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Reef 2050 Long-Term Plan Submissions  
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### **Submission from North Queensland Conservation Council on the Reef 2050 Plan: 'The King is in the altogether'**

I write as the Coordinator of North Queensland Conservation Council (NQCC), the regional conservation council responsible for working for the environmental protection of the area from Bowen north to Cardwell and from the reef to the border of Queensland and the North Territory.

Five years ago, in GBRMPA's first Outlook Report in 2009, the Executive Summary included the statement:

*'... even with the recent management initiatives to improve resilience, the overall outlook for the Great Barrier Reef is poor and catastrophic damage to the ecosystem may not be averted'.*

Five years later, the Authority's 2014 Outlook Report, using virtually the same language, confirmed that things had worsened:

*'Even with the recent management initiatives to reduce threats and improve resilience, the overall outlook for the Great Barrier Reef is poor, has worsened since 2009 and is expected to further deteriorate in the future.'*

In other words, recent (and not so recent) 'management initiatives' have not had the desired effect.

But the lesson has not been learned. The Draft Long Term Sustainability Plan for the Reef 2050 (the Plan) relies, almost exclusively, on a 'business as usual' approach, 'building on' existing activities, tweaking what we already have. Even the Premier's 'Great State Update' could only point to the fact that the Plan is a means of drawing together all the other plans and programs for the Reef.

The Website notes that 'At the core of the Plan is an outcomes framework' – a skeleton of aspirations for the Reef, lacking the flesh and muscle needed for the skeleton to be anything other than a rigid picture of what is desired without details of the means to make it happen.

This is inadequate. If the Reef is to be saved, there must be a paradigm shift, a whole re-think of the issue, an approach not bound by earlier, failed or only partially effective, approaches. Instead, the Plan focuses on building on a medley of past attempts to improve the health of the Reef - and even that not just without additional resources, but also with cuts in current levels of funding to the main organisations involved in and charged with protecting the Reef.

At a time of very real crisis, it is necessary to think outside the box, face hard questions and make equally hard decisions.

What consideration has, for example, been given to World Heritage Manuals - such as managing tourism at world heritage sites? What consideration given to the likely increase in the size of ships (e.g. Triple Es) and the impact that will have? What about the impact of the elephant in the room – climate change?

When bold action was called for, we have been offered a timid approach, albeit one camouflaged with hollow managerial words and lofty aspirations.

The final Plan needs to be based on an open admission that 'things are dire, the potential catastrophic, and our well-intended approach has not worked because things are getting worse'.

### **The failure of multiple use**

The approach seemingly being taken rests on a false belief that because the Reef is big ('*the size of Italy*'), it can absorb more and more, indeed endless numbers of, insults. It is assumed that the main object of the Marine Park Act ('... to provide for the long term protection and conservation of the environment, biodiversity and heritage values of the Great barrier Reef Region) is only as important as the secondary ones – whereby uses are allowed only '**so far as [they are] consistent with the main object**'.

Instead of respecting this hierarchy, over the years, and increasingly, the concept of multiple use has become sacrosanct: if it is permissible, it must be permitted. The failure of this approach is clearly evidenced in Figure 2 of the Draft LTSP, a summary of the findings of the 2014 Outlook Report. Of the 9 chapters listed, all measures of natural health (biodiversity, ecosystem health, natural heritage values, resilience, and long-term outlook for the Reef) are declining. At the same time, non-natural and negative criteria (commercial and non-commercial use, risks, and factors negatively influencing the Reef) are increasing. Put simple, **use is increasing, health is declining**. But notwithstanding that blatantly obvious correlation, existing protection and management is deemed to be improving!

In other words, the authorities (including governments) are claiming to be doing a good job, all the while allowing increased exploitation of the Reef to damage the natural values.

This delusional approach must be abandoned. The truth that the king has no clothes – is 'as naked as the day that he was born' – must be admitted.

### ***Cumulative Impacts, Offsets and Net Benefit***

Cumulative Impact Assessments must be used in order to put limits around developments, not to provide information that can be used to design monitoring program – or worse still 'offsets' or (even worse again) 'net benefit' programs.

Offsets and the new, and even deadlier, 'net benefit' concept (which provides a perverse incentive to damage) implies the reef can continue to absorb more and more damage and that there will always be ways of 'making up for this'. There is no evidence that offsets or net benefit approaches work. If they did we would not be seeing the continuing decline the health of the Reef.

