

SE Cth Marine Reserves review

Thankyou for the opportunity to comment.

### **Why is offshore MPA planning difficult for us?**

We are relatively new to the issue of Commonwealth marine reserves management and our membership does not feel that we have the background or expertise to make a detailed contribution on management processes.

“A challenge for partners in implementing this Strategy is that Commonwealth marine reserves are located in offshore environments, typically between three nautical miles off the coastline to the outer boundary of the Economic Exclusion Zone. Reserve values lie beneath the surface, not easily accessed or appreciated. This makes it difficult to engage audiences and impart the importance of reserve values. It follows that partnerships will need to consider and utilise innovative and targeted methods in their approach.” [SE-Network-Communication-Plan-2016 \(parksaustralia.gov.au\)](https://parksaustralia.gov.au/SE-Communication-Plan-2016)

We suggest that you could improve your consultation material. An excellent recent example are the processes around the Macquarie Island MPA extension, but I assume that is more politically topical and was allocated more resources? Tasmanian DPIWPE fisheries review materials are also quite good without necessarily being costly. They have been recently unusually frank and appear to be a genuine attempt to summarise the proposed changes and issues of controversy. One of our members commented that the Sustineo report ‘was created for a different audience’. The lack of easily accessible interpretative material suggested that a significant public response is not expected for this review.

### **Primary challenges**

The primary issues for sound management that come out from background reading are: building political support, funding, skilled staffing retention (which is a factor of improving goal setting and morale), better internal relationships, research, education and communication (both external and within the hierarchy of Parks Australia). We speculated that there appear to be significant problems in these areas, which aren’t easily rectified by this planning process.

### **Answers to specific questions**

The questions asked in your on-line response materials were

1. *Provide comments relating to the zoning and assigned IUCN categories for the South-east Marine Parks Network.*

“The primary goal of the National Representative System is to establish and effectively manage a comprehensive, adequate and representative system of marine parks and to protect marine biodiversity.”

Commentary in the public domain appears to state that there is an issue with the design of the parks, that it has been subject to interference politically<sup>1</sup>. Your own report states “the SE Network was in many ways the test case and possibly the most difficult because at the time that it was initially being designed in the late 1990s, it overlapped with some of the nation’s biggest fisheries areas including trawling areas. Therefore, attempting to manage it as a Marine Reserve Network was a somewhat contested endeavour”. Summary Report from Sustineo dated Feb 2022.

It is suspected then that you are already aware of the zoning issues, and that the current designs are often not located to protect key features.

### *Ideal level of protection*

In an ideal world “no fishing reserves” are superior, “our study indicates that a highly effective but underused tool in the manager’s toolbox is expanded rollout of no-fishing “marine reserves”. Despite receiving wide public support, most Australian marine reserves are small and located in areas with few fishery resources. They consequently house few mature, egg-producing females and do little to assist in the rebuilding of overfished stocks.”<sup>2</sup>

Management should attempt to impose IUCN II reserves where there are unique areas or species, but this may not be practical over very large areas used by existing industries.

IUCN IV zones will function only if they can be actively managed in a precautionary way, and the sustainability of the activity can be objectively demonstrated. In our limited experience of inshore sites, they are yet to meaningfully moderate any politically supported proposal. The major decisions are made by politicians rather than land managers.

The relevant managers appear from the public commentary to have had little control over users like the oil and gas industry. There appears to be lack of political support to take on powerful interests, at least in the past.

The end result is a perception that active management that clashes with an established industry like fishing and oil exploration, has been too difficult to manage meaningfully.

Another perception from the materials that stakeholders aren’t use to dealing with these restrictions, and as the government isn’t backing economically restrictive outcomes as a ‘business as usual’ requirement for these industries, the stakeholders are resentful of any restrictions.

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<sup>1</sup> See E.g. <https://theconversation.com/australias-marine-un-protected-areas-government-zoning-bias-has-left-marine-life-in-peril-since-2012-153795> ; <https://theconversation.com/our-new-marine-parks-the-unanswered-questions-8087> ; <https://theconversation.com/worlds-largest-survey-of-marine-parks-shows-conservation-can-be-greatly-improved-22827>

<sup>2</sup> <https://theconversation.com/australian-commercial-fish-populations-drop-by-a-third-over-ten-years-97689>

2. *Provide comments relating to natural values and/or pressures within the South-east Marine Parks Network.*

“Given the remoteness and the predominance of offshore deep sea marine parks in the SE Network, one of the most challenging direct management responsibilities under the SE Management Plan is to increase knowledge and understanding of the values and pressures within them”. Sustineo Report

We have few means of interacting with those natural values, other than through scientific literature, which you should be across more than us. The obvious features to protect are bird foraging areas and migration routes, areas of unique undersea phenomena such as upwellings, unique habitats (such as seamounts) and unique species. Your scientific program needs to clarify those values and your communication plan sell these to the taxpayers.

