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SA Marine Parks Review
Department for Environment and Water
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cc: David Speirs MP, Minister for the Environment, minister.speirs@sa.gov.au

Thursday 2 July 2020

Re: Proposed changes to SA's marine parks

To whom it may concern,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to comment on the proposed changes to South Australia's marine parks. Since 1962, the NCSSA has been a strong advocate for the protection of native vegetation and biodiversity in South Australia with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and the management of protected areas.

The NCSSA does not support the reductions in sizes or 'reshaping' of the Sanctuary Zones as part of these proposed changes.

The establishment of South Australia's marine parks, and their associated Sanctuary Zones, has been a result of 20 years of community and governmental effort, including research, consultation and compensation paid to fishers. It is therefore unacceptable to 'wind back' the protection for our unique marine environment that has been achieved through this process, and to suggest it is needed for fisheries in the wake of the COVID-19 pandemic is disingenuous at best.

These marine parks are the long-awaited realisation of a commitment that was made in 1992 by the South Australia Government to establishing a comprehensive, adequate and representative marine park network, including Sanctuary Zones that afford the highest level of protection. The development of the current network was guided by a set of principles that related to both the biophysical environment and the needs of local communities and, as such, already represents a compromise from a nature conservation perspective: from the preliminary sanctuary zone scenarios provided in 2010 to the final sanctuary zoning established in November 2012, the area within sanctuary zones was reduced from 7,517 km² (12.5 per cent of state waters) to 3,014 km² (5 per cent of state waters, BDO Econsearch 2018).

The NCSSA recognises that following the establishment of Sanctuary Zones, some important fishing areas became unavailable to commercial fishers. This was unavoidable to achieve a comprehensive, adequate and representative marine park network. However, the particular fishers affected by the establishment of these Sanctuary Zones have been compensated¹, with twenty-one licenses or authorities to fish having been voluntarily

¹ https://www.pir.sa.gov.au/fishing/commercial_fishing/licensing_registration/catch_effort_reduction_program

offered for Government acquisition. Whilst the precise figure is not publicly available, the NCSSA understands the cost of compensation was in the tens of millions of dollars, paid with public money. It is therefore egregious and unacceptable to propose that a significant portion of these areas for which compensation has been paid now be re-opened to fishing.

The proposed changes also go against clear advice to the Marshall Government provided in two independent reports. The first report considered the scientific as well as the social and economic impacts and consequences of the Sanctuary Zones (BDO Econsearch 2018), and the second specifically analysed the proposed changes (BDO Econsearch 2020). The reports unequivocally support maintaining the current Sanctuary Zones, stating that the proposed changes will reduce the area of habitats and features which are afforded the highest level of biodiversity protection and reintroduce threatening activities such as fishing and other extractive uses, as well as allowing for aquaculture, coastal developments, dredging, active surveying and wastewater discharge from vessels and desalination plants.

In terms of the additions to the Marine Park network that are being proposed, the NCSSA supports the establishment of new Sanctuary Zones at Port Stanvac, as this will protect the significant environmental values of the reef, sand and seagrass habitats in the area which have been protected to now through the area being 'restricted access'. The NCSSA also supports new Sanctuary Zones to protect the values that have been or will be established through artificial reefs at Windara Reef and off Glenelg. However, these additions do not compensate for the protection that will be lost in the reductions and 'reshaping' of the other Sanctuary Zones that are proposed.

The NCSSA notes that there is a legislated review of marine parks due in 2022, and firmly believes there shouldn't be any reductions in Sanctuary Zones prior to that process.

Yours sincerely,



Michael Stead
President
Nature Conservation Society of South Australia

References

BDO EconSearch, 2018. Environmental, Social and Economic Values of Marine Park Sanctuary Zones. A report to the Department for Environment and Water, Adelaide.

BDO EconSearch, 2020. Supplementary report to 'Environmental, Social and Economic Values of Marine Park Sanctuary Zones . A report to the Department for Environment and Water', Adelaide.