



Marine Reserve Proclamations Team  
Marine Division  
Department of Sustainability, Environment, Water, Population and Communities  
Edgar Waite Building  
203 Channel Highway  
Kingston TAS 7050, Australia

Dear Sir or Madam,

Shark Savers is a non-governmental organisation working to increase protections for sharks and rays.

Thank you for your decision to extend the existing Marine Protected Areas and integrate them into a network of marine reserves. We support this necessary step for all coastal countries throughout the world to maintain both healthy ocean ecosystems and the income generated by sustainable fisheries.

As an organisation that is committed to shark conservation we focus our comments on this class of animals.

Sharks have existed in our oceans since before the dinosaurs, yet currently, at least 30% of the species assessed by scientists for the IUCN (International Union for Conservation of Nature) are threatened or near-threatened with extinction<sup>1</sup>. Sharks grow slowly, mature late and produce few young making them vulnerable to overexploitation<sup>2</sup>. With up to 73 million sharks worldwide killed every year, most recent shark fishing is not sustainable<sup>3</sup>. Since sharks are apex predators, their depletion also risks changes in our ocean foodwebs thereby potentially impacting conventional fisheries<sup>4</sup>.

**North Commonwealth Marine Reserves Network:** We understand that the planned reserves cover 19.6% of the region, which is a significant improvement, compared to the situation before this expansion. However, Australia has the unique opportunity to become the leading industrial country in pushing for even more extensive MPA's. We urge you to work to continue to extend the marine reserves to all of your territorial waters to include the entirety of your EEZ.

With some concern, however, we note that 81.88% of the proposed network will consist of Multiple Use Zones and only 10.78% will be designated Marine National Park. With drag nets

---

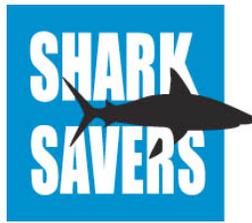
<sup>1</sup> Hoffmann, M., C. Hilton-Taylor, et al. 2010. The impact of conservation of the status of the world's vertebrates. *Science*, 330: 1503-1509.

<sup>2</sup> Frisk, M.G., Miller, T.J., and Dulvy, N.K. 2005. Life histories and vulnerability to exploitation of elasmobranchs: inferences from elasticity, perturbation and phylogenetic analyses. *Journal of Northwest Atlantic Fisheries Science*, 35: 27-45.

<sup>3</sup> Clarke, S. C., M. K. McAllister, et al. 2006. Global estimates of shark catches using trade records from commercial markets. *Ecology Letters*, 9: 12.

<sup>4</sup> Myers, R.A., Baum, J.K., Shepherd, T. D., Powers, S.P., and Peterson, C.H. 2007 Cascading Effects of the Loss of Apex Predatory Sharks from a Coastal Ocean. *Science*, 315: 1846-1850





allowed in the vast majority of the reserves we anticipate a potential significant risk to your shark populations as by-catch.

**Coral Sea Commonwealth Marine Reserve:** We fully support the protection of the waters of the Coral Sea that fall within your EEZ. This is an important step towards protecting sharks, especially migratory species that need large, continuous reserves that can provide refuge from fishing pressures. With 50.8% of the region covered by reserves, this is a good result. Nevertheless, we ask you continue to work towards still more protections.

When it comes to allowing the purse seine and the pelagic long-line fisheries in the reserves we are deeply concerned and apposed. As stated in your proposal the Coral Sea region is an important area for white sharks as well as well as other highly migratory pelagic shark species. Such insights seem incompatible with allowing these fishing methods as they can directly target migratory pelagic sharks and may result in significant numbers of sharks being caught.

For this reason we urge you to prohibit purse seine and pelagic long-line fishing operations in all zones of the marine reserve.

**Temperate East Commonwealth Marine Reserves Network:** With some disappointment we learned that only 4% of the region is planned as Marine National Parks. Compared to the percentages in all the other regions throughout Australia this share is seems particularly low, especially given that this area too provides habitat for the protected, migratory white sharks.

