



**Regional
Development**
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Dear Sir/Madam

RE: Submission to the Great Barrier Reef Strategic Assessment: marine & coastal components.

Regional Development Australia Far North Queensland & Torres Strait (RDA FNQ&TS) welcomes the opportunity to provide comment on the substantive work delivered by the Queensland Government and the Great Barrier Reef Marine Park Authority regarding the Great Barrier Reef Strategic Assessment.

RDA FNQ&TS provides a significant role in strategically facilitating, supporting and promoting regional development to deliver cultural, social, economic and environmental benefits across the region. We work in collaboration with key stakeholders, industry, local government, State and Federal Government and the community to deliver on our broad agenda to secure a prosperous future for the region and its communities. Our work is directed by the Regional Road Map, underpinned by six pillars and delivered through twelve Strategic Priority Packages (please refer to <http://www.rdafnqts.org.au/index.php/rda-initiatives/regional-road-map> for further information).

This submission will provide brief comment relevant to both the marine region and coastal zone program reports, with a focus on the Queensland Government proposed initiatives. A summary of recommendations is provided at the end for easy reference. In developing this submission RDA FNQ&TS has had discussions with several stakeholder groups including the Cairns Regional Council, Advance Cairns, the Wet Tropics Management Authority (WTMA), Far North Qld Regional Organisation of Councils, and the Reef and Rainforest Research Centre. This submission reinforces elements raised by these organisations but it does not seek to represent their views.



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1.0 Opening comments

RDA FNQ&TS supports and promotes the world-class management of the outstanding natural and cultural values across our region, encompassing the Wet Tropics and Great Barrier Reef World Heritage Areas. We accept the need for balanced development through improved planning, assessment and approval processes providing certainty for the community and proponents alike.

We support the strengthening of proactive management programs regarding water quality, protected area management, threatened species, invasive species and Indigenous cultural heritage and seek to leverage greater regional investment to more strategically deliver on outcomes. Critical to this process is strong regional engagement including local government as a key partner through ongoing engagement mechanisms particularly around offsets and cumulative impacts policy development and the related planning and decision making implications. Please note that references in this submission to 'regional' are restricted to the Far North Queensland and Torres Strait region (covering 21 local government areas plus one town authority) from Cardwell to Kowanyama across the Cape including all of Torres Strait Islands.

2.0 Local government – the missing partner?

Local government plays a critical role in managing and regulating land use, water quality, facilitating economic development and supporting communities in the GBR catchments. It seems that effort needs to be made to develop a genuine tripartite arrangement, with the Queensland and Federal Government, to effectively achieve the objectives of the Strategic Assessment process in a coordinated and integrated fashion.

For example, whilst the GBR Coastal Zone Strategic Assessment report mentions the Reef Guardian Councils and the Reef Plan 2013 program there is insufficient focus on the importance of local government in planning, management and decision-making regarding activities and land use in the coastal zone throughout the remainder of the document.

Recommendations

1. Increase engagement with Local Government around the Sustainability Plan through an on-going, resourced, collaborative working group of Great Barrier Reef councils and/or Regional Organisations of Councils. To provide specific input on development of cumulative impact assessment guideline, Qld offset policy, Direct Benefits Management Plan, and advise on appropriate approaches for ensuring planning schemes and related assessment decision-making delivers on outcomes sought through both program reports and the Sustainability Plan.
2. Strengthen and improve the Reef Guardian Council program including funding for on-ground projects.



3. Improve focus on the urban environment through Reef Plan Program including additional funding for local government projects directly delivering on water quality benefits such as, the Reef Urban Stormwater Management Improvement project.
4. Provide clarity, guidance and support to local governments regarding the implications of the Sustainability Plan and related policy changes including impacts on Regional Planning, planning scheme development, assessment and decision making on development proposals etc.

3.0 Offsets

RDA FNQ&TS welcomes the coordinated approach to developing an integrated, comprehensive and effective offsets policy for the whole of Queensland and the specific GBR focused Direct Benefits Management Plan. We acknowledge the importance of focussing on avoiding impacts and then considering steps to mitigate impacts before moving to offsets. RDA FNQ&TS supports a strong focus on these first two steps in the project development assessment process. We suggest that the GBR Implementation Plan explicitly reflect this.

RDA FNQ&TS is keen to ensure there is strong and effective regional engagement in the policy development process. We note that a draft Queensland Offsets Framework has been released but was not been widely circulated nor the subject of a comprehensive consultation process. A successful policy in large part relies on the quality of its content as well as the extent of understanding and commitment to its objectives by stakeholders. Clear and consistent consultation processes are an effective way to developing and delivering a successful policy.

