

PROTECT KEPPEL BAY

15 April 2013

To Whom It May Concern:

Dear Sir/Madam,

RE: Senate Inquiry into the Environment Protection and Biodiversity Conservation Amendment (Great Barrier Reef) Bill 2013

The Keppel and Fitzroy Delta Alliance (KAFDA) welcomes the proposed EPBC Amendment (GBR) Bill introduced by Senator Waters as an important step to greater protection for this world heritage area. KAFDA was formed in late 2011 in the Central Queensland region to represent the regional community's concerns in relation to the Balaclava Island Coal Export Terminal (BICET) proposal. It has since rapidly grown to include thousands of supporters from the region, all over Australia and internationally.

KAFDA is extremely concerned about the current health of the GBR and the additional pressure created by proposed, large scale industrial development will only make the situation worse. Our group met with representatives of IUCN and UNESCO during the WHC Reactive Monitoring Mission in 2012 and supports the recommendations of the WHC and the Mission for greater protection of the Reef from poor water quality, industrial developments and shipping.

We therefore welcome the proposed amendments to the EPBC Act, in particular a ban on new port development outside of the existing and long-established major port areas, including the banning of new port developments at Port Alma, Balaclava Island and northern Curtis Island. We further support a moratorium on any expansions until the Strategic Assessment is completed and the ability to assess both the individual and cumulative impacts of all projects is possible.

KAFDA provided a variety of relevant submission to both State and Federal Government over the past year and in particular have expressed our extreme concern with regard to why the current EPBC Act is insufficient to ensure the protection of the Reef's outstanding universal values and why we support the strengthening of the EPBC Act through these proposed amendments. An example of such submissions – our response to the Queensland Government GBR Port Strategy - is attached for your reference.

The fact that the Queensland Government owned Ports Corporations, in particular the Gladstone Ports Corporation, is continuing to openly state that they intend to develop and facilitate port development of the Fitzroy Delta and Port Alma area despite the recommendations of the World Heritage Committee is a strong indication of the need for this amendment.

Clearly, the recent example of Gladstone Harbour and the need for an independent review of those developments is reason enough for this amendment.

Sincerely,

Ginny Gerlach
Director/Coordinator
Keppel and Fitzroy Delta Alliance

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17 December 2012

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Dear Sir/Madam,

Re: Keppel and Fitzroy Delta Alliance official submission to the GBR Ports Strategy

The Keppel and Fitzroy Delta Alliance (KAFDA) was formed in late 2011 in the Central Queensland region to represent the regional community's concerns with regard to the above mentioned proposed coal port proposals. It has since rapidly grown to include thousands of supporters from the region, all over Australia and internationally.

KAFDA recognises the importance of Queensland's resource industry to the wealth of, not only Queensland, but to the whole of Australia and further recognises the fact that there must be associated infrastructure developments (such as shipping ports) to support such industries.

However, we also hold the view that this new and proposed port infrastructure needs must be consolidated and optimised in already established major port precincts.

The rapid increase of coastal developments, including ports infrastructure and proposed ports infrastructure particularly for the Port of Rockhampton area, which includes the Fitzroy Delta, Keppel Bay and North Curtis Island, threatens the ecosystems of the Great Barrier Reef and we welcome the opportunity to respond to the Queensland Government's Great Barrier Reef Ports Strategy.

Page/Section	Description of Issue	Proposed Resolution/Comment
General Comment 1		There is great confusion as to where the "strategy" is in this document. It appears to be a superficially worded promotional style document lacking in detail of premise, planning or strategy.
General Comment 2		The timing of the release of the GBR Ports Strategy seems inconsistent with the intent of the Great Barrier Reef Coastal Zone Strategic Assessment. "Assessment" should come before "strategy".
General Comment 3		The 10 year timeframe for the GBR Port Strategy is far too short and given the changing face of the resources boom and implementation times of port approval and construction, this should be at least 25 years to provide long term certainty for community and industry with a 5 year review cycle.
General Comment 4		The community consultation process for this GBR Ports Strategy relies purely upon internet access in order to be informed, access the documents and be

