

**Submission on the Draft NSW Mainland Marine Park  
Network Management Plan 2021-2031 – Jervis Bay Marine Park**

**CRUISE SHIPS IN JERVIS BAY**

The Draft NSW Mainland Marine Park Network Management Plan supports the use of Jervis Bay as a cruise ship port. I write to oppose this action, and recommend that all Marine Parks, including Jervis Bay, prohibit the use of the marine park as cruise ship ports.

**Cruise ships are a threat to the primary purpose of marine parks** - to conserve the biological diversity, and maintain ecosystem integrity and ecosystem function, of bioregions in the marine estate, and to the following management plan objectives.

- 1. Ecosystems, habitats and species** – to protect and enhance species, habitats and ecosystems within marine parks:
  - Cruise ships may import pest species (such as Asian Bag Mussel, Northern Pacific Seastar, Japanese Seaweed, New Zealand Screwshell) in their bilge or on their hulls and constitute a biosecurity threat to Australian Marine Ecosystems;
  - There is no anchorage option that will not cause environmental harm: Cruise ships will either need to dredge to find safe anchorage OR anchor in deeper water. Ocean swell in Jervis Bay means that dredging will have a negative environmental impact on the shorelines, seagrasses and shallow habitats well beyond the dredged area; using the deeper seafloor endangers the oyster reefs, deep water algae and sponge gardens supported in these areas;
  - Increased boating activity associated with the cruise ships will add to the damage to sea grass beds;
  - Cruise ships will result in additional noise, exhaust fumes, oil to the Bay water; **no environmental impact study has been prepared;**
  - Increased wildlife disturbance, physical disturbance, vessel strike to marine mammals and bird life, destruction of jelly fish, and noise disturbance, which are all noted as existing threats.

Cruise ships will also have a detrimental impact on the other 5 objectives of the Plan:

- 2. Water Quality:** to improve water quality and reduce marine litter for the environment and community - Cruise ships present a critical threat to water quality from potential spills, grey water, litter.
- 3. Climate Change:** to help understand, mitigate and adapt to the impacts of climate change on the NSW Marine Estate - Cruise Ships can make no contribution to coping with this.
- 4. Aboriginal Culture:** to partner with Aboriginal people for protection of Aboriginal cultural values and improved marine park management - There is a clear conflict in Jervis Bay Marine Park with cultural use & Native Title and again cruise ships can make no contribution to this.
- 5. Community Access & Opportunity:** to improve access and opportunity for enhanced social, cultural and economic values from marine parks – The plan justifies cruise ships by arguing there is a threat to access and opportunity, but no evidence has been given of this threat. The presence of cruise ships will have a negative impact on the relationship and opportunities that Jervis Bay Marine Park represents for the community – no consideration has been given to this; **No economic modelling of costs and benefits has been undertaken.**
- 6. Community Engagement & Governance:** To support evidence-based, inclusive and effective decision-making and marine park management. There has been no direct community consultation at this point; even though cruise ships have been, and still are, selling tickets to visit Jervis Bay. Removal of regulatory burdens as a mechanism to improve governance is flawed as codes of conduct are not enforceable. The proposed MOU with the Australian

Government to better manage Commonwealth and NSW waters is a smoke screen to facilitate the entry of cruise ships which are inconsistent with the primary purpose of marine parks.

### **CONCLUSION ON CRUISE SHIPS**

The proposed and planned presence of cruise ships in Jervis Bay Marine Park does not serve any of these Objectives. The presence of cruise ships in Jervis Bay is not consistent with the primary purpose of marine parks and their presence will increase the threats to the park rather than diminish it.

### **PRIORITISING CONSERVATION AND THE IMPORTANCE OF SANCTUARY ZONES**

**The Plan undermines the primary purpose of marine parks, being conservation, and fails to acknowledge the science supporting no-take sanctuary zones as the best tool available to achieve this purpose.**

The Marine Estate Expert Knowledge Panel notes 'Marine Protected Areas, and in particular no-take Sanctuary Zones, address the cumulative impacts of fishing by re-establishing key aspects of ecosystem functioning'. The Australian Marine Sciences Association recommends marine parks 'with at least 30 percent sanctuary (no-take) zone are the most effective and therefore the preferred design option'.

As a result, I request:

1. The Plan be amended to provide an unambiguous commitment across all marine parks that any assessment of risks and trade-offs give primacy to biological and ecosystem outcomes and be consistent with principles of ecological sustainable development.
2. All action items in the Plan be amended or removed to be consistent with the legislative requirement to conserve, i.e. in regards to commercial ventures such as cruise ships and aquaculture and any supporting works and infrastructure; recreational activities such as boating, jet skiing, four wheel driving, spear fishing and dog walking; and any proposed marine infrastructure and works.
3. An additional action item to increase no-take sanctuary zones to 30 percent of the Jervis Bay Marine Park, consistent with current scientific recommendations.
4. An additional action item to invest in research and monitoring of the impact of sanctuary zones on local ecology and fish stocks in Jervis Bay Marine Park.
5. An additional action item to invest in communication and compliance resources, such as signage and enforcement staff, to improve community knowledge of marine park rules and zoning.
6. Additional action items for Jervis Bay Marine Park to research and monitor the impacts of urchin barrens, the health of sea grass beds and any carbon opportunities, impact of development on mangroves.
7. An additional action item to partner with conservation and community organisations to address key threats, such as urchin barrens and coastal development, noting that the Plan refers to several partnerships with extractive industries.

### **CONSULTATION AND TRANSPARENCY**

To date, this process of marine reform in NSW has been plagued by a lack of transparency and genuine consultation. I request that the Government rethink their approach to community consultation by undertaking several public meetings and workshops throughout the process of reform; publishing all expert reports relevant to marine parks; and publishing all public submissions on this Plan and the following stages of reform.

Name \_\_\_\_\_ Address \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_