



114 Boundary Street  
Railway Estate, Townsville  
Qld, 4810  
PO Box 364, Townsville  
Ph: 61 07 47716226  
[office@nqcc.org.au](mailto:office@nqcc.org.au)  
[www.nqcc.org.au](http://www.nqcc.org.au)

Great Barrier Reef Strategic Assessment  
Public Consultation Manager  
GPO Box 668  
Brisbane QLD 4001

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E: [Feedback@reefhaveyoursay.com.au](mailto:Feedback@reefhaveyoursay.com.au)

## **Comment on the Draft Great Barrier Reef World Heritage Area Strategic Assessments 2013**

### **Introduction**

North Queensland Conservation Council is the regional conservation council covering the area from Cardwell to Bowen and from the coast to the NT border. Established in 1975, we act as the voice for the environment in North Queensland.

We have long acknowledged and been concerned about the condition of the Great Barrier Reef World Heritage Area (GBRWHA) and the multitude of pressures upon it. Accordingly, we are pleased that the World Heritage Committee has seen fit to call for this timely assessment of the state and management of the GBRWHA and to have this opportunity to comment on the draft reports.

### **Overall response**

This response from NQCC deals separately with the Federal and the Queensland processes. Despite our support for a thorough assessment of the current and anticipated condition and management of the GBRWHA, and for improved future directions and approaches, we find, regrettably, that the reports generally fall short of what is needed at this critical time for the GBRWHA. They are overly sanguine in relation to the effectiveness of the current management, and fail to offer a plausible or convincing way forward that will deliver the protection need to prevent continuing decline in the health of this world heritage property.

NQCC finds the Coastal Zone assessment to be particularly inadequate, and, given that the pressures on the GBRWHA derive largely from terrestrial activity and that the current Queensland government is overwhelmingly supportive of industrial development, this is of very great concern.

Validation of our conclusions, along with some suggestions as to how the reports could be improved, is presented below. The comments and suggestions are not and

do not claim to be exhaustive. However, NQCC would be pleased to be involved in the further inquiries and processes foreshadowed in the reports.

Before turning to some of the detail, it is vital to appreciate that the significance of Strategic Assessments is potentially massive.

According to the Australian government's [Strategic Assessment Prospectus](#):

*'Strategic assessments remove the need for the assessment of individual projects, instead they mean a range of developments can proceed without further approval if undertaken under a policy, program or plan endorsed under the EPBC Act'. (p.2)*

The import of this for the GBRWHA could be immense. With development-hungry governments, any number of individual development proposals could be swept through the approval process on the basis of the assessments without the necessary level of investigation, with dire consequences for the future of the Reef.

We note, in particular, that a primary purpose of Strategic Assessments is to consider cumulative impacts.

*'Instead of considering individual projects, strategic assessments enable the community to consider cumulative environmental impacts in a broad area at the assessment stage and provide input on where they think development should occur and what areas should be protected.'* (p.6)

Neither of the 'Strategic Assessments' have delivered any useful data on cumulative environmental impacts on the GBRWHA.

Indeed, it could be questioned as to whether or not a Strategic Assessment has indeed been conducted, when what was done is considered in the light of the Prospectus, which includes not only the above statements, but also the following:

*'...a strategic assessment offers the opportunity to closely examine cumulative impacts on the environment that occur when there are many projects being undertaken either in a single area or across a region.'* (p.5)

Regardless, NQCC notes that, as this Strategic Assessment focused on the management of the GBRWHA, the proposed Program put to the Minister for approval under the EPBC Act must similarly focus on managerial issues. NQCC contends that it then follows that any acceptance of the proposed Program will, in line with the Prospectus, demonstrate Ministerial approval of individual management approaches within the proposed Program, **not to a range of development proposals.**

Nevertheless, given the potential impact of any Strategic Assessment Report accepted under the EPBC Act by the Federal Minister for the Environment, it is imperative that the final Program Report is based on robust science that has been subjected to rigorous expert, and peer-reviewed analysis in order to derive similarly accepted effective and appropriate conclusions. Without that, the Reef could be placed in further peril.

## A. The Federal Assessment – the Marine Zone

The GBRWHA Strategic Assessment process has pulled together a large amount of information that jointly gives an extensive, probably the most extensive to date, snapshot of the GBRWHA, its current and its anticipated condition.

The picture is shocking, especially when it comes to the southern two-thirds of the inshore (SI) area of the GBRWH region. Of course, this geographic dispersal of damage is not coincidental; the SI region is adjacent to a far greater concentration of coastal/catchment use/development (urban, tourism, port, industrial, aquacultural, agricultural, horticultural, grazing, recreational etc.) than is the healthier northern third. The direct and indirect cause of the decline is human activity, and it is this that must be modified/curbed if the Reef and the GBRWHA are to survive.

### A.1 The current situation

According to the Strategic Assessment, the overall condition of marine and terrestrial habitats and of biodiversity values in the southern region is ***poor and declining***.

Also rated as ***poor and declining*** are GBR habitats as a whole and terrestrial habitats as a whole that support the GBR, as well as species as a whole in the Southern inshore waters.

For specific issues (seagrass meadows, corals and dugongs and connecting waterways in the adjacent ‘coastal strip’) the situation is even grimmer, with the condition of each found to be ***very poor and declining***.

The list of values, habitats and species rated as ***poor and declining*** is also dismal: Marine habitats as a whole; species as a whole and open waters in the southern inshore region; terrestrial habitats that support the GBR in coastal and inland regions; southern coastal saltmarshes; southern coastal and inland freshwater wetlands; southern coastal and inland forested floodplains; southern coastal connecting waterbodies; southern offshore corals; inshore sharks and rays across the length of the GBR; marine turtles in the northern region (inshore and offshore); offshore seabirds along the length of the GBR; shorebirds along the length of the GBR; and southern dolphins.

### A.2 The future

Most alarmingly, the projected conditions for biodiversity values, overall, are ***poor***. As is noted in the Strategic Assessment, ‘poor’ means that: “*Without significant additional management intervention, some of the values will deteriorate in the next 25 years and only a few values are likely to be healthy and resilient in the longer term*’.

