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Shy Albatross (*Thalassarche cauta*)

SUBMISSION TO

Draft Southeast Marine Park Network Management Plan

Victorian National Parks Association

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To: Director Parks Australia
Department of Climate Change, Energy, the Environment and Water
Canberra, Australia

Via email: sereview@dcceew.gov.au

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**Submission to Parks Australia on Behalf of the Victorian National Parks Association (VNPA)
Regarding the Draft Southeast Marine Park Network Management Plan**

Introduction

The Victorian National Parks Association (VNPA) welcomes the opportunity to comment on the draft Southeast Marine Park Network Management Plan. Established over 70 years ago, VNPA has a long-standing commitment to the conservation of Victoria's natural areas, including marine environments. Our role in advocating for the protection of biodiversity, ecosystems, and sustainable management of natural areas is at the core of our mission, and we are pleased to contribute to this important marine park network review process. With increasing threats from climate change, industrial activities, pollution, including noise pollution, and overfishing, it is essential that this management plan reflect the best available science and address the urgent need for expanded marine sanctuary protection (National Park Zones) across the Southeast Marine Region.

Summary messages

- VNPA supports the increase of the much needed 11 additional protected zones across the network
- We also support the exclusion of new oil and gas titles from all marine parks zones in the Southeast marine park network.
- We support the Macquarie Island Marine Sanctuary
- We support the proposed independent oversight of regulatory agencies.
- We are disappointed that a large area (11,000 square km) of Flinders Marine Park Marine Sanctuary is proposed to be opened to fishing.
- We support expanding the proposed marine sanctuary protection in the Tasman Fracture Marine Park to protect the canyons and seamounts of this biodiversity hotspot.
- There are new areas worthy of protection including within the Beagle and Apollo Marine Park.

Marine Parks are a critical conservation tool

Marine parks are an essential tool for safeguarding biodiversity, preserving important habitats, and ensuring the health of marine ecosystems in the face of increasing pressure and impacts. Marine sanctuary zones, in particular, provide a crucial refuge for species and ecosystems, supporting them to be resilient and thrive in the face of these cumulative stressors. The South-east Marine Region, home to a range of unique species and habitats, is one of Australia's most biologically significant marine areas. Properly managed marine parks with adequate sanctuary zones not only protect biodiversity but also help build the resilience of ecosystems against the impacts of climate change and human activities. Better management and protection in these offshore Commonwealth waters will be of direct benefit to Victorian state waters and their ecosystems, habitats and species. This is especially the case where adjacent marine parks allow for improved connectivity of protected areas, such as at Apollo and Beagle Marine Parks.

Cultural and Community Engagement

VNPA recognises the deep cultural connections that Indigenous peoples have with their Sea Country and acknowledges the importance of involving Traditional Custodians in marine park management. The previous management plan iteration included collaboration on Sea Country projects with Tasmanian Traditional Custodians, and VNPA believes that expanding this engagement to include Victorian Traditional Custodians should occur. Incorporating traditional knowledge into marine park management can strengthen conservation outcomes and enhance cultural heritage protection.

Additionally, VNPA values the role of local communities in supporting marine conservation efforts. Marine parks provide important recreational, economic, and social benefits to coastal communities, and public engagement is essential to ensuring the long-term success of marine park management. VNPA encourages Parks Australia to continue fostering collaboration with local stakeholders, ensuring that marine park policies are developed in consultation with the communities that rely on these ecosystems.

Threats to Marine Ecosystems

1. Industrial Activities and Marine Ecosystem Degradation

The ongoing threat posed by oil and gas industry activity, including the devastating impacts of seismic blasting is of particular concern for VNPA. These activities have the potential to cause irreversible damage to sensitive marine ecosystems, particularly in areas of high conservation value. Although the draft plan introduces some important restrictions on new oil and gas titles as well as carbon capture and storage, leaving National Park Zones open to the construction and operation of pipelines undermines the intention and effectiveness of these marine sanctuaries. These industrial activities introduce risks of habitat destruction, pollution, including noise pollution, as well as risks of accidents and spills. All of which are detrimental to marine life in best case scenario and catastrophic in the worst.