Recommendations

5. Establish and support a regional stakeholder group, to provide input to the policy development and implementation process, covering both Qld offsets policy and GBR specific Direct Benefits Management Plan. Including development of regionally strategic 'off the shelf' offsets projects that can deliver maximum outcomes through leveraging regional 'investment'.
6. Ensuring offsets will be delivered within the relevant LGA and/or same bioregion.
7. Clarifying linkages between the Qld offsets policy and the Direct Benefits Management Plan.

4.0 Cumulative impacts

The Abbot Point Cumulative Environmental Impact Assessment (CIA) demonstration case snapshot is a point of interest indicating that this approach is only partially effective and that "*managing the cumulative impacts from the multiple Abbot Point projects requires a level of port-wide integration and cooperation*



between proponents." RDA FNQ&TS is interested in further work regarding the proposed Cumulative Impacts Assessment Guideline including consideration of ways to improve the effectiveness of collaborative and proactive CIA, such as undertaken at Abbot Point and development of strategies to facilitate and encourage cooperation between proponents and with key agencies, such as NQ Ports Corporation, Local Government etc.

Recommendations

8. Effective, ongoing regional participation across relevant stakeholder groups, including local government, to inform the development of the Cumulative Impacts Assessment Guideline and other related policy, programs and initiatives.
9. Clarification on where the Cumulative Impacts Assessment Guidelines will fit with the current Federal-Queensland EPBC Assessment Bilateral Agreement processes.

5.0 Strengthening existing management programs

RDA FNQ&TS supports efforts to strengthen existing management programs noting the need for greater effort to halt the decline in ecological condition, reduce impacts and improve sustainable practices.

That the condition of northern GBR catchments is characterised as 'generally good' downplays the need to address ongoing chronic issues in many places regarding management of fire, weeds and invasive species, habitat fragmentation, building resilience to climate change. For example, water quality impacts around Princess Charlotte Bay are a key area for improved land management practices, supported for example via the Reef Rescue Program.² It is important to note that effective effort across the entire GBR region including the Cape York and Far Northern Sections is required to ensure protection of MNES and OUV of the GBR Region. Noting that the 2011 Reef Report Card assessed the water quality of the Cape York section as poor and did not assess the health status of coral reefs of this section.³ Greater effort for monitoring and reporting is required to track the health of the entire GBR Region and to make management decisions accordingly.

Similar assumptions are made that the condition of land within "protected areas" is likewise 'high' and that MNES are sufficiently protected. This is not necessarily true in the long-term without re-dedicated effort to address the same chronic impacts of fire management, invasive species, habitat fragmentation and increasing resilience to climate change.

¹ p.5 – 186 GBR Coastal Zone Strategic Assessment Report

² Reef Rescue and other programs relating to natural resource management and conservation could consider the strategic value and cost and benefits of destocking land, particularly in riparian and gully areas to manage erosion, as well as the role acquisition and management of high conservation value land can play in managing impacts and protecting MNES and the OUV of the GBR WHA.

³ p.4 – 82 GBR Coastal Zone Strategic Assessment Report



To improve outcomes through strategic regional alignment, consultation with regional stakeholders is required to identify regional targets maximising strategic outcomes. Program delivery must increase impact of outcomes through improved regional strategic alignment.

Recommendations

10. Consultation with regional stakeholders to identify strategic regional targets to maximise outcomes from existing programs including Back on Track, Everyone's Environment Grant Program, Qld Regional NRM Investment Program. Including alignment of program outcomes with intent of GBR Implementation Plan.

11. Bolster funding and focus on achieving strategic regional outcomes from existing (and any new) Qld programs regarding threatened species management, invasive species, fire management and water quality (informed and directed through engagement with regional stakeholders – rec 7.1)

12. Increase funding and focus efforts on addressing ongoing impacts on Protected Areas including fire, invasive species and habitat fragmentation.

13. Expand support for Indigenous Sea Country Management (plans, activities, forums etc).

14. Build links and align the Back On Track species prioritisation framework and other Qld Government threatened species initiatives with the Federal Government's Recovery Plan process and related initiatives.

15. Ensure the Implementation Plan (and related programs and initiatives) focus on the Far Northern and Cape York Sections of the GBR.

6.0 Queensland Government Reform Agenda: interaction with GBR Strategic Assessment

It is important to fully consider the implications of Queensland legislative reform, as well as changes to funding arrangements for programs and relevant departments, that may impact upon the implementation of the Program Report (strengthening existing programs and forward commitments). For example in this year alone the *Water Act 1989* and *Land Act 1994* are to be revised, the proposed new *Planning for Queensland's Development Bill* is to be introduced and the Cape York Regional Plan will be delivered. Consideration of the impact of legislative and policy changes over the previous year may also be useful in assessing the effectiveness of the existing policy and legislative framework regulating development and planning, managing resources and supporting conservation outcomes.

