab Fishery. Mud crab pots are light weight and do not harm or cause destruction to the seafloor habitat.

2. Habitat Protection Zones are amended to allow the use of traps and trotlines to prevent unnecessary impact on the NT Coastal Line Fishery in its further development, particularly in the East Arnhem region.

3. Clarification of the support to be provided by the Commonwealth to commercial fishing operators if it is determined that Vessel Monitoring Systems are required for fishing vessels.

4. The economic impacts of the North Network on the seafood industry remains unknown, a full Regulatory Impact Statement prior to the adoption of management plans must be completed.

5. The Offshore Net and Line Fishery is moving to quota and the current management plan imposes significant closures to this fishery. It is unclear why demersal longline gear is proposed to be excluded and the risk profile and assessment process used to support this decision is sought.


Additional feedback on marine reserves within NT waters:

Joseph Bonaparte

- The economic impact of the excluded fishing gears from the seafood businesses that are developing in this area have been grossly underestimated.
- The size of this marine reserve and exclusion to prospective fishing activity for the seafood industry remains a concern.
- This marine reserve has not taken into consideration the developmental nature of the Northern Territory.
- The allowance of mining activity within this area and exclusion of fishing activity is not justified.
- This marine reserve inhibits the development of the NT Offshore Net and Line Fishery and future expansion of NT fisheries.

Oceanic Shoals

- The expansion of the Special Purpose Zone (Trawl) is supported as it will aid in reducing economic impacts for the NT Timor Reef fishery, NT Demersal Fishery and NT Offshore Net and Line Fishery by allowing demersal and pelagic nets, and demersal and mid water trawl.
- The allowance of aquaculture, dropline, hand collection, hand net, minor line and purse seine net in the Habitat Protection Zone is supported as it removes unnecessary impact on the NT Aquarium, Coastal Line Fishery, Trepang and aquaculture industry.
- The allowance of mining activity within this area and exclusion of fishing activity is not justified.
- The introduction of a Marine National Park Zone is rejected as it was not consulted on with stakeholders from the NT Aquarium, Trepang, Spanish Mackerel, Coastal Line Fishery and aquaculture sector and their operations will be directly impacted without any assessment or justification of the risks they pose to this area.

Arafura

- The expansion of the Special Purpose Zone (Trawl) is supported as it will aid in reducing economic impacts for the NT Demersal Fishery and NT Offshore Net
and Line Fishery by allowing demersal and pelagic nets; and demersal and mid water trawl.

- This reserve covers highly prospective fishing grounds for the NT Demersal Fishery and the NT Offshore Net and Line Fishery.
- The inclusion of Special Purpose Zone will reduce economic impacts on the NT Offshore Net and Line fishery.
- The removal of the Habitat Protection Zone which had inhibited further expansion of pearling aquaculture, NT Aquarium Fishery and the Coastal Line Fishery is supported.
- The allowance of mining activity within this area and exclusion of fishing activity is not justified.

**Arnhem**

- The economic impacts of the excluded fishing gears from the seafood businesses that are developing and are likely to develop in this area have been underestimated.
- The allowance of mining activity within this area and exclusion of fishing activity is not justified.
- It is not supported that prospective fishing operations within the NT Offshore Net and Line Fishery are excluded from this area.

**Wessel**

- The area to the North-East of this reserve is an important area of the NT Demersal Fishery.
- The expansion of the Special Purpose Zone (Trawl) is supported as it will aid in significantly reducing economic impacts for the NT Demersal Fishery and NT Offshore Net and Line Fishery by allowing demersal and pelagic nets; and demersal and mid water trawl.
- The removal of the Marine National Park Zone allows the development of the NT Coastal Line Fishery, which is currently seeking to develop a commercial fishery in this region. It also minimises the impacts of the Trepang, Spanish Mackerel, Aquarium, Mud Crab and Aquaculture industry.
- With remote and scarce infrastructure in the region, the removal of the Marine National Park Zone also supports development of sustainable small scale fishing operations that provide economic and social benefits to the remote region.
- The allowance of aquaculture, dropline, hand collection, hand net, minor line and purse seine net in the Habitat Protection Zone is supported as it removes unnecessary impact on the NT Aquarium, Trepang, Coastal Line Fishery and aquaculture industry.
- It is important that the introduction of the Habitat Protection Zone does not exclude any gear from the Coastal Line Fishery as this fishery is a key fishery for development in this region.

**Limmen**

- The fishing industry supported the original version of this marine reserve (being a Multiple Use Zone) as it did not impose major adverse impacts on the seafood industry.
- The removal of the Marine National Park Zone is supported as it was detrimental to the development of sustainable small scale fishing operations providing economic and social benefits to this remote region.
- It is important that the introduction of the Habitat Protection Zone is not detrimental to the development of sustainable small scale fishing operations providing economic and social benefits to this remote region.
- The allowance of aquaculture, dropline, hand collection, hand net, minor line and purse seine net in the Habitat Protection Zone is supported as it removes unnecessary impact on the NT Aquarium, Trepang, Coastal Line Fishery and aquaculture industry.
- The Habitat Protection Zones needs to be amended to allow the use of commercial mud crab pots.

The following as the NT Seafood Council’s view on essential elements for management plans:
• Clarity about the management objectives for the marine reserves network.

• Industry need for security and certainty, balanced with the stated objectives of adaptive management.

• Government commitment to engagement/funding needed should be embedded in the plan.

• Sufficient detail should be articulated in each management plan, particularly relating to a research, monitoring, review and evaluation system, to enable tracking how the plan is meeting its objectives.

• Certainty about the development of Class Approval and dealing with sensitive information.

• A Plan should allow for explicit review and assessment of allowed activities, based on a clear, transparent process and sound science.

• The plans must make reference to a National Fishing Gear Risk Assessment framework.

• Ongoing formal industry, and other stakeholder, engagement in the management of the reserves network, including through the establishment of a formal Advisory Committee rather than an informal reference group for each region.

• Government commitments to ensuring it is the responsibility of the Australian Government to adequately fund all aspects of the management a Marine Reserves Network, and that the costs of the management of the Network should not be incorporated into fisheries management levies.

• Given Marine Reserves establishment involves the reallocation of the marine resources from a private benefit to a broader public good, the costs of management, compliance and monitoring of a Marine Reserves Network should be fully borne by the community.

• A formal or measurable marine research strategy.

• An agreed and regular reporting framework, through consultative structures, to ensure reviewing and reporting on progress.

• The management plans must also reflect regional circumstances.

NT Seafood Council on behalf of its members looks forward to continuing to work the Department and other stakeholder collaboratively.

Yours sincerely

Daniel Kimberley
Chairman
Dear Sir/Madam,
The renaming of Marine Reserves to Marine Parks is, to me, just another way of wasting time, energy and money on superfluous agendas aimed at maximising future encroachment and development for human needs in these areas. The renaming of a Reserve to a Park erodes the value of the area protected.

A 'Reserve' is just that: reserved for natural inhabitants ie. birdlife, animals, insects. A 'Park' has a different connotation; a place where human interaction takes place and sets a precedent for future changes such as construction and development for human wants.

We need to protect our waterways, oceans, and rivers from pollutants and development for humans needs.

We need to protect the animals, birds and insects that live in and around our waterways from encroaching human development and pollution.

Maximum areas of natural habitat should be set aside to be just that: Natural!

I strongly oppose the renaming of Marine Reserves to Marine Parks as it is the beginning of encroachment for humans' (unnecessary) needs.

Yours sincerely,
Tasha Gergel
West Hobart,
Tasmania