

**A submission to the Parliamentary Inquiry into the Environment
Protection and Biodiversity Conservation Amendment (Bioregional
Plans) Bill 2011**

For the attention of:

**The Committee Secretary
Senate Standing Committees on Environment and Communications
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By Electronic Delivery

Introduction:

The South Australian Marine Parks Management Alliance represents all commercial fishing sectors in South Australia and was established some 2 years ago to specifically address the industry's concerns regarding the marine parks process as it unfolds in both Commonwealth and State waters.

It is a reflection of the level of concern among the industry that, in my 30+ years experience in both Government and fishing industry roles (including as Director of Fisheries in South Australia, 1997-2000), I have never known an issue to create such anxiety and uncertainty in the industry and this is the only time I can ever remember that ALL sectors of the industry have come together to address what they see as a major threat to their livelihoods.

The SA Fishing Industry's position:

In summary, the commercial fishing industry in South Australia is fully supportive of the National Representative System of Marine Protected Areas (NRSMPA) and has repeated this support many times. This is consistent with support for the NRSMPA by other organizations. The NRSMPA is of course the policy response to Australia's signing of the International Convention on Biological Diversity (CBD).

However, the industry does not support what we see as an extremist interpretation of the NRSMPA that is being promoted by environmental lobby groups which, unfortunately, have found a receptive ear in both State and Commonwealth Government Departments.

Evidence of such extremist interpretation can be found in examples such as:

- The SA State Environmental Department (DENR) citing 'international obligations' (i.e. through the CBD) as the reason for promoting and attempting to implement large 'no-take' sanctuary areas in State waters that covered a minimum of 10% of state waters (about 6,000 square Km and equivalent to about 25% of the area of SA's marine parks). The Alliance requested confirmation from the Hon. Tony Burke on Australia's international obligations and he confirmed that there are no such obligations to justify these large sanctuary areas.
- The 'Design principles' of SA's marine parks being modelled not on the agreed Commonwealth/State process of the NRSMPA but on 'design principles' developed by the University of Queensland, with funding from a large environmental lobby group (see below). One wonders why a separate set of design principles were needed when an agreed process already existed?

An issue that also causes considerable confusion in the fishing industry is the total lack of co-ordination between State and Commonwealth marine Park processes. As highlighted above, this even extends to South Australia having different 'design principles' for marine parks than is used in Commonwealth waters, despite the fact that parks are often contiguous!

The Current Status of Marine Biodiversity Protection in Australia

- Australia leads the world in protecting its marine environment both through marine park declaration and recognised world-class fisheries management. Australia ranks number 2

worldwide in managing fisheries for sustainability and also has 38% of all marine parks in the world, by area.

- Australia is also one of the few countries that has already met the CBD's 2020 target of 10% of marine waters under management to provide protection to marine biodiversity

The Impact on the fishing industry of an extremist interpretation of the CBD

The CBD is based on the principles of Ecological Sustainable Development – it is not an instrument that is designed to, promotes, or should be used for, the locking up of large marine areas where marine biodiversity is not threatened.

If, through extremist interpretations of Australia's obligations under the CBD and the NRSMPA, large marine areas are declared as 'no-take' sanctuary zones, the fishing industry (as well as recreational fishing activities) will be devastated. In South Australia, the Alliance has estimated that the current marine park proposals in State waters will result in a 25% reduction in the gross value of product landed annually – or about \$48 million pa. Almost all commercial fishing activities are located in regional areas of Australia and therefore, with this loss of fishing activity, the Alliance estimates that the impact on regional communities in South Australia would be approximately \$150 million per annum. This figure is large enough to result in the depopulation of regional communities that have a high dependence on the fishing industry.

Economic impacts are already being felt in South Australia because of the uncertainty generated by proposed marine parks, both in Commonwealth and State waters. Asset values (licenses, fishing quota etc) have reduced in price and, in many instances are almost un-saleable.

