



Australian Government

Australian Maritime Safety Authority

North-East Shipping Management Plan

INVITATION TO COMMENT

August 2013

Post to: **AMSA**
NESMP Consultation
Ship Safety Division
GPO Box 2181
Canberra ACT 2601

or **Email to:** NESMP@amsa.gov.au

RESPONDENT DETAILS

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Date of submission 03/10/2013

Which of the following best describes you or your organisation?
(Please tick appropriate box)

- ☐ Shipping industry
☒ Environmental organisation
☐ Port Authority
☐ Coastal resident
☐ Government

Other:

☐ Please tick if you would prefer your comments and details to remain confidential.

Your responses to the following questions is much appreciated, you can answer as few or as many of the following as you wish.

General questions:

Question 1.

Do the shipping management measures outlined in the plan adequately address environmental impacts?

Comments: We submit that the shipping management measures outlined in the plan do not adequately address environmental issues/impacts.

General comments:

- Broadly speaking this plan is characterised by a lack of detail regarding existing and future impacts of shipping in the GBR region and a lack of real commitment to addressing impacts as evidenced by the references to 'encouragement' of action addressing threats rather than regulation and enforcement.
- It is our view that the plan should be withdrawn and resubmitted with adequate detail on both known and potential impacts included. Constant references to the need for more information are inadequately addressed in the workplan.
- The information sources used in the report are rarely available to the reader to verify, and insufficient detail is provided in many cases for an informed commentary on the risks and measures proposed.
- The actions proposed lack detail in terms of activities and timing precluding adequate examination of their potential effectiveness. Specific actions proposed should be outlined rather than vague references to 'encouraging' changes to vessel management.
- The plan seems to almost entirely ignore the significant vessel traffic inside the reef that does not visit Qld ports and the cumulative impacts and risks associated. We believe that most vessels that do not stop at Qld ports should be using shipping lanes outside of the reef not inside the reef and that the current plan should go beyond merely the motherhood statement of "encouraging a greater number of vessels, particularly oil tankers to use the Outer Route" and outline a path to regulation of this traffic.

- The report contains no real assessment of the impact of underwater noise on the environment and ignores this major impact in terms of mitigation of existing impacts and the increases to this threat as shipping volumes and vessel sizes increase in the GBR region.

Specific dot points that need to be addressed:

- The plan fails to address marine impacts associated with noise. In light of the projected increases in shipping numbers and ship size, this is an issue that needs to be properly addressed as part of the Plan. As stated by The United Nations Environment Program (UNEP) "Effective management of anthropogenic noise in the marine environment should be regarded as a priority for action at the national and regional level." , and that Low frequency noise has ... increased "due primarily to commercial shipping."
- The Plan does not identify the current ambient sound levels at any port or anywhere in the GBR. It does not identify an historical baseline. It does not identify any studies that have been conducted into the impacts of sound on marine life and it does not propose any steps to deal with the impacts of marine noise. Inadequate attention is given to decibel levels associated with larger ships nor the range of impacts that noise and increased shipping can have on marine life including larval organisms, teleosts, crustaceans, cetaceans, or other species .
- The risk-based approach adopted means that only a small proportion of vessels are inspected – eg, in 2012, of the 4296 vessels arriving at one of the ten ports in Qld, only 594 (12%) were inspected. The ships inspected had an average of 2.6 deficiencies. Despite this, only 47 (8%) of the vessels inspected were detained. There is no break-down of the type of deficiencies. This risk-based approach, virtually by definition, requires use of the precautionary principle. Nevertheless, the report never questions expansion of shipping in the light of the risks and the lack of data/information.
- Vessels arriving at port were a small percentage of vessels operating with the region. In 2001-12 there were 10,879 large commercial ship movements in the area, as well as 83,000 private recreational vessels and 485 commercial trawlers. Ie, the risk is far higher than that associated with the limited number of ships arriving in port. But the report is based on those vessels.
- Assuming the same number for 2012, the percentage of all vessels operating in the region (94,364) that were inspected (594) falls to 0.6%. This is an indicator of risk and therefore the need for the precautionary principle.
- In particular it is very confusing to note that "To provide updated information and forecasts for this report AMSA commissioned Braemar Seascope to undertake the 'North Queensland Ship Traffic Growth Study' which is published along with this report" (p17) however the results of this report have seemingly not been used for the risk based assessment or management planning. Instead planning seems to have been based on a report commissioned by BHP.
- The Braemar report also excludes from consideration a huge number of vessels including oil and other tankers, car carriers, passenger vessels, service vessels and live export vessels. The justification for excluding these vessels from the study borders on the nonsensical as the report implies that massive oil tankers do not pose any threat to the reef and that only coal and bulk carriers pose risks and are worthy of consideration.
- Much of the NESMP consists of actions yet to be designed and/or implemented. Of the 57 actions of the MP, only 15 are ongoing. 29 are targeted for completion in the Short-term (<2yrs); 7 in the medium-term (2-5 yrs); and 3 in the long-term (>5yrs). Three actions have no target completion date at all. This is acknowledgment of the inadequacy of the existing system and therefore the need to employ the precautionary principle.
- While current activities are described, there are no quantitative assessments of the current effectiveness of the actions. The forthcoming actions (see above) arise from the assessment done (but not made public) for the MP exercise. There is no public information on the effectiveness of current approaches.
- Despite the unpreparedness of the shipping authorities (as reflected in the fact that only 15 of the 57 actions deemed necessary to protect the marine environment of the region are currently operating) the report notes (EP, p.2), "The exploitation of coal and natural gas deposits in eastern Australia will see an increase in international vessels visiting ports and transiting the waters north-east of Australia over the coming decades". Ignoring the precautionary principle, the report accepts expanded business, even though we haven't the necessary means to cope, or evidence that they will work if and when they are implemented.
- The work plan is based on an evaluation of the effectiveness of navigation and ship safety measures for current and forecast traffic levels (to 2032). This evaluation is not provided,

