QRC
# submission

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# Submission to the Senate Inquiry on the Great Barrier Reef

2 June 2014

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QUEENSLAND resources COUNCIL

# QRC Submission: Senate Inquiry - Great Barrier Reef

## EXECUTIVE SUMMARY

The Queensland Resources Council (**QRC**) welcomes the opportunity to provide a submission to the Senate Committee on its inquiry into management arrangements relating to the Great Barrier Reef.

QRC is the peak representative organisation of the Queensland minerals and energy sector.

QRC's membership encompasses minerals and energy exploration, production, and processing companies and associated service companies. QRC works on behalf of members to ensure Queensland's resources are developed profitably and competitively, in a socially and environmentally sustainable way.

The promotion of leading environmental management practices is a key goal of QRC, and is vital to ensuring the Queensland resources sector remains environmentally responsible and continues to meet community expectations.

As evidenced by its World Heritage listing and recognition of its outstanding universal value, the Great Barrier Reef (**GBR**) is unquestionably one of the most important features of Australia's environmental heritage and biodiversity landscape. The resources sector has a very strong interest in preserving the biodiversity of the iconic GBR and QRC recognises that the health of both the reef and the resources sector are intertwined.

QRC's fundamental position in relation to the GBR and industry co-existence is the need for continuing focus on risk management and addressing the impacts of scientifically documented environmental threats. The fulfilment of (legal and ethical) obligations and transparent presentation of factual scientific information by industry, governments and the community is essential if this is to occur.

It is our view that the existing governance, planning and environmental assessment and management arrangements have delivered positive environmental, social and economic outcomes. However, QRC recognises that there are areas where improvements can be made which will help to provide strategic clarity, improved performance and confidence for a range of stakeholders.

The QRC notes that the Terms of Reference for this inquiry relate to a broad scope of issues relating to the management of the Great Barrier Reef, but within the terms of reference there is a focus on specifics ports, port development and port related activities such as dredging and shipping. In addition the timing of the inquiry is somewhat unusual in that many of the aspects being reviewed overlap with the content and intent of the *Great Barrier Reef Strategic Assessment*[1] and the scope of the proposed *Long Term Plan for Sustainable Development*[2]. Given that the finalisation of the strategic assessment is still to occur and that the *Long Term Plan for Sustainable Development* has not yet been released it is likely that the inquiry will not be able to consider the final results and recommendations of these two important initiatives.

Noting that there has also been a number of other inquiries and reviews undertaken relating to the GBR either broadly or on specific issues, the QRC is strongly of the view that a coordinated and consolidated approach is needed to the development of policy and the ongoing management of matters effecting the GBR. The strategic assessment and the *Long Term Plan for Sustainable Development* would appear to be the appropriate overarching mechanisms to delivering this coordinated approach.

[1] Refer: http://www.environment.gov.au/protection/assessments/strategic/great-barrier-reef
[2] Refer; http://www.environment.gov.au/system/files/pages/e166e5b7-bd7f-4bc5-9807-ba263e248632/files/gbr-ltsp-info-sheet_0.pdf

## 1. OVERARCHING PRINCIPLES

QRC would like to highlight a number of overarching principles proposed by the Queensland resources industry relating to the GBR.

QRC supports the consolidation of port infrastructure to assist in providing better environmental outcomes, efficiencies and better use of the strategic advantages of each port. In line with this, the maximised use of existing port precincts and associated infrastructure (brownfield) is supported on the basis that:

1. It can deliver viable economic and environmentally sound options for proponents, particularly in terms of simplified planning, approvals, tenure access and supply chain linkages;
2. Brownfield ports are subject to efforts to improve port efficiency and lower costs with clear performance benchmarks and there is capacity for expansions to be developed quickly and efficiently to meet new growth; and
3. In the longer term, resource projects are not sterilised based on their lack of access to brownfield infrastructure.

Furthermore, economic development and environmental protection should not be considered mutually exclusive and it should be recognised that the ability to conduct project-by-project assessments that still consider cumulative impacts is significantly improving.

