



North Queensland Conservation Council

... the voice for the environment in North Queensland

Department of Environment and Heritage Protection
By email: Epact.Policy@ehp.qld.gov.au

Dear Director General

Proposed regulation of trans-shipping activities in Queensland waters and the Great Barrier Reef - comments

Please accept our submission following in respect of your Proposed regulation of trans-shipping activities in Queensland waters and the Great Barrier Reef.

The North Queensland Conservation Council is a community organisation committed to protecting the natural environment in North Queensland. For 40 years we have had a particular responsibility to protect the region's environment from ecologically unsustainable development, including the Great Barrier Reef (GBR).

At a time when marine ecosystems and species are under great threat and pressure from a myriad of directions, including pollution, sedimentation and mass coral bleaching such as occurred in the Great Barrier Reef and broad parts of the tropical Pacific Ocean from warming waters in 2015 and 2016, now is the time for significantly increasing reef protections not winding them back. This is particularly the case directly in the GBR which will be impacted inevitably by trans-shipping of coal and potentially significantly.

The proposal effectively allows the loading of coal ships at sea in the Great Barrier Reef Marine Park, and particularly when in association with a declared port. Given that there are likely four of these in Queensland including Adani's Abbot Point port this renegs on the Queensland Labor government's 2015 election promise to ban trans-shipping in reef waters and is unlikely to meet our commitments to UNESCO. While overall there may be stricter protections this loop hole is extraordinary and undermines the stated intentions of the policy. The exceptions make the bans in the rest of the GBR largely ineffectual.

NQCC opposes the exceptions for declared ports.

NQCC opposes the proposed protections not applying to existing operations in reef waters.

NQCC opposes no mandatory refusal applying to new proposals deemed a high risk of ships striking marine mammals or turtles, or "significant adverse effect" on threatened species or coral and seagrass through water pollution or seabed disturbance.

NQCC supports a total ban on all trans-shipping of coal within the GBR and that this policy be modified to accommodate this. Ship movements increase noise, add more light, and greater likelihood of strikes of marine animals. It increases the risk of damage to seagrass meadows, the home of turtles, dugongs and corals because of the dredging and anchoring in order to establish the trans-shipping sites.

Yours sincerely

Russell Kelly, Coordinator, North Queensland Conservation Council