



Feedback regarding the draft management plan for the Heard Island and McDonald Islands Marine Reserve

the climate centre





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The Department of Climate Change, Energy, the Environment and Water has invited interested parties and members of the public to share their views on the draft management plan for the Heard Island and McDonald Islands Marine Reserve.

The Climate Centre welcomes the opportunity to comment on how Australia can improve upon the draft management plan. While we believe the plan is generally well drafted and the Australian Government and nation can be proud of its management of the reserve to date, there are a number of issues with both the plan and historical and future management that need addressing.

Climate change and monitoring

Heard Island and McDonald Islands are already facing severe pressures due to climate change as acknowledged by a variety of stakeholders including the Australian Fisheries Management Authority, which stated the “region has experienced long-term warming”, which has been associated with a “sharp decline” in the availability of some species for commercial fishing activities (Australian Fisheries Management Authority, 2023). Academia has also documented climate change impacts including marine heatwaves in the region and found their impact to be detrimental to marine species, and that such impacts will occur more frequently in the future (Su et al. 2021). Our own analysis has shown that the waters around Heard Island and McDonald Islands in the 2025 calendar year experienced their hottest year on record, being approximately 1 degree warmer than mid-20th century temperatures, and increasing at a rate of almost 0.1 degrees per decade based on long-term historical trends (a rate that will likely increase in the future; The Climate Centre, 2026). Our analysis of atmospheric temperatures show a total change of 1.6 degrees since mid-20th century, with an almost 0.2 degrees per decade rate based on long-term historical trends (again, a rate that will likely increase in the future; The Climate Centre, 2027, publication pending). According to our analysis of future projected air temperatures, increases by 2100 could be an additional 3.2 degrees compared to 2015, with an accelerated rate of almost 0.4 degrees per decade over this period.

Because of this, it is important that the plan names climate change as a pressure the plan acts on, and that it carries a standing and funded monitoring commitment with measurable targets, and that it also includes a mechanism for new climate information to change management practices. The draft plan indeed names climate change as a pressure, but says that there is uncertainty “due to the lack of sustained observations and monitoring”. The draft plan itself has identified a need for sustained observation and monitoring in order to understand the impacts of climate change upon the reserve. The greater concern is that the plan says climate change “cannot always be addressed by reserve management”, that management “may have limited direct influence”, and that “many interventions will not be feasible”, so it “may focus on monitoring”. We believe this mindset is a barrier to greater protections being implemented to mitigate the impacts of climate change. For example, Lopazanski et al. (2023) examined 172 plans covering 555 MPAs in 52



countries and found that 60.5% had explicit climate change management objectives, 47.7% explicitly described climate monitoring and 20.9% had detailed action plans, while 21.5% never mention climate change. Roberts et al. (2017) conclude that well-managed marine reserves are a viable low-tech, cost-effective adaptation strategy. The Australian Government could be amongst those countries that list explicit climate change management objectives in its marine park management plans, however the current plan for the reserve is lacking in this detail.

Of additional concern is that the audit report demonstrated “arrangements required to both achieve and measure effective management of the Reserve were not in place” and “lacked clear targets” (Commonwealth of Australia, 2025). The Australian Government needs to demonstrate its ability to develop indicators, baselines and targets for achieving meaningful protection and management. However, the plan itself notes a management and science visit “no later than two years before the Management Plan’s expiry”, which is potentially eight years after the plan comes into effect. If the Australian Government is serious about management and protection of this territory it can and must do better. We encourage the Australian Government to implement ongoing remote monitoring with visits to the territory once every two years. We acknowledge that the Government has already committed to a mindset that frequent visits are “neither logistically feasible or desirable”. However, because research and monitoring is so limited in this area of the world, the Government itself has very restricted capacity to know how to manage this area. It could explore alternative approaches, such as deploying automated and remote observational equipment.

Note on mechanisms for enhancing protection

The health of the marine park requires that its management acknowledges three problems: sections of the EEZ are not protected; a majority of the park experiences relatively low levels of protection; and no capacity to police such protection exists. In comparison to the Heard and McDonald Island territory, the adjacent Kerguelen Islands territory receives a higher level of protection over a much broader area. Instead Australia has decided that a majority of the territory warrants lesser protection on the order of IUCN II and IUCN IV. The plan should commit to increasing the level of protection within the entire zone to be IUCN Ia, at some point in the near future. Greater protections and well managed no take areas allow marine biomass to recover against over-exploitation and such biomass and biodiversity can act as a buffer against some climate change impacts, so the environmental and economic benefits that come from enhanced protection are clear (Duffy et al. 2016 and Sala & Giakoumi 2018). A primary issue with protection is that because the Australian Government doesn’t visit the island regularly there is no mechanism to police enforcement. As such, the Australian Government could at the very least implement a remote observation program to determine if and where violations of protection occur, complemented with a more frequent visitation commitment. Again, we acknowledge it has stated that frequent visits are “neither logistically feasible or desirable”. While this is disappointing, we encourage the Government to invest and explore opportunities through technological means, which is acknowledged in the draft and may enable “remote or minimally intrusive approaches” to monitoring, including for the purposes of policing enforcement of protection.