QRC has called on all levels of government to achieve greater regulatory alignment, and reduce duplication of processes when assessing projects. As such it is important that all parties do not underestimate:

1. The significant economic cost currently borne by industry, and thus the community, which stem from duplicative regulatory processes; and
2. The environmental and management risks that multiple environmental management systems, assessments and conditions can cause, particularly in terms of unnecessary complexity and poorly aligned environmental objectives.

The integration and streamlining of regulation across all jurisdictions that incorporates planning, project assessment, environmental management and monitoring will help ensure that desired industry, social and environmental outcomes are better achieved.

QRC continues to support the use of the hierarchy of risk minimisation[3] as a tried and tested mechanism to manage significant environmental impacts, and believes that this should be built into any assessment and approval regulatory framework.

QRC and industry recognise the importance of assessing cumulative impacts, particularly in the context of the GBR, and QRC and its members support the adoption of clear and consistent voluntary industry-led cumulative impact assessments for major port developments, in partnership with government.

Fundamentally, future resource port development in the GBR region must be underpinned by long term planning undertaken by government, ports and resource proponents, to ensure sustainable development in Queensland (in the context of consideration of all the principles of ecological sustainable development) is achieved. Inherently such planning must be informed by peer-reviewed science. Government has a role to play in ensuring that communities and other stakeholders (national and international) are well informed with the scientific facts.

[3] First avoid then minimise, manage, mitigate and then offset the impact

## 2. RESOURCES SECTOR'S 'FIT' WITHIN THE GBR REGION

The resources sector's operations in Queensland are based on the presence and location of various mineral and gas resources, infrastructure access as well as the active decisions by government, by the community and by industry over many decades.

It is important that the realities of the relationship between the resources industry and the GBR are properly understood. Key points are:

- The resources sector does not extract minerals or gas from within the GBR World Heritage Area (**GBRWHA**).
- Operations in the GBRWHA are limited to port and processing facilities, including (within defined port limits) shipping along designated and well managed shipping routes.
- The resources industry provides significant value, economically and socially, to Queensland and the nation, as well as to the environmental management and scientific understanding of the GBR.
- All Port related activities and area occupy less than 1% of the Queensland coast and areas set aside for dredge spoil placement are <0.02% of the total area of the GBRWHA.
- The actual amount of land being physically disturbed by resources related operations in all of Queensland is approximately 0.09%.

*Socio-economic Contribution*

The Queensland resources sector is highly capital-intensive, drawing heavily on other business sectors to provide essential inputs. An analysis of the economic benefits of the resources sector in Queensland reveals[4]:

1. The full direct spend by the Queensland resources sector in 2012-13 was $38 billion. This comprised:
    - $31 billion in purchases from related sectors such as construction, rail transport, utilities, professional services, and manufacturing (up from $28 billion in 2011-12).
    - $7 billion in wages paid to 43,300 direct resources workers.
2. The additional supply chain purchases from local businesses and additional workers spending their incomes on Queensland goods and services supported another $37 billion in indirect value-add.
3. The total economic impact in 2012-13 was:
    - $75 billion in value-add or more than one in every $4 dollars Queensland wide (27% of Gross Regional Product of $283 billion)
    - 434,000 direct and indirect jobs or almost one in five jobs Queensland wide (19% of total state employment of 2.3 million)
4. For 2012/13 the payments to government from the Queensland resources sector were:
    - Royalties and land rents paid to the Queensland Government were $2.6 billion; and

[4]Lawrence Consulting – Economic Impact of the Queensland Resources Sector on the Queensland Economy 2012/13

- Company tax, personal income tax, and carbon tax paid to the Australian Government totalled approximately $3.5 billion.

*Environmental Contribution*

As a result it is clear that the resources sector is a significant contributor to the economic wealth and stability of Queensland and Australia. This has a flow-on of direct relevance to the protection of the Great Barrier Reef's outstanding universal values. As reported by UNESCO, 42 of the 44 World Heritage sites listed as 'in-danger' are found in countries where a lack of financial resources for environmental protection is most evident.

