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Comments related to Mission Beach Safe Boating Infrastructure Project

North Queensland Conservation Council (NQCC) is grateful for the opportunity to submit these comments to the Great Barrier Reef Marine Park Authority (GBRMPA) in relation to the application for a permit to construct infrastructure in the waters of the Marine Park at Boat Bay (Narragon Beach) in north Queensland.

Having examined the material provided by the proponent, NQCC is opposed to the granting by GBRMPA for any permit for this construction. Our reasons are provided below.

1. Lack of information on which to make a decision

For reasons that are hard to fathom, but may well be linked to a desire to avoid undertaking a full assessment, this relatively tiny project was determined to be a 'Major Project' under State legislation. Despite being so categorised, and despite the existence of many MNES within the area (itself part of the GBR World Heritage Area and abutting the Wet Tropics World Heritage Area), the project was deemed by the Department of Environment to not warrant listing as a controlled action. As a result, the project also managed to avoid full assessment at the Federal level.

As a result of this inexplicable but suspicious and conflicting process, resulting in a lack of proper assessment at any level, there is inadequate information on which GBRMPA can make a permit decision.

(a) Marine Ecology, Water Quality and Sediment Sampling Report

This report (Appendix D) is totally inadequate – a fact attested to by the list of limitations of the methodology included in the Report. This list is worth reproducing. It states in its entirety:

- *Each survey point represents a one off snapshot in time of the ecological characteristics of Boat Bay and Clump Point;*
- *The survey does not represent the entire Boat Bay and Clump Point sub-tidal environment;*
- *Identification of sub tidal [sic] flora, fauna and coral and marine fauna is limited by the methodology employed and the prevailing underwater visibility;*

- *Due to the timing limitations of the project, delineation of dry and wet seasons has been based on typical seasonality, and may not reflect the prevailing climatic conditions; and*
- *The diving component of the investigation was not undertaken by an experienced marine ecologist.*

Despite this woefully inadequate survey, including the fact that just one sample water sample was taken on one day in the dry season, and two samples were taken over two days in the wet season, the samples were subject to tests that provided no less than 102 pages (of a 217 page report (including all appendices, indices, cover pages, references – everything except the 'Summary Document') of detailed water quality data. There is little to no discussion of the implications of these data.

(b) Lack of information relating to wave action and beach erosion

The placing of a permanent fixed structure in the coastal zone will, inevitably, change wave patterns, leading to beach erosion. Such has happened at, for example, Nelly Bay, where twice year sand replacement activities are required to compensate for the loss of beach resulting from a similar breakwater. An estimated 15 metres of beachfront land has been lost, with the loss of many trees and threats to properties.

It is already recognised that a proposed land reclamation at Townsville Port will have a similar impact on The Strand.

Given the lack of need for this proposed project, any intentional undertaking of actions that would result in such damage cannot be countenanced.

(c) Lack of information on need or effectiveness

There is no hard information provided as to the benefits to be derived from this project.

Appendix C (Consultation Material) includes a reproduction of a flier distributed only to local community members. There is no indication of how this survey was conducted, response rates, whether or not results were statistically valid etc, yet it makes sweeping 'positive' statements relating to the Clump Point boat ramp, The only comment related to the Jetty in the flier is 'Concern was expressed about the effectiveness and visual impact of the jetty upgrades'. A further consultation document notes that 'The jetty concept was viewed with caution'. Issues raised included safety and exposure of the jetty, water depth, navigation around the breakwater, and visual impact of the overtopping breakwater.

The flier makes the comment that 'larger commercial operations from the Perry Harvey Jetty [will give] the local economy a much-needed boost'. There is no evidence (such as a socio-economic assessment) supporting this statement. There is no discussion of the potential impact of any such 'boost' on other aspects of the local community and economy. For example, there is no consideration given to the impact on wildlife (especially cassowaries) of any increase in road traffic or widening of roads.

Finally there is no information provided on how the jetty will create safe conditions or over what period in what conditions. The jetty faces ENE in a wide bay exposed to the full brunt of prevailing winds, storms, waves and cyclones (in a period when storms and cyclones are expected to intensify due to unabated human-induced climate change). There is no information how a pile of rocks in the ocean will mitigate these conditions and allow for 'safety'.

There is also the concern that creation of this breakwater would set the stage for further intrusive development at this extremely valuable area in Australia, where two World Heritage Areas (the GBR WHA and the Wet Tropics WHA) met.

(d) Lack of information of the impact on marine flora and fauna

The information on and discussion of the impact of the proposal in marine ecology is inadequate. Indeed, it appears to be based entirely on lists of MNES species that could be found at the site and comments on the discovery of unidentified flora in the 3 dives (by a non experienced marine ecologist) undertaken over 3 days.

(e) Lack of information on the Multi-Criteria Analysis undertaken

Multi Criteria Analysis has previously been used to assess options for activities related to the GBRMP. Of note is that done by GHD for the Abbot Point spoil disposal options. That MCA was severely flawed in its approach and identified the now abandoned offshore site in the GBRMP as the 'best' option. What was later identified as the best option by the proponent (the State government), was identified in the MCA as the worst option.

There is no data related to the MCA in the documentation provided. It is possible that this too was seriously flawed. It is essential that that documentation is obtained and fully assessed prior to any decision being made by GBRMPA.

2. Conflict with principal object of the GBRMP Act

The project lies within the GBR Marine Park and so is subject to the GBRMP Act, the principal objective of which is: *to provide for the long term protection and conservation of the environment, biodiversity and heritage values of the Great Barrier Reef Region.*

All other objectives of the Act allow for various uses (including public enjoyment, and recreational, economic and cultural activities) **ONLY** so far as they are consistent with the main object.

There is no evidence that the proposed project would assist in provision for *the long term protection and conservation of the environment, biodiversity and heritage values of the Great Barrier Reef Region* at Boat Bay.

However, there is evidence that the proposal would harm the environment, biodiversity and heritage values of the GBR Region at Boat Bay.

3. Conflict with the objective of the EPBC Act

The infrastructure proposed would be in the GBRMP and the GBRWHA. As is patently obvious, including those consulted during the process, the breakwater would have a huge impact on the aesthetic aspects of the area.

This is an important component of the World Heritage Convention, as recognised by UNESCO, yet it rates little to no comment in the report and the material provided for comment.

As with the objectives of the GBMP Act, the proposal is inconsistent with the objects of the EPBC Act.

Summary

On the basis of the above brief comments, NQCC urges GBRMPA to reject the application for a permit for the construction of the breakwater at Boat Bay, in the grounds that no convincing case has been made for its construction and that the construction, by nature of its location, would have negative impacts on the GBR and the GBRWHA.

A handwritten signature in black ink, appearing to read "Wendy Tubman". The signature is written in a cursive style with a period at the end.

Wendy Tubman
Coordinator