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		aware of the submission requirements, this is not an inclusive consultation process as it does not take into consideration the considerable number of community members without computer literacy or access.
General Comment 5		Define “port limits” and detail all current State Government owned Ports Corporations and their individual boundaries and limits, targets and strategies. Outline all proposed or planned changes to those limits.
General Comment 6		Define “port expansion” and “incremental port expansion” and detail how these expansions will be individually and cumulatively assessed.
General Comment 7		There is no reference as to how the GBR Ports Strategy takes into consideration and upholds the Outstanding Universal Values of the Great Barrier Reef World Heritage Area. That any GBR Ports Strategy should directly address the specific concerns and recommendations of the UNESCO World Heritage Committee Report (36 th Session – 24 June to 6 July 2012) and Australia’s obligations to protect the Outstanding Universal Values of the Great Barrier Reef World Heritage Area should take precedence over any direct or cumulative impacts from Port Development or shipping activities in the GBR WHA.
General Comment 8		Concerns regarding how the Queensland Government intends to assess the individual and cumulative impacts of any port development, shipping and associated infrastructure on the other local, regional and GBR associated established and growing economic sectors such as agriculture, tourism, lifestyle and recreational communities, commercial fishing and recreational boating.
General Comment 9		GBR Ports Strategy does not adequately address assessment of the overall cumulative impacts of port development and infrastructure to the functionality of the coastal, estuarine and Great Barrier Reef ecosystems.
General Comment 10		Lack of detail regarding how the GBR Ports Strategy will take into consideration and work with the Federal Government on the Matters of National Environmental Significance that need to be addressed under the Environment

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		Protection and Biodiversity Conservation Act 1999 in port development within or adjacent to the Great Barrier Reef.
P5, s1 About this Strategy	<p><i>"The strategy also complements the Great Barrier Reef Coastal Zone Strategic Assessment being undertaken by the Queensland Government".</i></p> <p>The fact that the adequateness of the current level of management of the Great Barrier Reef is a major focus of the Strategic Assessment should therefore be the first step to be completed prior to developing the GBR Port Strategy</p>	The timing of the release of the GBR Ports Strategy seems inconsistent with the intent of the Great Barrier Reef Coastal Zone Strategic Assessment. "Assessment" should come before "strategy".
P5, Great Barrier Reef Coastal Zone Strategic Assessment	<p><i>"The Queensland Government is leading the coastal component examining coastal development including planning for urban, industrial and port development and the processes and management arrangements in place to ensure development occurs sustainably and does not impact unacceptably on the reef's unique values".</i></p> <p>Where is the definition for "unacceptable impact" on the reef's values.</p>	Define 'unacceptable impact' on the reef's values and link this to Matters of National Environmental Significance under the EPBC Act and Australia's obligations to the World Heritage Committee for the GBR WHA
P6 s2 Consultation	The dot points include no reference to consideration of protection of the environment only <i>"assessment and management of environmental impacts"</i>	Include details and questions throughout the document that address issues regarding protection of the environment
P7-8, s3 Ports facilitate Queensland's four pillar economy; and Figure 1: The role of ports adjacent to the Great Barrier Reef	<p><i>"resources from Australia's largest coal deposits as well as significant lead, zinc, silver, gold and copper reserves make their way to global markets through ports along the Great Barrier Reef".</i></p> <p>Figure 1 there is no mention of the role of LNG/CSG relating to the Gladstone Port, however this is a key commodity triggering the growth of ports in the GBR</p>	Detail the current, approved and future demand for LNG and how this will impact on port capacity, shipping and compliance with the recommendations of the Strategic Assessment.
Figure 1: The role of ports adjacent to the Great Barrier Reef	In Figure 1 Rockhampton has been labeled as a port. Port of Rockhampton which is now currently managed by the Gladstone Port Corporation, should be clearly defined. The current minor existing port facilities of Port Alma should be identified including their size, type of export/import goods and draft and tidal limitation.	Clarify and identify the Port of Rockhampton and Port Alma and the limitations of the existing minor facility and the lack of infrastructure leading to or on the southern side of Raglan Creek and Balaclava Island. This is a "green field site with no infrastructure and should not be identified as an existing port.
P9, s4 Protecting the Great Barrier Reef: Environmental Impacts	<i>"The Great Barrier Reef Outlook Report 2009 identified a number of major threats to the health of the Great Barrier Reef including climate change, declining water quality from catchment runoff, loss</i>	The Outlook Report 2009 should not be used as the sole basis for developing the GBR Ports Strategy, it should also include results from the Strategic Assessment and a detailed

