

Tasmanian Waters, Commonwealth Problems

Submission to the South-east Commonwealth Marine Parks Network review

The South-east Commonwealth Marine Parks Network is a patchwork of poor protection that provides minimal conservation benefits. Despite its large coverage, impactful human activities continue almost unabated. A lack of protection in adjacent Tasmanian waters further diminishes marine conservation in the region. The Australia Institute recommends a significant increase in fully protected areas, greater state government accountability, and full implementation of the proposed Macquarie Island Marine Park expansion.

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ACKNOWLEDGEMENT OF COUNTRY

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Summary

The Australia Institute Tasmania welcomes the opportunity to make a submission on the future management of the South-east Commonwealth Marine Parks Network (the “South-east Network”), including the proposed expansion of the Macquarie Island Marine Park.

Despite the extensive coverage of the South-east Network, human activities such as fishing, seismic exploration and oil and gas extraction are still extensively permitted in the region, including in some marine parks. The sparsity of fully protected areas affects the ecological connectivity of the South-east Network, provides limited scientific reference areas, and gives inadequate refuge to marine species.

A lack of protection in adjacent Tasmanian waters further diminishes the effectiveness of marine parks in the region. Tasmania has the poorest levels of marine protection of any Australian jurisdiction; only 1.1% of Tasmanian state waters fully protected. Despite this, there has been a moratorium on any new marine parks since 2014. This incongruence between the Tasmanian and Australian Governments’ approaches to habitat protection directly impacts the effectiveness of the South-east Network, and the Tasmanian Government should be held to account.

The proposed expansion of the Macquarie Island Marine Park is to be commended, but the Australian Government must vastly improve the broader South-east Network if comprehensive, adequate and representative marine biodiversity conservation is to be achieved in the region.

To improve the function of the South-east Network, the Australia Institute Tasmania recommends the future management plan includes the following actions:

1. The Australian Government should work with state governments to ensure they meet their responsibilities to include proportionate protection of state waters in marine parks. The mechanism to achieve improved integration and coordination between both levels of government should be articulated in the future management plan.
2. The future 10-year management plan should prioritise ecological connectivity in the South-east Network.
3. Increase no-take zones to protect 30% of the South-east Marine Region using the Comprehensiveness, Adequacy and Representativeness principles.
4. Designate all sites of high conservation value in the South-east Marine Region as no-take zones within the South-east Network.
5. Implement the proposed zoning changes and expansion to the Macquarie Island Marine Park in full.

Introduction

Australia's ocean health is deteriorating. The *Australia: State of the Environment 2021* report highlighted biodiversity loss, ecosystem degradation and species decline, all affected by the cumulative effects of climate change and direct human impacts.¹ Recent research has shown that 57% of Australian reef species have experienced population decline from 2011 to 2021. This trend is especially pronounced in the temperate waters of the South-east Marine Region.^{2,3} The east coast of Tasmania is a global ocean warming hotspot, and with no shallow southward habitat to retreat to, local reef species are increasingly vulnerable to the effects of climate change and human impacts.⁴

As a member of the High Level Panel for a Sustainable Ocean Economy, Australia has committed to sustainably manage 100% of its oceans by 2025, to be guided by a Sustainable Ocean Plan.⁵ Australia has also committed to conserving 30% of its land and sea by 2030 through a representative system of marine protected areas as a signatory to the Convention on Biological Diversity, the High Ambition Coalition for Nature and People, and the Global Ocean Alliance.

Australia's existing National Representative System of Marine Protected Areas (NRSMPA) covers 4 million km² or 45% of state, territory, and Commonwealth waters.⁶ The NRSMPA aims to:

Establish and manage a comprehensive, adequate and representative system of marine protected areas to contribute to the long-term ecological viability of marine and estuarine systems, to maintain ecological processes and systems, and to protect Australia's biological diversity at all levels.⁷

¹ Cresswell et al (2021) *Australia: State of the Environment 2021*, <https://soe.dcceew.gov.au/>

² The South-east Marine Region incorporates Commonwealth waters (the area between 3 to 200 nautical miles from shore under s. 24 of the EPBC Act) extending from the far south coast of New South Wales, around Tasmania and as far west as Kangaroo Island in South Australia, including Commonwealth waters in Bass Strait and those surrounding Macquarie Island. State and territory jurisdictions extend from the high-water mark to 3 nautical miles offshore.