Furthermore, the Queensland resources industry makes significant direct contributions to the protection, management and improvement of the GBR environment. For instance, during the 2012/13 financial year resource companies contributed almost $40 million to a broad range of environmental programs that had a direct or indirect benefit to the management and protection of the GBR. Additionally, future spending on GBR related environmental programs, based on current commitments, is expected to be in the order of $250 million over the next 5 years. This investment demonstrates the valuable contribution resource companies make across a wide range of environment related programs.

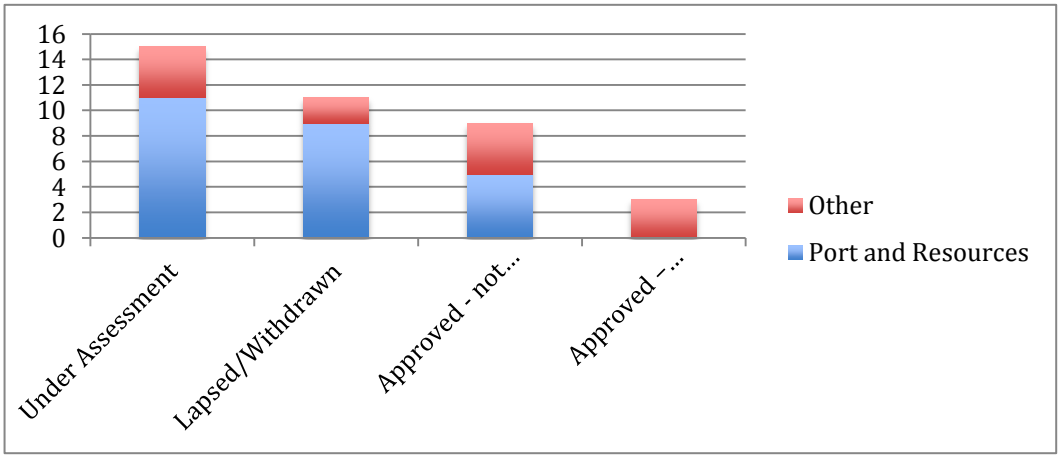
These figures are only a portion of the money spent on environment related work undertaken by resource companies and do not incorporate the expenditure in environmental mitigation, monitoring and management undertaken on a daily basis at resource operations throughout the State. Additionally, companies invest considerable funds in managing the environmental aspects of new projects; one QRC member has calculated that it has invested in excess of $17 million (with an anticipated $6.5 million future spend) on GBR related environmental programs associated with a construction project on the Queensland coast.

## 3. LIKELY INDUSTRY GROWTH

The GBR received its World Heritage status in 1981, the first coral reef ecosystem in the world to have this distinction. The presence of major industrial ports within a World Heritage property is clearly not unique or mutually exclusive. In establishing the GBRWHA boundaries in 1981 the presence of a number of commercial trading ports inside the boundary was a clear recognition that port infrastructure and operations were not considered to be unworkable or unmanageable in a World Heritage context. Since 1981, port development has continued, with all developments and operations being subject to stringent regulation at local, state and national levels.

In recent times a number of commentators, organisations and interested individuals have made public statements and claims about the rate of future growth in the Queensland resource sector and related port developments. Many of these statements have been made without a factual basis or are derived using flawed or misleading methodologies. Such statements are often reached when parties incorrectly tally the number of resources projects currently progressing through feasibility stages. It is important that the Committee understands the actual prospects for growth given the array of constraints likely to hamper new developments for the foreseeable future, and why simple aggregations of proposed mine and port developments is a poor proxy for assessing export volumes, likely shipping numbers and dredging requirements, and indeed any risk to the GBR. Caution and rigour must be exercised when making forecasts and claims of industrial growth.

In order for a new project to be developed, the expected price for its coal must be above the incentive price (i.e. the price per tonne required to cover both the operating costs of the mine and the cost of the capital used to develop it). Australian metallurgical coal projects have amongst the highest incentive prices globally, meaning they are the least likely to proceed without either a significant increase in metallurgical coal prices or a major shift in the cost environment for new projects (labour, regulatory and transport in particular). The graph below demonstrates that a large number of publically announced projects do not proceed to construction or completion. The data presented below shows that of the 38 projects notified to UNESCO since July 2011 only three have at this stage commenced construction and 11 have been withdrawn or lapsed. The numbers are even more revealing for port and resource related projects: of the 25 referred, nine have been withdrawn, five have been approved and not a single resource/port related project has commenced.




