



## Surfers Appreciating The Natural Environment

1.2.2013

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**Cc:** The Honourable Ryan Smith, Minister for the Environment  
Level 17, 8 Nicholson Street, Melbourne, VIC  
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### **Re: Response to the proposed performance and management review of Victoria's marine protected areas by VEAC.**

#### **1. History:**

In the interest of VEAC understanding the level of interest held by us in this review, Surfers Appreciating Natural Environment (SANE) reiterates the following as an update of our historical context and involvement in the Marine Investigation:

SANE was established in 1988 by a group of local surfers concerned about human impact on the local cliff tops; in particular the ongoing pressure by humans on flora and fauna within the Bells Beach Surfing & Recreation Reserve.

Over the last 24 years SANE has engaged and worked with the Surf Coast Shire Council and its Officers, Government bodies at varying levels, other community groups and local businesses on environment issues, projects, working bees and forums.

We were proactive in the establishment of the Point Addis Marine National Park and Pt Danger Marine Sanctuary and were recognised by the State Government with an explicit award for our contribution and work toward achieving that goal in 2002.

Additionally, we were strong advocates and successful in having local biodiversity recognised through the expansion of the Greater Otway National Park along the south-western boundary of the Bells Beach Surfing and Recreation Reserve.

We re-iterate that human impact and population pressure are the greatest threats to biodiversity locally - and internationally. At the same time the Bells Beach Reserve is home to a spectrum of highly diverse and significant points of interest. This includes:

- Internationally significant Moonah Woodland and Coastal heath.
- Stands of the Nationally Endangered Bellarine Yellow Gum (*Eucalyptus leucoxylon* ssp. *bellarinensis*) are represented as well as the Nationally Vulnerable Long-leaf Box (*Eucalyptus littoralis*).
- Critical habitat to a range of species including the Nationally Endangered Rufous Bristle Bird.
- Geological formations of state significance.
- A unique contribution to our understanding of the fossil record through the discovery and collection of an ancient whale specimen; notably *Janjucetus hunderi* at the base of the Bells Beach steps.
- Multiple sites of aboriginal cultural significance.
- Being a tourism hotspot of local, national and international interest.

Within the Point Addis Marine National Park, one can also add:

- Home to 26 shorebird species including the Nationally Endangered Hooded Plover.
- Giant Kelp (*Macrocystis pyrifera*) is documented at Ingoldsby Reef on the western perimeter of the Point Addis Marine National Park. It also has been recently listed as Nationally Endangered through the 1999 EPBC Act.
- Point Addis limestone is a geological feature of state significance.
- Victoria's state emblem, the Leafy Sea-Dragon

In summary of the key points of interest described above, it is with growing anxiety that the list of species considered as Threatened continues to grow even within our own local area of interest despite our best efforts. It is anathema to the aspirations of SANE and highlights the point that the current level of protection and management is not sufficient on land or in the marine environment. Together with an unsustainable system of so-called 'Sustainable Growth', the upward spiral of species along the extinction ladder is likely to accelerate.

## **2. Your Terms of Reference:**

*The purpose of the marine investigation is to examine and provide an assessment of:*

(a) existing marine protected areas in meeting the purposes for which they were established, particularly the protection of the natural environment,

indigenous flora and fauna and other natural and historic values; and

(b) any ongoing threats or challenges to the effective management of these marine protected areas, particularly in relation to the biodiversity outcomes.

In addition to the considerations in section 18 of the Victorian Environmental Assessment Council Act 2001, the Council must take into account the following matters:

(i) all relevant State Government policies and strategies, Ministerial statements and reports by the Victorian Auditor-General; and

(ii) all relevant national and international agreements, policies and strategies, including ecosystem-based management approaches.

### **3. Our Response:**

In recognition that VEAC must report on the completed investigation by February 2014, SANE is submitting this 2<sup>nd</sup> round response as part of our improved understanding of the issues; as well as finding that our involvement in the marine environment continues to increase with time. To that end, we make the following points:

- i. SANE is very supportive of the concept of a network of Marine National Parks and Sanctuaries across Victoria. The 2002 successful bi-partisan passage of legislation through the Victorian Parliament to make this possible was a milestone in marine conservation and improved community awareness of our marine environment. Indeed, as surfers the Point Addis Marine National Park has opened up a whole new field of opportunity, understanding and exciting discovery. Absorbing the concept of marine stewardship into our 'terrestrial' psyche is by its very nature a slow and complicated process. Importantly, this pathway of discovery has our group now focused on forming an in-SANE scuba-diving sub-group; the aim being to emulate the scientific contribution that groups like the Friends of Beware Reef have made.
- ii. In reference to IUCN-WCPA framework and the six elements of management; the SANE committee acknowledges the good work done by PARKS VIC with Reef Watch and Sea Search. However, we think the 3<sup>rd</sup> element of management, namely 'INPUTS' can be better captured if community is provided with formalised conditions that foster a greater role in monitoring and information gathering about our reefs from scuba diving. It is interesting to note that in Tasmania a dive trail brochure has been produced by the Tasmanian State Government with many of the dive locations providing experienced underwater guides. The practice has great scope for increasing community confidence in participation in Victorian waters. Finally, if the idea is shown to have merit, then consideration should also be given to formalising a process that makes clear the steps to follow by the community, and the contribution that can be expected from PARKS VIC in these situations.
- iii. We concur with the Victorian National Parks Association, which believes VEAC should, as part of its final report, make recommendations for a new

investigation that looks at fixing the gaps in the current network of MPAs. This is in recognition of the different habitats identified across the five bioregions by IMCRA which are still inadequately represented and which do not meet the pre-2002 scientific recommendations put before Government.