³ Edgar et al (2023) *Continent-wide declines in shallow reef life over a decade of ocean warming*, <https://www.nature.com/articles/s41586-023-05833-y>

⁴ Ibid.

⁵ DCCEEW (2023) *Sustainable Ocean Plan*, <https://www.dcceew.gov.au/environment/marine/sustainable-ocean-plan>

⁶ DCCEEW (2023) *Ocean Sustainability and Climate Change*, <https://www.dcceew.gov.au/climate-change/policy/ocean-sustainability>

⁷ ANZECC (1998) *Guidelines for Establishing the National Representative System of Marine Protected Areas*, <https://parksaustralia.gov.au/marine/pub/scientific-publications/archive/nrsmpa-establishing-guidelines.pdf>

The South-east Commonwealth Marine Parks Network⁸ (the “South-east Network”) forms part of the NRSMPA and contains 14 marine parks in Commonwealth waters, including the Macquarie Island Marine Park. The South-east Network was declared in 2007 “for the purpose of protecting and maintaining marine biodiversity, while allowing for the sustainable use of natural resources in some areas” in the South-East Marine Region.⁹

However, human activities such as fishing, seismic exploration, and oil and gas extraction are permitted throughout the South-east Marine Region, including in some areas designated as marine parks.¹⁰ Marine parks that completely protect the marine environment from such activities are few and far between. Most marine parks in the South-east Network exist in areas of over 1500m in depth where fishing and other extractive industries generally do not operate, while the shallower, more biodiverse shelf waters are left effectively unprotected. The sparsity of fully protected areas affects the ecological connectivity, reduces available refugia for marine species, and fails to provide adequate scientific reference sites in the South-east Network.

This patchwork of poor protection is further weakened by a lack of marine protection measures in Tasmania’s state waters,¹¹ which border the majority of marine parks in the South-east Network. Tasmania has some of the highest levels of marine diversity and endemism in the world, yet it is the worst performing Australian state jurisdiction when it comes to marine protection.^{12,13}

The South-east Commonwealth Marine Reserves Network Management Plan 2013-2023 has now concluded.¹⁴ Before the next 10-year management plan is released, the Australian Government is presented with the opportunity to comprehensively revise conservation efforts in the South-east Network, and oversee a protected area network that actually affords protection to marine ecosystems.

⁸ Formerly the ‘South-east Commonwealth Marine Reserves Network’.

⁹ Director of National Parks (2013) *South-east Commonwealth Marine Reserves Network management plan 2013-2023*, <https://parksaustralia.gov.au/marine/pub/plans/se-network-management-plan2013-23.pdf>

¹⁰ Ibid.

¹¹ Grech et al (2014) *Australian Marine Protected Areas*, https://www.researchgate.net/publication/293079951_Australian_marine_protected_areas.

¹² Grech et al (2014) *Australian Marine Protected Areas*, https://www.researchgate.net/publication/293079951_Australian_marine_protected_areas

¹³ Wescott and Fitzsimons (2016). *Big, Bold & Blue: Lessons from Australia’s Marine Protected Areas*. CSIRO Publishing.

¹⁴ Director of National Parks (2013) *South-east Commonwealth Marine Reserves Network management plan 2013-2023*, <https://parksaustralia.gov.au/marine/pub/plans/se-network-management-plan2013-23.pdf>

State waters, Commonwealth problems

ECOLOGICAL CONNECTIVITY

Ecological connectivity between habitats protected by marine parks is critical for the long-term success of biodiversity conservation.¹⁵ Connectivity is impacted by both the arrangement of marine parks within a network, and the management of adjacent waters. The South-east Network is therefore directly impacted by the marine protection mandates of the neighbouring state governments in Victoria, South Australia, and most critically, Tasmania.

Tasmanian waters border 10 of the 13 temperate marine parks in the South-east Network.¹⁶ Tasmania has some of the highest levels of marine diversity and endemism in the world, yet it is the worst performing Australian state jurisdiction when it comes to marine protection.^{17,18} Despite this, the Tasmanian Government has had a moratorium on any new marine parks since 2014.¹⁹ Consequently, Tasmania's negligible marine protection directly implicates the ecological connectivity of a large proportion of the South-east Network.