(It should be noted that in section 7.8 of the Strategic Assessment ‘Current condition and trend – Summary of Outcomes’ the issue of biodiversity is not included. Given that the main Object of the GBRMPA Act is ‘... to provide for the long term protection and conservation of the environment, *biodiversity* and

heritage values of the Great Barrier Reef Region', this exclusion of the findings on the poor condition of biodiversity is, to say the least, curious.)

Projected to be **very poor** in the longer term is the condition of coral reefs and corals, seagrass meadows and seagrasses; sharks and rays; shorebirds; and dugongs. As is noted in the Strategic Assessment, 'very poor' means that: "*Without urgent and effective additional management intervention the Region's biodiversity values are likely to continue to deteriorate.*"

Projected to be **poor** in the longer term is the condition of beaches and coastlines; open waters; terrestrial habitats that support the GBR; marine turtles; seabirds; and dolphins.

Very significantly, the specific condition of six of the seven matters of national environmental significance relating to the reef – namely its World Heritage status; the GBRMP; its national heritage status; its Commonwealth marine park status; listed migratory species; and listed threatened species – is projected to be **poor**.

In summary, the future for the most 'iconic' features (values) of the GBR – its coral reefs, its beaches, its turtles, dugongs, dolphin, sharks and rays, and its shore and sea birds – is, without urgent and effective intervention, limited.

There can be no argument that the health of the Reef, despite past management efforts is critical, and that a 'business as usual' approach will only result in further continuing degradation.

### **A.3 Impacts and risks**

The actions and events that have impacts on the GBRWHA and which pose a risk to the biodiversity of the GBRWHA are known.

The Strategic Assessment notes that 'Twenty five impacts are assessed as having high or very high effects on the Region's values' (but then goes on to identify only 12 impacts (pp. 6-57, 58, 87)). The twelve identified are: cyclones, sea temperature increase, freshwater inflow, nutrients, crown-of-thorns starfish, pesticides, sediment, modifying supporting terrestrial habitats, death of discarded species, dredging, dumping and resuspension of dredge material, and illegal fishing and poaching). It is also noted (p6.88) that 'The vast majority of impacts are assessed as increasing into the future'.

Constituting **very high risks** (with risk being a function of the likelihood and the consequence of an impact occurring) are: sea temperature rise; ocean acidification; nutrient-rich run-off; crown-of-thorns; sedimentation; grazing; urban and industrial development; by-catch; and illegal fishing and poaching.

Constituting **high risks** are: cyclones; sea-level rise; increased freshwater inflow; pesticides in run-off; artificial barriers to flow; fishing of spawning aggregations; fishing of top-order predators; marine debris; and noise pollution.

NQCC is not convinced by the conclusions drawn in relation to the impacts and risks and returns to this topic under the discussion of targets (below).

## A.4 Assessed effectiveness

As indicated above, despite the alarming findings in relation to current and anticipated condition of the GBRWHA, the Draft Report offers a sanguine assessment of the effectiveness of GBRMPA management, and one that does not appear to be supported by the findings of the independent effectiveness assessment.

The Draft Report notes ‘The strategic assessment demonstrated that the Authority’s management is **effective** for activities in the Region for which the Authority has direct jurisdictional control’ [emphasis added]. In contrast, the independent assessment found ‘... the Authority is **working towards effective management in all areas**... [emphasis added]. There is a lot of difference between the two.

The purported effectiveness rings false in the light of the poor and declining condition of so much of the GBRWHA. If everything is pretty good, why has everything got so bad? And why is the future expected to be so bleak?

It is also difficult to accept GBRMPA’s claim to ‘effectiveness’ in the light of the ‘scores’ given by the independent assessors, as demonstrated in the following table, derived from the draft Strategic Assessment; there are few (16 out of 105) ratings of ‘effective’. (Note that the definitions of effectiveness are themselves misleading, with ‘partially effective’ being anything with a rating of between 21 and 50% (in other fora this would be regarded as a distinct ‘fail’); and ‘mostly effective’ being between 51 and 80% (meaning that something rated as, for example, 52% would be deemed to be mostly effective – a very generous interpretation).)

Management effectiveness (7 elements assessed for each):	Effectiveness			
	Effective	Mostly effective	Partially effective	Ineffective
Biodiversity protection	0	6	1	0
Indigenous heritage values	0	5	2	0
Historic heritage values	0	2	5	0
Community benefits	0	4	3	0
Climate change and extreme weather	0	5	1	1
Water quality protection (catchment run-off)	1	4	2	0
Coastal development	0	1	6	0
Tourism	3	4	0	0
Commercial fishing	0	1	6	0
Recreational fishing	0	1	6	0
Recreation	0	7	0	0
Ports	0	2	5	0
Shipping	2	1	0	0
Defence activities	7	0	0	0
Research activities	3	4	0	0

Significantly, in relation to the effectiveness of the Authority's arrangements to manage (avoid, mitigate, offset and adaptively manage) impacts, surely the most crucial criterion given the hierarchy of objectives of the GBRMP Act, the results, as detailed below (from p.8-37), are disturbing.

<b>The effectiveness of GBRMPA in:</b>		
Appropriately considering direct and indirect impacts	'mostly effective'	51-80% effective
Appropriately considering consequential and cumulative impacts	'partially effective'	21-50% effective
Effectively addressing impacts and moving toward attainment of desired outcomes	'partially effective'	21-50% effective
Ensuring that use of the GBR is demonstrably environmentally sustainable	'partially effective'	21-50% effective

These are highly unfavourable and worrying findings, suggesting that, despite claims, the management to date has fallen far short of what is needed.

GBRMPA needs to take a more honest approach to self-assessment, unclouded by its aspirations. It is also apparent that the Authority needs to be strengthened in order to be able to exert greater control over range of activities that have an impact on the GBRWHA.

In relation to the assessment of effectiveness, it is disappointing in that it appears to be based *solely* on the views of an unknown number of people with varying levels of expertise – and the freedom to comment on issues regardless of their area of expertise.