There is some cause for optimism that this is happening to an extent, “As a result of at least 18 projects focussed on research and monitoring of conservation values and pressures both nationally and exclusively in the SE Network, the knowledge and understanding of conservation values in the Network has increased. Many voyages included extensive mapping to build baseline knowledge of the parks across the SE Network.” Summary Report from Sustineo dated Feb 2022

3. *Would you like to provide comments relating to allowable activities and use in the South-east Marine Parks Network ?*

Extractive uses need to be the focus of effort, and building up the internal skills and political support to manage them more effectively. If you are not able to meaningfully do that, don't hassle low impact users like tourist boats. Publish some guidelines or standards and let them self-manage.

4. *Would you like to provide comments relating to allowable activities and use in the South-east Marine Parks Network ?*

Aquaculture – this industry is moving offshore, particularly as public protests about inshore impacts stimulates new technology and processes. It will need to be evaluated like any other industry.

Commercial fishing – has to be evaluated for sustainability, and kept away from particularly unique areas. It sounds like there might be cause for optimism that this could be managed more intensively with the assistance of AFMA and other partners, with political support. Other forms of fishing, like recreational game fishing, are not likely practical in many places, or of any great economic/social benefit in light of the remote locations and alternative nearby sites. The same rules apply for all fishing, exclude this in sensitive areas.

“The technical audit assessed that there has been considerable research and analysis on the effects of fishing as a pressure in selected areas of the SE Network. However, further effort is required on other pressures, such as noise and light pollution from shipping and mining, oil pollution, and invasive species and diseases, to understand the specific impacts these pressures are having on SE Network values. Parks Australia (PA) self-identified the need for

improving understanding of pressures as a priority for the Consolidation Phase of the SE Management Plan, indicating some effort was being directed to adapt management in response to recognising knowledge gaps.” Summary Report from Sustineo dated Feb 2022

Commercial media, tourism, non-extractive recreation should be encouraged

Waste management uses should be discouraged.

National security and emergency response - you won't win that argument, best to cooperate with the Navy on best practice guidelines for activities like sonar use, obviously peacetime use for exercises should be discouraged in sensitive areas.

Oil, gas, or mining – We doubt there is widespread majority community support for this, despite the activity having large economic benefits. I suspect most current MPAs have unsuitable geology for this anyway, or they wouldn't have been put there in the first place. We should particularly attempt to discourage risky speculative exploration that may be damaging, in areas that are unlikely to ever reveal a payable resource anyway, e.g. Great Australian Bight.

It appears that you will need political support, to handle the big players, and staff on-ground to work with other partners. “The evaluation found that SE Network management relationships with commercial fisheries and especially tourist charter industry and recreational fishing groups remains a work in progress. Whilst there is substantial understanding of commercial fisheries and other economic stakeholder group activities in the SE Network, there is not substantial evidence of establishment of effective mechanisms for regular engagement in this sector. Finally, it is evident that there are unresolved concerns about the potential for the National Offshore Petroleum Safety and Environmental Management Authority to insufficiently consider marine park values, including the use of seismic testing and reservations regarding the oil and gas approval process, particularly in dealing with cumulative impacts.” Summary Report from Sustineo dated Feb 2022

Ports or shipping, Structures and works, Telecommunications – work with stakeholder to protect any areas of specific sensitivity , e.g. whale aggregation sites.

Renewable energy – offshore wind needs to be located away from bird migration and foraging pathways, but it has ecological and economic benefits too.

Research –credible institutions should be actively encouraged.

Space launches and returns – this seems speculative at this point, work with stakeholders. I would have thought equatorial sites were more likely.

Traditional use – We have no specific knowledge of the values/interests present in these areas, many far offshore, again a matter for open-minded consultation and assessment of risk for any specific proposals.

## **Other Comments**

“We have the most influence over how we conduct our work, who we engage with, how and where we allocate our resources, our approach to risk, and how we implement practical management under management plans.” [Director of National Parks Corporate Plan 2022–23 \(dcceew.gov.au\)](https://www.dcceew.gov.au)

The issues highlighted in your governance document included:

Issues -Ineffective partnering and stakeholder engagement

- Community engagement (we note there are funds for digital programs)
- Proactive media engagement

Issues - failure to deliver quality and timely programs due to a lack of financial sustainability

The measures suggested to mitigate this funding issue did not appear particularly persuasive and we would suggest the root cause is a low profile and low public and political support.

We also noticed with interest some of the recommendations from the Sustineo Report.

[SE Network Evaluation Report \(parksaustralia.gov.au\)](https://parksaustralia.gov.au)

*Despite considerable investment in science during the foundation phase its use by Parks Australia to inform management decisions remains limited for a variety of reasons. In order to meet the desired 10-year management outcome, over the next 4 years it will be important to:*

- *Focus research and monitoring on key management questions.*
- *Ensure management decisions are based on an adaptive management approach and informed by science.*
- *Ensure scientific information is available on systems easily and quickly accessible to managers and is in appropriate formats to answer management questions.*

*It would appear that revised communication efforts includes internally too, “ there is only minimal evidence that the consultation, aggregation of research and education activities of PA staff and associated researchers has contributed to DNP understanding of the SE Network or AMPs in general and was having subsequent impact on decision making”*

Thank you for the opportunity to comment.

Enc. Organisational statement