THE STATE OF TASMANIA'S COASTAL WATERS

Recently published Australia-wide research found more than 500 common species of marine life have declined in the past decade.²⁰ These declines are most marked in the rocky kelp-dominated reefs around Tasmania. Furthermore, Tasmania's east coast is a climate change hotspot and sea temperatures are rising four times faster than elsewhere worldwide.²¹ But coastal development, catchment degradation, pollution and fishing are also having impacts. The Maugean Skate and Red Handfish teeter on the brink of extinction. Meanwhile,

¹⁵ Roberts et al (2020) *Assessing the current state of ecological connectivity in a large marine protected area system*, <https://conbio.onlinelibrary.wiley.com/doi/epdf/10.1111/cobi.13580>

¹⁶ This excludes the Macquarie Island Marine Park, which borders with Tasmanian state waters surrounding Macquarie Island.

¹⁷ Grech et al (2014) *Australian Marine Protected Areas*, https://www.researchgate.net/publication/293079951_Australian_marine_protected_areas

¹⁸ Wescott and Fitzsimons (2016). *Big, Bold & Blue: Lessons from Australia's Marine Protected Areas*. CSIRO Publishing.

¹⁹ Ibid.

²⁰ Edgar et al (2023) *Continent-wide declines in shallow reef life over a decade of ocean warming*, <https://www.nature.com/articles/s41586-023-05833-y>

²¹ Hobday et al (2014) *Ocean warming hotspots provide early warning laboratories for climate change impacts*, <https://link.springer.com/article/10.1007/s11160-014-9355-9>

Tasmania has not produced a State of the Environment Report since 2009, despite being required to do so every five years.²²

Marine management shortfalls

Tasmania's marine management framework dates back nearly 30 years. The state's main marine law, the Living Marine Resources Management Act 1995 is only now being reviewed for the first time. The State Coastal Policy 1996 has never been comprehensively updated. Recreational gillnetting is still allowed and depleted fish stocks continue to suffer excessive fishing pressure. Only 1.1% of state waters are fully protected.

Despite the economic, environmental and cultural importance of State waters, marine governance lacks integration – between Federal and State governments and across sectors, government departments and the catchment-coast-marine continuum. Tasmania's siloed approach to managing the multiple uses of the marine environment continues to be dominated by economic imperatives and is allowing the health of marine ecosystems to decline. Legislation to protect the marine environment is heavy on process but light on performance measurement, with inadequate tools to ensure statutory goals are achieved.

The Tasmanian Government has not conducted a state-wide assessment of the condition of Tasmania's marine environment for 14 years. This is despite a statutory requirement to produce State of the Environment (SOE) Report every 5 years.²³ The *Australia: State of the Environment Report 2021* highlighted that Tasmanian waters are facing multiple significant pressures;²⁴ however, a state-specific report is required for a comprehensive appraisal of the health of Tasmania's marine environment.

Depleted fish stocks

The Tasmanian Scalefish Fishery Assessment 2020/2021 found that high fishing pressure is a concern for six popular commercial and recreational species.²⁵ Sand Flathead, Striped Trumpeter, Bastard Trumpeter, Southern Garfish and Blue Warehouse stocks were all classified as depleted, while Southern Calamari stocks were found to be depleting.

Decline of key ecosystems

Over 95% of Tasmania's giant kelp forests have been lost over recent decades. In 2012, Giant Kelp Marine Forests of South-east Australia became the first marine community to be listed as endangered under the Environment Protection and Biodiversity Conservation Act

²² State Policies and Projects Act 1993 s29.

²³ Ibid.

²⁴ Cresswell et al (2021) *Australia: State of the Environment 2021*, <https://soe.dcceew.gov.au/>

²⁵ Fraser et al (2022) *Tasmanian Scalefish Fishery Assessment 2020/2021*, https://www.imas.utas.edu.au/__data/assets/pdf_file/0005/1632515/Scalefish-Assessment_2020-21.pdf

1999. Despite this, there is still no Recovery or Threat Abatement Plan prepared for this community.²⁶

Public opinion backs the science

Tasmania's coastal waters are in trouble and Tasmanians know it. A survey by the Australia Institute in April 2023 asked Tasmanians a range of questions about their concern for the health of Tasmania's coastal waters.²⁷ Three quarters (76%) of Tasmanians are concerned about the health of Tasmania's marine environment. Despite most people (59.3%) being unaware just how bad the situation is for some of Tasmania's most popular fish stocks, almost half of Tasmanians surveyed (49.8%) were not confident that the Tasmanian Government's current marine law reforms will do enough to protect the health of Tasmania's coastal waters.

