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Great Barrier Reef Strategic Assessment

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CAFNEC comment on the Strategic Assessment

1.1 About CAFNEC

The Cairns and Far North Environment Centre (CAFNEC) is the peak environment organisation for the region from Cardwell north to Torres Strait and from the coast west to the Gulf of Carpentaria. CAFNEC is a non-profit, community organisation that has been operating for over 30 years with the aim of encouraging the community to value, protect and restore the natural environment.

1.2 Introduction

CAFNEC commends the UNESCO World Heritage Centre (WHC), and the International Union for Conservation of Nature (IUCN) for their actions that have led to the production of this report and the Government for taking up the challenge of producing a plan for the future health of the international natural icon that is the Great Barrier Reef (GBR).

We must up front express our disappointment with some aspects of The Strategic Assessment as it is our view that it does not adequately address the known decline of GBR condition / negative trends and serious threats to the future of the GBRWHA identified by UNESCO.

The Strategic Assessment contains a good collation and assessment of the scientific knowledge of reef health, particularly in the GBRMPA report. This information paints a disturbing picture of a reef in declining health facing a range of threats. This emphasises the need for immediate and major action to reverse the negative trends and to protect those areas of the reef that remain in relatively good condition (mainly in the less populated North) from future threats.

A general criticism is the separation of the Assessment into two sections (coastal and marine) which has created a situation in which some areas of crossover, notably port management, 'fall through the cracks'.



The drafts, while containing many positive initiatives does not go far enough in the proposed actions to reverse these trends or minimise the threats. The strategic assessment reports also lack real actions and targets and instead comprises motherhood statements that fail to link to real actions and shifts responsibility for action on to other inadequate plans, policies which in many cases are yet to be produced or are in draft form.

Of particular concern is the Queensland Government's 'business as usual' approach in the assessment, with an overly generous or potentially misleading appraisal of the effectiveness of current programs, an overabundance of 'motherhood statements' that do not provide clear paths to action and a lack of adequate attention to key issues such as the issue of port development – an issue that initiated the UNESCO concern in the first place. The Queensland Report concludes by recommending a plan for a plan to better coordinate plans. How this will help halt and reverse the degradation of the GBRWHA, especially in the time frames required, is unclear.

The following comments on the Strategic Assessments reflect some of the organisational priorities of CAFNEC but, given the size and breadth of the documentation covered cannot be considered as exhaustive.

1.3 *Areas in which the Draft Assessments require more detail or are lacking (overview).*

- More detail on implementation strategies for identified actions.
- Clear identification of level and source of resources to achieve identified goals.
- Stronger linkage of recommendations with future tasks – for example, development of the Sustainability Plan and the intended **outcomes** of this.
- Real and measurable targets and timelines (versus processes only), especially for the coastal assessment.
- Clarity or explanation behind some of the condition assessments. Specific examples include: the 'good' condition of dugongs in northern inshore waters and the 'good' condition and stable trend of bony fish in southern inshore waters or the 'good' condition of sharks and rays on offshore areas despite very significant fishing pressures.
- Clarity or explanation behind some of the threat assessments, for example the assessment of dredging and the dumping and re-suspension of dredge material as only a 'medium' risk to biodiversity values and the lack of detail underpinning the 'very effective' rating for management of protected areas.
- Assessments or actions on the threat of new port developments, including the clear breach of the UNESCO recommendation for a hold on new port developments during the assessment process which was breached by approvals at Abbot Point and the continuing approvals processes at other Queensland ports.
- The broad brush stroke of cutting the reef up into only 4 zones for condition and trend analysis lacks the required definition for a true regionalised picture of species and ecosystem health.



