

4 April 2023

To:

Parks Australia

Department of Climate Change, Energy, the Environment and Water

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The Director,

Thank you for the opportunity to provide comment on the proposed expansion of the Macquarie Island Marine Park. BirdLife Australia supports the proposed extension of the Macquarie Island Marine Park to encompass the entire Exclusive Economic Zone (EEZ) around the island. Protection of marine habitats is a globally recognised conservation tool for seabirds, and broadscale threats to this highly threatened group of birds cannot be effectively addressed without such spatial protection measures. Marine Protected Areas (MPAs) are important not just for protecting seabirds from direct impacts of human activities, but also for conserving prey resources, maintaining and improving long-term population resilience and securing climate refugia.

The island's terrestrial environment and surrounding waters are inextricably linked; thus, increased protection of the marine environment directly supports many of the island's World Heritage values. The Macquarie Island Pest Eradication Project has ensured that nesting habitat for the 25 breeding seabird species is now well-protected. The proposed Marine Park expansion will extend this protection to large areas of the marine foraging habitats of these species, contributing to their long-term population viability.

The existing Macquarie Island Marine Park represents only a small proportion of the foraging ranges for many of the seabird species breeding on Macquarie Island. Whilst some of these species are very wide-ranging across oceans, especially during their non-breeding seasons, the proposed Marine Park expansion encapsulates a far greater area of their foraging range during the breeding season than is currently protected.

Other species such as penguins which are more localised foragers during the breeding season will benefit even more significantly from expanded protection of their at-sea habitat around the island. The proposed expansion will also offer increased protection of the foraging habitat for the additional 32 non-breeding seabird species that have been recorded utilising the waters of the EEZ surrounding the island.

The existing longline Patagonian Toothfish fishery operating within the EEZ is Marine Stewardship Council (MSC) certified, and operates in accordance with Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR) guidelines. Restricting the proposed Habitat Protection Zone to the current and historical footprint of this fishery is appropriate given that there are some noted impacts to benthic environments from demersal longlining fishing. Habitat Protection zoning is appropriate as it does not allow trawl fisheries and mining activities which would risk greater impacts to these vulnerable benthic habitats.


At the 2022 Conference of the Parties for the Convention on Biological Diversity, to which Australia is a party, a target was set to protect 30% of the world's land and seas by 2030. Currently, 45% of Australia's EEZ is included within State or Commonwealth MPAs; however, only a quarter of this area is protected from fishing through no-take zones. The proposed Macquarie Island Marine Park expansion will increase the area of Australia's marine estate under a higher level of protection (Sanctuary and National Park zones) and increase the total protected area of our EEZ to 48%.

Through CCAMLR, Australia is currently championing the establishment of an MPA network in the Southern Ocean, in waters beyond any national jurisdiction. It is therefore particularly important for Australia to lead by example through marine habitat protection in Southern Ocean waters within our own jurisdiction.

Kind regards,



Paul Sullivan
Chief Executive Officer, BirdLife Australia



Dr Barry Baker
Chair, Australasian Seabird Group