Finally, the all-important precautionary principle, which would limit damaging exploitation, is virtually ignored.

Overall, NQCC is of the view that the Plan has taken a limited view of the situation and the steps required to turn it around. With an approach blinkered by past and current practices, the architects of the plan have failed to appreciate the enormity of the challenge and the subsequent need to consider new, bold, initiatives, and the need for limits to the exploitation of the Reef.

Fundamentally, they have ignored the main object of the GBRMP Act and the requirements of the EPBC Act and forsaken hard models for soft, vague and aspirational statements.

### ***Link between targets and actions***

There is inadequate consideration of how actions will achieve targets. Definitions are poor and the program logic is missing. As a result, the Plan can only be seen as aspirational; it is not based on the robust and rigorous science that is necessary to protect something as complex as the GBR.

Actions that will be introduced in order to more fully protect the Reef are inadequately defined and detailed. What action will be undertaken? And what is the evidence that they will be likely to deliver against the targets and outcomes proposed?

Furthermore, there is no explanation of how will achievement of targets be enforced?

Recommendation: Actions need to be detailed and clearly linked to targets and outcomes in quantitative rather than just qualitative ways.

## ***Historical achievements***

The failure of earlier approaches needs to be acknowledged and considered in whether or not they should be continued, let alone, used as a basis for building on.

For example, the decreases in sediments and nutrients achieved under existing programs have been very slow and way below target. Should such 'voluntary' schemes be relied upon to work, let alone work better, in the future? Is it not time to consider regulatory prohibitions on runoff?

The Plan fails to acknowledge planned policy changes in Queensland that will contribute to increasing the pressures on the Reef.

In this we are aware that the upper one third of the Reef is in relatively good condition, the lower two thirds suffering. The causal factor is the extent of human impact and coastal development. To plan to greatly increase the development of the northern hinterland is only to encourage further degradation of the Reef.

Recommendation: Comment is needed on the impact of the relaxation of state land clearing laws and of the state proposal to open up Cape York and others areas of northern Queensland to irrigated agriculture.

## ***Climate change***

We are aware from the GBRMPA Outlook Reports (2009 and 2014) that the greatest threat to the Reef is climate change. With bitter irony, NQCC notes that the current plans to greatly expand the development of the GBR coast relates to the expansion of coal export terminals, with coal being the greatest driver of climate change.

In this scenario it is ludicrous to claim that in the matter of climate change, 'the Australian government is playing its part'. **It is not.** And it is recognized worldwide as not. It is globally regarded as dragging the chain on this matter.

Within the main agency responsible for attaining and maintaining the good health of the Reef, GBRMPA, severe staffing cuts have been made and the groups dedicated to climate change, abandoned. This is mirrored throughout government bodies.

Recommendation: The greatest threat to the Reef, climate change, must be addressed seriously.

## ***Port development plan***

Much has been made about the plan for port development along the Reef. As has been pointed out previously, the plan as, again, a business as usual approach. All current proposals for expansions are exempt from constraint, while the plan itself only constrains development for ten years.

Recommendations: Serious thought must be given to find creative approaches to deal find alternatives to endless growth for port development along the GBR coast.

### **Lack of funding support**

UNESCO requires plans for the care and restoration of the Reef to be adequately funded. Under the terms of the WH convention, Australia is required to do its utmost to protect the Reef.

The lack of additional funding to restore the health of the Reef is indicative of the government's frail commitment to achieve the required outcomes.

Recommendation" That the resources necessary to restore the Reef to health must be dedicated if Australia is to be compliant with its obligations or satisfy the demands of UNESCO. At a time when Australia can find billions of dollars to wage a war in the middle east, budgetary poverty cannot be used as an excuse to resile from its responsibilities.

### **Summary**

NQCC expresses its disappointment with the Reef 2050 plan.

At a time when the future of the Reef itself (let alone its future as a World Heritage listed icon) is at risk, an important opportunity has been missed.

The Draft Plan is timid and irrational, relying on more of the same to deliver a different outcome.

Words will not deliver, spin will not conceal the fact that without serious discussion of the issues and a willingness to adopt bold change, the Great Barrier Reef is will become little more than an algal covered inanimate rock edifice slowly breaking up along the Queensland coast.

NQCC asks that the final Plan step up to the challenge and deliver a blueprint far more likely to ensure the renewed health of the Great Barrier Reef.



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