- Reliance on 'encouragement' – (p14) 'a view to encouraging a greater number of vessels, particularly oil tankers to use the Outer Route'; 'to encourage users of shipping to ports to employ ships constructed with bunker fuel tanks; (p.82); 'To encourage and improve ship-cetacean collision reporting'; 'to encourage users of shipping to ports in the region to employ ships fitted with ECDIS (p. 789)'to encourage and improve the improvement and use of waste facilities' (p. 83). The state of the reef and the potential for increased shipping means that enforcement must go beyond 'encouragement'.
- The draft plan acknowledges that ships will be larger, but appears not to question the wisdom of this or to make use of this information in terms of impact - for example, with respect to disturbance to seabed and supported biodiversity; increased amount of anti-fouling toxins; impact of much larger propellers.
- In terms of biofouling management the report states that "A preferred management option has been recommended" but contains absolutely no detail on management options or the recommendation.
- In regards to invasive species the shipping plan does an adequate job of identifying the problems but it only has 2 actions, which don't address the shortcomings identified in the report - no regulation for biofouling (which is the predominant source of marine invasive species) and no proposed regulation of ballast water on ships travelling between domestic ports. We endorse the proposal for national regulation of ballast water discharge.
- The report is heavy with references to the need for more information – as demonstrated by the need for information/data gathering actions in the work plan (eg. a series of research projects focused in the contribution of the human element to shipping incidents; 'conduct of a risk-assessment of shipping around the Capricorn-Bunker Group of islands; to investigate how new ship tracking technology can be used for vessel traffic services; to review the effectiveness of the UKCM system; to consider the implications of voluntary pilotage in the southern GBP; to assess the viability of implementing satellite oil spill detection; to conduct stochastic modeling and physical tracking of ballast water dispersal plumes; to undertake further research onto cumulative impacts from shipping; to assess the availability of HNS cargo information; to identify response strategies for cargoes; to monitor effectiveness of renewed contracts for emergency towage'.

The issue of sediment plumes from shipping and wake effect is not adequately addressed. We recommend the expansion of the Under Keel Clearance Management system from Torres Strait into the northern Great Barrier Reef waters, the Introduction of a maximum size limit or keel clearance for Great Barrier Reef shipping channels and the limiting of access to problem areas under low tide conditions to ensure vessels which may cause sediment plumes take an outer shipping route through the Coral Sea.

Question 2.

Having read the plan, has your understanding of shipping management in the north-east increased?

Comments:

It is disturbing to note that our understanding of shipping management has not significantly increased after reading the plan due to the lack of detail provided and the lack of availability to the reader of information sources used.

Question 3.

The following is a list of shipping management measures outlined in the plan.

Please indicate (1, 2, 3) the three measures you believe are most important to protecting the region.

- ... Aids to Navigation Network
- ... Pollution Prevention and Response
- ... National Maritime Emergency Response Arrangements
- ... Coastal Pilotage
- ... Particularly Sensitive Sea Area

... REEF Vessel Traffic Service
... Under Keel Clearance Management System
... Vessel Inspections

Comments: 3 measures that we believe are important are:

Redirecting all unnecessary shipping traffic (traffic not requiring to visit Qld ports) from the inner to the outer route.

Addressing the current and future impacts of underwater noise.

Thorough and enforced national regulation of ballast water discharge.

General feedback

Comments:

This submission has focussed on the inadequacies of the information provided, issues covered and the detail of actions proposed. Our feedback focuses on environmental issues and as such is contained in Question one of this form.

We support aspects of the plan including moves to address issues such as invasive species including the ratification of the IMO's Ballast Water Management Convention and further research into cumulative impacts from shipping in the GBR.