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19 April 2016

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To OIC, Maintenance Dredging Strategy

**Re: Comments on Draft Queensland Maintenance Dredging Strategy**

NQCC thanks the Department for this invitation to comment on the Draft Queensland Maintenance Dredging Strategy (QMDS).

NQCC is the regional conservation council for the area from Cardwell to Bowen and from the Reef to the NT border, and one of ten regional councils under the broad umbrella of Queensland Conservation Council. It was established in 1974 and has worked as the voice of the environment for the north since then, focusing on education, advocacy and policy development.

Our achievements and focus are provided in more detail on our website, [www.nqcc.org.au](http://www.nqcc.org.au)

We appreciate the effort put in to developing this draft and the desire of the Department to address this important issue. It is especially relevant considering the dire state of the Reef and the likelihood that much of it has died in recent weeks as a result of climate change induced by carbon emissions.

GBRMPA has said since 2009 that to help the Reef survive the impact of climate change it is essential that insults such as coastal development are minimised, if not eliminated.

We offer the following comments on the QMDS.

**Focus of Strategy**

1. It would be far more acceptable if the QMDS were constructed around the need to minimise the impact of dredging than, as it seems to be, the convenient availability of the dredge, TSHD Brisbane. There are

multiple examples of this in the QMDS and the supporting Technical material.

## **2. Compliance with Reef 2050**

Reef 2050 has been described as a plan for a plan. It is heavy on targets but light on how these will be achieved. Indeed many of the targets (especially those to do with water quality) are already seen to be unachievable given the funds allocated, time lags and the 'business as usual' approach going on around the Plan.

Nevertheless, the Reef 2050 Plan states that the development of a State-wide Maintenance Dredging Strategy should:

- Identify each port's historical dredging volumes and likely future requirements and limits
- Identify appropriate environmental windows to avoid coral spawning, seagrass recruitment, turtle breeding and weather events
- examine opportunities for beneficial reuse of dredge material or on-land disposal from maintenance activities, and
- establish requirements for risk-based monitoring programs.

From our reading of the documentation provided, none of these have been done.

### *(a) Limits*

No limits have been set (and 'likely future requirements', at least in the case of Townsville, are highly questionable – see below).

### *(b) Environmental Windows*

No appropriate environmental windows have been identified (although the criteria identified in the Reef 2050 Plan - coral spawning, seagrass recruitment, turtle breeding and weather events - have been referred to).

The Executive Summary of the Technical report states:

*Port managers during their risk assessments for prioritising the timing and management of maintenance dredging activities should consider the potential risks to these communities, the environmental windows (i.e. times where the communities are most susceptible) and any major storm or cyclone events that have proceeded maintenance dredging.*

This empty comment gets us no further from where we are at present.

(c) Beneficial reuse

Although it is stated in the QMDS that significant constraints exist within the ports, beneficial reuse of dredge material has been examined (Section 5.7 Technical report) by looking at previous 'assessments' done largely by port authorities, which have a vested interest in not identifying more costly options. The past history of beneficial use suggests that no real effort has been applied to finding beneficial reuse, and adherence to the London Protocol has been limited.

The reasoning that it is difficult to find land-based alternatives has not hindered the banning of dumping capital dredge spoil within the GBRWHA nor should it limit the banning of maintenance dredge spoil.

The Technical Report lists five vague opportunities for beneficial reuse and 34 constraints. Given that capital dredge material can no longer be dumped in the GBRWHA, this is not very helpful.

(d) Risk-based management

Risk-based management is referred to twice in the 253-page Technical Report. Both occasions advocate a 'business-as-usual' approach that leaves this to the individual ports.

### 3. Future dredging in Townsville

Table 5 of the QMDS states that predicted increases in maintenance dredging amounts due to future projects is zero.

The proposed expansion of the Townsville port – between EIS and SEIS stages – plans a deepening, widening and 1.8 km lengthening of the existing channel. That this will result in no future increase in maintenance dredging defies comprehension.

The 'zero' is explained in the QMDS (footnote 3 to Table 5) by the statement:

*There is no predicted increase in maintenance dredging volumes from future projects at the Port of Townsville as the 25% reduction in volumes predicted as a result of the reclamation associated with the Port Expansion Project is larger than the increase resulting from the additional berths and channel enlargement.*

Prestidigitation at its best!

This is genuinely incomprehensible. Is it a case of mixing up capital and maintenance dredging?

In relation to future expansion, is there any limit on the size of ships that will be allowed to enter Townsville port (and other ports on the GBR

coast? With Triple E ships now coming into use in Europe and plans to create another canal in S America from the Atlantic to the Pacific, will Australian ports be expected to cater for whatever comes? There must be a limit on the size of ships in order to limit future dredging requirements; the growth scenario cannot be open-ended.

A strategy such as this needs to be looking that far into the future.

Finally, the report and documentation does insufficient recognition to the fact that Cleveland Bay (the site of the Port of Townsville) is regarded by the State of the Environment report as a biological hotspot and of very high ecological value, with a Dugong Protection Area, turtle nesting, fringing reef and extensive seagrass meadows. Despite this, only Bundaberg is referred to in terms of it being a turtle-nesting site.

#### **4. Impact of maintenance versus capital dredging**

According to the QMDS (p.27):

*...the evidence suggests maintenance dredging and disposal is not found to be a stressor of primary importance for conserving key flora and fauna species, the adoption of environmental windows is unlikely to provide a contribution to mitigating environmental harm to sensitive receptors.*

This claim is repeated in the Executive Summary of the supporting Technical Report.

However, the body of the Technical Report states:

*The action associated with maintenance dredging and material disposal can introduce environmental stressors that have the potential to impact upon environmental values. (p.10)*

This is at odds with a statement made to the Senate Inquiry into Reef Management by the CEO/Chair of GBRMPA, Russell Reichelt in July 14. In his opening statement, Dr Reichelt said:

On the issue of disposal of dredge spoil, the available science does list it as a significant risk in a local setting. It does change the regions up to perhaps 10 kilometres away from the port. That is visible if you wander out and look at the Townsville port and have it explained to you where the mangroves and mud banks came from on southern and western Magnetic Island, for instance, or the expansive mud flats at Cairns. There is no question that they have a significant local effect.

On the issue of maintenance versus capital dredging, maintenance spoil, which is finer, is more like to spread far and wide than is capital dredge spoil. This is also true when spoil is dumped at 'approved' soil management disposal sites.

## 5. Monitoring and Offsets

All dredging activities within the GBRWHA (not just those for Townsville Port) should be deemed greater than low risk because of the location within a World Heritage Area and risk to the Outstanding Universal Values.

Furthermore, all monitoring and reporting must be transparent and open, as specified within the Gladstone independent review.

A hydrodynamic model needs to be developed (and peer-reviewed) by independent experts to predict sediment plumes, with dredging halted if predictions are exceeded.

Offsets must always be the last 'solution' and must deliver a net benefit to water quality. The amount of fine sediment released into the marine environment must be offset at 1.5 times the amount released. This is in line with promoting a net water quality benefit to the GBRWHA as has been imposed in the approval conditions of recent capital dredging applications.

I am attaching the NQCC response to the EIS on the Proposed Port Expansion for the Port of Townsville (the PEP) and ask that it be read as part this NQCC submission.

Yours truly,

Wendy Tubman  
For North Queensland Conservation Council