- iv. In relation to existing Marine Sanctuaries and National Parks, there should also be scope to assess opportunities to enhance performance standards by expanding their boundaries if the science demonstrates a need. For example, the Ninety Mile Beach marine national park largely covers sub-tidal sandy habitat, with the adjacent calcarenite reef habitat and associated biodiversity left out of the reserve boundaries. In relation to the Point Addis Marine National Park, there is also concern that increased urban pressure and the siting of the Anglesea sewerage outfall not far off its western perimeter (p. 67 of your discussion paper) may in the longterm compromise the values within the Park. SANE believes consideration should also be given to protecting all of the reef system that is in line with the eastern boundary of the Bells Beach Reserve. This natural inclusion would include the Winki-Pop reef through to the White WAVE entrance of the Bells Beach Surfing Reserve.
- v. As alluded to in the point above, it remains a concern of SANE that the current terms of reference to VEAC are too narrow. Part 1 of the investigation should give consideration to ongoing threats or challenges to the whole Victorian marine environment and biodiversity, including opportunities for improved management and protection.

## **Part 2 of the investigation:**

### **Threats and challenges to Victoria's existing marine protected areas: addressing term of reference (b):**

- i. SANE draws VEAC's attention to the Worldwatch Institute's findings of (2012) that describe population growth as a key issue for humanity and the planet in the 21<sup>st</sup> century<sup>1</sup>. With that in mind, it is concerning that some of the policy context to which VEAC is relying is out-dated for 2013. In particular, SANE members wonder about the wisdom of using the '1992 National Strategy for Ecologically Sustainable Development (shown on page 13) as a guide to how we do things in the future. Clearly, the (2011) State of the Environment report to the Australian Government (as noted on page 47 of your report) demonstrates that whatever mechanisms we currently have in place, they are not sustainable and the mechanisms are not working with population growth and economic growth identified along with Climate Change as key drivers of Australia's continuing declining biodiversity. Your reference to the 2008 Marine Biodiversity Decline report (also on page 47 of your report) underscores the fact that the issues don't stop at the shoreline and that extinction rates are accelerating both on land and at sea. It is also worth

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<sup>1</sup> Engelman, Robert (2012). State of the World 2012. Moving Toward Sustainable Prosperity. Nine Population Strategies to Stop Short of 9 Billion. The Worldwatch Institute. Washington, DC 20036. p.p. 121-128.

highlighting the fact that scientists are documenting the disappearance of biodiversity across the planet at rates not seen for 60 million years and species disappearance occurring at up to 10,000 times faster than the normal background rate<sup>234</sup>. It is also relevant to the Point Addis Marine National Park where increasing urbanisation has been identified within the VEAC Discussion Paper<sup>5</sup>. Bearing all this in mind, we feel it will be important to highlight a strong correlation between the extinction process and human population growth- all of which will carry on uninterrupted if ignored by Government- ultimately amplifying all threats regardless of the gains on performance and management criteria that VEAC may produce.

- ii. Climate Change: Not surprisingly, this issue is also intimately linked to population. Nevertheless, the SANE committee is pleased to see issues and areas outside MPA's are considered in that they are relevant to the management of MPA's. As such, we would like to draw VEAC's attention to an oceanic algal bloom that occurred on the 19<sup>th</sup> and 20<sup>th</sup> of November, 2012 between Lorne and Torquay (see Figures 1 and 2).

**Figure one:**



*Red algal Bloom, Point Danger Torquay, 19<sup>th</sup> November 2012.*

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<sup>2</sup> Call of Life (2010). Call of Life: Facing the Mass Extinction is the first feature documentary to investigate the growing threat to Earth's life support systems from this unprecedented loss of biodiversity. <http://www.calloflife.org/>

<sup>3</sup> Normander, Bo. (2012). State of the World 2012. Moving Toward Sustainable Prosperity. Biodiversity: Combating the Sixth Mass Extinction. The Worldwatch Institute. Washington, DC. 20036. p.p. 169-182.

<sup>4</sup> Ehrlich, Paul & Ehrlich, Anne(2009). The Dominant Animal-Human Evolution and the Environment. Island Press. Washington DC 20009. p.p. 310-330..

<sup>5</sup> VEAC (2012). Marine Investigation Discussion Paper- for public comment. Victorian Environmental Assessment Council. East Melbourne, 3002. p.67.