Given that so much weight is placed on the assessment of effectiveness (for example, targets are to be set according to the results of the effectiveness assessment, and these targets are to be used to develop the management framework), it is essential to know the background of those surveyed and the areas in which they contributed a view on managerial effectiveness. These data need to be included in the Final Strategic Assessment.

It is also disappointing that no other means of assessing effectiveness were employed. Expert panels focusing on specific programs, for example, would have been useful – and possibly more convincing than a small survey. In this regard, demonstration cases are more descriptive than analytical.

While NQCC was active in pushing GBRMPA to go beyond 'an internal assessment of in-house procedures' (and is pleased that this was done), the external effectiveness assessment is a fragile and limited foundation on which to base such momentous decisions as the future management framework.

GBRMPA needs to undertake further, more varied and more robust, assessment of its managerial effectiveness prior to finalising the Strategic Assessment and Program Report.

## **A.5 The Situation and the Strategic Assessment**

Given the seriousness of the current and anticipated condition of the GBRWHA, the Strategic Assessment, on which so many have laboured and for which so many have waited, is, unfortunately, a disappointment.

Despite the claim made in the first paragraph of the Draft Program Report, '[this Report] ... describes the Authority's future management program to protect and manage matters of national environmental significance in the Region', NQCC contends that it fails to do this in any but the most broad-level, conceptual terms.

The concerns with respect to the Strategic Assessment are discussed below. But in a nutshell, after all the work and resources that have gone into the Strategic Assessment, a recommendation to develop a plan (a plan for a plan to better coordinate plans) is hardly what was expected, and nowhere near what is needed.

It is acknowledged that the current powers of GBRMPA to take action on many of the issues that have a negative impact on the Reef are limited. However, this Strategic Assessment process would have been the ideal time to raise the issue of the adequacy of the powers of the agency to deliver on its objectives. NQCC suggests that, if the governments are serious about protecting the GBRWHA, this issue be made the subject of further review.

### **A.5.1 Delivery against Terms of Reference**

NQCC questions whether or not the SA has delivered against the Terms of Reference (ToR).

Has the Draft Report, for example, recommended 'improvements to related local, state and national government programs' (ToR 6.1.2)? Has it described 'how the principles of ESD have been applied in the proposed Program' (ToR 6.2)? Does it 'describe how the adaptive management measures will be implemented to ensure the relevant matters of MNES, including the OUV of the GBRWHA are effectively protected and managed over the life of the Program [25 years]' (ToR6.3(b))? Has it analysed the actual and potential impacts, including cumulative impacts and the likely impacts of climate change (ToR3.1 (b)(ii and iii)?

The answers to those rhetorical questions are, we suggest, 'no'. To the extent that these ToR have not been addressed, the Final Program report must address them.

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.

### A.5.2 Output vs Outcome and timing

While the draft assessment and program reports list 38 recommendations, and the draft program report lists 36 preliminary (largely qualitative) targets, the reader is left searching for more concrete and substantial outcomes.

Beyond a clearer understanding of (i) how (badly) the Reef is faring, (ii) what causes the condition of the Reef to decline, and (iii) what GBRMPA would like the condition of the Reef to be in terms of somewhat nebulous targets, there is little indication as to how conditions are to be improved, how the targets are to be reached.

Even the information that is provided in terms of the future demonstrates a process-focussed approach, with emphasis on planning, mapping, identifying, management systems, improved understanding, collaboration, promoting, policy and supporting mechanisms etc.

And there is no indication of how and to what extent these outputs would contribute to the (largely qualitative) targets or outcomes.

The final report will need to more clearly demonstrate the links between the condition of all aspects of the GBRWHA with the causes of degradation and the associated proposed changes to deliver the targeted quantified benefit.

### A.5.3 The targets

Many of the 2019 'preliminary targets' mirror those that have been around for a while but not been met (see following table). Most of the targets (26 of the 36) are only superficially quantitative, with reliance on terminology such as 'improved', 'reduced', 'increasing trend', 'maintained', 'enhanced'.

Values/impacts	Preliminary targets (for 2019)	Previous targets/effectiveness
Coral reefs and corals	Trends in coral reef condition and resilience indicators are improved (including herbivory, coral diversity, disease and recruitment)	GBRMPA's Climate Change Action Plan 2007-2012 <sup>1</sup> included this target - aiming to build resilience into the reef and improve reef condition. <i>During this time, reef health continued to diminish.</i>
	The Authority will further examine the development of targets for corals that specify ranges for condition and resilience indicators for regions and subregions	These thresholds were meant to have been developed (key strategy 1.2 in GBRMPA Climate Change Action Plan 2007-2012). <i>Regardless of delays, it is not known whether these targets will explicitly be used by the GBRMPA Ministerial Forum when they set the trigger</i>

<sup>1</sup> [http://www.gbrmpa.gov.au/data/assets/pdf\\_file/0020/4493/climate-change-action-plan-2007-2012.pdf](http://www.gbrmpa.gov.au/data/assets/pdf_file/0020/4493/climate-change-action-plan-2007-2012.pdf)

