



Cairns and Far North Environment Centre

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Wangetti Referral Officer

Referrals Gateway

Department of Agriculture Water and the Environment

GPO Box 787

CANBERRA ACT 2601

epbc.comments@environment.gov.au

Dear Wangetti Referral Officer,

**Cairns and Far North Environment Centre : Wangetti Trail Proposals (North and South)
EPBC Referral Submission (Referral Numbers 2020-8722 and 2020-8723)**

The Cairns and Far North Environment Centre (CAFNEC) is a not-for-profit incorporated association that acts as the peak environment group for the region from Cardwell north to Torres Strait and from the east coast to the Gulf of Carpentaria. CAFNEC works to protect the environment by enhancing the capacity of local groups and community members to act for conservation, strengthening networks within FNQ, facilitating region-wide cooperation to identify and coordinate action on issues of regional significance and when necessary, engaging in campaigns that are strategically important for the region. Our organisation is responsible for a region that stretches over 380,748 km², has 538 individual members and 28 member organisations. CAFNEC also has a larger supporter base outside of our core membership.

CAFNEC believes that community interaction with, and stewardship of, our protected areas is essential to their ongoing conservation and protection. World Heritage areas that help people connect with their own reliance on our natural systems is key to all of our wellbeing. While the Wangetti Trail could have the potential to support this kind of stewardship and positive interaction, CAFNEC does not support activities in protected areas that are incompatible with the purpose of national parks, the conservation of nature as enshrined in the Nature Conservation Act 1999 (Qld). For that reason CAFNEC has some serious concerns about some of the elements of the proposed Wangetti trail.

Submission

Cumulative impacts

The Wangetti Trail is a significant trail that moves through many different land tenures, ecosystems, and has a number of different uses proposed. The trail must be assessed as a whole, acknowledging the interconnectedness of the ecosystems and how the different associated impacts of the trail impact each other.

The Independent Review of the EPBC Act: Interim Report, (Samuel, June 2020) demonstrates that the lack of consideration for cumulative impacts when assessing proposals under the Environment Protection and Biodiversity Conservation Act 1999 (Cth) is a key failure in its ability to protect our environments of significance. By separating the trail into two different assessments, the issue is only compounded.

The trail should be assessed as a whole, considering the interrelatedness of impacts.

Significant Impacts on our Protected Areas

As noted earlier, the Wangetti Trail proposal moves through numerous land tenures, including the Wet Tropics World Heritage Area (Wet Tropics). The Wet Tropics is recognised for both its natural and cultural outstanding universal values. Amongst a number of different concerning impacts to threatened species and their habitats, there are a number of issues that stand out. The proposal includes

- Between the two proposals, more than 30 hectares of Southern cassowary (*Casuarius casuarius johnsonii*) habitat is proposed to be cleared
- Injury and mortality of wildlife
- Habitat degradation through increased run-off and sedimentation
- Introduction and spread of invasive species and pathogens
- Disturbance of surface waterways and water bodies
- Habitat fragmentation
- Reduction in water quality in waterways from runoff from the proposed works

CAFNEC would also like to register concern regarding the permit issued by the Wet Tropics Management Authority (The Authority) which asserts that “the proposal is an activity which has been assessed pursuant to Part 4 Division 2 of the WTM Plan as having minimal impacts on the World Heritage value”. This assessment has been reached, despite the fact that The Authority has provided no conditions on the interference with a watercourse by extracting or diverting water, damming the watercourse or carrying out another activity that interferes with its natural flow. CAFNEC have serious concerns about the unregulated ability of interference of water courses in our World Heritage Area.

Operational and Management Costs

The Wangetti Trail proposal will require ongoing maintenance and management. At this point the proposal indicates that the management and maintenance of the trail will fall to the Queensland Parks and Wildlife Services (QPWS). Our Queensland Parks and Wildlife Service is already underfunded and struggling to maintain the existing parks infrastructure and natural areas (Queensland Treasury Corporation, September, 2018). The proposal does not demonstrate how QPWS will be resourced to carry out the extensive maintenance and management required for the trail.

Alternatives to the proposal

The referral indicates there are no alternatives to the proposal. CAFNEC has proposed alternatives to the trail to the EcoTrails team. Our region already has mountain bike trails that suffer from underfunding and poor management. As our submission asserted, mountain bike trails combined with hiking cause recreational conflict between users, and mountain bikes have significant impacts on natural areas. Alternatives exist for better managing our existing bike trails, and ensuring that the Wangetti trail is for walking purposes only.