**Figure two:**



*Red algal bloom, Urquhart Bluff, 20<sup>th</sup> November 2012*

The large-scale event was breathtaking in relation to the complete lack of scientific explanation provided; largely we believe as a result of cuts to marine science staff by the current State Government. VEAC would be aware of countless international studies showing climate change is implicated in huge changes to the ocean. For instance:

**LONDON, UK, June 21, 2011 (ENS)** – *The oceans are at high risk of entering a phase of extinction of marine species unprecedented in human history, a panel of international marine experts warns in a report released today. A deadly trio of factors - warming, acidification and lack of oxygen - is creating the conditions associated with every previous major extinction of species in Earth's history, the panel warned. The combined effects of these stressors are causing degeneration in the ocean that is "far faster than anyone has predicted," the scientists report<sup>6</sup>.*

Rhetorical Question: Are these algal blooms an historically ‘natural’ event? Or are they a result of the extra carbon in the system sinking to the lower depths of the marine water column and then re-surfacing via a cold upwelling? Who would know? Certainly, the SANE committee is not impressed or placated by press releases that say nothing other than it will be safe to swim again shortly. Such issues should not simply be brushed aside as a quirky inconvenience. We need to understand what is happening. Therefore, rather than slashing staff levels within the Marine Sciences sector, there needs to be a dramatic turnaround with an increase in staffing together with a focus on long-term security to allow at least a modicum of hope that management challenges and environmental threats can be logically tackled in this 21<sup>st</sup> century.

- iii. Marine Debris: It is a well-known factor that an enormous amount of human-derived waste escapes into the ocean. However, the answer to bottles and aluminium cans being thrown away is to introduce State-wide container

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<sup>6</sup> [http://www.stateoftheocean.org/pdfs/1906\\_IPSO-LONG.pdf](http://www.stateoftheocean.org/pdfs/1906_IPSO-LONG.pdf)

deposit legislation. The answer to reducing plastics entering the uncontrolled waste stream is to introduce legislation across the whole State to become 'plastic bag free'; a concept that would not even be leading the way, but simply following leaders from other states and other nations in becoming plastic bag free. It should be noted that the township of Torquay has a community group called '*Torquay Plastic Bag Free*' that has been running now for over three years to bring about that precise change. Yet, recalcitrance and pandering to businesses like Coca Cola on behalf of successive State Governments makes this important solution unrealised. As part of VEAC's terms of reference, we hope issues like this will be highlighted.

#### **4. In Conclusion:**

SANE believes the current study should be seen as a strategic and solid platform upon which to launch future investigations into our entire Victorian marine environment. Clearly, because the terms of reference are so narrow, none of the outcomes produced from this investigation will have the capacity to bring about the dramatic improvements in addressing threats, improving species abundance and species management that is needed within the Victorian marine environment.

Rather, the study may well improve our ability to understand what we have and the respective threats, as well as how to manage those things a bit better. It may also highlight the limitations of a marine environment in which just 5.3% is fully protected; a marine environment in which nearly all commercial fish species are either approaching, at, or beyond their sustainability levels, the Southern Sand Flathead is a classic example of a formerly very common species that has now become locally rare; a marine environment that is in the middle of a global climate change experiment where all the science points to very poor outcomes, and a marine environment in which our coastline will continue to suffer from still many other major pressures of anthropogenic origins (marine debris, introduced pests, pollution, sedimentation, etc. [as shown on p. 49 of your discussion paper]). To that end, it is noted by SANE that VEAC makes specific reference to cumulative impacts being hard to assess due to the current level of available scientific understanding about the relevant ecological interactions. We note also VEAC does not plan to overlook these considerations (p. 50 of your discussion paper). Given these cumulative impacts are nearly all coming from outside MPAs, and given they represent the overwhelming threat to marine ecological integrity, we trust VEAC will devote a considerable amount of space to:

- Highlight the gravity of these issues
- Forecast a set of scenarios using different timelines based on a business-as-usual approach to highlight where we are headed. (The book '*Limits To Growth*<sup>7</sup>' is a useful reference for this.)
- Using your terms of reference, provide discussion point alternatives that consider better marine stewardship generally as an integral tool for improved management within MPAs.

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<sup>7</sup> Meadows, Donella; Randers, Jorgen; Meadows, Dennis. (2005). *Limits To Growth- THE 30 YEAR UPDATE*. Earthscan. UK.

It is worth reiterating that at the 5<sup>th</sup> International World Parks Congress in 2003, one of the strategic outcomes was a call on the international community to increase MPA networks of strictly protected areas to at least 20 – 30% of each marine habitat. Since then, whilst the body of evidence clearly shows MPAs are an important instrument of conservation, there is also compelling work produced by marine scientists locally and globally showing the marine environment is at unprecedented risk from population pressure and over fishing, invasive species, pollution and ocean acidification. As a result, we urge the State Government to not only strengthen and expand the current MPA network across Victoria, but to immediately address as many threats as possible with an action that actually achieves something!!!!

SANE thanks the Victorian Government for the opportunity to participate in this process and we look forward to your ongoing response.

Sincerely,

Graeme Stockton and Charles Brooks  
(on behalf of the SANE Executive Committee)