

17th December 2018

Priority Port of Townsville Master Planning
Transport Strategy and Planning
Department of Transport and Main Roads
GPO Box 1549
Brisbane QLD 4001

By email: TownsvillePortMasterPlan@tmr.qld.gov.au

Dear Minister,

RE: AMCS, WWF-Australia and NQCC submission on the Townsville Port Master Plan

Thank you for the opportunity to provide comment on the Draft master plan Priority Port of Townsville (**Master Plan**). This letter forms a part of submission for the Australian Marine Conservation Society (**AMCS**), the World Wide Fund for Nature Australia (**WWF**) and the North Queensland Conservation Council (**NQCC**). Within this letter we have highlighted our primary concerns with the Master Plan, which we will provide more detailed information on in the upcoming weeks.

The level of dredging proposed when the health of the Great Barrier Reef is declining

There is overwhelming evidence that many of the values that collectively comprise outstanding universal value (OUV) of the GBRWHA have deteriorated since 1981. The Reef is exposed to many direct and indirect human induced threats, including agriculture run off, fishing, shipping, urban and industrial development and climate change. The cumulative impact of all these activities, along with naturally occurring impacts such as cyclones and outbreaks of coral predators and disease, has caused a massive decline in the presence and resilience of the habitats and species of the Great Barrier Reef.

The amount of dredging proposed is the largest amount of dredging proposed for the whole Reef coast. While other ports are making decisions to not expand (Hay Point) or reduce dredging (Abbot Point) the Port of Townsville has increased its amount of dredging from 10.9 to 11.4 million cubic metres. The duration of dredging will also increase from 4 years to 10 years, placing more long-term pressure on the surrounding areas of the Port.

Adequate options for land-based disposal

Priority should be given to scoping further the potential for land reclamation / reuse as the Port's annual maintenance dredging volume of 450-600,000 m³ is a significant volume for long term annual sea disposal. As our understanding improves about the measures needed to enhance the resilience of the GBRWHA both short term and long term under projected climate change impacts, the ability to dredge

and dump at sea may be further constrained. It would seem that further discussions are required with Townsville City Council and Townsville State Development Area owners including the Queensland government.

Optimisation

We appreciate the further work looking at optimisation of the port. However, we feel this can be a lot more detailed in terms of how the port itself can be better utilized to reduce the need for expansion. For example, Utilisation of the Dynamic Under Keel Clearance Systems (DUKC) and port arrival systems can reduce requirements for dredging and achieve operational efficiency of port infrastructure. We would also like to see more detail on the projected growth consistent with realistic export produce forecasts and economic growth scenarios for northern Australia.

Impacts to OUV

The OUV and their significance appear to draw largely on the EIS for the port expansion. This EIS dates back to 2013, which predates the two major bleaching events in 2016 and 2017. In 2016, the Great Barrier Reef experienced its worst bleaching event on record. This was followed by another severe bleaching event in 2017. Two consecutive years of severe bleaching within the Great Barrier Reef has resulted in 50% shallow water coral loss. This needs to be considered when assessing the importance of corals within the area. Similarly recruitment within the Great Barrier Reef has been severely reduced therefore the contribution of local reefs to recruitment cannot be undervalued and should not be compared to the size and density to mid and offshore reefs.

Cumulative impacts

The master plan refers to environmental impact assessments forming part of the process in terms of assessing the cumulative impacts. As stated above the EIS that is used to assess the impacts of the port expansion predate the back-to-back bleaching events in 2016 and 2017.

In its 39th session in July 2015, the World Heritage Committee noted that the overall outlook for the Reef is poor, and that climate change, poor water quality, and coastal development are major threats to the region's habitats, species, and ecosystem processes¹. During the Committee's discussions, four countries specifically mentioned the cumulative impacts of these threats².

The committee did not list the Reef as “in danger” at the 2015 meeting, however it did put the government on notice. The WHC requested that the Australian Government demonstrate how it will implement its long-term plan (Reef 2050) designed to restore the values for which the Reef was listed as World Heritage, and then to report again in 2019. Managing cumulative impacts is a major underpinning theme of the Reef 2050 Plan and requires all threats to be assessed as a whole.

More up-to-date information that includes the bleaching events of 2016 and 2017 must be included.

Investigations to be included

Finalisation of the draft Master Plan needs to take into account presently uncompleted investigations including i) a comprehensive risk assessment covering all environmental, technical and operational, economic, and social and cultural risk areas that have been developed for the Port of Townsville, and

¹ *World Heritage Committee. (2015). Decision 39 COM 7B.7. United Nations Educational, Scientific and Cultural Organization (UNESCO), Paris, France, pp. 68-69.*

http://whc.unesco.org/download.cfm?id_document=137710&type=doc.

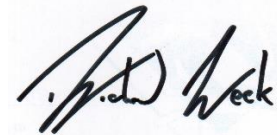
² <https://theconversation.com/not-out-of-hot-water-yet-what-the-world-thinks-about-the-great-barrier-reef-42945>

(ii) a dredge material placement area (DMPA) location investigations for future disposal options within Cleveland Bay and the Townsville area.

Yours sincerely



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