

60 London Road
MILE END SOUTH
SA 5031
Telephone: 08 8234 8622
Facsimile: 08 8234 8633



28 February 2006

The Secretary
Senate Environment, Communications Information Technology and the Arts
References Committee
Parliament House
Canberra ACT 2601

Dear Committee Secretary,

SUBMISSION TO THE SENATE INQUIRY INTO AUSTRALIA'S NATIONAL PARKS CONSERVATION RESERVES AND MARINE PROTECTED AREAS

Our comments are focused specifically on Marine Protected Areas and the consequences of adopting a classification process (IUCN standards) that largely relate to issues associated with the management of terrestrial reserves and issues of fisheries resources protection as a consequence of over fishing in the highly industrialised fisheries of the northern hemisphere. As such, the adoption of a classification process based upon the experiences of the northern hemisphere does not meet the needs for the effective management of natural resources within Australia.

VALUES AND OBJECTIVES

In developing Marine Protected Areas there needs to be a recognition that Australia already has a suite of Marine Protected Areas that includes "aquatic reserves", "no fishing zones" for commercial and recreational fishers and other management responses. These other closed areas must be acknowledged and recognise when Marine Protected Areas are established and should form a key consideration when considering whether or not the Marine Protected Areas have met the arbitrary percentages of protected areas established within the marine park framework.

There is no integration within the Marine Protected Areas/parks framework for the various government agencies. There is an urgent need for Commonwealth agencies to have a common position and adopt "a whole of government" approach to identification and establishment of Marine Protected Areas.

Industry generally, supports the key objectives for the establishment of Marine Protected Areas and marine parks it is however highly critical of the mechanisms used by government agencies to develop and describe access arrangements within the IUCN/EPBC classification systems. From an industry perspective good fisheries management and marine planning processes should ensure the protection of the

integrity of the marine ecology to provide for a healthy ecosystem that is resilient and therefore supports sustainable fisheries while protecting the key processes.

While we accept the concept and the principle of biodiversity conservation, the industry does not support the notion that the only mechanism requires the total exclusion of fishing in order that fisheries productivity is enhanced and the environment protected. There is no clear evidence that Marine Protected Areas are effective at providing buffers against exploitation to ensure the survival of key species. There is no clear evidence from within the Great Barrier Reef Marine Park that large scale closures to fishing will provide any long-term benefits and/or enhance fisheries productivity. Given this, Marine Protected Areas should not claim to be “beneficial to fish stocks” generally.

The objective of Marine Protected Areas is for the protection of biodiversity through the development of “multiple use” areas. The current implementation of MPAs has not effectively distinguished the risks of different uses of the marine environment and therefore has not established effective “multiple use” zoning within any of the current marine parks. The current zoning in recently established MPAs at a Commonwealth and State level merely excludes commercial fishing, but provides access for charter boat and recreational fishing and oil/gas exploration even though many of these activities have the same or higher risk than commercial fishing.

SUFFICIENT RESOURCES FROM GOVERNMENT

It is not clear from the long history of terrestrial parks that they provide the necessary protections for a range of key species or habitats. In particular because of the poor level of management and resources available many terrestrial parks now pose a significant threat both to the species they intended to protect and to adjacent properties; e.g. risk of fire and invasive species.

Unless there is a specified and adequately funded management, monitoring and review process of MPAs/parks against the objectives for which it was established then there is little value in seeking to preserve these areas. There is a need to ensure that there is regular ongoing monitoring of parks in order to compare the baseline information on the ecological characteristics of the park in order to ensure there is no degradation from introduced or invasive species or a change in the system which brings about a shift in the eco-dynamics of the park.

THREATS TO THE OBJECTIVES AND MANAGEMENT

A key threat to the integrity of parks, reserves and Marine Protected Areas is the failure of environmental agencies to adequately recognise the dependence of communities upon the social and economic benefits derived from the various uses of those areas. For MPAs, a key threat is the failure to build a creditable partnership with all users given the multiple use framework upon which they should be developed. In order to ensure community and industry support for MPAs the need for multiple use arrangements is essential. In developing multiple use zoning it is

essential that the agency engage all stakeholders, extractive and non-extractive, in a true negotiation. Thus, ensuring the outcomes have the full support of all parties, recognise all their interests and so ensure total community stewardship and so reduce the potential for the arrangements to be undermined.

A further threat is the failure to adequately account for external impacts that can not be managed within the framework for parks and MPAs. These include:

- climate change,
- terrestrial impacts such as agricultural runoff;
- industrial pollution;
- the dumping of effluent into the marine environment;
- increased urbanisation; and
- coastal development including tourism related development.

RESPONSIBILITIES OF GOVERNMENT

It the responsibility of governments to fund the collection of comprehensive research encompassing ecological, biological, social and economic aspects prior to considering any park, reserve or MPA.

Developing strong, strategic partnerships between State and Commonwealth agencies and key stakeholder groups is essential for the successful implementation of parks or MPAs. A failure to have open dialogue between government and stakeholders has the potential to jeopardise the ability for the park or MPA to meet its objectives.

Governments need to facilitate negotiated outcomes that account for the interests of all stakeholders.

One of the key responsibilities of governments in the establishment of parks and MPAs is the identification and preservation of regional and rural communities that are located in areas near parks and MPAs. In order to maintain these communities it is critical that compensation be made available to all dependent components of that community including property owners, producers, their employees, and business within those communities that are dependent upon the productive capacity of areas that are alienated under parks, reserves or MPAs. Any compensation arrangement must include not only the immediate loss of entitlement or property, but a recognition of the ongoing cost to the community from the lack of those enterprises.

Government has a responsibility to ensure there is effective capacity for baseline studies, management, monitoring and review or any potential or established park, reserve or MPA.

RECORD OF GOVERNMENT

The record of government in the establishment and management of parks, reserves, and MPAs is very poor. In particular, the depressed state of many terrestrial parks

and their ability to continue to reflect the original values attributed to them should be of concern. In addition, more recently the Great Barrier Reef Marine Park (GBRMP) arrangements clearly demonstrate that government, and the advice provided to it, failed to account for all interests and the consequences of wholesale area closures on rural and regional communities and economies. The fact that the GBR process continues years after it was first launched and the total value of this restructure has still not been identified clearly shows government does not have adequate mechanisms for understanding the true impacts of the desire to make conservation fit a fixed target number or percentage.

The establishment of arbitrary percentages of area/habitat to be protected does not ensure that the best conservation outcome is achieved nor does it provide for the most equitable sharing of the environments economic potential between extractive and conservation uses.

The poor record of government is also demonstrated by the recently released South East Regional Marine Plan (SERMP). The SERMP process which, despite an extended internal development period and eventually a process of engaging industry in assessing risks to the ecology of the region, drew strong reaction from various user groups over the nature and extent of the proposed "multiple use parks".

The inability of government bodies to adequately understand the true impact and extent of any changes, both socially and economically, to parks or MPAs and the subsequent acceptance of that advice challenges the capacity for government to adequately understand the implications of major changes in policy when they are driven from idealistic concepts. Policies such as protecting specific fixed percentages of an area regardless of the costs rather than balancing the costs and impacts on the affected industries and communities with the intended benefits need to be challenged and a different philosophy adopted by government to environmental management and protection.

I am happy to provide further information, evidence or submissions. Thank you for the opportunity to comment on the Inquiry.

Yours sincerely

A handwritten signature in black ink, appearing to read "Neil MacDonal". The signature is written in a cursive, somewhat stylized font.

Neil MacDonal
GENERAL MANAGER