Over 80% supported one or more key management action to strengthen protection of marine life including reducing catch limits, protecting fish nurseries, and immediately banning recreational gill netting. The most popular response was to support all the suggested management actions, and only 5.6% did not support any of these management actions being taken.

The Australia Institute's research shows that Tasmanians have little confidence in the Government to undertake meaningful environmental protection. The message from this research is clear: public opinion backs the science – an overwhelming number of Tasmanians support what the evidence is telling us we need to do.

TASMANIA'S MARINE PARKS

There is currently an incongruence between Tasmanian and Australian governments commitments to habitat protection. Four of Tasmania's nine geographically distinct marine bioregions are not represented by any class of marine reserve. Only 1.1% of the state's waters are fully protected and 2.7% partially protected from fishing.²⁸

In 2003–04 the first inquiry into establishing marine parks in Tasmania was undertaken and resulted in the Kent Group National Park marine extension and Port Davey Marine Reserve being declared.²⁹ The Bruny Bioregion was the second bioregion referred for inquiry and 14

²⁶ Department of the Environment. (n.d.) *Threatened Ecological Community Profile — Giant Kelp Marine Forests of South East Australia*, <http://www.environment.gov.au/cgi-bin/sprat/public/publicshowcommunity.pl?id=107>

²⁷ The Australia Institute (2023) Polling: Reduce Inshore Salmon Farming to Protect Tassie Coast <https://australiainstitute.org.au/post/reduce-inshore-salmon-farming-to-protect-tassie-coast-research/>

²⁸ Wescott and Fitzsimons (2016). *Big, Bold & Blue: Lessons from Australia's Marine Protected Areas*. CSIRO Publishing

²⁹ Resource Planning and Development Commission (2003). *Inquiry into the establishment of marine protected areas within the Davey and Twofold Shelf Bioregions. Final recommendations report*.

Marine Conservation Areas were subsequently proclaimed in 2009;³⁰ however, fishing continues to be permitted in almost all areas of Tasmania’s waters.³¹ The Tasmanian Government’s poor track record of protecting the state’s coastal waters directly implicates the effectiveness of the South-east Network, and the Australian Government’s commitment to sustainable ocean management by 2025.

Recommendation 1: The Australian Government should work with state governments to ensure they meet their responsibilities to include proportionate protection of state waters in marine parks. The mechanism to achieve improved integration and coordination between both levels of government should be articulated in the management plan.

Recommendation 2: The next 10-year management plan should prioritise increasing ecological connectivity in the South-east Network.

³⁰ Wescott and Fitzsimons (2016). *Big, Bold & Blue: Lessons from Australia’s Marine Protected Areas*. CSIRO Publishing

³¹ Carr and Minshull (2020). *Towards a sustainable marine management regime for Tasmania*. <https://australiainstitute.org.au/report/towards-a-sustainable-marine-management-regime-an-update-on-tasmanian-progress/>

South-east Commonwealth Marine Parks Network

The South-east Network was declared in 2007 “for the purpose of protecting and maintaining marine biodiversity, while allowing for the sustainable use of natural resources in some areas”³² in the South-east Marine Region.³³ The South-east Network contains 14 Commonwealth marine parks, including the Macquarie Island Marine Park, which were selected as representative of the bioregions contained in the South-east Marine Region. Each marine park in the South-east Network is zoned using IUCN categories which range from highly protected zones (IUCN I and II) to zones that allow extractive uses (IUCN Zones III-VI).³⁴

Under the NRMSPA, marine parks are required to be designated in areas that afford protection to a comprehensive, adequate and representative (CAR) example of a broader bioregion to support biodiversity and ecological viability. The NRMSPA describes the CAR principles as follows:

- **Comprehensiveness:** The NRMSPA will include the full range of ecosystems recognised at an appropriate scale within and across each bioregion.
- **Adequacy:** The NRMSPA will have the required level of reservation to ensure the ecological viability and integrity of populations, species and communities.
- **Representativeness:** Areas that are selected for inclusion in marine protected areas should reasonably reflect the biotic diversity of the marine ecosystems from which they derive.³⁵

If implemented accordingly, marine parks help mitigate the impacts of climate change by reducing other pressures on marine species.³⁶ Additionally, fully protected marine parks can be used as scientific reference sites from which such pressures on surrounding areas can be monitored and compared. Managing a network of marine parks that adheres to the

³² Director of National Parks (2013) *South-east Commonwealth Marine Reserves Network management plan 2013-2023*, <https://parksaustralia.gov.au/marine/pub/plans/se-network-management-plan2013-23.pdf>

³³ The South-east Marine Region incorporates Commonwealth waters (the area between 3 to 200 nautical miles from shore under s. 24 of the EPBC Act) extending from the far south coast of New South Wales, around Tasmania and as far west as Kangaroo Island in South Australia, including Commonwealth waters in Bass Strait and those surrounding Macquarie Island. State and territory jurisdictions extend from the high-water mark to 3 nautical miles offshore.

