

Manager, Strategy Development
Environmental Assessment and Protection
Great Barrier Reef Marine Park Authority
By email: consultation@gbmpa.gov.au

18 November 2016

Submission on Improving the GBRMPA Permission System

The North Queensland Conservation Council (NQCC) welcomes the opportunity to make a submission on GBRMPA's improvements to the permission system. We acknowledge and commend the process and thorough consideration of this important issue.

NQCC is the regional conservation council for the area from Cardwell to Bowen, and from the Reef to the Northern Territory border. Established in 1974, it falls under the broad umbrella of the Queensland Conservation Council and focuses on education, advocacy and policy development.

Overall, NQCC **supports** changes that facilitate understanding of the permit system and increase its transparency for applicants and the public. At the same time, NQCC appreciates the need for some system of triage, especially given the limited resources available to GBRMPA.

We **strongly support** upgrading 'discretionary considerations' (ie: optional considerations for application assessments) to making all criteria 'mandatory considerations'.

NQCC **supports** a system that retains decision-making within GBRMPA (that is, minimises delegation to more remote agencies), and one that strengthens the power to revoke permits where non-compliance is of concern.

It is essential that all GBRMPA permits remain appealable under the AAT.

NQCC **urges** GBRMPA to push for an end to the dumping of maintenance dredge spoil in or adjacent to the GBRMPA.

Brief NQCC comments on the specific issues follow.

1. Minimising decision timeframes

Comment:

- (a) Within any timeframes there must be scope and processes for extending the period in specific circumstances

(b) Assessment must remain with GBRMPA – delegation to the Department of Environment for assessment under the EPBC Act is not supported.

2. Expanding the standard ‘routine’ tourism permit

(a) Support

3. Requiring relevant information with an application

(a) Strongly support

4. Changing the permit fee system

(a) Support

5. Removing duplication with the EPBC Act

(a) NQCC has concerns that this may, while appearing logical, lead to a ‘lowest common denominator’ approach to approvals.

(b) We are also concerned about decisions being made ‘from a distance’.

(c) Rather than delegating to resources in Canberra, it would be preferable to increase resources in GBRMPA in Townsville.

(d) The GBRMP Act and the EPBC Act address slightly different issues and have different foci; it is important that both laws are complied with.

6. Identifying different assessment processes

(a) Support in principle, subject to the content of the forthcoming guidelines.

7. Improving the assessment criteria

(a) Strongly support, subject to proposed public consultation.

8. Evaluating prudent and feasible alternatives

(a) Strongly support

(b) Support ‘continuation applications’ being required to consider alternatives.

9. Changing the public advertising requirements

(a) Support but would like to see quarterly publication of a list of ‘minor’ permits approved but not advertised prior to assessment

10. Changing the process for suspending and revoking permits

(a) Strongly support

11. Expanding limited impact research

(a) Support

(b) Support publication of key statistics (as per 11.7)

12. Defining impacts

- (a) Support, subject to the pending guidelines (especially with respect to cumulative impact assessment)

13. Using risk management tools

- (a) Support

14. Managing facilities

- (a) Support

15. Setting permit terms

- (a) Support on the assumption that there will be close control over what is deemed 'low impact'

16. Aquaculture and Mariculture in the GBRWHA

- (a) NQCC **rejects** the use of the marine park for any form of aquaculture or mariculture. We see this as akin to allowing grazing in terrestrial national parks and is inconsistent with the conservation values of the marine park.

- The purpose of the GBRWHA is not for farming, but to perpetuate natural properties and processes with freedom from human interference. Farming structures, work vessels and work activities cannot be described as fulfilling world heritage duties.

- (b) NQCC **rejects** the proposal to define aquaculture within the GBRMP as "extensive".

- We posit that mariculture/aquaculture is intensive, because of the unnatural crowding together large numbers of organisms. Whether or not feed is added to the containments does not change the intensity. The defecation leading to unnatural accumulation of faeces has an impact on the natural life of the GBRWHA.
- Crowding of native and non-native organisms has the potential to lead to unnatural accumulation of faeces, disease and genetic introductions and restriction of food particles that wild organisms should be consuming.
- Accumulation and removal of faeces by fish farm workers, or dispersal by currents indicates a disturbance in the natural environment.

- NQCC previously opposed pearl farming off Orpheus Island National Park in the late 1990s. Accumulated faeces were carried away by fortnightly spring tides, ending up in the shallow, coral filled channel between Orpheus and Fantome Islands.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Jacob Miller', with a long horizontal flourish extending to the right.

Jacob Miller
Community Campaigner