		<i>thresholds.</i>
Terrestrial habitats that support the Great Barrier Reef	There is no net loss of the extent, and an improvement in the ecological processes and environmental values, of natural wetlands	This is refined from a key outcome of the current Reef Water Quality Protection Plan <sup>2</sup> (joint initiative with GBRMPA and various departments). <i>Results so far have been described by at least one expert as 'too little too late' – a statement that is supported by the achievements against targets in relation to water quality and wetlands.</i>
Community benefits	<p>There is local, regional, national and international community awareness of the Great Barrier Reef World Heritage Area; appreciation of its biodiversity and heritage values; and understanding of its issues</p> <p>Tourism and recreation users of the Region are highly satisfied with their experiences</p> <p>Traditional Owners, stakeholders, visitors and local residents maintain their personal connections to the Great Barrier Reef</p> <p>The Great Barrier Reef continues to provide personal and community health benefits</p>	<p>These are standard GBRMPA objectives (in Strategic Plans and Annual Reports). <i>Note: It needs to be kept in mind that, Under the GBRMP Act, public enjoyment and appreciation, and recreational economic and cultural activities can only occur 'so far as they are consistent with the main objective [of the GBRMPA Act]'</i>.</p>
Impacts due to direct use	<p>Illegal fishing and poaching: A reducing trend in the incidence of illegal fishing and poaching through:</p> <ul style="list-style-type: none"> <li>- Implementation of a remote vessel monitoring system on the commercial fishing fleet by 2015</li> </ul> <p>The maintenance of an effective field compliance presence in the Region</p>	<p>Reducing this trend was already an objective of GBRMPA (see GBRMPA Strategic Assessment objectives 2010-2014<sup>3</sup>, Objective 1 (to address key risks affecting the outlook for the GBR). Implementation of remote VMS on the commercial fleet was already an objective of GBRMPA – refer to 2002 'Framework for management for focused recommendations'<sup>4</sup> – that document schedules stage 1 (mandatory fitting of VMS on the trawl fleet – by July 1999), with other fishing vessels to be fitted with VMS 'over the next few years'. GBRMPA were also going to address issues with VMS to monitor the line fishing fleet' /illegal fishing and poaching remains a very high level risk.</p>

<sup>2</sup> <http://www.reefplan.qld.gov.au/resources/assets/reef-plan-2013.pdf>

<sup>3</sup> <http://www.gbrmpa.gov.au/about-us/strategic-plans/statement-of-expectations>

<sup>4</sup> [http://www.gbrmpa.gov.au/\\_data/assets/pdf\\_file/0017/5462/framework-for-management-2002.pdf](http://www.gbrmpa.gov.au/_data/assets/pdf_file/0017/5462/framework-for-management-2002.pdf)

	<p>Marine debris</p> <ul style="list-style-type: none"> <li>• The volume of marine debris on the Great Barrier Reef's islands, beaches and coastlines is reduced by 20 per cent .</li> <li>• The mortality of species of conservation concern due to ingestion of or entanglement in marine debris is reduced by 20 per cent</li> </ul>	<p>GBRMPA's 2009 Outlook Report<sup>5</sup> included many actions to combat the problem of marine debris; DEHP's 2009 Threat Abatement Plan <sup>6</sup> also included a long list of actions (according to the plan – all of the actions should now be in place). <i>Despite these measures marine debris is still a major problem for the GBR.</i></p>
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The choice of targets is hard to comprehend. Notwithstanding that it maybe a good idea, why, for example, has marine debris, which is not listed in 6.11 as having a high impact and which is hard to control on the required international basis, been included as target? Furthermore, why was 20% chosen as the target, and how will achievement against this target be measured?

More importantly, why is there no target for dumping and resuspension of dredge material, which is assessed to have a 'very high effect on the Region's biodiversity values' (p.6-91) and which is totally within the control of Australia? This would have been a very opportune time to raise the issue of future disposal of dredge spoil.

Not only is the issue of dumping not referred to in the 'Targets', there is also no mention of it in the Recommendations.

The two-page Table of 'Desired Outcomes to the condition of the Region's values and processes' (Table 3 of the Draft Program Report), is really a long way of saying we would like everything to shift up one or two places in our hierarchy of conditions. It is important that the targets are made qualitative and are genuinely achievable, albeit with necessary levels of funding, rather than merely aspirational.

It is also of concern that nowhere do the targets refer to ecologically sustainable development (and its all-important precautionary principle), a legislatively inscribed policy that is, nevertheless, increasingly being dropped from environmental policy at both Federal and State level.

Given GBRMPA's requirement to comply with the principles of ESD (including the precautionary principle), the acceptance of a largely business-as-usual approach, despite the absence of (gaps in) necessary information made evident from the Strategic Assessment, is alarming.

**A.5.4 The recommendations**

The Strategic Assessment provided evidence to show that the GBRWHA is in a perilous condition and that crucial aspects of management are inadequate. That being the case, it is unclear as to why so many (31 of 38) recommendations are

<sup>5</sup> [http://www.gbrmpa.gov.au/outlook-for-the-reef/great-barrier-reef-outlook-report/outlook-online?sq\\_content\\_src=%2BdXIsPWh0dHAIM0EIMkYIMkZ3d3ctcmMuZ2JybXBhLmdvdi5hdSUyRmNvcnBfc2l0ZSUyRmtleV9pc3N1ZXMIkZib25zZXI2YXRpb24IMkZuYXR1cmFsX3ZhbHVlcUyRnRocmVhdHNFYW5kX21hbmFnZW1lbnQIMkZwb2xsdXRpb25fYW5kX21hcmluZV9kZWJyaXMmYWxsPTE%3D](http://www.gbrmpa.gov.au/outlook-for-the-reef/great-barrier-reef-outlook-report/outlook-online?sq_content_src=%2BdXIsPWh0dHAIM0EIMkYIMkZ3d3ctcmMuZ2JybXBhLmdvdi5hdSUyRmNvcnBfc2l0ZSUyRmtleV9pc3N1ZXMIkZib25zZXI2YXRpb24IMkZuYXR1cmFsX3ZhbHVlcUyRnRocmVhdHNFYW5kX21hbmFnZW1lbnQIMkZwb2xsdXRpb25fYW5kX21hcmluZV9kZWJyaXMmYWxsPTE%3D)

<sup>6</sup> <http://www.environment.gov.au/system/files/resources/d945695b-a3b9-4010-91b4-914efcdbae2f/files/marine-debris-threat-abatement-plan.pdf>

based on doing more of the same, albeit, maybe a bit better. Even more unclear is why it is anticipated that these 'business-almost-as-usual' approaches will deliver against targets that have not been met to date.

Indeed, this, the all important, material, seems to be left to the development and implementation of a 'long-term sustainability plan' (Recommendation 26 of the 38 Federal recommendations, and mirrored in Recommendation 15 of the 21 State recommendations). Even this recommendation is merely a 'long-term sustainability plan ... **to better coordinate programs** designed to manage and improve the Reef' (emphasis added). The issue has been kicked down the road a bit, at a time when significant action is urgent if the GBRWHA is to be saved.

