Gladstone Ports Corporation

Growth, Prosperity, Community.

Our Ref: 933 454

8 April 2013

Committee Secretary
Senate Standing Committee on Environment and Communications
P.O. Box 6100
Parliament House
Canberra ACT 2600

Dear Sir/Madam

Environmental Protection and Biodiversity Conservation Amendment (Great Barrier Reef) Bill 2013

Thank you for the opportunity to provide a submission on the Environmental Protection and Biodiversity Conservation Amendment (Great Barrier Reef) Bill 2013.

Gladstone Ports Corporation (GPC) operates port centres at the Port of Rockhampton, Port of Gladstone and the Port of Bundaberg. The Rockhampton and Gladstone ports are located within the Great Barrier Reef World Heritage Area (WHA) and shipping travelling to and from these ports passes through the Great Barrier Reef Marine Park.

GPC and its precedent organisation have been undertaking port operations and constructing and managing port infrastructure in Central Queensland for nearly 100 years. The majority of its employees live locally and enjoy the many benefits that the reef has to offer. Throughout its history the Port has been acutely conscious of its responsibilities to the community and, foremost amongst these, for minimising impacts on the Great Barrier Reef (GBR) and its surrounding environment.

GPC believes that given the large amount of work that is currently being undertaken by both State and Commonwealth agencies in response to the UNESCO's Great Barrier Reef Mission Report March 2012, and that the outcomes of this work are not yet available, an amendment to the EPBC Act of this nature is premature and probably unnecessary.

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The Bill appears to be based on an assumption that the development and operation of Ports is the predominant cause of adverse impacts on the GBR and the WHA. GPC challenges this assumption. In its *Great Barrier Reef Outlook Report 2009* the Great Barrier Reef Marine Park Authority (GBRMPA) identified that the major pressures on the reef included climate change, declining water quality, loss of coastal habitat from coastal development and some fishing activities. The risk assessment included in this report showed that risks associated with port development were in medium risk categories.

The results of the extensive monitoring program currently being undertaken as part of the Western Basin Dredging and Disposal Project in the Port of Gladstone show that the impacts of dredging activities are not significant in terms of environmental quality and impacts on marine ecology, and very localised. This is in stark contrast to natural events like the 2010 and 2013 floods which had catastrophic effects on the ecosystem which extended well beyond the immediate harbour.

Giving priority to amending legislation in a manner which focuses on an acknowledged medium risk ahead of activities presenting higher risks does not seem logical for the long term sustainability of the GBR. Information provided by GBRMPA suggests that run off from land draining into waters around the GBR has the most significant impact on the quality of the reef environment. A pragmatic approach would suggest that this issue is the priority for action.

Focusing on restricting port activities in the way outlined in the Bill creates a risk to Queensland and Australia's economic sustainability. Sustainable management involves the balancing of ecological needs with the economic and social / cultural needs of a community. The value provided by Ports to sustaining Australia's economy needs to be recognised. This is well summarised in the following statement from the National Ports Strategy

"Australia is an island whose place in the international economy and whose productivity, living standards and quality of life depend on trade performance. As a nation dependent on maritime trade, Australia's ports are an important gateway for goods. Consequently ports and associated infrastructure are of the utmost economic and social importance to Australia"

The Bill seeks to prohibit port development in areas with existing and lawfully established Port designations, such as Port Alma, and to place a moratorium on approvals for future port development in areas, such as the Port of Gladstone, subject to the completion of strategic assessments. The rationale for this approach is to limit ecological impacts on the WHA. GPC believes that the current provisions of the EPCB Act provide sufficient ability to achieve the outcomes related to approvals sought by this Bill. Accordingly it does not feel that the details included in the proposed amendment add value from this perspective.

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We also note that recommendation R2 of the UNESCO Mission report suggested that no approvals be issued for any new port development or associated infrastructure outside of the existing long-established major port areas within and adjoining the property. The Bill appears to seek far greater restrictions on port development than those recommended by UNESCO in the report which has triggered the current widespread concerns about the WHA. The current strategic assessments, and related work, being undertaken by State and Commonwealth agencies will provide a substantial amount of information that will allow rational discussion about future management regimes for both the GBR and the WHA. GPC believes it is prudent to consider the outcomes of this work before implementing any legislative changes.

Port operations and port limits at the Port of Gladstone and Port of Rockhampton pre-date the subscription of the WHA in 1981. Further, the outstanding universal values (OUVs) of this WHA were determined sometime after the WHA was established. GPC acknowledges the ecological significance of the GBR and supports endeavours to ensure its long term conservation and preservation; however, it has long standing concerns about how relevant the stated outstanding universal values of the GBR are to the environment within Port Curtis and Port Alma. Both Ports are naturally turbid estuarine environments protected from open water by coastal islands and are some distance from the GBR. .

Thank you for the opportunity to make this submission. GPC has no issue with the Committee releasing this submission to the public when it deems it to be appropriate.

Kind regards

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CHIEF EXECUTIVE OFFICER

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