One glaring oversight the draft plan makes is that it does not mention the High Seas Treaty (BBNJ), areas beyond national jurisdiction (ABNJs) or the 30 by 30 commitment stemming from the Kunming-Montreal Global Biodiversity Framework (Convention on Biological Diversity, n.d.). The high seas can act as a genuine extension of Australia's own marine parks, thus creating better outcomes for the marine park and its management. Cooperation with France is also highly relevant to these initiatives, not just for the purposes of fisheries enforcement, but also for delivering improved environmental outcomes for this region. Regional cooperation should be named as a specific priority, including cooperation on connected and expanded protected areas. This is particularly relevant in other matters, such as the occurrence of avian influenza or invasive species, both matters of biosecurity, of which Australia could be considered a global expert. The territories of the Crozet Islands, the Kerguelen Islands, Heard Island and McDonald Islands, and Saint Paul and Amsterdam Islands could be connected through an internationally recognised protected area. Additionally, the Australian government should also be advocating for the protection of areas identified by the Marine Mammal Protected Areas Task Force. These areas are termed Important Marine Mammal Areas (IMMAs), which are "defined as discrete portions of habitat, important to marine mammal species, that have the potential to be delineated and managed for conservation. IMMAs are identified in order to prioritise their consideration for conservation measures by governments, intergovernmental organisations, conservation groups, and the general public" (Marine Mammal Protected Areas Task Force, n.d.). Areas that have been identified include expanded protected areas around some of the previously mentioned islands, specifically:

- Crozet Islands IMMA
- Heard Island, Kerguelen and Surrounding Waters IMMA
- Amsterdam Island, Saint Paul and Associated Waters IMMA

Australia could work with France for international recognition of the Heard Island, Kerguelen and Surrounding Waters IMMA as an internationally protected ABNJ. We ask that the plan name the BBNJ treaty, that it acknowledges ABNJs as being ecologically continuous with the reserve, and also that it publish candidate areas under the BBNJ Agreement within one year of commencement, as well as committing to bilateral and regional cooperation, and state that the 30 by 30 commitment accounts for cross-boundary connections. It should explicitly commit Australia to work bilaterally with the French Government toward achieving the full protection of the Heard Island, Kerguelen and Surrounding Waters IMMA through the BBNJ treaty.



References

Commonwealth of Australia (2025). Technical audit and review of the implementation of the Heard Island and McDonald Islands Marine Reserve Management Plan 2014–2024. Department of Climate Change, Energy, the Environment and Water, Canberra. Available at:

https://storage.googleapis.com/files-au-climate/climate-au/p/prj3c53659a7c60fafa98d62/page/fil3f672f606619e8f3a39dc_Technical_audit_of_the_HIMI_Marine_Reserve_Management_Plan_2014_2024.pdf

Australian Fisheries Management Authority (2023). Adaptation of Commonwealth fisheries management to climate change: Heard Island and McDonald Islands Fishery Climate Adaptation Workshop, 1–2 May 2023, Hobart. Australian Fisheries Management Authority. <https://www.afma.gov.au/sites/default/files/2023-10/HIMI-Climate-Adaptation-Workshop-Report.pdf>

Commonwealth of Australia (2026). Draft Heard Island and McDonald Islands Marine Reserve Management Plan 2026. Public consultation draft. <https://consult.dcceew.gov.au/draft-management-plan-heard-island-mcdonald-islands-marine-reserve>

Convention on Biological Diversity (n.d.). Target 3. Kunming-Montreal Global Biodiversity Framework. Accessed October 2026. <https://www.cbd.int/gbf/targets/3>

Duffy, J.E., Lefcheck, J.S., Stuart-Smith, R.D., Navarrete, S.A. and Edgar, G.J. (2016). Biodiversity enhances reef fish biomass and resistance to climate change, *Proceedings of the National Academy of Sciences, U.S.A.* 113 (22) 6230–6235, <https://doi.org/10.1073/pnas.1524465113>

Lopazanski, C., Foshay, B., Couture, J.L., Wagner, D., Hannah, L., Pidgeon, E. and Bradley, D. (2023). Principles for climate resilience are prevalent in marine protected area management plans. *Conservation Letters*, 16, e12972. <https://doi.org/10.1111/conl.12972>

Marine Mammal Protected Areas Task Force. (n.d.). Home. <https://www.marinemammalhabitat.org/>

Roberts, C.M., O'Leary, B.C., McCauley, D.J., Cury, P.M., Duarte, C.M., Lubchenco, J., Pauly, D., Sáenz-Arroyo, A., Sumaila, U.R., Wilson, R.W., Worm, B. and Castilla, J.C. (2017). Marine reserves can mitigate and promote adaptation to climate change. *Proceedings of the National Academy of Sciences, U.S.A.* 114(24), 6167–6175. <https://doi.org/10.1073/pnas.1701262114>

Sala, E. and Giakoumi, S. (2018). No-take marine reserves are the most effective protected areas in the ocean, *ICES Journal of Marine Science*, Volume 75, Issue 3, Pages 1166–1168, <https://doi.org/10.1093/icesjms/fsx059>

Su, Z., Pilo, G.S., Corney, S., Holbrook, N.J., Mori, M. and Ziegler, P. (2021). Characterizing marine heatwaves in the Kerguelen Plateau region. *Frontiers in Marine Science*, 7, 531297. <https://doi.org/10.3389/fmars.2020.531297>



The Climate Centre. (2026). Global Ocean Update 2025. <https://climate.org.au/outreach-climate-update.html>

The Climate Centre. (2027). Spatial Heterogeneity in Temperature Change across Australia's External Island Territories: Implications for Territory-Level Climate Adaptation. Publication pending. <https://climate.org.au/projects-research-assessments.html>

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Goodsell, B. (2026). Feedback regarding the draft management plan for the Heard Island and McDonald Islands Marine Reserve. The Climate Centre.

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The Climate Centre is a volunteer-run charitable not-for-profit focused on building bridges between research, policy and communities. It achieves this by undertaking research relevant to local communities, providing digital materials and outreach initiatives that make it easier to interpret climate information and apply it to a local scale, as well as engaging in policy analysis and advocacy to government, and fostering conversations and understanding at individual, community, and national scales through its various projects.