

SEAFOOD CONSUMERS ASSOCIATION LIMITED

30 September 2026

Submission to the Australian Marine Parks Management Plan Review

From 30% Protection to 100% Ocean Stewardship

Healthy Oceans • Sustainable Seafood • Nourished People • Resilient Communities

Executive Summary

Seafood Consumers Association Ltd (SCA) supports effective protection of Australia's marine biodiversity and recognises the important role that well-designed marine protected areas can play in conserving vulnerable habitats, biodiversity and ecosystem functions.

However, SCA submits that the success of Australian marine policy should not be measured principally by the percentage of ocean enclosed within marine park boundaries.

Australia already has approximately 52% of its waters within marine protected areas, with around 24% in highly protected no-take zones. The Australian Government has committed to increasing highly protected marine areas to 30% by 2030 (DCCEEW, 2026).

At the same time, Australia's newly released Sustainable Ocean Plan commits the nation to the sustainable management of 100% of Australia's ocean (DCCEEW, 2026).

SCA believes these two objectives must be considered together.

The central question should therefore not simply be:

How do we reach 30% highly protected ocean?

It should be:

How do we ensure that 100% of Australia's ocean is healthy, resilient, productive and sustainably managed?

SCA proposes a simple national principle:

Protect what needs protecting. Manage what can be sustainably used. Restore what has been degraded. Measure outcomes across 100% of Australia's ocean.

Marine protected areas are an important management instrument. They should not, however, become a substitute for effective fisheries management, pollution control, climate adaptation, habitat restoration, biosecurity, monitoring, enforcement and management of the land-based activities that ultimately affect marine ecosystems.

Nor should marine conservation decisions be considered independently of their consequences for Australia's food system.

Australia is a major seafood-consuming nation that already depends substantially upon imported seafood. Restricting productive and demonstrably sustainable Australian fisheries

may therefore displace rather than eliminate environmental impacts if domestic seafood is subsequently replaced by products from fisheries or aquaculture systems operating under different environmental, fisheries-management, labour, traceability or food-safety standards.

SCA's principal recommendations are:

Develop an Australian Blue Economy and Aquatic Food Vision to 2050, connecting marine conservation, sustainable fisheries, aquaculture, nutrition, food security, regional communities, First Nations participation, science and national resilience.

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Seafood Consumers Association Ltd is an independent Australian not-for-profit charity representing the interests of seafood consumers.

SCA also participates in international networks concerned with aquatic foods, responsible seafood and fisheries transparency, including membership of the Aquatic Blue Food Coalition and the Conservation Alliance for Seafood Solutions, and Affiliate status with the Coalition for Fisheries Transparency. These relationships provide SCA with access to international perspectives across food security, sustainability, traceability, fisheries governance and consumer interests while SCA retains its independent Australian consumer advocacy role.

SCA supports consumer access to seafood that is healthy, affordable, accurately described, sustainably produced and supplied through transparent and responsible systems.

Our interest in the Australian Marine Parks review therefore differs from that of either an industry association or an environmental advocacy organisation.

SCA's question is:

What marine-management arrangements will best protect Australia's marine environment while ensuring present and future Australians continue to benefit from healthy, sustainable and nutritious aquatic foods?

These objectives need not conflict.

Healthy oceans are fundamental to sustainable seafood.

Sustainable seafood production provides food, nutrition, employment, regional economic activity, knowledge and incentives for continued stewardship.

The challenge for public policy is to achieve both.

2. SCA Supports Effective Marine Protection

SCA does not oppose marine protected areas.

The current management-plan process also sits within a clear statutory framework. The Director of National Parks administers Commonwealth reserves under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), including Divisions 4 and 5 of Part 15, and management plans must provide for the protection and conservation of the relevant reserves while helping to reconcile competing interests.

There are places where permanent spatial protection may be the most appropriate management tool: vulnerable benthic habitats, important breeding or nursery areas, unique ecosystems and areas where particular activities create demonstrable ecological risks.

Properly designed no-take areas may also protect breeding populations, biodiversity and habitat and, in appropriate circumstances, provide benefits to adjoining fisheries.

The question is therefore not whether Australia should have marine parks.

The appropriate question is:

What are we protecting, from which demonstrated threat, what management intervention is most appropriate, and how will we know whether it worked?

No single management instrument can appropriately address every marine threat.

effective fisheries management;

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- pollution prevention;
- habitat restoration;
- climate adaptation;
- invasive-species and biosecurity management;
- scientific monitoring;
- enforcement;
- Indigenous stewardship;
- sustainable aquaculture;
- international fisheries cooperation; and
- consumer and food-security policy.