We support the prohibition of demersal long-line fishing in most parts of the reserves network in that this may help protect critically endangered grey nurse sharks as well as various species of deepwater sharks. However, with white sharks and other pelagic sharks in mind, we are concerned about the allowing pelagic long-line fishing in the Habitat Protection Zones and the Multiple Use Zones because long-lines cannot discriminate between targeted species and protected or vulnerable shark populations thus incurring unwanted and wasteful by-catch.

Therefore, we urge you to prohibit pelagic long-line and purse seine fishing in the Habitat Protection Zones and in the Multiple Use Zones that together represent 82.8% of the reserve area.

**Southwest Commonwealth Marine Reserves Network:** We appreciate that 35.3% of the network area is planned as a Marine National Park. Yet we note that only 36% of the Southwest region is covered by the marine reserves' plans. Please reconsider your decisions and extend the marine reserves to cover at least to 50% of the region given that much of the area is essential foraging habitat for white sharks that may need larger protected areas. In this context, again, we also ask you to consider further restricting the pelagic long-line fishery, the demersal long-line fishery as well as the mid-water trawl as all of these methods result in unnecessarily high numbers of bycatch, including sharks.

**Northwest Commonwealth Marine Reserves Network:** Every year large numbers of whale sharks aggregate at Ningaloo Reef and attract large numbers of tourists who in turn help





support the local economy. Therefore, we support your plan to protect 37.1% of the northwest region with 31.84% designated a Marine National park.

According to your plans commercial shipping and recreational boating is permitted in all of the zones. As whale sharks are often injured or even killed by collisions with ships and boats<sup>5</sup> we ask that you consider restricting/regulating the recreational boating in the Marine National Park Zones to prevent any further accidents produced by recreational boaters who may approach these gentle giants too closely.

We recommend that you expand the level of protection to the fullest extent possible as evidence from an Australian study shows that significant declines in reef sharks populations are occurring even in well monitored no-take zones when compared to no-entry zones<sup>6</sup>.

We also urge you, once again, to restrict the pelagic long-line and gillnet fisheries as they result in too much bycatch of vulnerable sharks and, in this case, gill nets may also pose a serious threat to the whale sharks in this area<sup>7</sup>. This is especially necessary in the Multiple Use Zones as they represent 62.89% of the proposed network. In fact, in general, we recommend and urge you to continue to work towards extending the percentage of Marine National Park Zones and to prohibit the pelagic long-lines, gillnets and demersal long-lines in all Zones of the marine reserves network including the Multiple Use Zones.

Thank you for creating this impressive network of marine protected areas that represent another step towards a sustainable future for all our oceans. And thank you for the opportunity to express our views on the Commonwealth Marine Reserves Network Proposal.

Sincerely,

Michael Skoletsky  
Executive Director  
Shark Savers – International

Manuel Wendt  
Director, Shark Savers - Germany

*Joao Santos* – Shark Savers Portugal  
*EunJae Im* – Shark Savers Korea  
*Sharon Martin* – Shark Savers South Africa  
*Jenny Chin* – Shark Savers Malaysia  
*Catherine Teng* – Shark Savers Singapore  
*Shannon Lee* – Shark Savers Taiwan  
*Ruth Harries* – Shark Savers United Kingdom  
*Jonn Lu* – Shark Savers Hong Kong

<sup>5</sup> Mau, R. 2008. Managing for conservation and recreation: The Ningaloo Whale Shark experience. *Journal of Ecotourism*, 7(2-3): 213-225

<sup>6</sup> Robbins, W. D., Hisano, M., Connolly, S.R., and Choat, H. 2006. Ongoing collapse of coral-reef shark populations. *Current Biology*, 16(23): 2314 – 2319.

<sup>7</sup> Norman, B. 2005. Rhincodon typus. In: IUCN 2012. IUCN Red List of Threatened Species. Version 2012.1. [www.iucnredlist.org](http://www.iucnredlist.org). Downloaded on 19 June 2012.