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- More detail is required to address the issue of noise pollution which is rated as being a 'high risk' to biodiversity but a relatively long two-year time frame has been allocated to "strengthen guidelines". The Program Report states that the Authority will encourage and support research into noise impacts, but no timeframe is provided.
- Better demonstration of how legislation or other planning instruments achieve outcomes is required.
- An explanation on why OUVs/natural values have declined despite apparently 'effective' or 'partially effective' management programs.
- Clear actions addressing the various noted medium – high fishing risks.
- Clear detailed actions addressing the existing and emerging risks of climate change. This is a key issue with respect to severe weather events potentially tipping a fragile ecosystem already in decline and with increased pressures.
- Clarity on how the principles of ESD are applied in the program or how the precautionary principle is applied under Sustainable Planning Act 2009 (the legislation noted)
- There is a reliance on the use of offsets to achieve environmental goals that is not backed up with detail regarding how these offsets will be managed, prioritised or implemented.
- The recommendation regarding the development of a cumulative impact assessment policy is supported by CAFNEC as clarity around this issue is long overdue. There is insufficient detail regarding this and it is a policy that should be developed and included in the strategic assessment rather than yet another 'plan for a plan'.
- For the 'extent, condition and trend' assessments the trend may be presented as "good", but the confidence is "limited". The ratings are stated as having been adapted from Australia's State of the Environment reports. Under these guidelines a trend of "good" or higher is misleading.
- The environmental legislation referred to as having been adequate or good protecting environmental values over the past few years has, or is currently undergoing considerable change to facilitate economic growth with the focus on development approvals and streamlining these.
- The report notes that farming practices in the Great Barrier Reef World Heritage Area (GBRWHA) Coastal Zone have led to improved practices and water quality from off farm impacts (nutrients, sediment, pesticides) and that this trend is expected to continue. The Great Barrier Reef report card for the reef program in fact shows that adoption of Best Management Practices is low and progress toward targets is very low. Additionally, a regulatory driver to change practices has been halted in preference to a voluntary approach.
- Despite several references to the need for resilience of the GBRWHA to cope with climate change and extreme weather events, working toward building resilience has not been addressed.
- The 32 per cent of GBR coastal zone mentioned as being within conservation areas is now afforded less environmental protection due to considerable changes in legislation over the past 18 months.
- The assessment of threatened species, migratory species and threatened ecological communities is flawed in that, for example of 175 threatened species in the GBR coastal



zone, only 11 key species are considered due to exclusions. This, as stated, is largely because they are not triggered under the EPBC Act for development assessment. In some instances, species were omitted due to lack of sighting data.

- The assessment of cumulative impacts and threats to MNES values is flawed and inadequate. For example, impact on MNES values and the need to avoid, mitigate or offset is provided in the context of development approvals rather than in the maintenance and/or improvement of these values.
- Threatened ecological communities have been excluded because of 7 only 2 have the "majority of their extent" within the GBR coastal zone.
- Despite noting the weaknesses in past and current processes/systems to monitor or assess cumulative impacts, an assessment is provided without accompanying confidence levels in this assessment.

1.4 CAFNEC seeks inclusion of

- Acknowledgement and action regarding the known serious risk dredging and dumping of dredge spoil can have on a system poses to the reef, instead labelling this a medium risk.
- Genuine recommendations and actions to address Port Management and Shipping Management rather than reference to draft plans which fail to address impacts adequately in their current form, including increased actions that demonstrate water quality management priorities around dredging and shipping.
- Proper actions to address noise pollution which is rated a high risk, including the development of enforceable standards for limiting noise pollution.
- Proper consideration, assessment of and actions on
 - a) the cumulative impacts on a fragile interconnected system and;
 - b) reef resilience to withstand further pressures (including climate change) including improved consideration, assessment of and actions on the complex interactions between ecological processes (e.g. ocean acidification and species recruitment) and the threats of resultant impacts when one part of the system is impacted.
- An annual "dashboard" of trends in "key indicators" (water quality etc.) on GBRMPA's website.
- Information on and reference to any risk assessment studies on the impacts of ship traffic.
- The Final Report would benefit from a cross-reference table setting out exactly where each specific ToR is addressed in the Draft Strategic Assessment and the Draft Program Report. This applies also to the Queensland Assessment and Report. This would identify any gaps – which would need to be addressed.
- Given the import of the issue, it would also be appropriate for the Final documents to include investigation of the issue of uranium mining in and transport through the GBRWHA region – even though this was added to the MNES listed in the EPBC Act after the ToR for the Strategic Assessment were finalised.



1.5 CAFNEC particularly commends

- Recommendations to better coordinate water quality testing, including before and after dredging events.
- Increased management of water quality from catchment activity runoff.
- Illegal fishing and poaching are rated as a very high risk to the reef's biodiversity and heritage values and we support Recommendation 16 to improve compliance.

1.6 Detailed comment on key areas of concern for CAFNEC

Port Developments and management.

There is a real need for more detail on port development in the reports. This is a very surprising oversight particularly in light of the World Heritage Committee's concerns about port expansions throughout the Great Barrier Reef Coastal Zone.

Proposed port developments such as the Cairns port dredging expansion project are not adequately addressed in any of the reports. The description of port development and related activities such as dredging and shipping require further detail.

The Qld coastal program report does not actually deal effectively with the issues of port development, instead deferring to the draft Queensland ports strategy. This is a document which is not finalised and does not, in its current form, achieve the stated objective of "consolidation of port development around long-established major ports in Queensland" due to the many loopholes in relation to exceptions and developments that have pending approvals.