Again, the links between the recommendations and the assessed effectiveness, impacts, risks and targets are not apparent. Importantly, there is no plausible explanation of how the recommendations would result in improved condition of the GBRWHA.

For example:

- The recommendations for **streamlining** (REC8 and REC9), reflect current government policies intent on making development quicker and easier for business; there is no evidence to show that streamlining would improve the condition of the GBRWHA. Intuitively streamlining of assessment of development proposals that are, according to the Productivity Commission's recent report, 'bigger, more complex and more numerous' than previously, is likely to worsen rather than improve the protection of the Region.
- The recommendation for plans for use of areas with high potential growth for **recreation** and other uses (REC10) could be seen as more closely aligned with current government policy to make protected areas economically productive than it is with the primary objective of the GBRMP Act. Given that, according to the Draft Program Report (p.11), only 8% of the GBRMPA is covered by management plans, are these areas of the highest priority, or is this a way of speeding up their industrial exploitation?
- The recommendation for **community and industry involvement** (REC14), again reflecting current government policies (eg, the Federal government's Green Army, the Queensland government's Everyone's Environment Program), is too vague to allow proper analysis. To the extent that it could be seen to involve well-meaning but possibly ineffective or, worse, damaging, efforts by unskilled but enthusiastic members of the community, and to the extent that it involves a 'quid pro quo' for industry, this recommendation could make things worse.
- Despite claims (at least by the State government) that there is a strong and effective partnership between it and the Federal government in terms of the GBRWHA, recommendations relating to **climate change** (RECS35-38) are conspicuous in that they are unmatched by any State commitment. This calls into question the ability of GBRMPA to develop, as suggested on p.24 of

its Draft Program Report, targets in relation to climate change on a 'collaborative' basis with the Queensland government.

Regardless of Queensland's recalcitrance on the issue of climate change, NQCC applauds GBRMPA for these recommendations, made in line with GBRMPA's public acknowledgment (2009 Outlook Report *inter alia*) that the greatest threat to the GBRWHA is, indeed, climate change and that the optimal strategy is to relieve the GBR of all other pressures so that its resilience to climate change can be maximised.

- The recommendation to support Queensland's **port development** strategy (REC11) is disappointing, given that the proposal places limits on port development outside existing major ports only until 2022; and that it enables massive port expansion, much of it in very risky and threatened areas (such as the Port of Townsville, which would involve massive capital and maintenance dredging of a shallow bay in an environmental hotspot). This recommendation ignores the Strategic Assessment finding of the high effect of dredging and sea-dumping on the values of the Region.

NQCC requests that the Final Program Report explain in detail how each recommendation links back to priority needs and is expected to deliver the desired outcomes.

### ***A.5.5 The new initiatives***

#### *A.5.5.1 Adopting a management framework based on outcomes and targets to guide decision-making and actions required to maintain and restore the condition of values. (REC 25)*

While this is supported, it is extraordinary and extremely disconcerting to learn that using outcomes and targets to guide decision-making would be a new initiative for a 39-year-old organisation.

#### *A.5.5.2 Developing a cumulative impact assessment policy (REC 7)*

While this is supported, it is similarly disappointing to learn that development of a cumulative impact assessment policy, a vital component of assessment, long a requirement of Environmental Impact Assessments, and on which there is a significant body of literature and considerably expertise in Australia, has not yet been developed by GBRMPA.

Given that the ToR required GBRMPA to describe and analyse 'direct, indirect, consequential and cumulative impacts' this 'new initiative' demonstrates a failure of the Strategic Assessment.

#### *A.5.5.3 Developing a net benefit policy (RECS 23, 24)*

This 'new initiative' focuses exclusively on offsets – and to a large extent on the ability to raise funds outside the Federal budget to protect the Reef. This is of concern because it provides a perverse incentive to permit actions that have a

negative impact on the Reef in order to raise operational funds. This incentive is increased by the notorious difficulty of delivering other than financial offsets when it comes to the marine environment.

This is particularly important in the light of the move toward 'streamlining' by way of delegation of assessment powers from the Commonwealth to the State government. The 'proposed' new Queensland offset policy is based on improving the speed and ease of the process for business and is not based on science.

#### *A.5.5.4 Implementing a Reef Recovery program (REC 29)*

While the idea of an all-out, all-hands-on-deck approach to restoring the health of the Reef has some appeal, NQCC would like to see assessments of similar 'localised' programs designed to protect the environment, in order to determine whether or not this is likely to deliver the outcomes needed in the very near future. For example, what were the quantifiable outcomes of 'Caring for Country'? What quantifiable outcomes has the Reef Guardianship program delivered to date? Or the Reef Plan?

While all of these initiatives may have minor benefits, are they able to deliver the magnitude of change needed? How likely is that, for example, community efforts under a Reef Recovery program could override the intentions to develop northern Australia, or to control nutrient run-off, or the expansion of various Queensland ports?

Overall, would the Plan result in the Federal and State governments dodging their responsibilities and delegating responsibility for GBRWHA protection to bands of keen but unskilled volunteers?

In relation to Townsville (a priority area), for example, how would the localised, largely community-based Reef Recovery program counteract the current proposal to increase the size of the Townsville port three-fold, with associated capital dredging of 9.9 million cubic metres of seabed and the dumping of 5.6 million cubic metres of spoil in the GBRWHA? How would it counteract ongoing coastal residential development?

#### *A.5.5.5 Implementing a Reef-wide integrated monitoring and reporting program linked to the outcomes-based management framework [New Initiative 1] and underpinning the Authority's adaptive management approach (RECS 31, 32, 33)*

While this is supported, it is again extraordinary and extremely disconcerting to learn that using a Reef-wide integrated monitoring and reporting program would be a new initiative for a 39-year-old organisation.