**The status of EPBC Act 'controlled actions' notified to UNESCO 2011- 2013[5]**

[5] Source: Australian State Party Reports 2011,2012 and 2013.

In summary:

- Many of the statements being made by certain NGOs and their political supporters about a "frenzy" of coal and gas port developments are clearly little more than sensationalism intended to create hysteria and unnecessary concern, particularly with the UNESCO World Heritage Committee and the broader community.

- A balanced, factual debate is needed. For instance:
  - Queensland coal exports totalled **196mt in 2013**.
  - QRC's coal members now estimate a likely growth in exports on average of about **3.9% per annum.** Hence, by 2016, Queensland coal exports would be in the vicinity of **219mt**. This is in fact significantly lower than BREE 's forecasts of 269mt and demonstrates that not all proposed projects are likely to proceed to construction.
- Companies with undeveloped interests in Queensland will continue to invest in new projects, however the rate of growth in coal exports is unlikely to exceed historical growth rates of 5-6% pa.

## 4. CURRENT AND FUTURE MANAGEMENT AND PLANNING

QRC supports a strategic vision for industrial development within the GBR region and more broadly, including the development and implementation of overall state-wide port and infrastructure strategies as well as port/precinct scale master plans.

QRC has consistently advocated that the existing governance, planning and environmental regulatory framework and management arrangements for the resources industry have delivered positive environmental, social and economic outcomes.

New projects are subject to detailed and comprehensive environmental assessment. Depending on the type and scale of the project, the proposed project may trigger environmental assessment at the federal, state and local government level.

However, one of the current problems with the regulatory framework is that in certain instances it fails to capture actions which have, and are still having, the most significant impacts on the relevant matter of national environmental significance, in this case the GBR. This is particularly relevant in the instance of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (**EPBC Act**), which rarely captures agricultural or urban activities, particularly ongoing practices, to assess their impact on the environment.

To effectively ensure the protection and rehabilitation of the GBR, the environmental regulatory framework must adopt a 'whole of impacts' approach to the regulation of the reef, rather than relying solely on the assessment of referred development projects caught in the regulatory net.

The QRC and industry have long supported a risk-based approach to regulation. QRC believes that the conditioning of development applications should be based on risk-based outcomes. Fundamentally, prescriptive process-based conditioning of development neither supports development nor effective environmental protection.

The QRC is supportive of a number of the proposed future management arrangements that are currently in development, including:

- Queensland Ports Strategy – including the identification of priority port development areas (**PPDAs**) and restrictions on capital dredging to within these priority ports for the GBR coastal area.
- Port Master Plans – development of statutory master plans for all PPDAs to manage development and the potential for impacts to outstanding universal value (including dredging and spoil placement).
- Finalisation of the North-East Shipping Management Plan – to manage all commercial shipping activities under the direction and management of the Australian Maritime Safety Authority.
- EPBC Bilateral Agreements – developed to environmental standards that reduce duplication, confusion and costs; and enable focus on environmental management and compliance.

## 5. GREAT BARRIER REEF STRATEGIC ASSESSMENT

The QRC has welcomed the draft strategic assessment reports and is encouraged to see governments working together for positive economic and environmental outcomes, on the basis of rigorous, methodical scientific evidence and practice.

The general findings of the draft strategic assessment are important to note, specifically that the key and real risks to the long-term health of the GBR are:

- Increasing sea temperature, storms and cyclones;
- Nutrients and sediments from catchment run-off; and
- Crown of Thorns starfish.

It is also noted that industrial development - including shipping, port development and dredging operations - are recognised in these official reports appropriately as having lesser, temporary and localised impacts.

The QRC is supportive of many of the 'program enhancements' that have been identified in the strategic assessment draft reports and believes that a better coordination and planning framework is needed to deliver improved outcomes. To this end the QRC is supportive of efforts to develop a *Long Term Plan for Sustainable Development* (the *Reef 2050 Plan*) that can be used to bring together the key elements, outcomes and frameworks for continued management of the GBR. The preparation of a *Long Term Plan for Sustainable Development* is of key interest to the UNESCO World Heritage Committee and is the appropriate overarching mechanism to deliver a coordinated and whole of region approach.