VNPA urges Parks Australia to prioritise the long-term ecological integrity of marine parks by prohibiting fossil fuel industry activities in all sanctuary zones, including pipelines.

2. **Overfishing and Marine Conservation Rollbacks**

Commercial fishing remains a significant threat to marine ecosystems and threatened species. The proposal to downgrade a fully protected marine sanctuary opening it up to tuna longlining in the Flinders Marine Park represents a backward step in marine protection. Longlining has been shown to deplete fish stocks and pose a high risk of bycatch to other marine species.

The Murray Marine Park proposal to change some Special Purpose Zone to Habitat Protection Zone represents the downgrading of protection of over 3,000km² of what had effectively been 17 years of marine sanctuary protection over high conservation value canyon habitats. These areas provide biologically important feeding grounds for pygmy blue whales and sperm whales, which are now at risk from commercial and recreational fishing.

VNPA strongly opposes the rollback of sanctuary protections in the Flinders Marine Park and the opening up of Murray Marine Park to commercial fishing, both of which have been effective fully protected conservation zones for over 17 years.

3. **Climate Change and Marine Resilience**

Climate change is having a profound impact on marine environments, especially so in the South-east Marine Region. Rising sea temperatures, ocean acidification, and changes in ocean currents are already altering marine ecosystems, affecting species distribution and reproductive patterns. Marine parks with strong sanctuary protections are critical in helping ecosystems be resilient and adapt to these changes. However, the current draft plan does not provide adequate marine sanctuary coverage to secure resilient ecosystems, habitats and species. Scientific consensus says that we must protect at least 30% of our oceans fully protected marine sanctuaries by 2030 to give our marine ecosystems a fighting chance.

VNPA recommends the Management Plan invest in climate resilience through expanded and better connected marine sanctuaries.

Further Recommendations

1. **Establishing New Marine Sanctuaries in Priority Areas**

VNPA supports the draft plan's new marine sanctuary areas as these are a fantastic start. We strongly encourage the government to expand marine sanctuary protections for the underrepresented shelf area, currently at less than 1% of the South-east marine region under full protection. In addition, creating a new sanctuary in East Gippsland Marine Park and expanding the proposed sanctuary in Tasman Fracture Marine Park would allow for the protection of key ecological features such as the Upwelling East of Eden, the West Tasmanian Canyons and the Tasmanian Seamounts. These improvements would enhance the network's ability to protect biodiversity. We also encourage Parks Australia to implement the guiding principle for the development of the Commonwealth waters marine park network to include continuous depth transects wherever possible.

2. **Establish Commonwealth marine sanctuaries in close proximity to state waters near Victoria's two largest marine sanctuaries at the Twelve Apostles and Wilsons Promontory.**

VNPA supports the establishment of a new marine sanctuary in the western section of Beagle Marine Park to complement Victoria's Wilsons Promontory Marine National Park. This adjacent management and protection would enhance the overall conservation value of both parks. Creating a marine sanctuary in the northern section of the Apollo Marine Park would provide for management and protection efforts in adjacent waters at the Twelve Apostles Marine Park. Further, this would also create a marine sanctuary for the Central Victoria bioregion (the only location where this can occur) as well as the Central Bass Strait bioregion.

3. **A new marine sanctuary for East Gippsland Marine Park:** The Upwelling East of Eden is a key ecological feature of high productivity, supporting significant marine life aggregations. VNPA recommends the establishment of a marine sanctuary in East Gippsland Marine Park for this important area off the Victorian coast.

4. **Acknowledge the need for future marine parks**

Victoria's offshore waters and the Bass Strait across to Tasmania are home to diverse and valuable marine environments. These waters are inadequately protected by the South-east marine park network, a network now 17 years old. VNPA asks that the management plan acknowledge the shortcomings of this 17 year old network and note the need for future marine park planning.

Submitted by:

Victorian National Parks Association (VNPA)

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