It also calls into question on what basis GBRMPA has, to date, been 'regularly review[ing] its management priorities and arrangements to ensure its resources are applied most effectively to achieve the long-term protection, ecologically sustainable use, understanding and enjoyment of the Great Barrier Reef' - as reported under 'Findings of the strategic assessment', on page 59 of the Draft Program Report.

Given the rapidity of deterioration of the Reef, and the extent of development proposals, monitoring and reporting must occur more frequently than every five years.

## **A.6 Political influence**

It is of concern that possibly the most central recommendation of the Strategic Assessments, the long-term sustainability plan for the Great Barrier Reef, is seen as the responsibility of the Ministerial Forum. This immediately politicises the development of the plan.

Given also the very clear policy focus of the two levels of government on economic development, and the unarguable watering down of environmental legislation that has occurred, this is alarming.

Even the make-up of the Ministerial Forum is itself cause for concern. Why is the Minister for Natural Resource and Mines one of the four Ministers (two federal, two state) on this Forum. Would the Minister for Tourism not be a (more) suitable contributor?

It is unclear how civil society is to be included in the development of this major plan – nor of other elements of the Strategic Assessment’s ‘Forward Commitments’ (including the development of net benefit (offsets) policy and cumulative impact assessment policy). Such inclusion is imperative.

## **B. The Queensland Assessment – the Coastal Zone**

### **B.1 Exaggeration of management effectiveness**

NQCC contends that, in the light of the dramatic decline in the health of the Reef, there is no real basis for the claims in the Queensland government’s Draft Program Report that management has been effective. These claims include, or example, ‘... the effective management system is testament to the strong joint management of the two governments since the late 1970s’ (p.1-19) and ‘the integrated governance and management model for the GBR that has been functioning over the last 36 years has proven to be effective and successful’ (p.1-19).

It is preposterous to claim that the assessment provides evidence that demonstrates the Queensland Government Program is effective, while also referring to, for example:

- ‘poor water catchment quality’,
- ‘the poor state of many of the key ecosystems’,
- poor ‘understanding of the relationship between water quality, tourism activity and economic benefits’, and
- poor ‘habitat data’,

and stating that, for example:

- marine conditions have ‘declined from moderate to poor’,

- ‘for areas of more moderate land use such as grazing lands, the condition and trend for MNES is generally considered to be very poor and declining (and at risk of being lost) (p.4-79),
- ‘most NRM regions [showed a similar trend] with moderate, poor or very poor for the integrated metrics of water quality, seagrass and coral’ (p.4-81),
- ‘poor water quality flows into the GBR from the major NRM regions’ (p.4-85),
- ‘the extent and condition of MNES values in adjacent [to the WTHA] areas were assessed as poor and in decline’,
- ‘TEC in moderate areas are considered to be generally in poor condition and TEC in urban areas are considered to be in very poor condition with both likely to decrease over the life of the Queensland Government’s Program’ (p.4-99)
- etc etc etc.

Furthermore, given that the Draft Program Report claims ‘strong joint management’ and an ‘effective and successful integrated governance and management model’ between the State and Federal governments, it can only be assumed that the claims to effectiveness are made in the knowledge of and despite the dire findings of the Federal Strategic Assessment (see A.1 and A.2 of the Federal Assessment – the Marine Zone, above).

This disconnect between claims and reality is a constant throughout the Draft Report. Some exemplary disconnects are discussed below.

## **B.2 Gladstone healthy harbour partnership**

Nowhere is the chasm between claims to effectiveness and reality more obvious than in the case of the Gladstone healthy harbour partnership agreement. The report notes that the partnership was established in 2012 ‘to ensure the ongoing monitoring and improvement of Gladstone Harbour and surrounding catchments’ and claims that ‘by implementing collaborative actions, the partnership will maintain and continuously improve harbour health’.

The irony is that in January 2014, during the period of comment on this Strategic Assessment, it has been revealed that the Federal Minister for the Environment has called an inquiry into the dredging project at Gladstone that will be ‘broad enough to properly investigate the Gladstone harbour dredging project, the failure of the wall designed to retain dredge spoil and the management of the port on the central Queensland coast’. Prior to the facts of the matter being revealed by a ‘whistleblower’, the government had assured the community that the ‘mass deaths of fish, turtles, dolphins and dugongs inside the GBRWHA’ was the result of floods. It now appears that systemic failings in monitoring, managing and reporting allowed the Gladstone port development to deliver massive negative impacts to the GBRWHA.

Here again is evidence of the empty rhetoric behind many of the government claims. Significant was the point made by one journalist, pointing out the conflict of interest involved with the government being both assessor and monitor for port developments.

The active support for further port development the length of the Queensland coast by way of streamlining (reductions) in regulations and assessment processes and incentive programs for developers, with the associated impacts of, *inter alia*, capital and maintenance dredging and spoil dumping, raises serious concern about the protective ability of current management. The management effectiveness in relation to ports was assessed to be only 21-50% effective.

### **B.3 Offsets**

In its Draft Report program, the Queensland government notes that its 'avoid, mitigate, offset' hierarchy 'will effectively ensure that unacceptable impacts on MNES will not occur' (p.3-34). Its new offsets policy (interestingly, as yet, only a draft, the call for comment on which has only just closed) is listed in the Draft Report as one of its Forward Commitments.

A close examination of the proposed/adopted(?) new offsets policy shows that the aim of the revision of the offsets policy was to make the development application/assessment process quicker and easier for business. It was not based on an empirical assessment of the ability or failure of the existing/old offsets policy to deliver net benefit for the environment.

The Draft Report claims that the weakness of the existing/old offsets policy was that it had 'limited opportunities to deliver more holistic and strategic outcomes' – but what this translates as is unclear. It is unfortunate, but possibly significant, that the alleged weakness is not couched in terms of the health of the environment.

In reality, the new offsets policy, against expert views on best practice offsets policy, delivers a 'one-size-fits-all' ratio of damage:offsets. This ratio (1:4) means that species and issues that require a greater than 1:4 ratio of loss to offsets in order to survive, will be sacrificed.