Success should be measured by the condition of Australia's ocean, not merely the area enclosed within designated boundaries.

4. Conservation Value – Threat – Response

SCA recommends that significant proposed zoning changes be accompanied by a transparent three-stage assessment.

What is the conservation value?

Identify precisely the species, habitat, ecological process or other value requiring protection.

What is the demonstrated threat?

Identify the activities actually placing that value at risk and quantify their contribution where possible.

What is the most effective response?

Determine whether permanent spatial exclusion is necessary or whether another intervention—gear restrictions, seasonal closures, catch limits, dynamic management, pollution control, habitat restoration or another measure—would achieve the objective with fewer unintended consequences.

This approach would move marine policy beyond the assumption that greater spatial restriction necessarily equals better conservation.

5. Measure Outcomes, Not Only Area

Every significant marine protected area should have:

a published ecological baseline;

clearly stated conservation objectives;

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measurable performance indicators;
monitoring arrangements;
periodic public reporting;
assessment of ecological and socioeconomic outcomes; and
formal periodic review.

This outcomes-based approach is also consistent with wider responsible-seafood practice internationally, where credible sustainability systems increasingly emphasise reliable data, measurable objectives, traceability, verification, monitoring and transparent reporting rather than reliance upon claims or designation alone.

The relevant question after five, ten or twenty years should not simply be:

How many square kilometres remain protected?

It should be:

What became measurably healthier because of the protection?

Where objectives are not being achieved, management should adapt.

Where ecological conditions have changed, management should respond.

Where restrictions are no longer achieving their intended purpose, they should be capable of review.

6. Displacement Must Be Measured

One of SCA's major concerns is that conventional assessment of marine closures can stop at the boundary.

When fishing activity is excluded from an area, it does not necessarily disappear.

It may move.

Potential consequences include:

concentration of fishing pressure elsewhere;
displacement onto different habitats;
longer steaming distances;
increased fuel consumption;
increased emissions;
higher operating costs;
vessel-safety implications;

congestion and competition in remaining fishing grounds;
changes in catch composition; and
impacts on regional ports and communities.

SCA welcomes that work but considers displacement modelling essential **before final zoning decisions are made.**

7. The Missing Question: What Replaces the Seafood?

There is also **food-system displacement**.

seafood produced elsewhere in Australia;

Australian aquaculture;

imported seafood;

another protein source; or

reduced seafood consumption.

Each alternative has consequences.

The replacement question will become more important as Australia's population grows. Australian Bureau of Statistics projections indicate a population of roughly 30-32 million by the mid-2030s under the main projection scenarios, increasing the need to plan future access to nutritious aquatic foods rather than assess today's supply in isolation.

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This highlights an important characteristic of well-managed wild-capture fisheries. Most terrestrial food production necessarily modifies natural ecosystems to create productive agricultural landscapes. Sustainable wild fisheries, by contrast, depend upon maintaining functioning natural marine ecosystems capable of continually renewing the biological resource being harvested.

The policy question is therefore not simply whether restricting fishing reduces an impact within a marine park. It is also whether the food displaced by that restriction creates greater environmental impacts elsewhere.

A 2026 James Cook University-led review by Barbosa Martins, Smart, Chin and colleagues reports that about 65% of Australian seafood consumption is met through imports and warns that heavy import reliance can shift environmental and socioeconomic costs to producing nations. The authors call for stronger import standards, investment in sustainable domestic production and transparent, evidence-based allocation of marine resources.

International research has similarly identified the risk of fishing and environmental pressures being displaced from jurisdictions with comparatively strong fisheries management into jurisdictions with different management capacity.

SCA therefore proposes a:

Seafood Supply and Substitution Assessment

for major marine spatial proposals likely to materially affect seafood production.

Such an assessment should consider:

volume and species of Australian seafood potentially displaced;

likely replacement products;

country and fishery of origin;

fisheries-management standards;

illegal, unreported and unregulated (IUU) fishing risk;

traceability;

availability and verifiability of vessel, catch and supply-chain information;

labour and human-rights risks;

food-safety and contaminant surveillance;

transport and carbon implications;

consumer price effects; and

consequences for national food security.

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Marine conservation should not be considered successful if environmental impacts have simply disappeared from Australia's map and reappeared in another nation's waters.

8. Highly Migratory Species Require Management Across Their Range

Southern Bluefin Tuna provides a useful example.

The Australian Southern Bluefin Tuna Industry Association has drawn SCA's attention to the limited ability of fixed spatial boundaries alone to manage a highly migratory stock.

