Sea Darwin Dock 2 Stokes Hill Wharf Darwin 0800 7 March 2018

NT Coastal and Marine Management Strategy PO Box 496 Palmerston NT 0832 marinecoastal.strategy@nt.gov.au

Dear Sir/Madam,

Re: Submission on the Coastal and Marine Management Strategy Discussion Paper

Sea Darwin is a multi-award-winning, marine-based tourism company that provides tours on Darwin Harbour, around Darwin's WWII sites and to Ngulbitjik (Bare Sand Island) for turtle watching. We are pleased with the opportunity to comment on the Coastal and Marine Management Strategy Discussion Paper released in February. The Strategy provides the NT with the opportunity to protect our coastline now and for future generations, for it's extrinsic values as well as a significant tourism asset. The natural environment is one of our greatest strengths in the NT and has the potential to support an expanding tourism industry, and it should be protected.

Sea Darwin is committed to marine protection and the maintenance of Indigenous culture and have achieved Advanced Eco Certification and Respecting Our Culture accreditation. We do as much as we can to look after the coastal and marine environments of the Darwin Harbour and strive to ensure that our tours are ecologically sustainable by:

- not using disposable containers or cutlery; ours are made from compostable materials
- using temporary mooring at Ngulbitjik (Bare Sand Island) minimises anchoring damage
- collecting rubbish found in the locations we visit
- monitoring and reporting marine mammal sightings and the location and identification of nesting turtles
- following turtle watching protocols based on Territory guidelines
- minimising our fuel emissions and using offsets to help mitigate climate change
- contributing a percentage of the ticket price to Austurtle for sea turtle research.

Our business is dependent on the good health of the Top End's coastal and marine environments. It also relies on a partnership with the Larrakia people, the Traditional owners of Ngulbitjik. We are licensed by the Northern Land Council to provide turtle tourism on Ngulbitjik and we honour Traditional Owner requests that passengers stay on the beach or the sand dunes, light no fires and do not visit the sacred site.

The focus of our tours is the flatback turtle, which is listed as Vulnerable in the NT and across Australia. They only nest on the beaches in northern Australia, generally between November and January, but in the Top End it is all year round, peaking between June and August. They feed in shallow waters on soft corals, jellyfish and sea cucumbers.

The main threats to the flatback turtle are illegal harvesting of eggs, predation by pigs, dogs and foxes, as bycatch in commercial fishing operations, entanglement and drowning in ghost nets, marine pollution, coastal development and human disturbance at nesting sites. For our

business to thrive, and others like us, the nesting and feeding areas, the critical habitats of flatback turtles need protection. But at the moment protection is only given to a tiny fraction of their range, mostly in the Garig Gunak Barlu National Park, Limmen Bight Marine Park and along coastal strips of land-based national parks. It is crucial that in the NT we proactively protect flatback turtle critical habitat, as well as that of other threatened species, through mechanisms such as marine national parks and seacountry IPAs.

The NT Government website tells us that as well as being Vulnerable, the flatback turtle is data deficient in the Top End. That is all the more reason to be cautious in the way in which decisions are made about coastal development and other marine-based uses. We also need to improve our knowledge with more resources to scientists, Indigenous ranger groups and citizen science.

Marine parks, also known as marine national parks, are significant tourism drawcards. It is where visitors know they will have the best natural and wildlife experience. Tourists are also willing to pay more and travel further to have these ultimate natural experiences - necessary in the NT in order to encourage people go the extra distance. Around Australia, local tourism bureaus and their brochures boast about local marine parks. The Coastal and Marine Management Strategy should support more marine national parks, not just for the benefits to tourism, but also for the necessary conservation benefits —two marine parks are simply not enough when you consider what other states in Australia have achieved.

With Sea Darwin's knowledge and expertise being focussed on the Darwin Harbour and its surrounds, we would support the creation of jointly managed marine parks that included Ngulbitjik, Bynoe Harbour, the blue holes off Gunn Point, and Glyde Point. These areas have significant natural and cultural values, and their status as a Marine Park could serve to draw significant tourism interest. We are not the only ecotourism operator in the Territory and we are sure that others, as well as guided fishing tour operators, would have areas they would recommend for marine park protection.

Our partnership with the Larrakia people is critical to the ongoing successful operation of our tours. For new and jointly managed marine parks to be effective, Traditional Owners and Indigenous ranger groups will need to be given enough resources, training and enforcement powers to implement management plans.

With both the Federal and Territory Government's push for development in the north, there is a real risk that it will put more pressure on flatback turtles and other threatened marine life, and also potentially Indigenous culture and connection to country. Before such development occurs, it must be comprehensively assessed and, if it does go ahead, built in appropriate places, with adequate monitoring, checks and balances. We've all seen what has happened elsewhere when development occurs without the proper protections in place. Darwin Harbour has suffered significantly from recent developments.

We are pleased that the Gunner Government is prioritising ('turbocharging') tourism and expanding infrastructure in parks and reserves. This tourism strategy must be matched by adequate protection of the natural and cultural assets upon which this tourism depends, that which is special about the Top End: the rich marine life, the deep cultural connections that Traditional Owners have with saltwater country, and the outdoors lifestyle, to name a few. These are the things that our guests want to engage with; for many it is the experience of a lifetime. They may not come back but they will tell their friends, relatives, colleagues and others about their experience and that is what helps grow our guest list.

We are all for creating new jobs in Territory tourism but we must ensure we keep the jobs that we already have. This requires support to small, home-grown operators like ourselves, other ecotourism businesses and guided fishing tour operators. Many take their guests

beyond Darwin into regions where they are important for regional economies. Any major tourism projects supported by the Gunner Government must not price small operators out of the market.

At Sea Darwin, we believe that the development of the Coastal and Marine Management Strategy should support:

- exercise caution in the way in which decisions are made about coastal development and other marine-based uses and their impact on threatened species and habitats.
- proactively protect flatback turtle critical habitat, as well as that of other threatened species, through mechanisms such as marine national parks and seacountry IPAs.
- invest in resourcing of scientists, Indigenous ranger groups and citizen science to improve our knowledge.
- the expansion of jointly managed marine parks
- adequate protection of the natural and cultural assets that tourism depends upon
- support for saltwater country management by Traditional Owners and Indigenous ranger groups
- support for partnerships between small-scale tour operators and Traditional Owners
- support for small-scale tourist operators who provide important benefits to regional communities.

Thank you for the consideration of our views.

Yours sincerely

Jim Smith Sea Darwin