Wet Tropics Management Permit

According to Schedule 1 of the Wet Tropics World Heritage Protection and Management Act 1993 (cth), the Wet Tropics Management Authority will;

“work in partnership with the community as a means of building a sense of ownership and sharing both the benefits and burdens of sound management. In particular, the Authority will consult with the community, both through its committees and directly and extensively on matters with significant community impact”

Additionally, as a member of the Community Consultative Committee (CCC) for The Wet Tropics Management Committee, I am responsible for providing feedback on the;

- *provision for acceptable use of the Area compatible with maintaining World Heritage values and integrity, and,*
- *Members of the Community Consultative Committee will have a duty to seek the views of the communities of interest that they represent on relevant issues.*

From what I can ascertain from documentation provided, the permit application came to the Wet Tropics Management Authority in December 2019. The Permit application was not brought to the attention of the CCC and we were not asked for our feedback regarding whether or not it was *acceptable use of the Area compatible with maintaining World Heritage values and integrity*. Therefore, I was unable to ensure my responsibility to ensure that the community I represent was able to represent on the issue.

CAFNEC is concerned the Wet Tropics Management Authority Permits contained in the referral to the EPBC Act were not publicly available or notified prior to the referral to the commonwealth and was issued prior to any public consultation on the details of the design and associated environmental impacts.

CAFNEC also holds concerns regarding the approval of private development within Zone C of the Wet Tropics Management Plan (The Plan). According to The Plan, the purpose of zone C is to

- a) to accommodate community services infrastructure, other community facilities and visitor facilities; but
- b) to the greatest possible extent
 - i) to ensure any adverse impact of activities carried out in the zone on the area's integrity is minimal and acceptable under this plan; and
 - ii) to otherwise protect and enhance the integrity of land in the zone.

CAFNEC does not believe that Zone C, as described, allows for private development. Community Infrastructure is generally not considered a for profit system. Given the lack of consultation for the permit given by The Wet Tropics Management Authority, CAFNEC does not believe that the community has been given the opportunity to provide feedback regarding this kind of development in Zone C.

Consultation on behalf of the proponent

The Proponent's Consultation Report states that there was regular engagement with CAFNEC. *"The Project Team has responded to all correspondence issued regarding the Wangetti Trail and continues to engage informally with these conservation groups."*

As the current Director of CAFNEC, since August 2019, I have not once been engaged in consultation or conversation of any kind with the Project Team. I have called their offices on a number of occasions, emailed and even attempted to engage through the Department of Environment and Science Community Engagement Team. Before my employment at CAFNEC, the team had contact with David Edwards, however my attempts to contact him have not resulted in anything.

There has been low transparency for the proposal. There has been little meaningful engagement with the community. There has been engagement for over a year now, with the CAFNEC, the representative conservation group for the region. The consultation report is not reflecting the truth of the situation.

Threatened Species

CAFNEC, like many other community organisations is suffering from capacity limitations during the pandemic, and has had insufficient time to review the impact assessment on threatened species and would like to reserve the right to comment on all threatened species later in the referral process. Particularly for habitat clearing and fragmentation. It is important to ensure that the activities of the Wangetti Trail is not putting further strain on our threatened species.

While CAFNEC is supportive of activities that promote stewardship of our protected areas, and believes that walking trails can be a great opportunity to do that, there are currently key elements of the Wangetti Trail that will have unacceptable impact on our protected areas.

CAFNEC requests that the Department of Agriculture Water and the Environment:

- Require the Referrals (2020-8722 and 2020-8723) to be resubmitted as one complete package once the full details of the proposal are known so that cumulative impacts can be assessed appropriately
- Classify the proposal as a controlled action
- Mountain biking be removed from the proposal as it is detrimental to protected areas and intrinsic World Heritage values and would undermine the experience of walkers and other low impact users
- Eco-Accommodation to be removed from the proposal due to its incompatibility with Zone C under the Wet Tropics Management Plan
- Require the full explicit support of the land manager (QPWS), and demonstrate how the land manager will be resourced adequately
- Allow additional time for the public to review the impact assessment, including impacts on threatened species, acknowledging the impact of the Covid-19 pandemic

Your Sincerely

Lucy Graham

Director

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