Southern Bluefin Tuna is managed internationally through the Commission for the Conservation of Southern Bluefin Tuna and domestically through Australian fisheries-management arrangements.

This does not mean MPAs have no relevance to tuna fisheries. Spatial measures may protect habitats, associated species or other ecological values.

However, where the objective is conservation of a highly migratory stock, government should demonstrate the additional stock-level benefit expected from spatial exclusion relative to existing international and domestic management.

A useful principle is:

Manage mobile stocks across their range. Protect vulnerable places where they occur.

9. Seafood Is Food

Marine policy frequently describes fishing as an extractive activity.

For a renewable biological resource, however, that language can obscure an important distinction.

Wild-capture fishing is the harvesting of a renewable biological resource for food. Its long-term productivity depends upon maintaining functioning marine ecosystems and keeping harvest within scientifically sustainable limits.

A productive sustainable fishery and a healthy marine environment should therefore not automatically be treated as competing objectives. Properly managed, each depends upon the other.

Australian consumers who do not have the equipment, physical capacity, knowledge, time or geographic opportunity to catch fish themselves depend upon commercial fisheries to access Australia's wild seafood resources.

This creates an important equity question.

A recreational fisher accesses the resource with a fishing line. A non-fishing consumer accesses it through the seafood counter. Both are Australians.

Resource-allocation and marine-conservation decisions should therefore consider consumers who access Australian seafood through markets.

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SCA also believes national marine policy should recognise the nutritional importance of aquatic foods.

Emerging research suggests climate change may alter not merely the distribution and abundance of marine species but potentially their nutritional composition, including long-chain omega-3 fatty acids.

Australia's marine resources should therefore be considered part of national **food and nutrition security**, not simply environmental assets or commercial commodities.

This approach is consistent with the growing international recognition of aquatic or “blue” foods as an integral component of sustainable food systems. SCA is a member of the Aquatic Blue Food Coalition, which brings together organisations working to ensure that aquatic foods are integrated into policy responses addressing food and nutrition security, biodiversity, climate resilience and sustainable development. This reinforces SCA's view that decisions concerning Australia's marine estate should assess not only conservation outcomes, but also the contribution that sustainably managed aquatic resources make to nutrition, food security, livelihoods and resilient food systems.

10. Catchment to Coast — The Ocean Begins on Land

Marine parks cannot prevent every threat to marine ecosystems.

A boundary cannot stop:

PFAS;

agricultural nutrients;

pesticides;

urban stormwater;

sediment;

plastics;

heavy metals;

wastewater;

introduced species / feral pests;

ocean warming; or

acidification.

Many marine pressures originate outside marine parks and, in some cases, outside the marine environment entirely.

Australian research provides a practical example. A Southern Cross University study of the Richmond River estuary detected 21 pesticides across oysters and water/passive samplers,

with oysters proving particularly useful as biomonitors for some compounds. The work demonstrates how chemicals used upstream can enter estuaries and affect environments and seafood-producing systems beyond the point of application.

The South Australian harmful algal bloom provides a powerful contemporary illustration of the complexity of marine ecosystem management. Scientific investigation has considered interacting climatic, oceanographic and nutrient-related factors.

SCA therefore recommends greater integration between:

Australia's Sustainable Ocean Plan already recognises the interconnectedness of land, sea and sky.

11. PFAS and Emerging Contaminants

Europe has established maximum levels for certain PFAS compounds in fish and other foods.

This issue reinforces a broader principle.

Consumers need confidence that replacement seafood meets appropriate standards for:

veterinary residues;

species identification;

origin; and

production integrity.

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Food safety and environmental policy are increasingly connected.

12. Climate-Ready Marine Management

The Food and Agriculture Organization of the United Nations (FAO) has emphasised the need for climate-adaptive fisheries governance, including climate-informed science, ecosystem monitoring, adaptive management and stronger regional cooperation.

Climate change is altering:

ocean temperatures;

currents;

species distributions;

productivity;

habitats;

spawning behaviour; and

ecosystem relationships.

Static spatial management will remain appropriate for some fixed ecological values.

But dynamic ecosystems may also require dynamic management.

Australia should expand the use and investigation of:

seasonal closures;

real-time monitoring;

dynamic spatial management;

climate-informed stock assessments;

adaptive management procedures;

electronic monitoring;

satellite and oceanographic data; and

periodic boundary review where appropriate.

The principle should be:

Fixed ecological values may require fixed protection. Dynamic ecological risks may require dynamic management.

13. Restore the Ocean — Don't Only Restrict Its Use

Australia should measure marine conservation not only through areas protected but through ecosystems actively restored.