³⁴ IUCN (1999) *Guidelines for Marine Protected Areas*
<https://www.iucn.org/sites/default/files/import/downloads/mpaguid.pdf>

³⁵ ANZECC (1998) *Guidelines for Establishing a National Representative System of Marine Protected Areas*
<https://www.dcceew.gov.au/sites/default/files/documents/nrmspa-establishing-guidelines.pdf>

³⁶ AMSA (2022) AMSA Position Statement: Climate Change

NRSMPA's CAR principles is critical for marine protection generally, but at present the South-east Network provides inadequate protection from a range of pressures.

POOR PROTECTION IN THE SOUTH-EAST NETWORK

Highly protected or 'no-take' zones (IUCN categories I and II) – which afford an area full protection from extractive industries – play a crucial role in building resilience in marine environment. Despite the South-east Network's extensive coverage, areas that are subject to human impacts (particularly fishing) are not well protected.³⁷ At present, fishing is only prohibited in the Macquarie Island Marine Park Sanctuary Zone, and four National Park Zones.³⁸ These no-take zones are located almost exclusively in abyssal areas which are rarely fished, and therefore provide little benefit to biodiversity conservation.³⁹ All other marine parks permit fishing in some form.

Temperate ecosystems are facing increasing pressures from warming waters, ocean acidification and species range shifts, all of which are compounded by the impact of human activities. The South-east Network was implemented without significantly restricting existing human activities, and as such its conservation value is limited. For the Australian Government to meet its commitment to sustainably manage its oceans by 2025, greater protection in areas vulnerable to human impacts – especially fishing – must be afforded.

Recommendation 3: Increase no-take zones to protect 30% of the South-east Marine Region using the Comprehensiveness, Adequacy and Representativeness principles.

LIMITED REPRESENTATION OF KEY BIOREGIONS

The CAR principles are not met at the most basic levels in the South-east Network. There is particularly poor protection for areas with the greatest conservation values in the South-east Marine Region. Only 0.75% of the continental shelf area in the South-east Marine Region is a designated no-take zone, despite the area being characterised by both significant fishing activity and high biodiversity.⁴⁰ Most of the habitat that is protected by the South-east Network is abyssal plains which are under less pressure than shallower habitats. Furthermore, sites of high conservation value in the South-east Marine Region are not

³⁷ ANZECC (1998) *Guidelines for Establishing a National Representative System of Marine Protected Areas* <https://www.dcceew.gov.au/sites/default/files/documents/nrsmpa-establishing-guidelines.pdf>

³⁸ Director of National Parks (2013) *South-east Commonwealth Marine Reserves Network management plan 2013-2023* (p22-23). <https://parksaustralia.gov.au/marine/pub/plans/se-network-management-plan2013-23.pdf>

³⁹ Edgar et al (2008) *Key biodiversity areas as globally significant target sites for the conservation of marine biological diversity*, https://onlinelibrary.wiley.com/doi/epdf/10.1002/aqc.902?saml_referrer

⁴⁰ Nevill and Ward (2009) *The National Representative System of Marine Protected Areas: Comment on recent progress*, <https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1442-8903.2009.00493.x>

represented in the marine parks network at all, such as the Bonney Upwelling and Big Horseshoe Canyon.⁴¹

Marine parks must not only be located in areas that are least disruptive to activities such as fishing and other extractive industries. The Australia Institute's research indicates the need to further reform the zoning, boundaries, and distributions of marine parks in the South-east Network in the future to ensure the Comprehensiveness, Adequacy and Representativeness principles are suitably implemented. Marine parks that do not contribute to marine protection are a waste of management efforts, contribute disproportionately to protected area targets, and, most critically, protect areas and features that are in the least need of protection.⁴²

Recommendation 4: Designate all sites of high conservation value in the South-east Marine Region as no-take zones within the South-east Network.

⁴¹ Edgar et al (2008) *Key biodiversity areas as globally significant target sites for the conservation of marine biological diversity*, https://onlinelibrary.wiley.com/doi/epdf/10.1002/aqc.902?saml_referrer.