## 6. DREDGING

All major ports in Queensland require the dredging of channels and berthing areas to allow ships to enter efficiently and safely. Due to the shallow inner harbour areas of these ports and continued siltation, dredging is an essential activity that has been conducted for more than a century. Prohibitions on dredging would significantly affect the operation of ports in the GBR and significantly constrain our export and import industries.

As noted by Ports Australia in their recent report *Dredging and Australian Ports - Subtropical and Tropical Ports:*

- "Sea transport, via Australian ports, offers the most economical, energy efficient and environmentally friendly transportation for large-scale movements of all cargo types. As an island country, there are limited alternatives available to the use of sea transport for the movement of general freight and bulk commodities, particularly mineral resources.
- Shipping channels are of equal importance to our road and rail networks and, like these networks, need to be maintained and developed as trade grows and as vessels increase in size.
- Dredging of shipping channels is an essential part of port operation in Australia and globally."

All dredging and at sea placement activities are subject to detailed environmental assessments and management to ensure impacts are effectively reduced and managed to avoid environmental harm. In addition to sediment plume modelling, each proposed dredging project must undertake a rigorous analysis of the sediment to ensure it is not contaminated or toxic; and also a thorough investigation of disposal options. All dredged material that is placed offshore is placed in designated areas following a detailed environmental assessment and approval process. These seabed areas are generally free of vegetation, distant from major coral reefs and many have been used for decades. Dredged material is never placed on coral reefs or other areas of high conservation value.

Dredge material placed offshore is primarily retained in the placement location; some finer material does disperse in the form of sediment plumes. Results from extensive monitoring of dredging and other development/operational impacts at ports across Australia has been compiled in two recent reports (the *Improved Dredge Material Management Report (SKM and APASA, 2013) – Appendix B to Appendix B*[6] and in *Dredging and Australian Ports - Subtropical and Tropical Ports (Ports Australia 2014)*[7]. This information provides robust evidence that previous dredging campaigns have resulted in minor impacts, which have been within those predicted during project impact assessments. These monitoring results also suggest that factors such as flooding and cyclones are significantly more detrimental to the GBR than dredging activities.

Unfortunately, these results have not been well reflected in the ongoing public and media debate on dredging in the GBR. A greater use and reliance on actual dredging project results should occur to inform policy and management responses.

As an example, the computer modelling of dredge material dispersion undertaken for the GBR Strategic Assessment[8], as part of examining the benefits of relocating placement areas, actually concluded that there was little environmental benefit in allocating new areas. However, this modelling

[6] SKM (2013) Improved dredged material management for the Great Barrier Reef Region. Sensitive Receptor Risk Assessment of Alternative and Current Dredged Material Placement Sites: Report prepared in conjunction with Asia-Pacific Applied Science Associates for Great Barrier Reef Marine Park Authority.
[7] Morton R., and Sprott J. (2014). Dredging and Australian ports - Subtropical and tropical ports. *(Report prepared for Ports Australia), available at: http://portsaustralia.com.au/dredge-report.pdf*
[8] SKM (2013) Improved dredged material management for the Great Barrier Reef Region. Sensitive Receptor Risk Assessment of Alternative and Current Dredged Material Placement Sites: Report prepared in conjunction with Asia-Pacific Applied Science Associates for Great Barrier Reef Marine Park Authority.

has been misunderstood and misused. Certain organisations[9] have inappropriately used this report to suggest widespread dispersion of dredged material and greater impacts than actually occurs. Such statements ignore the critical limitations stated in the report that it overestimated sediment dispersion and was not intended to model actual sediment movement or indicate potential environmental impacts.

The report clearly outlines what these limitations are:

> *"The purpose and scope of the hydrodynamic modelling and environmental risk assessment reported herein are explicitly not intended to provide a comprehensive EIA [environmental impact assessment] of specific, individual dredging projects at a level of rigour and detail needed for best-practice management commensurate with the iconic status of the World Heritage Area. Therefore, the results should not be interpreted as concrete predictions of environmental impact from dredge material placement at specific sites, for specific projects, or upon specific receptors."*

The many limitations of the report and study methodology are significant; making the report very restricted in its use and value. Especially when compared to the more detailed and calibrated studies undertaken at a project specific level.