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	<p><i>of coastal habitats from coastal development and impacts from fishing. Threats to the health of the reef from ports and shipping were identified as moderate and localized.”</i></p> <p>That was reported in 2009 is not three years old and does not reflect the proliferations of port development in Gladstone and on Southern Curtis Island and the consequent impacts and environmental damage to the GBR WHA. That development triggered the UNESCO and IUCN 2012 Reactive Monitoring Mission and consequent report Proposed port development including Balaclava Island Coal Export Terminal, Fitzroy Terminal Project and the clearly stated intentions of the Gladstone Ports Corporation for development of northern Curtis Island in the Sea Hill area were not considered when the Outlook Report was release in 2009.</p>	<p>update of all current, approved and proposed port development, specifically in Central Queensland the threat from port development to the GBR WHA is significant – not “moderate and localized”.</p> <p>The Fitzroy Delta area including all the area of the Port of Rockhampton is the largest Estuarine system feeding the waters of the largest catchment on the East Coast of Australia into the Great Barrier Reef. The estuary has no major port development on its shoreline and no coal port activity. Clearly any new port development of this area or expansion of the existing minor facilities at Port Alma would pose a significant threat to the Great Barrier Reef.</p> <p>The GBR Port Strategy should also take into consideration the drivers of both coal and LNG export industries on port expansion.</p>
P10 Environmental Impacts	<p><i>“Queensland can build on its well-established processes to measure and manage environmental impacts of port development.”</i></p> <p>The Strategic Assessment has been put in place to assess those processes and determine if the “well established” processes are effective and the GBR Port Strategy should not preempt that process.</p>	<p>This statement is misleading and should be removed.</p>
P10 Environmental Impacts	<p><i>“Working with relevant private proponents, environmental impacts are assessed and management strategies developed....”</i></p> <p>Working with all stakeholder not just the relevant private proponents would be more appropriate.</p> <p>Lack of identification with regard to who and where the State Government owned Ports Corporations are and what the relationship and obligations are for those Corporations in regard to the private proponents.</p>	<p>The Strategy should include working with all stakeholder and particularly the communities that will be directly impacted by any port development and infrastructure. It should be clearly identified in the Strategy that the major existing ports are all State Government owned Corporations. In the situation where the State Government is working with State Government owned Corporations and proponents to assess and manage all the issues as listed in the current GBR Port Strategy document with regard to environmental impacts, all of the parties involved have a financial imperative.</p>
P10, Environmental Impacts: Consultation Question	<p><i>“How can we meet the demand for port capacity while minimizing environmental impacts?”</i></p>	<p>Consolidate and optimize port development to existing major ports. In Central Queensland this means that all port development be conducted in the existing major port of Gladstone Harbour</p>

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		and that the Port of Rockhampton and its minor port facilities at Port Alma should not be expanded and no new port development should be allowed in the Fitzroy Delta area.
P10 Social Impacts: Consultation Question	<i>“What are important factors in social and cultural planning?”</i>	Transparent and open planning and consultation with the conservation sector, local groups, community members and Regional Councils is important. It is critical to recognize and include the need to maintain lifestyle, recreation and tourism hubs within the Great Barrier Reef that are separate from industrial port activities. Keppel Bay and the Capricorn Coast including the waters of the Fitzroy Delta should be considered as a tourism, recreation and lifestyle hub. There is a social and cultural obligation to maintain the existing fabric of communities and therefore an imperative to consolidate port activity in the existing major ports.
P12, s4, Shipping Management	More detail is required in the description of “compulsory and recommended pilotage regimes”	All shipping traffic in the Great Barrier Reef should have compulsory pilotage and the Strategy should address the issues with regard to training and maintaining sufficient skilled and experienced pilots with knowledge of the Great Barrier Reef waters.
P12, s4, Shipping Management	Safety issues and emergency procedures in the advent of an accident or disaster due to extreme weather with shipping have not been addressed. The recent experience with the Shen Neng highlights the need for the the Strategy to address these issues.	Address the safety issues and emergency procedures in the advent of an accident or disaster due to extreme weather including an emergency response procedure and defined lines of responsibility between all three levels of government.
P12, s4, Shipping Management	<ul style="list-style-type: none"> <i>“designated anchorage areas for ports</i> <i>the establishment of designated shipping areas and defined traffic routes, limiting shipping to specific zones along the Great Barrier Reef (see Figure 3)”</i> 	The Keppel and Fitzroy Delta Alliance agrees with the principle of these statements however asserts strongly that neither of these activities should be allowed in the waters of Keppel Bay and the Fitzroy Delta, with the exception of the existing shipping traffic coming to the minor port facilities of Port Alma. This detail should also be reflected in Figure 3 on P13.
P13, Shipping Management: Consultation Question	<i>“What are the opportunities for owners, charterers, terminal operators, ports and government to improve shipping management?”</i>	Compulsory pilotage, rigorous compliance of worlds best practice shipping practices and improved Vessel Monitoring Systems in all waters of the Great Barrier Reef World Heritage Area. Do not allow any shipping traffic or cargo vessel anchoring in the waters of Keppel Bay and the Fitzroy Delta with the exception of the existing shipping traffic