These are large costs and the costs will be borne mostly by regional communities. Member of the Alliance ask me where are the benefits of large 'no-take' sanctuary areas and, unfortunately, I can't tell them because there has been no cost:benefit analyses to inform the process.

The activity of environmental lobby groups and their influence

Environmental lobby groups have increased their activity significantly in Australia in recent years. The Alliance is particularly concerned about the large, US-based Pew Charitable Trust that, as part of its International Global Ocean Legacy campaign, is active worldwide in promoting large 'no-take' sanctuary areas. Their strategy for these sanctuary areas starts with the premise that all fishing is bad and therefore there should be a complete ban on all types of fishing in these areas.

The Pew Charitable Trust actively supports and funds 'pseudo-research' in Australia, mainly through the University of Queensland's Ecology Centre.

The Pew Trust has funded modelling 'studies' that they claim clearly demonstrated that 50% of the proposed South West Marine Park in Commonwealth waters should be sanctuary areas in order to provide the required level of protection. In publicizing this study through the media and to MPs, what the Pew Trust fails to mention is that the 50% sanctuary area was an **input** to their modelling, not an **output** – in other words, the model was designed to produce a pre-determined result of 50%.

A more worrying, but similar, example has occurred in South Australia where the results of Pew-funded 'research' have actually been taken at face value and has resulted in the State Government and the Department of Environment and Natural Resources promoting large sanctuary areas.

The science of marine parks and the relationship between marine parks and fisheries management

The South Australian fishing industry's view is that marine parks have a role to play in the conservation of marine biodiversity through the agreed NRSMPA process.

However, based on the available scientific evidence, marine parks are not effective as an alternative to robust fisheries management arrangements where such arrangements are already in place, such as in SA. In fact, there is research from Tasmania (e.g. Buxton 2006) that shows that marine parks can actually have a deleterious effect on commercial fish resources. Marine Parks can have positive impacts on commercial fish resources only in places where there is no fisheries management – it is these places (e.g. Philippines, USA, Kenya etc) where all the quoted examples of marine parks benefiting fisheries originate

The industry has long stressed the need for a science-based approach to the development of marine parks that includes (a) identifying the conservation values requiring protection (b) assess the threats to those conservation values (c) put in place appropriate and cost-effective management to manage those threats. This approach is an integral part of the NRSMPA process. In SA, there has been a focus on 'percentages' of sanctuary areas, rather than such a orderly, science-based approach, there has been no rigorous threat identification or assessment (particularly from fishing activities) and the process is clearly not science-based

As noted above, we are extremely concerned that the science behind marine parks has been irreparably tainted by the activities of environmental lobby group's funding 'pseudo-science' and that such 'pseudo-science' is finding its way into policy decisions within Government. We believe that Minister Garrett's decision to excise some 1000 square Km of the Coral Sea from Australia's marine bioregional planning process – after having only consulted with the Australian Conservation Foundation and the Pew Charitable Trust – is an example of this.

Conclusions and summary:

We firmly believe that the marine parks process has been significantly diverted from its original intentions of implementing Australia's obligations under the Convention on Biological Diversity through the NRSMPA process. This diversion has been to use the legitimate NRSMPA process to drive a fundamentalist protectionist agenda, often without consideration to the social and economic costs on regional communities who bear the brunt of the impacts.

The origins of this diversion, which we believe is supported by the examples provided above, is in the increased activity and influence of large, international lobby groups that not only have the resources to fund Australian environmental lobby groups to support their views but also can, and do fund compliant research institutions to produce 'science' to support their views.

The power and influence of these external lobby groups shouldn't be under-estimated.

It is for this reason that we are firmly of the view that decisions related to the establishment and management of marine parks should not be the responsibility of any single Minister or person but should be subject to broader examination through the Parliamentary process. It is only in this way will the risk of undue influence by these extremist groups be reduced.

Yours sincerely,

Dr. Gary Morgan
Chairman
Marine Parks Management Alliance