It is our view that the reference to the commitment to limit future port developments to the existing port limits until 2022 is insufficiently explained to the point of being potentially misleading. Significant expansion of port capacity to accommodate new shipping berths could occur within the existing port limits at many port locations and a range of developments for which approval processes have already started could occur. The majority of concerns raised regarding port expansions on the Great Barrier Reef have occurred in response to proposals to increase capacity within existing port limits. Also, the Program life is stated to be 25 years, which is longer than the currency of the 2022 port commitment.

This is symptomatic of the 'overall business as usual' approach of the coastal zone reports that repeatedly point to one or another plan, strategy or other document without proper consideration of their effectiveness or required improvements. The approach of abdicating responsibility for, or examination of, important issues simply by reference to plans or policies that are often not effective or even in place does not stand up to proper scrutiny.

We have serious concerns regarding the "one stop shop" approach. The Queensland Government is either a vocal supporter of major economic developments or the actual proponent (in the case of



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the Cairns port, the government-owned corporation of Ports North). We believe delegating the assessment of projects that may significantly impact the reef to the Queensland Government could result in a conflict of interest. We doubt have little confidence the Queensland Government will allocate the resources, or have the appropriate culture, to impose and enforce the conditions necessary to protect the Reef.

There is insufficient justification provided for the assessment of risks relating to ports and dredging activities in the reports.

Fisheries management

The issue of fisheries management has not been adequately addressed in either the coastal or marine strategic assessment documents. Various forms of extraction are rated as medium to high risk (Appendix 4 in the program report) but these impacts are not comprehensively addressed in the proposed program. We support Recommendation 29 to adopt regionally based cooperative approaches to protect biodiversity hotspots, and note there are no relevant recommendations in the coastal zone assessment.

The strategic assessment has rated fishing spawning aggregations as a “high” risk yet the program report does not directly address the impact other than through broad statements about working with partners and stakeholders.

Illegal fishing and poaching are rated as a very high risk to the reef’s biodiversity and heritage values and we support Recommendation 16 to improve compliance.

Potential impacts from aquaculture are poorly examined in the reports and an examination and recommendations regarding the regulation of aquaculture activities is an omission from the reports that need to be rectified.

Climate change and ocean Acidification

Existing and emerging risks to the Great Barrier Reef associated with climate change are not discussed to the level of detail expected to be consistent with the Terms of Reference. CAFNEC concurs with the following assessment taken from the SKM independent review of the Coastal Zone Strategic Assessment.

“The impact of severe weather events on the Great Barrier Reef could be better explained to provide the reader with more information on the interaction of anthropogenic activities with severe weather events. Severe weather events are identified as posing one of the highest future risks to the Great Barrier Reef, and are expected to become more severe in the future, due to the influences of climate change. However the Great Barrier Reef has been exposed to severe weather events for thousands of years, and these events alone do not explain the declining condition and trend of the reef.



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An important component of the description of severe weather events is the cumulative impact of human-related activities which may be manifested during such events. For example, floods carry more sediment, nutrients and pesticides onto the reef than would have been the case prior to European settlement, due to land uses in the catchment. The reports could do more to acknowledge that pressures from human activity are capable of exacerbating impacts from severe weather events.”

Water Quality

We support recommendations to better coordinate water quality testing, including before during and after dredging operations. We would like to see an annual “dashboard” of key indicators produced for the GBRMPA website that clearly shows the trend in key indicators (eg. water quality, crown-of-thorns starfish, dredge spoil, bleaching events, pH, water temp and extreme weather event frequency).

We support the strong focus on the management of water quality issues arising from runoff within the catchment as a means of protecting MNES of the Great Barrier Reef and mitigating the impacts of sediment, nutrient and pesticide discharges.

However, we are concerned that the focus on prevention of sediment runoff to the reef seems to be restricted to farming and revegetation actions and largely ignore the impacts of shipping and dredging in suspending sediments. The approved and proposed dredging projects along the GBR coastline would suspend volumes of sediment and order of magnitude higher than the worthy and much needed programs and investment in preventing land based erosion. While the reports do identify the problem e.g. “The operation of ports and further port development will require capital and maintenance dredging, potentially involving much larger volumes. Recent research indicates re-suspended dredge material may move over much greater distances from disposal sites than previously assumed. While the full extent of any effects on the Region’s values is not well understood, uncertainty regarding the additional effects of sea dumping is a key concern, particularly given the potential for large volumes of proposed dredge material to be dumped and resuspended in areas of the Region already in poor condition” the reports and recommendations do little to address this problem.