Recommendations

16. Greater consideration of any implications of Queensland Government's broad legislative reform agenda on the design and delivery of the joint Implementation Plan.



8.0 Indigenous Initiatives

RDA FNQ&TS strongly supports the initiative to identify Indigenous Heritage Values and anticipate that it will lead into proactive management activities as desired by Traditional Owners. We further strongly support the continuation of the Indigenous Sea Country Management program and initiatives supporting traditional management of marine turtle and dugong, Traditional Use of Marine Reserve Agreements (TUMRA) and other mechanisms that meet the aspirations of Traditional Owners to care for, manage and control their sea country.

9.0 Boosting regionally based assessment capacity

RDA FNQ&TS has previously raised the need for regionally based assessment staff in relation to the Federal-Queensland EPBC Assessment Bilateral Agreement processes to:

- a) build regional assessment capacity – prudent given the high proportion of MNES in the region (including the Wet Tropics and Great Barrier Reef World Heritage Areas);
- b) build expertise and local/regional knowledge of MNES by assessment staff;
- c) reduce proponent frustrations with turnover of Canberra based staff;
- d) contribute to progressing one-stop-shop for development assessment;
- e) improve communication and information sharing – within the Department, with Local, Qld and Federal Governments, with proponents and the broader community.

Regionally based assessment staff can deliver significant efficiencies to the assessment process. Further efficiencies could be delivered with regionally based capacity to drive related aspects of the Implementation Plan including a point of contact for information and advice on the offsets policy, Direct Benefits Management Plan and cumulative impacts assessment guideline.

10.0 Other matters

- **Integration and multiple policy objectives** – Stronger integration and coordination needs to be delivered through the Implementation Plan as there appear to be several policy objectives being addressed through the Strategic Assessment process. Clarification on the core policy objective, with this clearly carrying through the Implementation Planning process would be helpful.
- **Addressing Outstanding Universal Values** – It is not clear whether MNES are an effective 'substitute' for Outstanding Universal Values (OUV), but throughout both program reports MNES are being used as such. The Wet Tropics Management Authority (WTMA) is developing guidelines for assessing impact on OUV and a related reporting framework. This work could be useful for the Implementation Plan.



Summary of Key Recommendations

1. **Progress a tripartite agreement with Local Government** to deliver the Implementation Plan – including support and guidance regarding implications for planning scheme development and development assessment and approvals;
2. **Establish a regional stakeholder group** for ongoing engagement regarding policy development (Qld offsets policy, Direct Benefits Management Plan, cumulative impacts assessment guideline etc), to provide input to the Implementation Plan and support delivery of specific initiatives;
3. **Increased funding and regional strategic focus for existing programs** including protected area management, invasive species management, fire management, Back on Track (threatened species), Everyone's Environment Grant Program (local conservation capacity), Qld Regional NRM Investment program, Reef Guardian Councils, Reef Plan 2013 (and future) and Indigenous Sea Country Management;
4. **Ensuring a focus on the Cape York and Far Northern Sections of the GBR WHA** within the Implementation Plan priorities and related policies/programs.
5. **Consideration of implications of Queensland Government legislative and policy reform agenda** on achieving outcomes sought through the joint Implementation Plan; and
6. **Boosting regionally based assessment capacity** to improve efficiencies in the development assessment process (under the Federal – Qld Assessment Bilateral Agreement) and to increase delivery of initiatives under the Implementation Plan including cumulative impacts and offsets policies.

Conclusion

RDA FNQ&TS supports continued efforts to improve the management of the Great Barrier Reef World Heritage Area and adjacent coastal zone through collaborative governmental, industry and community efforts. We appreciate the enormity of the task ahead and note the need for strong regional engagement, clear policy and program integration and coordination across jurisdictions and increased strategic investment.

RDA FNQ&TS will be contributing to the draft Cape York Regional Plan with a focus on following through biodiversity, water quality, coastal zone and other related State matters that are identified as delivering on outcomes under the GRB Strategic Assessment. This will enable us to provide an informed case study as to how effectively Regional Plans can deliver on meeting outcomes sought to improve management of the coastal zone of the GBR in line with the State Planning Policy and the GBR Strategic Assessment Coastal Zone Program Report.

RDA FNQ&TS is keen to pursue responses to the recommendations put forward and is interested in further engagement with both the Queensland Government, GBRMPA and the Department of Environment to facilitate effective regional stakeholder engagement in the development and delivery of the Implementation Plan, and related policies and programs.



Please do not hesitate to contact me with any queries regarding our submission or to discuss related matters. I look forward to working with our Local Government partners, the Queensland and Federal Governments to progress this important work.

Yours sincerely

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