

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

By

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For the attention of:

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By Electronic Delivery

Introduction

From the outset, I must stress that I am not opposed to the environmental protection and biodiversity conservation of our oceans as important national objectives. I personally have a strong conservation and environmental focus, and have operated strategically through various roles in my career to date across three Australian States in order to deliver many positive marine conservation outcomes in Australian fisheries.

The cost to the taxpayer

In terms of the Commonwealth Bioregional planning process for our oceans as well as the South Australian marine park planning process I have serious reservations about the extent to which such large areas of no-fishing sanctuary zones can be cost effectively enforced, researched and managed. Commonwealth and SA Fisheries enforcement makes only occasional visits to our area now depending on need. Where will the extra hundreds of millions of dollars required for effective on-water surveillance and enforcement operations come from as well as the budget to research and monitor the impacts of the various zones?

A lack of logical science

But the most fundamental concern that I have with the current Commonwealth Bioregional Planning and State marine parks planning process is that there is an apparent lack of relevant empirical science to support any large scale sanctuary zones at all in the context of oceans that have sustainably managed fisheries. In particular it is not clear to me that there has been any attempt to identify and rank key threats to biodiversity in our region (Commonwealth South West) and to respond appropriately and cost effectively to these depending on the magnitude of these threats as required under the Commonwealth/States Intergovernmental Agreement on the Environment, Commonwealth of Australia (1992).

I am also concerned about the apparent biased advocacy and misinterpretation of scientific literature in some recent “propaganda” type material reporting on the scientific basis for large no-fishing zones.

Much of the modeling work being utilized in the Bioregional and State marine park planning processes seems to simply presume that fishing represents a major threat to biodiversity without a grain of scientific evidence that this is in fact the case. All available evidence would indicate that the contrary is in fact true i.e. that biodiversity has not been impacted negatively by fishing in this region and that there are no populations of fish that are known to be over-exploited or that cannot be managed sustainably by existing fisheries management controls. I am acutely aware that South Australia has an excellent international record for implementing tight controls on commercial and recreational fishing effort that have enabled sustainable fisheries production for many decades now. Moreover, I am aware that the most recent science on this subject has shown that large no-take sanctuary zones do not benefit either fisheries or biodiversity in areas subject to good fisheries management such as exists in most Australian marine waters.

On the other hand, recognized threats to biodiversity in our region and elsewhere including pollution and introduced species appear not to be adequately addressed in the current Commonwealth and State proposals and it is not at all clear how having extensive no-fishing sanctuary zones will help mitigate these threats. These threats primarily need to be addressed at their source which is most often from terrestrial sources or ballast water and not through the direct management of selected areas of the ocean.

Social and economic losses not considered

Little has been offered by the Commonwealth or State Governments in this debate about the social/recreational and economic impacts of the introduction of large scale sanctuary zones. Surely these should be explored to provide a holistic basis for decision making. Determination of sanctuary zones on a scientific basis alone is ignoring the bigger picture implications. As tourism is our biggest industry, like most seaside locations, we need a good understanding of all the potential impacts that may affect the very foundation of our community.

- What will be the impact on new and second-hand boat sales?
- What will be the impact on the sale of boating accessories and fishing gear?
- What will be the impact on commercial fishing catch and what implications might this have on the retail cost of energy efficient fish products?
- What are the potential impacts on employment?
- Will people change their thought processes when making holiday decisions?
- What impact may this have on our local accommodation providers, retail businesses and service providers?

An exhaustive consideration of these and other matters is required. The community can hardly be expected to contribute constructively to this debate with so many unanswered questions.

Conclusions

I believe that a failure to conduct the required threat analysis or to consider the ecological, social and economic impacts of large scale no-fishing zones has resulted in a flawed design process that can only lead to negative impacts on fish stocks and fisheries with no clear likely benefits for the marine ecology of the area and substantial costs to regional economies and the taxpayer alike.

While I accept that Australia needs to meet its obligations towards the development of a National Representative System of Marine Protected Areas (NRSMPAs), I consider that a better approach to this would be to first assess the benefits (if any) that have accrued from offshore marine protected areas in Australia and similar countries to date.

Given the potentially devastating social and economic impacts of such large scale no-fishing zones and the apparent complete lack of empirical scientific evaluation of what we are actually trying to protect here in the first place along with the associated threats, it is my view that the current Commonwealth Bioregional Planning and SA marine park planning process needs to be suspended, at least until there has been a wider discussion on the rationale, objectives, scientific basis and processes by which marine protected areas are being implemented in Commonwealth and State waters. Such a discussion should first be based on achieving an agreed process for implementing obligations under the NRSMPA and, as required by the NRSMPA, should include the actual need, consequences and costs of large scale no-fishing zones as opposed to strategically placed smaller zones which meet our NRSMPA obligations yet have a lesser impact on fish populations in areas that remain open to fishing and a reduced overall economic and social impact on regional communities in particular.

It is also noted that there appears to have been a complete lack of coordination between the State and Commonwealth Governments to date over their plans for marine parks.

I would advocate a revised approach that will avert social and economic disruption to regional communities and effect a more orderly, cautious, socio-economically responsible and scientifically sound approach towards managing the biodiversity of our oceans and dealing fully and accountably with the range of **proven** threats that exist to this.

Yours sincerely

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