



Mr Ricky Archer  
Director of National Parks  
Department of Climate Change, Energy,  
the Environment and Water

14 November 2024

Dear Director of National Parks,

### **Draft South-east Marine Parks Network Management Plan 2024**

The Australia Institute is an independent public policy think tank. Since its launch in 1994, the Institute has carried out highly influential research on a broad range of economic, social and environmental issues. The Institute has a long track record of research and engagement on marine protection and management, both in Tasmania and nationally. We have published numerous research reports and submissions on marine related economics, sustainable fisheries management, integrated ocean management and marine protection. Most recently we contributed a submission to the draft Sustainable Ocean Plan and attended the Ocean Dialogue in October. The Institute has hosted two Tasmanian Ocean Summits in 2022 and 2023, among other public forums with a marine protection focus.

The Australia Institute Tasmania welcomes the opportunity to provide input on the proposed management plan for the South-east Marine Parks Network. We refer to our previous and detailed submission to the South-east Notice of Intent. While the expansion of marine protection in the South-east region is encouraging, the current draft plan does not adequately address the region's most critical conservation needs. The South-east Marine Parks Network, as proposed, remains limited in fully protected areas, leaving vulnerable habitats exposed to human impacts such as fishing and other extractive activities. To achieve true ecological sustainability, the South-east Network must implement more substantial protections that align with Australia's commitments to conserving 30% of its marine environment by 2030.

### **The Australia Institute welcomes:**

The Creation of 11 new marine sanctuary areas, increasing the number of bioregions with at least one sanctuary from 6 to 10 out of the 17 marine bioregions, and providing new protections for important species and habitats, and significant new marine sanctuary protection for biologically important areas, such as little penguin foraging grounds and sperm whale and Australasian gannet feeding grounds.

Finalising the Macquarie Island Marine Park, safeguarding its unique marine life.

Industrial activity restrictions prohibiting new oil and gas titles, seabed mining, carbon capture and storage (CCS), and offshore aquaculture, ensuring marine parks remain protected from industrial impacts.

### **Key concerns and recommendations:**

1. Inadequate state waters protection: The lack of protection in Tasmanian state waters weakens conservation efforts in the South-east Marine Region. Only 1.1% of Tasmania's waters are fully protected, the lowest proportion in Australia, while many Tasmanian marine ecosystems suffer from high human impact. The Australian Government should

work with state governments to integrate marine protection strategies, including accountability measures for Tasmanian waters adjacent to Commonwealth parks.

The need for federal intervention in Tasmanian waters is further demonstrated by the findings of the 2024 Tasmanian State of Environment (SOE) Report. Six of 12 coastal and marine indicators are getting worse, including sea surface temperature, kelp, threatened marine fish, beach change, salt marshes, and migratory shore birds. Coastal water quality was not even addressed, despite organic loads from finfish aquaculture, wastewater treatment, and industrial discharges being identified as key pressures on Tasmanian estuaries in the most recent national SOE Report.

2. Need for ecological connectivity: The draft plan leaves large connectivity gaps, with some marine sanctuaries separated by over 800 km. Effective marine protection requires an interconnected network that supports ecological processes across the marine environment. The proposed plan should prioritise ecological connectivity to bolster resilience and facilitate the movement and breeding of marine species across protected areas.
3. Increased no-take zones: Fully protected zones, or no-take areas, are essential for allowing ecosystems to recover and thrive. We recommend that 30% of the South-east Marine Region be designated as no-take zones, applying Comprehensiveness, Adequacy, and Representativeness (CAR) principles to ensure diverse and effective protection across all marine habitats.<sup>1</sup>
4. Downgrading of existing National Park Zone: The Australia Institute strongly opposes the proposed downgrading of 11,278km<sup>2</sup> of National Park Zone to Habitat Protection Zone in Flinders Marine Park. We also oppose the changing of Special Purpose Zone to Habitat Protection Zone to open it up to commercial fishing in Murray Marine Park. These areas should be made National Park Zone as they have been functioning as such for 17 years.
5. Protection of high conservation value sites: Designate all sites of high conservation value in the South-east Marine Region as no-take zones within the South-east Network to improve the function of the South-east Network.

### Specific zoning recommendations for enhanced marine protection

The Institute urges the adoption of the following specific zoning changes to help address identified shortfalls:

1. Beagle Marine Park: Establish a new marine sanctuary in the western Beagle Marine Park, enhancing connectivity with Wilsons Promontory Marine Park. Extend the proposed marine sanctuary southwards to more fully complement the Kent Group Marine Park in Tasmanian state waters.

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<sup>1</sup> Australia has committed to conserving 30% of its 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.



2. Franklin Bioregion Sanctuary: Create the first sanctuary for the Franklin bioregion by designating the southern end of Franklin Marine Park as a fully protected area, safeguarding its rich shelf habitats.
3. Expansion of Tasman Fracture Marine Park: Increase the marine sanctuary area within the Tasman Fracture Marine Park to maximise the inclusion of the West Tasmanian Canyons key ecological feature. Extending the full width of the existing sanctuary southwards across the upper slope and deep ocean to connect with the proposed new deep ocean sanctuary, creating a continuous shelf-to-deep-ocean depth transect.
4. East Gippsland Marine Park Sanctuary: Provide sanctuary status for the Upwelling East of Eden to support a highly productive area and diverse aggregations of marine life.
5. Flinders Marine Park Extension: extend the new proposed new marine sanctuary eastwards to include the whole of the canyon and include a continuous depth transect across the upper slope habitats and to be extended westwards to include a continuous depth transect across the shelf.
6. Freycinet Marine Park: Extend the proposed new marine sanctuary for Joe's Reef eastwards across the shelf and upper slope to establish a continuous depth transect to the existing deep ocean sanctuary.

If the above zoning adjustments are not feasible in the specified areas, we recommend providing equivalent protections in other parts of the South-east Network to safeguard these conservation priorities.

This expanded protection framework is essential for meeting Australia's marine biodiversity commitments and ensuring the long-term resilience of the South-east Marine Region.

Yours sincerely,

Eloise Carr  
Director  
The Australia Institute Tasmania