Project specific modelling uses comparative models to test a variety of weather, tidal and water current conditions calibrated against previous dredging campaigns. These models produce a series of possible plume scenarios depending on the various conditions, which can then be used to predict areas and levels of impact to nearby marine environments.

In the case of Abbot Point for instance, a comprehensive *Dredge Material Relocation and Reuse Options Assessment* was undertaken in accordance with the National Assessment Guidelines for Dredging. The assessment considered:

- reuse, reclamation and disposal options;
- an initial seven broad onshore/inshore/offshore locations; and
- an additional six onshore and five trestle extension options following feedback from the initial review.

These options were reviewed in consultation with regulators, scientists, engineers and dredging experts. The general consensus was that relocation of the dredge material to a deep offshore location area represented the best environmental outcome. The full *Dredge Material Relocation and Reuse Options Assessment* has been made publically available as part of the environmental assessment for the project[10].

In summary:

- ❖ Dredging in GBR ports is an essential activity.
- ❖ Land based disposal options are limited and often may provide worse environmental outcomes.
- ❖ Published science shows that dredging, ocean placement and plume monitoring techniques are accurate (counter claims by opponents have not been supported by published or peer reviewed science).

[9] Refer to Australian Marine Conservation Society, Dredging, dumping and the Great Barrier Reef. May 2014
[10] Refer: http://www.nqbp.com.au/environment/

- Dredging reports used in the GBR strategic assessment were not designed for detailed impact assessment and should not be used for such a purpose.
- After more than two years of scientific and technical studies in support of the assessment the findings were that the least damaging disposal option for Abbot Point dredged material is in deeper offshore waters.

## 7. SHIPPING

In recent years there have been wild claims of the GBR being turned into a "super highway" for coal and gas ships. With Greenpeace publishing the ludicrous statement that there would be 10,000 coal ships using the reef by 2020[11].

Proper analysis commissioned by the Australian Maritime Safety Authority (AMSA) has forecast 2,450 coal ships by 2020[12]. This forecast reflects both: the market changes that have occurred over the past 12-18 months; and also, in line with global shipping trends, an assumption that a greater number of the larger Capesize vessels will enter the trade. The AMSA work also forecasts up to 500 LNG vessels by 2025, all through the Port of Gladstone.

These numbers would amount to an approximate increase of 1000 vessels from today's numbers.

Supporting shipping in the GBR is the world's most advanced maritime safety arrangements:

- 4 main designated commercial shipping channels that avoid sensitive and high risk areas, theses are:
  - Inner channel
  - Capricorn channel (Gladstone)
  - Hydrographers Passage (Hay Point)
  - Palm Passage (Abbot Point and Townsville).
- REEFVTS: Vessel Tracking Systems (VTS) 24/7 coverage or all large vessels movements in the GBR (akin to air traffic control style management).
- Port and reef pilots in all ports and designated narrow channels
- Comprehensive vessel vetting to improve standards of vessels in operation

Shipping incidents since the introduction of REEFVTS have reduced from on average 1 a year to a single incident in the REEFVTS coverage area since 2003 (being a temporary bulk carrier grounding in the Torres Strait). The Shen Neng incident at Douglas Shoal in 2010 occurred outside the then coverage area for REEFVTS. That coverage area was subsequently expanded to included the southern area of the GBR.

In summary:

- ❖ Claims of massive increases in shipping numbers are incorrect.
- ❖ The Australian Maritime Safety Authority and Maritime Safety Queensland are the appropriate authorities for managing and regulating shipping activities.
- ❖ Management of shipping in the GBR is world's leading practice; risks to the Reef are extremely low.
- ❖ Future shipping management must have a focus on risk management with development of proportional responses that specifically address actual risks to human safety or environmental impact.

