

13 July 2021

Great Barrier Reef Marine Park Authority
Environmental Assessment and Protection Unit
PO Box 1379
Townsville, Qld 4810

assessments@gbrmpa.gov.au

Dear Sir/Madam,

Re: Museum of Underwater Art Proposal for Yunbenun (Magnetic Island)

North Queensland Conservation Council (NQCC) appreciates the opportunity to comment on the proposal for an underwater art installation at Yunbenun (Magnetic Island). We wish to highlight our conservation concerns and seek more detail and assurances regarding the management and/or mitigation of risks to the natural environment.

About Us

NQCC is a peak body for North Queensland's environment and is part of a state-wide network of conservation councils. Established in 1974, NQCC is a not-for-profit incorporated association with a broad mandate to protect the "land, waters and atmosphere of the region". We are the voice for North Queensland's environment and represent over 1300 members and supporters.

Overview

In principle, we support the Museum of Underwater Art's purpose to promote the natural values of the Great Barrier Reef, while educating visitors and encouraging behaviour that supports its long-term health. We also support the celebration of conservation science and recognition of individuals who have made significant contributions to reef conservation.

If this project is to proceed, it is crucial that it promotes and protects the natural values of the site and the Great Barrier Reef World Heritage Area. This includes mitigating and managing risks posed by the artworks themselves and any associated increase in human activity.

The main points that we wish to raise are as follows:

- The proposed project should not be located in a green zone (such as Geoffrey Bay);
- The PIP contains insufficient information regarding environmental risk mitigation;
- Assurances of best practice have not been adequately provided.

Site Selection and Zoning

'Site selection' is cited as important for mitigating impacts, yet the preferred site (Geoffrey Bay) is a green zone, a level of protection reflective of its high conservation value.

Below are just some of the important natural values of Geoffrey Bay, as identified by MINCA (Magnetic Island Nature Care Association):

- the beach and tidal flats at Geoffrey Bay host a large variety of vulnerable and critically endangered migratory bird species;
- the shallows are a nursery ground for many vulnerable shark and ray species;
- central areas of the bay support sea grass meadows, sustaining dugong and marine turtle species; and
- the bay boasts diverse and beautiful marine life, century-old coral assemblages and was the site of the world's first discovery of mass coral spawning in 1981.

Green zones are marine national parks, designated for the conservation of marine life. The installation of artworks in the Geoffrey Bay green zone would be inconsistent with the objectives of the zone. Granting permission for this use in a green zone could set a dangerous precedent and sends the wrong message about the purpose of green zones.

According to the [Geoffrey Bay and Alma Bay \(Arcadia\) Catchment Management Strategy Report](#) by Townsville City Council and Creek to Coral, "Human activity in the Geoffrey Bay and Alma Bay catchment can have adverse impacts on the Great Barrier Reef WHA and its values and especially in near shore areas." Foreshore degradation is already evident in Geoffrey Bay, believed to be the result of increasing visitor numbers.

We strongly urge other sites be considered above Geoffrey Bay for this installation. As an example, Nelly Bay offers very similar values to Geoffrey Bay but is a blue zone, which we believe would be more appropriate for this kind of purpose.

Risk Mitigation/Management

According to the PIP: "Effective management tools to mitigate the effects of underwater art installation and management include planning, risk assessment¹, site selection², design, training³, site supervision⁴, appropriate signage and briefings³ to educate visitors about best practices and their potential damaging activities."

Our questions:

1. Why were the full list of potential risks to the environment, and plans to mitigate/manage them, not clearly outlined in the PIP?
2. How was Geoffrey Bay selected as the preferred site for the proposal, given it is one of the most ecologically important and sensitive of those assessed?
3. Will training or briefings be mandatory for all visitors? How will this be provided?
4. When will the site be supervised and what will be the nature of this supervision?

We believe that there is insufficient information within the PIP regarding how impacts to the natural environment will be minimised and how visitor numbers and behaviour will be managed for this proposal to be given full consideration.

Assurances Required

For this proposal to proceed, we believe the following is required:

- A fully independent Environmental Impact Assessment, made publicly available;
- More information regarding how seagrass meadows will be protected;
- Assurance that each structure will be placed on sand or other substrate and not lead to the damage or removal of any corals;
- Assurance that the statues will be fully subtidal to minimise damage to reef flats;
- Evidence that the structures will be able to withstand cyclone/storm activity and that their materials will not degrade and cause environmental harm; and
- Details about how visitor numbers and behaviour will be managed to best protect sensitive ecosystems.

If Geoffrey Bay is selected as the site, we would further expect:

- An outline of the risk mitigation for the vulnerable and critically endangered migratory birds that utilise the beach and tidal flats at Geoffrey Bay;
- Details of the risk mitigation for the shark and ray species that use the shallows of Geoffrey Bay as nursery grounds;
- Justification for the construction of privately managed tourism infrastructure within a green zone, given this is not outlined as a permitted activity; and
- The decommissioning of Geoffrey Bay's old barge ramp and the rehabilitation of the barge access channel, as an offset (as put forward by Dr Katharina Fabricius).

Conclusion

We know GBRMPA prides itself on using the best available science to manage the Great Barrier Reef World Heritage Area. We expect that the precautionary principle will also be applied in this case, to best protect its natural values.

We look forward to receiving more information about this proposal and plans to manage/mitigate any environmental impacts on the Great Barrier Reef World Heritage Area.

Please contact our organisation for a response or any clarification on 0406 421 061 or by email at coordinator@nqcc.org.au.

Yours sincerely,



Crystal Falknau
Coordinator
North Queensland Conservation Council