⁴² Barr and Possingham (2013) *Are outcomes matching policy commitments in Australian marine conservation planning?* <https://www.sciencedirect.com/science/article/abs/pii/S0308597X13000213>

Proposed expansion of the Macquarie Island Marine Park

The Australian Government’s proposal to expand the Macquarie Island Marine Park is to be commended.⁴³ The proposed expansion will see a 300% increase in the total protected area, designating the entire Macquarie Island Economic Exclusive Zone as a marine park.

The new protected area will be designated as a National Park Zone (IUCN II), which significantly increases the area in which fishing and other extractive activities are prohibited. The proposed zoning will allow “low-impact scientific research activities to occur, to improve understanding of the region and its values”.⁴⁴ The existing Habitat Protection Zone (IUCN IV, which allows commercial fishing) will be reduced and relocated, while the existing Sanctuary Zone (IUCN Ia) will remain unchanged.⁴⁵ The expansion and zoning changes were proposed to “protect a wilderness area of [Australia’s] ocean that is of high conservation value, critical to many species, including threatened and endemic ones, and vulnerable to a changing climate”, while the low level of economic activity in the region “makes a significant increase in protection possible without displacing current users”.⁴⁶

A recent report by Cresswell et al indicated that the current zoning of the Macquarie Island Marine Park does not meet the NRSMPA’s CAR criteria.⁴⁷ The report analysed existing data on the pelagic and benthic environments surrounding Macquarie Island and indicated that key ecological features, including submarine seamounts and important foraging areas for protected seabirds, are not comprehensively or adequately represented in the existing marine park. This was reflected in the Australian Government’s rationale for expanding the marine park. Critically, both the report and the proposed expansion highlights the cumulative impacts of human activities, climate change and associated impacts such as ocean acidification, and the subsequent need for more comprehensive protection.

The revision of the Macquarie Island Marine Park’s adherence to the NRSMPA’s CAR principles should serve as an example for a revision of all marine parks in the South-east Network.

⁴³ Parks Australia (2023) *Proposal to expand Macquarie Island Marine Park*, https://storage.googleapis.com/files-au-climate/climate-au/p/prj255e690cd7c20706d4b40/public_assets/Proposal%20to%20expand%20Macquarie%20Island%20Marine%20Park%20%E2%80%94%20Public%20consultation%20paper.pdf

⁴⁴ Ibid, p23.

⁴⁵ Ibid.

⁴⁶ Ibid, p10.

⁴⁷ Cresswell et al (2023) *The unique marine ecosystem surrounding Macquarie Island: Independent Report published by The Australian Marine Conservation Society and The Pew Charitable Trusts*, https://www.saveourmarinelife.org.au/wp-content/uploads/2023/03/Macquarie_Report_Main.pdf

Recommendation 5: Implement the proposed zoning changes and expansion to the Macquarie Island Marine Park in full.

Conclusion and recommendations

Australia has committed to conserving and sustainably managing its oceans. The South-east Network does not comprehensively or adequately protect representative examples of the region's biodiversity and needs significant revision if Australia is to achieve sustainable management of its marine environment.

The Australia Institute Tasmania commends the proposed expansion of the Macquarie Island Marine Park, which will significantly increase both marine protection in the Macquarie Island region, and the extent of the South-east Network generally. The revision of the Macquarie Island Marine Park's adherence to the NRSMPA's CAR principles should serve as an example for a revision of all marine parks in the South-east Network.

The development of the South-east Network's next 10-year management plan provides an important opportunity to significantly improve marine protection in the South-east Marine Region. The Australia Institute's research also highlights the need to further reform the zoning, boundaries, and distributions of marine parks in the South-east Network in the future to ensure the Comprehensiveness, Adequacy and Representativeness principles are suitably implemented.

To improve the function of the South-east Network, the Australia Institute Tasmania recommends the future management plan includes the following actions:

1. The Australian Government should work with state governments to ensure they meet their responsibilities to include proportionate protection of state waters in Marine Parks. The mechanism to achieve improved integration and coordination between both levels of government should be articulated in the management plan.
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3. Increase no-take zones to protect 30% of the South-east Marine Region using the Comprehensiveness, Adequacy and Representativeness principles.
4. Designate all sites of high conservation value in the South-east Marine Region as no-take zones within the South-east Network.
5. Implement the proposed zoning changes and expansion to the Macquarie Island Marine Park in full.