

Dear SA Marine Parks Review (CC Minister Speirs, Premier Marshall, Shadow Environment Minister Close, Ms Bonaros MLC, Mr Parnell MLC)

We, the South Australian branch of the Australian Marine Sciences Association (AMSA), write to you regarding the proposed changes to SA's Marine Parks. As SA's largest professional association of marine scientists we represent a key stakeholder group actively using marine environments for research purposes. Our submission is supported by the AMSA position statement about MPAs most recently reviewed in 2019 (attached).

Australia is a party to the United Nations Convention on Biological Diversity (1992). The convention's 2011-2020 strategic plan urges party states to conserve, by 2020, at least 10% of their coastal and marine areas. South Australia's sanctuary zones currently make up only 6% of our state waters and have been in place for six years. In accordance with the AMSA MPA position statement, to achieve substantial and sustained biodiversity conservation that underpins productive recreational and commercial fishing, at least 30% sanctuary zone protection over a minimum of 10 years is necessary (Edgar et al. 2014). The proposed changes plan to cut some of our state's largest sanctuary zones by 80%.

AMSA-SA supports the increase in sanctuary zone coverage at Nuyts Reef and the new sanctuary zones off Pt Stanvac and Glenelg. This expansion contributes towards meeting SA's minimum target of 10% sanctuary zone coverage. However, we oppose reductions or any other changes to the existing sanctuaries in the network, including the cutbacks proposed at the St Francis Isles, North Neptune Island, Cape du Couedic, and the Clinton Wetlands. These cutbacks will reduce the comprehensiveness, adequacy, and representativeness of the network which directly contravenes the *Marine Parks Act 2007*, that has a main objective to "to protect and conserve marine biological diversity and marine habitats by declaring and providing for the management of a comprehensive, adequate and representative system of marine parks".

The proposed changes to sanctuary zones will jeopardise the protection of multiple key iconic species including white sharks *Carcharodon carcharias* and blue groper *Achoerodus gouldii* at North Neptune Islands, rock lobster *Jasus edwardsii* at Cape Du Couedic, blue crabs *Portunus armatus* and razorfish *Pinna bicolor* at Clinton Wetlands and a biodiversity hotspot at St Francis Island. Several of these areas include key habitats types which are not well-represented in other sanctuary zones such as offshore island archipelagos at St Francis Island and shallow seagrass habitats at Clinton

Wetlands. Reductions to these sanctuary zones will compromise the effectiveness of these zones and their connectivity to the wider network.

The SA Marine Parks review process indicates that the proposed changes will help support commercial fishing sectors impacted by COVID-19. The Econsearch report (2020) findings suggest that marine parks have not negatively impacted the commercial fishing sector. Furthermore, SARDI scientific reports demonstrate that rock lobsters have grown larger and are more abundant inside Kangaroo Island's Cape du Couedic Sanctuary Zone since fishing was restricted (McLeay et al 2017). When the sanctuaries were created, substantial compensation was paid to commercial fishing operators to offset their reduction in access. AMSA endorses the use of structural adjustment packages to buy out and retire fishing effort from industry following establishment of MPAs. However, commercial fishing access to marine sanctuary zones within six years of their implementation is counter-productive to the State's financial and conservational investment into the marine environment. SA's tourism markets, reliant on SA's conservation focussed reputation, have also experienced financial hardship as a result of COVID-19 and may be harmed by the proposed changes.

AMSA-SA strongly supports evidence-based MPA decision making from the best available science. In accordance with the evidence provided by the State Government, AMSA-SA supports the proposed expansions in sanctuary zone coverage and the new sanctuary zones off Pt Stanvac and Glenelg. All other proposed suggestions do not align with AMSA's MPA Position Statement with particular reference to meeting 30% sanctuary zone coverage and 10 year implementation requirements. Those proposed changes are not aligned with established scientific guidelines (e.g. Edgar et al. 2014), the AMSA MPA position statement, the Econsearch report (2020), or the *Marine Parks Act 2007* and thus cannot be supported.

EconSearch, B. 2020. Supplementary report to 'environmental, social and economic values of marine park sanctuary zones'. Adelaide.

Edgar, G. J., R. D. Stuart-Smith, T. J. Willis, S. Kininmonth, S. C. Baker, S. Banks, N. S. Barrett, M. A. Becerro, A. T. Bernard, and J. Berkhout. 2014. Global conservation outcomes depend on marine protected areas with five key features. *Nature* **506**:216.

McLeay, L., McGarvey, R., Linnane, A., Feenstra, J. and Hawthorne, P. (2017). Rock Lobster Survey of the Western Kangaroo Island Marine Park - Cape Du Couedic (Sanctuary Zone 3). Report to the Department of Environment, Water and Natural Resources. South Australian Research and Development Institute (Aquatic Sciences), Adelaide. SARDI Publication No. F2017/000282-1. SARDI Research Report Series No. 962. 38pp.