



To: Queensland Ports Strategy Manager

Department of State Development, Infrastructure and Planning

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Re: Draft Queensland Ports Strategy

The Cairns and Far North Environment Centre (CAFNEC) is the peak environment organisation for the region from Cardwell north to Torres Strait and from the coast west to the Gulf of Carpentaria. CAFNEC is a non-profit, community organisation that has been operating for over 30 years with the aim of encouraging the community to value, protect and restore the natural environment.

We have serious concerns with the draft Queensland Ports Strategy currently open for consultation.

While we support in principle the commitment to “restrict port development outside the long-established major port areas within or adjoining the Great Barrier Reef World Heritage Area” we do not consider that this strategy delivers on that commitment. We would also like to make clear that even if the stated goal was achieved via this strategy, stronger regulation regarding the type and impacts of developments within the proposed Priority Port Development Areas (PPDAs) is also required. Our main concerns are summarised below.

Strategy will result in no real improvement due to loopholes

- We consider this strategy to be a ‘swiss cheese’ proposal whereby sensible principles are riddled with so many loopholes as to render it an ineffective and essentially a tokenistic exercise in attempting to be seen to address UNESCO recommendations while at the same time facilitating no actual change in direction or activity either underway or proposed.

No capital dredging outside of existing ports?

- Although the draft Ports Strategy prohibits capital dredging outside of existing ports for a period of ten years, it excludes from this prohibition dredging in relation to all current proposals. In relation to, for example, Cairns Port this means no change from the current situation and places no additional requirements on this proposal to address issues impacting on reef health in terms of local or cumulative impacts. This is not acceptable to CAFNEC and we recommend a total ban on dumping of capital dredge spoil in Great Barrier Reef and adjoining waters be adopted as part of the strategy.
- The statement that capital dredging outside PPDAs will not be prohibited where it is being undertaken for safety reasons, to increase a port's resilience to extreme weather events, or to maintain the effective operation of existing port facilities sounds reasonable on the surface but requires further definition. Such an exemption could allow inappropriate and poorly thought out jetty based port developments to then argue safety reasons for new capital dredging. Such activities must be ruled out.



- There is a lack of clarity regarding the borders of the PPDA's and no maps showing their footprint.
- Even the identification of the 5 broad PPDA areas lacks any real justification. The number of ports so identified and the rationale behind this requires proper explanation with a view to reducing the number of sources of damaging sediment, chemical and shipping related impacts. We note that many of the proposed PPDA areas currently operate at far less than capacity and that future demand is highly uncertain given fluctuating commodity prices and the necessary move away from fossil fuel energy sources. The current rush toward potentially unnecessary expansion of port capacity must be curbed in the strategy.

No assurance for World Heritage

- The lack of any additional restrictions on already proposed port developments does not acceptably respond to the recommendations made by UNESCO World Heritage Committee or go far enough to address the cumulative or localised impacts of capital dredging programs or increased shipping.
- One needs only to look at the impacts and outcomes of the recent industrial activities in the Port of Gladstone to see that current regime of environmental management is insufficient to address the concerns outlined by the UNESCO delegations and the GBR draft strategic assessment. Of particular concern is the poor state of reef health and the links between sediment, toxin and nutrient loads (such as those mobilised by dredging and shipping) and poor reef health including crown of thorns starfish outbreaks, and the direct and habitat impacts on species of conservation concerns such as dugong and inshore dolphin species.

No restrictions on landside developments

- Another 'swiss cheese' hole in the strategy is the statement that "the government will not prohibit port developments outside PPDA's that do not require capital dredging (for example, landside developments, or the construction of jetties/barging operations to ships in naturally deepwater). This clause clearly leaves the door wide open for the transshipping model proposed by the Mitchell Group at both the Fitzroy Terminal Project and further north at Wongai in Cape York. These methods are largely unproven in relatively unprotected waters such as the areas proposed, and pose a major threat to reef health and species of conservation concern. Previous advice from the Great Barrier Reef Marine Park Authority that finds the method "clearly unacceptable" and "posing extreme risk" to the GBR World Heritage Area should not be ignored in this strategy. The Ports Strategy should specifically rule out major transshipping of coal in waters adjacent to or within the GBR.

Insufficient information on Environmental Management Frameworks

- It is noted that the Ports Strategy appears to rely strongly on Environmental Management Frameworks (EMFs), but that these are discussed sparingly. Given that EMFs appear to be a cornerstone of the new 'streamlined' approvals strategy, this is unacceptable. The extremely limited explanation of EMFs means that they cannot be usefully assessed or commented upon. More detail on the requirements of EMFs and Port master plans in relation to cumulative environmental impacts and local and regional scale impacts is required. The statement that non PPDA ports will not be required to align with Australian Government



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standards for environmental assessment in order to have a master plan approved by the Queensland Government flies in the face of common sense and any sort of 'streamlining'.

The link between damage to the reef and inshore marine environments from port expansions cannot be ignored and neither should the link between the major proposed cargo (coal) and climate change, which is another key threat to reef and broader environmental health.

In conclusion, CAFNEC does not consider that this strategy adequately addresses environmental concerns regarding reef and inshore environmental health and fails to address recommendations by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) World Heritage Committee for the government to restrict port development outside the long-established major port areas within or adjoining the Great Barrier Reef World Heritage Area. The final strategy must incorporate further detail around issues identified above and address the shortcomings identified. CAFNEC commends the Government in moving toward more strategic approach to Ports management and looks forward to continued engagement in this important issue.

We look forward to being contacted in the future about this project and related projects.

Josh Coates

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