[11] See http://www.greenpeace.org/australia/Global/australia/reports/Boom_goes_the_Reef_Report_4MB.pdf
[12] Braemar Seascope (2013) North Queensland Ship Traffic Growth Study Supplementary Report, Prepared for Australian Maritime Safety Authority, available at: http://www.amsa.gov.au/community/consultation/nesm-consultation.asp

## 8. UNESCO WORLD HERITAGE COMMITTEE DRAFT DECISION

The World Heritage Committee (**WHC**) draft decision welcomes progress in relation to the strategic assessment and water quality improvement and, importantly, does not recommend an 'in danger' listing at this time.

The draft decision does however contain some inaccurate and inappropriate references to:

- recent approvals (Abbot Point and Gladstone)
- a lack of retrospective application of the Queensland Ports Strategy
- concerns regarding proposed one stop shop arrangements.

Specifically the reference to the World Wildlife Fund report on implementation of WHC recommendations is of concern and any weight given to this report should be completely discounted. By its own admission, the methodology for this report consisted of a desktop review; followed by a subjective, superficial and arbitrary judgment on 'effectiveness'. The report is not based in research, is not a scientific document, nor has it been peer reviewed in any way.

The World Wildlife Fund (WWF) report has selectively and tactically ignored a number of published and peer reviewed reports including:

- previous State Party reports
- government recommendation reports for Abbot Point and Gladstone approvals
- GBRMPA Interpretative Statement for GBR strategic assessment dredging report
- Independent Inquiry reports
- Abbot Point Cumulative Impact Assessment.

Of further concern is that the URL for the document clearly shows the report has been developed as part of the WWF/AMCS 'Fight for the Reef' campaign, an association airbrushed from the report's appendix. The report and overall 'Fight for the Reef 'campaign is riddled with untruths and misrepresentations which ignore scientific evidence to create concern regarding port activities, while the real objective of the campaign is clearly aligned with efforts to simply shut down Queensland's export coal and gas industries.

The draft decision's position on the one stop shop arrangements is a surprising and unprecedented intervention into the structure of Australian legislative arrangements. The one stop shop process is to accredit not delegate decisions and is being established consistent with a number of independent inquiries that have recommended a streamlining of environmental regulation. There will be no change in environmental standards.

**CONCLUSION**

It is critical to recognise that resource activities, ports, shipping and associated activities that occur in and adjacent to the GBR are currently highly controlled and regulated via a broad suite of state, national and international regulations.

QRC's fundamental position in relation to the GBR is that there needs to be a focus on a risk management approach to the regulation of activities that actually impact on the environment and heritage values present at a particular location, rather than populist reactions to special-interest groups[13] and media commentary that does not correspond to the scientifically identified primary impacts. It is important in reviewing current management arrangements to recognise the track record and effectiveness the regulatory framework has in avoiding and mitigating environmental harm.

Ultimately, "the best science available estimates that around 90 per cent of the loads of sediments, nutrients and toxic chemicals entering the Great Barrier Reef lagoon come from agricultural practices in the Great Barrier Reef catchment."[14] Government has an important role to play in ensuring that the community receives accurate and informed information on the true risks and strategies needed to ensure the best possible protection of the GBR.

The current media and public debate and UNESCO WHC's interest in the GBR and port development specifically, is in the main part an overreaction that is being driven by the anti-development lobby for purposes other than genuine concern for the reef. Many of the claims and concerns of these lobby groups are not supported by the published evidence and science on issues such as dredging, shipping and port development.

It is our strongly held view that the existing governance, planning and environmental assessment and management arrangements have delivered positive environmental, social and economic outcomes. However, QRC recognises that many of the impacts to the reef are the legacy of past land use practices and changing climatic conditions and areas exist where improvements can be made which will help to improve performance and confidence for the community into the future. These improvements should be designed and implemented to ensure both environmental outcomes and operational effectiveness is enhanced.

[13] See for example *Boom Goes the Reef,* available at http://www.greenpeace.org/australia/Global/australia/reports/Boom_goes_the_Reef_Report_4MB.pdf
[14] GBRMPA, see Great Barrier Reef Outlook Report, available at http://www.gbrmpa.gov.au/__data/assets/pdf_file/0018/3843/OutlookReport_Full.pdf