The reality of the proposed new offsets policy does not concur with the Draft Report's assurance that the Queensland government will help 'ensure management adapts to the latest information and scientific evidence' (p. i-8).

Again, the rhetoric does not fit the reality.

### **B.4 Everyone's Environment Program**

The Queensland Government's Program Report refers to the "successful" Everyone's Environment (EE) Grants as one of several programs with the aim of enhancing MNES (PR, p. i-4). The Everyone's Environment program provides \$12 million over 3 years. The grants are for sums between \$2000 and \$100,000 and are given to a range of largely amateur community, school, landcare, hobby groups for a range of micro to small projects scattered across the State. To date, \$6.4 million have been distributed.

The Draft Report describes the EE Grant program as one of several 'initiatives designed to address systemic and chronic issues that are often the legacy of past activities'. It claims that these initiatives 'provide the best opportunity to make a

real difference to MNES over the 25 year life of the Program and will build resilience to cope with likely future impacts of climate change’.

There are no data to support these claims as to the ‘success’ and ‘value’ of the EE Grants. They are made despite the fact that the work involved in many of the projects in the first round of the program has not yet been completed. A major criterion for success is the number of volunteers involved in the project.

It is intuitive that a program of this type can have very little impact on the nature and scale of problems facing the GBRWHA coastal zone; nor are they likely to compensate for the ongoing negative impacts associated with ongoing and proposed coastal development and land use in the catchment.

Significantly, Phase Two of the EE Program is not even for environment-based projects at all; it is for ‘cultural heritage’ projects.

## **B.5 Dugong Protection**

According to the Federal Strategic Assessment, the condition of dugongs in the GBRWHA is ‘very poor and declining’ and the expected future condition is ‘very poor’. Presumably this situation is known to the Queensland government because, apart from the ‘strong joint management’ it claims to undertake with the Federal government, it, as pointed out in the Coastal Zone Program Report, ‘... undertakes broader scientific assessments of the threats to MNES. This includes ‘... a Dugong research and monitoring program’ (p.i-6).

Notwithstanding the state of the dugong population, and despite attempts to research, monitor and protect dugong via, for example, its ‘Dugong Protection Areas’, the Queensland government has not objected to the annual granting by the Federal government of permits for the annual jet-fired powerboat races in the Dugong Protection Area off Townsville, and has encouraged massive port expansion in known dugong habitat areas (such as Cleveland Bay in Townsville, Abbot Point and Gladstone).

Yet again, the Draft Report provides evidence of a disjunct between ‘what we say’ and ‘what we do’, between ‘how things are’ and ‘how things are portrayed’, and between ‘what is needed’ and ‘what is done’. Empiricism is missing in action.

## **B.6 Abbot Point CIA**

The demonstration case of Abbot Point states that the CIA done for Abbot Point was ‘effective’. This is strongly refuted on the basis that it failed to consider (i) several relevant indirect impacts of the port development (such as the railway and the mines themselves, without which the port would not be necessary; note that it was established in *Minister for the Environment and Heritage v Queensland Conservation Council Inc* (2004) – the ‘Nathan Dam Case’, that a decision maker cannot assess the impacts of a project without looking at what it is being built for.<sup>7</sup>), (ii) many factors related to the port development and having an impact on

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<sup>7</sup> McGrath, C 2005, [‘Federal environmental laws consider direct and indirect impacts of an action’](#).

the GBRWHA (for example, noise), and (iii) synergistic interactions between impacts.

The CIA was basically an exercise whereby a limited number of impacts from a limited number of actions were considered simultaneously. It failed to meet the standard established in 2010 by Franks et al. in their [Cumulative Impacts: A Good Practice Guide for the Australian Coal Mining Industry](#).

Finally, it did not fully explain how the cumulative impacts had been derived from the technical data on which it was based.

The adequacy of the voluntary NQBP et al. CIA was assessed in 2013 by [Grech et al.](#)<sup>8</sup>

They found that:

*The voluntary cumulative impact assessment conducted by several proponents of Abbot Point included a discussion on potential interactions between ports, port-related (shipping) and non-port pressures (climate change). However, this assessment did not quantify the relative magnitude of pressures or the additive, synergistic, or antagonistic interactions between them.*

## B.7 Reef Water Quality Plan

The Draft Report notes that, 'Reef Plan sets ambitious but achievable targets for water quality and land management improvement...' (p.3-47) and 'Reef Plan has a highly effective monitoring and review process to ensure the effectiveness of the management actions undertaken in the program' (p3-47).

Despite mention of annual reports on the progress of Reef Plan, there have been three such reports since 2003.

Since the beginning of the Plan, and despite \$200 million of taxpayer money, and more from land-users, it has been possible to decrease the quantity of nutrients, pesticides and sediment moving into the GBRWHA via run-off by only small and well-below-target amounts (see following table adapted from the Reef Plan Report Card 2011).

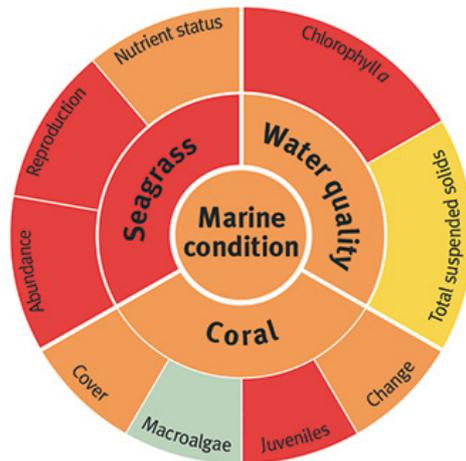
Issue	Target (%)	Achieved (%)
Proportion of graziers who adopted improved practices between 2009 and 2011.	50	17
Proportion of sugarcane growers who adopted improved practices between 2009 and 2011.	80	34
Proportion of horticulturalists who adopted improved practices between 2009 and 2011	80	25
Reduction in annual average total nitrogen load between 2009 and 2011.	50	7
Reduction in annual average total phosphorous load between 2009 and 2011.	50	7

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<sup>8</sup> Grech A et al. 2103, 'Guiding Principles for the improved governance of port and shipping impacts in the Great Barrier Reef', *Marine Pollution Bulletin*, 75 (2013) 8-20.