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SCA recommends creation of a:

National Blue Habitat and Fisheries Restoration Program

covering appropriate restoration and expansion of:

mangroves;

seagrass meadows;

saltmarsh;

oyster reefs;

mussel reefs;

kelp; and

other important fish habitats.

These ecosystems can provide multiple benefits, including:

nursery and breeding habitat;

biodiversity;

water filtration;

nutrient cycling;

shoreline protection;

climate resilience;

carbon sequestration;

fisheries productivity;

regional employment;

First Nations economic opportunities; and

sustainable seafood production.

Australia already has experience with blue-carbon restoration and an Australian Carbon Credit Unit (ACCU) methodology for eligible tidal-restoration projects.

SCA believes this should form part of a broader national marine-restoration agenda.

Government reporting could include:

hectares of mangrove restored; hectares of seagrass restored; hectares of shellfish reef rebuilt; ecological condition; carbon outcomes; water-quality outcomes; fish productivity; and regional economic benefits.

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Australia should measure not only how much ocean it restricts, but **how much marine habitat it rebuilds**.

14. Oysters and Bivalves — Productive Restoration

Oysters and other bivalves demonstrate that seafood production and environmental restoration need not be opposing objectives.

Shellfish reefs can:

create habitat;

support biodiversity;

filter water;

influence nutrient cycling;

support fisheries;

produce nutritious food; and

in suitable circumstances contribute to shoreline resilience.

Australian oyster-reef restoration projects already demonstrate substantial ecological potential.

SCA recommends that shellfish restoration and sustainable bivalve aquaculture be explicitly considered within Australia's future Blue Economy strategy.

This is a practical example of **productive conservation**:

Food production that can also contribute to ecological function.

15. Commercial Fishers Are Also Part of Australia's Marine Capability

Commercial fishers should not be viewed only as users of marine resources.

They are also:

observers of changing ocean conditions;

potential contributors to scientific data;

experienced mariners;

regional employers;

food producers;

sources of local ecological knowledge; and

a continuing Australian presence across parts of the marine estate.

International experience with illegal, unreported and unregulated (IUU) fishing demonstrates the importance of monitoring and presence across maritime jurisdictions.

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Australia is also a Party to the FAO Agreement on Port State Measures (PSMA), which complements at-sea monitoring by helping prevent vessels engaged in IUU fishing from using ports and landing illicit catch. Marine stewardship therefore requires coordinated surveillance, port controls, information sharing and market measures as well as spatial protection.

Australia should therefore investigate stronger mechanisms for incorporating fishing vessels and fishing communities into:

- environmental monitoring;
- citizen and industry science;
- biosecurity observation;
- marine debris reporting;
- IUU intelligence;
- climate observations; and
- maritime-domain awareness.

Marine conservation works best when resource users become active participants in stewardship.

The emerging international fisheries-transparency agenda reinforces this approach. SCA is an Affiliate of the Coalition for Fisheries Transparency (CFT), which supports the Global Charter for Fisheries Transparency. In June 2026, sixteen governments adopted the Mombasa Declaration on Fisheries Transparency, strengthening international momentum for improved collection and public availability of vessel and fisheries information and action against illegal, unreported and unregulated fishing.

This provides a useful principle for Australian marine policy: spatial protection and fisheries transparency should be complementary components of ocean stewardship. Knowing where fishing occurs, which vessels are authorised, what is being harvested and how fisheries are performing can improve accountability across the entire marine estate—not only within marine park boundaries.

16. First Nations and Co-Management

SCA supports meaningful First Nations participation in marine governance.

New Zealand's recent Otago marine-reserve arrangements provide one example of co-management involving Indigenous participation, baseline monitoring and periodic review.

Australia should continue developing management arrangements appropriate to Sea Country that incorporate:

- Traditional ecological knowledge;
- Indigenous governance;

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ranger programs;

research;

monitoring;

restoration; and

economic participation.

The objective should extend beyond consultation toward genuine partnership where appropriate.

17. Australia Needs an Aquatic Food Strategy

Australia's seafood policy is fragmented across fisheries, aquaculture, environment, trade, health, food standards and biosecurity portfolios.

Yet Australians experience these systems together—at the seafood counter and on the plate.

Other countries increasingly treat seafood and fisheries as elements of national food resilience.

SCA believes Australia requires an explicit **Aquatic Food Strategy** integrated with the Sustainable Ocean Plan.

It should consider:

sustainable wild fisheries;

responsible aquaculture;

seafood imports;

national consumption;

nutrition;

affordability;

regional employment;

climate resilience;

trade;

traceability;

food safety; and

environmental performance.

