

Draft

To: Minister for Primary Industries, Water and Environment
Draft Tasmanian Marine Protected Areas Strategy
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Submission

DRAFT TASMANIAN
MARINE PROTECTED AREAS STRATEGY

1. Opening comments: My perspective

Firstly, congratulations on a well-researched and documented report.

I am a member of the Tasmanian Sea Canoe Club, an amateur fisherman, and a recreational diver. These perspectives, to some extent, influence my comments.

2. Goals (report page 8)

The goals set out on pages 8 and 9 are well-chosen, and well-worded. There are, however, several ways in which the goals can be improved. In some cases a change of words is all that is needed; in others it will be better to add a separate goal statement.

2.1 Primary Goal

It should be made clear that this goal is qualified by the associated paragraphs. Of particular importance are the words in paragraph 2: "The need also extends to include the conservation and protection of significant physical natural features and seascapes, marine and cultural heritage, and aesthetic and wilderness values, together with providing specific sites for education and recreation, and scientific research and monitoring." *All* of these points should then be elaborated under "Secondary Goals". At this stage, some are, and some are not. There should also be clear links between IUCN categories and the overall goal framework.

There should also be a statement about consistency with national and international MPA frameworks in the section under the heading "Primary Goal".

These issues need to be clearly carried through to the Secondary Goals.

2.2 Secondary Goals

The secondary goals, where necessary, should be used to more clearly define (and where necessary expand) the general concepts of the primary goal and its supporting text.

A number of specific points need attention:

As "wilderness" and "seascapes" have been listed in the scoping paragraphs associated with the primary goal, it is desirable to include a specific secondary goal dealing with these issues.

I recommend that an additional goal be listed under the "Social" heading:

- *to protect and manage important seascapes and wilderness areas;*

This will provide a link between the scope of the Primary Goal, and the use of IUCN categories.

Tasmania is not alone on the planet. Tasmania receives, and indeed encourages, visitors. Tasmania and Australia are also part of a wider global community of nation-states, and in the interests of communication in a world where there are already too many impediments to understanding between peoples and nations, consistency with other MPA frameworks is an issue, and should be a goal.

I recommend that a second additional goal be listed under the "Social" heading:

- *to achieve a MPA framework which is, as far as practical, consistent with other jurisdictions, especially within the Commonwealth of Australia.*

2.3 Principles

The listing of principles is a strong point of this section of the draft Strategy. The principles set out are generally well-worded. However, I recommend a number of improvements:

The "Highly Protected Areas" principle is weak, and would be better worded: "The Representative System of Marine Protected Areas in Tasmania *shall* include some highly protected areas *of each major marine ecosystem* (IUCN Categories I and II) in each bioregion.

Further, I recommend three additional principles:

- The identification, selection, and management frameworks developed in Tasmania should consider consistency with MPA frameworks being developed, or already in place, in other jurisdictions. Frameworks developed by other Australian States and the IUCN are of particular relevance. The need to avoid a confusing proliferation of different types, or names, of MPA should be considered, in order to facilitate public understanding of the management frameworks.
- Boundaries and management regimes must recognise the difficulties inherent in policing remote areas. Enforcement issues will be simplified by selection of boundaries which can be readily identified by members of the public (such as line-of-sight between two landmarks). The issue of presenting enforcement evidence in court should also be considered.
- Boundary selection should not be unduly limited by the existing degradation of ecosystems where there is the possibility of long-term recovery.

3. Key Steps (Report page 14)

I think two points need further consideration:

Firstly, it may be unrealistic to consider the creation of a "final" MPA framework during the life of the current process.

It may be worth focussing the present program on IUCN categories I and II (the most highly protected categories), while fore-shadowing a second program in say 5 years time to expand the MPA framework with the remaining categories.

Secondly, I suggest STEP 2 be reworded (in the interests of consistency) to read: "Using *international, national and Tasmanian* identification criteria, identify..."

4. Criteria for the identification of MPAs (Report page 16)

While these criteria are generally well-chosen and well-worded, I suggest the following expansions:

Uniqueness

- contains unique or unusual geographic features *or seascapes*
- *contains unique cultural features in need of protection or special management*

Productivity

- *are areas significant in terms of the life-cycles of species (eg mating or nursery areas)*

Vulnerability assessment

- contains ecosystems and/or communities vulnerable to natural *or human-induced* processes (eg: *invasion of mainland sea-urchin*)

Naturalness

- extent to which the area has been protected from, or not been subject to, human-induced change;
- *the area's values which stem from its wilderness, or remote, attributes;*
- *the area's suitability for high-intensity passive "nature watching" recreation.*

5. Criteria for the selection of MPAs (Report page 18)

I suggest that the issue of national/international consistency be referenced here, under:

Practicality / feasibility

An additional point:

- The selection of areas should take into account the need for national and international consistency in MPA frameworks, within the practical constraints of the Tasmanian administrative and physical environment.

6. How are MPAs identified and selected? (Report page 19)

It will be important to ensure the independent authority foreshadowed in the Draft Strategy be well balanced, with a spread of industry, community and environmental representatives.

The Tasmanian *Water Management Act 1999*, for example, established an independent statutory committee, the Assessment Committee for Dam Construction (ACDC) which did NOT contain a voice for the natural environment of the State's rivers, streams and wetlands. This mistake has potentially serious ramifications, and should not be repeated with respect to the marine environment.