Reduction in annual average total pesticide load between 2009 and 2011.	50	15
Reduction in annual average total sediment load between 2009 and 2011.	20	6

As a result, the condition of water quality in the GBRWHA, of seagrasses and of corals is overall poor to very poor (see the following diagram from Reef Plan Report Card 2011).



Red = Very poor; Orange = Poor; Yellow = Moderate; Light Green = Good; Dark green = Very good

Given the poor results and the current condition of the Reef, it is difficult to understand why one of the 21 recommendations made in the Draft Report is: 'Consider expanding the scope of Reef Plan to incorporate other sources of pollutants (eg urban, port) **to provide a sound coordination mechanism** [emphasis added]. In the light of outcomes, it is time to critically assess the performance of Reef Plan.

Making the delivery of improvement (especially timely improvement) in water quality even more difficult/unlikely, is the fact that the Federal Minister for the Environment, in approving expansion of Abbot Point port, set the condition that water quality had to be improved by 150%.

The likelihood of achieving further improvement is also diminished by action at the State level. The Queensland government is working to remove Wild Rivers legislation and is supporting the proposal for large-scale developments (including horticulture, irrigated agriculture, grazing, and tourism) in Cape York and around Georgetown.

Any such development would have negative impacts for the Reef to the extent that they would inevitably increase sediment and nutrient input into the, as yet relatively healthy, northern third of the GBRWHA. The proposed development will be assessed by the Coordinator-General, whose primary responsibility is not environmental protection but economic development. It will be interesting to observe how GBRMPA's commitment (p.9 of the Draft Program Report) to '... focus on safeguarding values and maintaining the [northern] area in a natural state' will succeed.

The above are but examples of what NQCC sees as a fundamental problem with the Draft Report for the coastal zone. Similar examples occur in relation to: the claims for protected areas, which ignore the extent to which the protection of these areas is being whittled away by changes to legislation (see, for example, the submission of Queensland EDOs) and development approvals; and in relation to the Wet Tropics Heritage Area, the focus of a recent ABC Background Briefing Program, which highlighted the lack of resources provided to the WT Management Authority over an extended period of time, and the impact of invasive species.

## **B.8 The Draft Report's proposed 'improvements'**

The underplaying of the poor condition of the GBRWHA Coastal Zone and the over-egging of current programs to protect the zone would be less egregious if the Draft Report proposed improvements that would deliver real benefits to the GBRWHA of the nature and scale needed. Unfortunately this is not the case – as can be seen from the following table. There is no apparent attempt to link the cause of the problem to the 'improvement'. Furthermore, the majority of the 'improvements' appear to be minor adjustments to current practices – the very practices that have been in place during the period of rapid decline in the health of the Reef.

### ***Comments on the Draft Report's Recommendations for improved management of the GBRWHA Coastal Zone***

<b><i>Essence of the recommendation</i></b>	<b><i>Comment</i></b>
Make understanding and assessment consideration of MNES more explicit	No evidence to suggest how this would result in improve outcomes.
Make local area maps more available	No evidence to suggest that lack of maps has led to degradation of the zone.
Include additional material in maps	No evidence to suggest that poor maps has led to degradation.
Help identify GBRWHA values that are not easily mapped	Unclear how this would limit degradation, especially in the short - term
Help assess Indigenous heritage values in the GBRWHA	Limited relevance to environmental values.
Work with others to improve understanding of CIs in the GBRWHA	Good – schedule for this? Must go beyond 'understanding'.
Streamline assessments and better coordinate community consultation	No evidence to suggest that streamlining will lead to better environmental outcomes? Community consultation seen as 'box-ticking'
Streamline and better align Fed and State protected area and tourism management	No evidence to suggest that streamlining will lead to better environmental outcomes.
Concentrate port development around established major ports and encourage master planning	Little evidence how this will improve GBRWHA values. No discussion of impact of dredging or dumping. Or of time limits to this.
Support a management strategy for islands	How important is this? How long will it take? What would it be likely to involve?

Help establish conditions that 'give confidence that impacts will be mitigated as far as possible'	Confidence to whom? This should read establish conditions that ' <i>ensure impacts mitigated as far as necessary</i> '.
Review and align Qld offsets policy	Decision already made? Based on ease for business not robust scientific.
Help identify outcomes for MNES that can be monitored to assess the effectiveness of management	Surely these are already known... and surely empiricism is used in measuring management effectiveness now.
Develop and implement a long-term sustainability plan for the GBRWHA to better coordinate plans	Wasn't that the point of this SA exercise? And any plan needs to go beyond better coordination of plans.
Consider expanding Reef Plan	Identify why it is working only poorly before considering expansion. Quicker achievement of targets is essential.
Help identify research needs	Surely, standard ongoing practice
Help look for opportunities to integrate monitoring and report against consistent goals	Isn't this just standard practice for continual managerial improvement?
More explicitly report on condition/trend of MNES	Need to do something about improving the situation, not just reporting on it.
Consider improved governance arrangements	Wasn't that the point of the Strategic Assessment exercise?

Noticeably, in comparison with the recommendations made by GBRMPA in relation to the marine aspects of the Strategic Assessment, the Queensland Draft Report makes no recommendations for improvement in the area of climate change – not even of adapting to climate change. Given that climate change is the number one threat to the reef, and that the sources of climate change-triggering carbon emissions occur on land under the control of the Queensland government, this is a reprehensible, but telling, omission.

## B.9 Overall

Overall, NQCC supports the findings of the SKM independent review of the Coastal Zone Strategic Assessment that was commissioned by the Federal Government.

Its summarised concerns relate to overly positive claims for current management effectiveness, failure to address key issues, notably ESD and climate change, and recommendations that have no obvious link to the problems or the causes of the problems. 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, remains unclear.

As indicated at the throughout this submission, NQCC stands willing and able to contribute to the ongoing work foreshadowed in the reports.



Wendy Tubman  
Coordinator