The objective should not simply be producing more seafood.

It should be ensuring Australians have reliable access to **healthy, affordable, responsibly produced aquatic foods**.

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18. 2030 Capability — 2050 Vision

The present marine parks review should be viewed as part of a much larger national opportunity.

Australia is, in the words of our national anthem, “**girt by sea.**”

Our maritime estate is one of our great national assets.

SCA believes future generations should inherit a clear national vision for it.

This is consistent with earlier Australian fisheries foresight work, including the FRDC-supported 2050 vision work led by Kearney and colleagues, while the present review provides an opportunity to convert long-term vision into nearer-term capability and accountability.

2030 — Build the tools. 2050 — Deliver the vision.

SCA proposes 2030 as the practical accountability milestone. By then, Australia should have assembled the core tools, data, institutions and management systems required to steward 100% of its ocean effectively.

- ecological baselines and measurable objectives for marine parks;
- a functioning Australian Ocean Stewardship Scorecard;
- integrated fisheries, habitat and water-quality monitoring;
- a Seafood Supply and Substitution Assessment methodology;
- catchment-to-coast pollution monitoring and response capability;
- climate-adaptive and dynamic management tools where appropriate;
- measurable blue-habitat restoration targets;
- seafood, nutrition, affordability and food-security indicators;
- stronger independent and technology-enabled monitoring, including electronic monitoring and remote sensing;
- effective IUU and maritime-domain surveillance;
- First Nations co-management and participation mechanisms; and
- an integrated national Aquatic Food and Blue Economy framework.

2050 should remain the intergenerational horizon against which Australians judge whether those systems worked. This creates both immediate accountability and long-term ambition: each generation should inherit better knowledge, stronger management capability and healthier marine ecosystems than the generation before it.

By 2050 Australia should aspire to an ocean that is:

Healthy

Biodiversity and ecosystem function are maintained and degraded habitats are actively restored.

IUU activity;

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seafood production;
aquaculture production;
seafood imports;
seafood consumption;
affordability;
nutritional contribution;
regional employment;
fisheries transparency and public data availability;
traceability and verified seafood provenance;
monitoring coverage, including vessel tracking and electronic monitoring.
First Nations participation; and
performance of individual marine protected areas against stated objectives.

This would enable Australians to judge whether marine policy is actually improving the ocean.

20. Conclusion

SCA supports the Australian Government's ambition to protect Australia's marine environment.

But Australia should aspire to something larger than achieving a percentage target.

The Government's Sustainable Ocean Plan now provides the basis for that larger ambition: sustainable management of **100% of Australia's ocean**.

Marine protected areas should form part of that framework—not substitute for it.

Australia should protect genuinely vulnerable ecological values, maintain rigorous fisheries management, prevent pollution, adapt to climate change, restore degraded marine habitats, support sustainable aquatic food production and measure whether its interventions are working.

The ultimate measure of success should not be the number of square kilometres coloured differently on a marine map.

It should be the condition of the ocean and the benefits it continues to provide to Australians.

International experience increasingly points in the same direction. Biodiversity protection, sustainable aquatic food production, transparent fisheries governance and verifiable seafood supply chains should not be treated as separate policy objectives. Together they form the foundations of responsible ocean stewardship. Australia's opportunity is therefore not merely to expand the area classified as protected, but to build a marine-management system in which

conservation, sustainable use, food security, transparency and accountability operate together across 100% of the marine estate.

Protect what needs protecting.

Restore what has been degraded.

By 2030, Australia should have the tools and institutional capability to manage 100% of its ocean effectively. By 2050, success should be judged by whether the ocean within and beyond marine park boundaries is healthier; whether degraded habitats have been restored; whether pollution has declined; whether biodiversity is recovering; whether fisheries remain scientifically sustainable; whether coastal communities remain viable; and whether Australians continue to have access to nutritious, affordable and responsibly produced seafood.

It would represent genuine **ocean stewardship**.

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Seafood Consumers Association correspondence with Parks Australia/ABARES, FRDC, Seafood Industry Australia and seafood-sector stakeholders, August–September 2026.

Aquatic Blue Food Coalition - [Blue foods - Aquatic Blue Food Coalition](#)

Coalition for Fisheries Transparency - [Fisheries Transparency- » Sixteen Countries Adopt Mombasa Declaration to Advance Fisheries Transparency and Combat Illegal Fishing](#)

Conservation Alliance for Seafood Solutions - <https://solutionsforseafood.org/>

Yours sincerely

Seafood Consumers Association Ltd



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CEO

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