



8 November 2019

Dear Committee,

**Submission to the inquiry into the identification of leading practices in ensuring evidence-based regulation of farm practices that impact water quality outcomes in the Great Barrier Reef.**

The Australian Marine Conservation Society (AMCS) is the leading charity devoted solely to caring for Australia's oceans and their wildlife. AMCS has over 250,000 members and supporters in Australia who we represent and work with on key marine issues facing the nation. One of our core focus areas is to protect the Great Barrier Reef from threats, particularly climate change and poor water quality.

The Great Barrier Reef is one of the natural wonders of the world, home to thousands of incredible marine species, it contributes over \$6 billion to the economy and supports over 64,000 jobs.

The Great Barrier Reef Marine Park Authority's (GBRMPA) Outlook Report 2019 sets out climate change and inshore water quality as key threats to the Reef's future. It states:

*"Inshore water quality is improving on a regional scale, but too slowly, poor water quality continues to affect many inshore areas of the Reef."<sup>1</sup>*

The evidence base on farm run-off and the impact that it has on the Great Barrier Reef is very well established. The Independent Expert Panel (IEP), was set up to provide scientific and expert advice to the Australian and Queensland Governments on the Great Barrier Reef. At their fifteenth meeting, held in August 2019, they expressed their *unanimous* support for:

*"The science that underpins the evidence of the extent and probable causes of damage to the Great Barrier Reef.*

They go on to state:

---

<sup>1</sup> Great Barrier Reef Marine Park Authority, *Great Barrier Reef Outlook Report 2019*. Available here: <http://www.gbrmpa.gov.au/our-work/outlook-report-2019>

**Australian Marine Conservation Society**

Become a Sea Guardian today: [www.marineconservation.org.au](http://www.marineconservation.org.au)

PO Box 5815, West End QLD 4101 **p** 07 3846 6777 **f** 07 3846 6788 **e** [amcs@amcs.org.au](mailto:amcs@amcs.org.au)

*“There is evidence that water quality is important in that surviving coral or newly growing coral have a better chance of continued survival in cleaner water.”<sup>2</sup>*

This follows the 2017 Scientific Consensus Statement for the Great Barrier Reef.<sup>3</sup> This statement is a foundational document that underpins the Australian and Queensland Government’s Reef 2050 Water Quality Improvement plan. It was produced by 48 scientists with expertise in Reef water quality science and management and reviewed hundreds of peer reviewed, published papers and technical reports. It states that the *overarching consensus* is:

*“Key Great Barrier Reef ecosystems continue to be in poor condition. This is largely due to the collective impact of land run-off associated with past and ongoing catchment development, coastal development activities, extreme weather events and climate change impacts such as 2016 and 2017 coral bleaching events.*

*Current initiatives will not meet the water quality targets. To accelerate the change in on-ground management improvements to governance, program design, delivery and evaluation systems are urgently needed. This will require greater incorporation of social and economic factors, better targeting and prioritisation, exploration of alternative management options and increased support and resources.*

They go on to state that the main source of pollutants is from agriculture and these pollutants pose a risk to the Great Barrier Reef coastal and marine ecosystems. Specifically:

*“Sugarcane areas are the largest contributors of dissolved inorganic nitrogen and pesticides, while grazing contributes the largest proportion of sediment and particulate nutrients to the Great Barrier Reef primarily through sub-surface (gully, streambank and rill) erosion.*

It is clear that voluntary programs have failed to deliver clean water for the Great Barrier Reef. The Australian and Queensland Government’s Reef Water Quality Report Card 2017 and 2018 show poor to very poor progress on water quality targets and land management targets.<sup>4</sup>

The failure of voluntary programs shows that regulation is a critical part of the way forward if we are to dramatically decrease the volume of pollutants and sediment entering the Reef’s waters. This is further underlined by a global scientific review that found:

---

<sup>2</sup> Independent Expert Panel - Communique 13 August 2019. Available at: <https://www.environment.gov.au/system/files/pages/abff0d5e-b94d-4495-b79b-90dc52274f69/files/expert-panel-communique-13-aug-2019.pdf>.

<sup>3</sup> 2017 Scientific Consensus Statement for the Great Barrier Reef. Available at: <https://www.reefplan.qld.gov.au/science-and-research/the-scientific-consensus-statement>.

<sup>4</sup> <https://reportcard.reefplan.qld.gov.au/home?report=target>

*“The only significant reductions in agricultural pollution to coastal ecosystems have been achieved through legislation and regulation supported by long-term political commitment (e.g. China, Denmark) or by the combined effects of declining economic subsidies, fertilizer use and livestock numbers following the collapse of the Soviet Union (e.g. several rivers in eastern Europe) (Kroon et al., 2014).<sup>5</sup>*

Regulation has been a necessity for many landmark initiatives and is already used extensively within the Great Barrier Reef to limit the impact of industries such as tourism, fishing and aquaculture. Farming should be no different to other regulated industries that have a significant impact on the Reef.

It is important to note the extensive consultation undertaken by the Queensland Government in developing and delivering the reef regulations to address the problem of poor water quality on the reef.

Finally we would like to draw the Committee’s attention to the Australian Coral Reef Society’s statement that sets out the highly questionable nature of Peter Ridd’s claims.<sup>6</sup>

AMCS are willing to appear at a public hearing to further elaborate on the points raised in this submission.

Shani Tager  
Great Barrier Reef Campaign Manager  
Australian Marine Conservation Society

---

<sup>5</sup> Frederieke Kroon, Peter Thorburn, Britta Schaffelke, Stuart Whitten, *Towards protecting the Great Barrier Reef from land-based pollution*. 29 February 2016. Available at: <https://onlinelibrary.wiley.com/doi/full/10.1111/gcb.13262>.

<sup>6</sup> Australian Coral Reef Society, *The ACRS Disagrees with Peter Ridd’s Questionable Claims*. Available here: <https://australiancoralreefsociety.org/ridds-questionable-claims/>.

**Australian Marine Conservation Society**

Become a Sea Guardian today: [www.marineconservation.org.au](http://www.marineconservation.org.au)

PO Box 5815, West End QLD 4101 **p** 07 3846 6777 **f** 07 3846 6788 **e** [amcs@amcs.org.au](mailto:amcs@amcs.org.au)