Shipping Management

We are concerned that the Reports do not address the issue of shipping in a thorough manner instead deferring entirely to the draft North - East Shipping Management Plan, a document that is not finalised and falls short in addressing issues such as sediment plumes from shipping movements (under vessel clearance), noise pollution and the expected increases in size and number of vessels both visiting Queensland ports or travelling past without coming ashore in Queensland.

Noise Pollution

The examination of the issue of noise pollution in the Strategic Assessment is inadequate. The assessment notes the lack of specific standards for the range of noise pollution affecting Great



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Barrier Reef species. However there is no recommendation for the development or implementation of these much needed standards. Recommendations and actions need to go beyond a loose commitment to 'improving understanding' and outline a clear path to action on this important issue.

Ecologically sustainable development principles

We contend that the principles of ecologically sustainable development are not adequately applied in the reports, particularly the coastal zone reports. This is well summarised in the SKM Independent review report:

"It is not clear how the principles of ecologically sustainable development (ESD) are applied in the Program. The discussion of ESD is insufficient. One of the principles 'improved valuation, pricing and incentive measures' has been misinterpreted. The principle includes the following key aspects: polluter-pays, environmental factors should be included in the valuing of assets and services, costs should reflect the full life cycle of goods and structures, and financial or market incentives for developing effective solutions with a positive impact are available. It is not clear how the examples mentioned in the text (page 323) reflect or apply this principle.

The two other ESD principles (decision-making processes integrate both long and short term considerations, and the precautionary principle) are not addressed in detail. The precautionary principle is noted as being enshrined in the Sustainable Planning Act 2009, but further explanation would be helpful on how it is applied. Greater focus on long-term or forward looking measures, which are encapsulated in the first ESD principle (see page 321 of the Assessment Report) is recommended. Much of the coastal development and infrastructure within the Great Barrier Reef Coastal Zone (especially ports) will have a design life spanning decades."

There is a need to incorporate increased consideration of the interactions between ecological processes e.g. ocean acidification and other threats in the assessment of cumulative impacts and maintain and increasing reef resilience.

Offsets

There is a perceived reliance on the use of offsets to achieve environmental goals that is not backed up with detail regarding how these offsets will be managed, prioritised or implemented. It is our contention that in all cases prevention is better than cure and the reliance on offsets that may only be implemented gradually and well after the impacts they are designed to offset is a serious concern given the precarious state of reef health outlined in the report. Offsetting damage already done to the reef environment is a priority and preventing, rather than offsetting, future impacts must remain the key goal.

We concur with the opinion expressed in the SKM report:

"The application of offsets warrants greater scrutiny and analysis in the Strategic Assessment. It is generally acknowledged that offsets to date have been reactive, ad hoc and sited in areas of



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convenience, rather than for good ecological outcomes. As this is the pillar of the offsets component in the 'avoid-mitigate-offset' framework, some data on the number of offsets under the existing Program, their average size and condition is recommended. Information on ongoing management arrangements would also assist the reader in understanding how the current policy is applied. The assessment of 'partially effective' for offsets is not substantiated by hard evidence in the Assessment Report. The 'limited' confidence rating for this assessment is appropriate. It is noted that a new Queensland offsets policy is currently under development."

Adequate Resourcing

It is apparent to us that significant additional resourcing will be required to implement the recommendations in both the marine and coastal strategic assessments. The plan required a clear outline of how this additional resourcing will be provided.

Development assessments and approvals

We note Recommendation 8 to streamline assessment processes and have deep reservations about a "one stop shop" approach. The Queensland Government is either a vocal supporter of major economic developments or the actual proponent (in the case of the Cairns port, the government-owned corporation of Ports North). We believe delegating the assessment of projects that may significantly impact the reef to the Queensland Government could result in a conflict of interest. We have little confidence the Queensland Government will allocate the resources, or have the appropriate culture, to impose and enforce the conditions necessary to protect the Reef.

We contend that a better approach would be to improve the efficiency of the existing EPBC Act assessment and approval processes. The Federal Government has successfully provided an independent check on major projects over a number of years. On occasions, projects are refused but more often valuable extra conditions are imposed that ensure positive environmental outcomes. We believe the continuing involvement of the Federal Government, GBRMPA and/or an independent referral agency is absolutely necessary to counterbalance the self-assessment and decision-making power of a single Queensland Government agency.

Best practice environmental frameworks require affected communities to be consulted and to participate where there are environmental risks that might affect them. For an open and accountable system, our communities have a role to play to ensure the rule of law is respected. This means the public should have access to information and the right to be involved in assessment, review and enforcement processes.