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P15, Principle 1, Strategic use of ports to facilitate economic growth	<p><i>"The Queensland Government supports an integrated port network operating at peak efficiency with minimal duplication in infrastructure investment."</i></p> <p>This statement is clearly inaccurate given the Queensland Government's openly stated intent to facilitate the development of proposals for BICET, FTP and the GPC's plans for Sea Hill when there is currently no infrastructure in these locations and their proximity to the currently well established and growing infrastructure investment connected to the Port of Gladstone.</p>	<p>utilizing the minor facilities at Port Alma.</p> <p>The phrase "minimal duplication in infrastructure investment" is vague and should be defined and clarified. Investment by whom? This Strategy should not just address the question of infrastructure investment to be efficient, but should also include duplication of infrastructure itself. Confine coal export terminals, associated shipping or barging, and any further industrial port developments in Central Queensland to the existing major port of Gladstone south of a line at Ramsays Crossing in the Narrows west of Curtis Island. This will avoid duplication of infrastructure and infrastructure investment.</p>
P15, Figure 4, Future resource commodity export movements to Great Barrier Reef ports	The current and future CSG/LNG exports impacting on the strategic use of port facilities in the GBR are missing from Figure 4	Identify the future CSG/LNG export movements and their impact on ports and shipping activities and incorporate this commodity in the Strategy
P17, Principle 2, The right balance between economic development and environmental protection	<p><i>"Restrict any significant port development within and adjoining the Great Barrier Reef World Heritage Area, to within existing port limits for the next 10 years"</i></p> <p>This statement does not reflect the recommendations of the UNESCO WHC Report of 2012 which refers to "major existing ports" and the 10 year timeframe is insufficient.</p>	Define "existing port limits", separate the Port of Rockhampton from the Port of Gladstone and do not allow any port development or expansion of Port Alma in the Port of Rockhampton. Expand the time frame of the strategy to a minimum of 25 years.
P17 Innovative Solutions	<p><i>"Alternatives to large port operations are also being adopted internationally including the use of barges and trans-shipping."</i></p> <p>This technology is not currently being used for loading coal in exposed waters with choppy and rapidly changing sea conditions unprotected for prevailing strong southeasterly winds and is therefore untested in the currently proposed location of the Fitzroy Terminal Project. It is unacceptable to conduct this type of unproven activity in the GBR WHA which includes the waters of Keppel Bay and the Fitzroy Delta.</p>	Do not allow the use of trans-shipping and barges in the waters of the Great Barrier Reef World Heritage Area.
P19, Principle 2: Consultation Question	<i>"How can environmental management at ports be improved?"</i>	Wait for the completion of the Strategic Assessment to optimize and major existing ports to focus resources, monitoring and compliance in fewer well

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		managed areas. Do not allow port development in minor ports or currently undeveloped major estuarine areas such as the Fitzroy Delta that would have catastrophic environmental impacts to the area and the GBR WHA in general. Greater compliance and transparency of communications with regard to environmental monitoring through the use of independent experts with publicly available timely information.
P20, Principle 3, Consultation Question	<i>"How can we increase the efficiency of existing port capacity and infrastructure?"</i>	Maximizing and optimizing the use of existing port infrastructure, and ensuring that companies share facilities and infrastructure. The location of the proposed ports in the Fitzroy Delta area have no specific existing infrastructure in place currently and it would therefore be inefficient and costly to allow development of those proposals.
P27, s6, Implementation and review, Consultation question	<i>"What are the partnership opportunities to implement the principles in the Great Barrier Reef Ports Strategy?"</i>	It is difficult to respond to this question until all the suggestions in this document have been addressed. Again we would reiterate that the cart is before the horse. The Strategic Assessment should be completed before the Ports Strategy is formulated and that then the way forward for implementation should include consultation, open and transparent communication and collaboration with all stakeholders at three levels of government, port developers, the scientific community, conservation sector and community groups. Port development and associated infrastructure is not just about momentary economic drivers, it can shape and change the fabric of communities. Port development can impact on long term existing industries that rely on the health and reputation of the Great Barrier Reef in order to continue to be sustainable. All of these factors should be taken into consideration when looking to answer this question.
	<i>End of submission</i>	

Yours sincerely,

Ginny Gerlach
Director/Coordinator
Keppel and Fitzroy Delta Alliance

Keppel and Fitzroy Delta Alliance working to

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