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**Submission on Proposed Port of Townsville Port Expansion Project
(EPBC 2011/5979) –**

Members of this Association are conscious that this draft EIS is the result of a rigorous process initiated by a 5 April 2011 Initial Advice Statement and 26 May 2011 referral, and are aware that "Submissions should be limited to comments on the scope and presentation of studies and information required in the EIS to allow for an assessment and decision on the appropriateness of the proposal, rather than the merits of the proposed action"¹. We acknowledge GBRMPA's permitting and advisory role in this process.

We note that the AECOM 5 April 2011 Townsville Port Expansion Project: Initial Advice Statement states that: "The Port of Townsville is located on Cleveland Bay, approximately 3 km east of the City Centre of Townsville in Queensland (refer to Figure 1.1). The Port is situated within the Great Barrier Reef World Heritage Area. The majority of the Port infrastructure is positioned in an excised portion of the Great Barrier Reef Marine Park (GBRMP), with the exception of approximately 300 m of the Sea Channel (east of Magnetic Island). (MICDA underlining) This is shown on Figure 1.2. The PEP proposes to extend the existing port area northwards on the seaward side within the excised area, and proposes to deepen the channel, which would result in some lengthening of the current Sea Channel into the Great Barrier Reef Marine Park."

Further, we observe that the Draft Guideline EIS paragraphs 5.6 to 5.9 inclusive address environmental and ecological considerations including matters of National Environmental Significance (MNES) and consultation, "including a statement mentioning any communities that may be affected and describing their views".

COMMENT

1. Proposed Amendment of Draft EIS Guidelines²

Members of this Association are concerned at the potential impact on the contribution of Magnetic Island to the World Heritage Values of the Great Barrier Reef, particularly

¹ Preamble to the Draft Guidelines for the EIS

² (Paragraphs 3.1: Proposed Project Area, 5.5: Project Details, 5.6: MNES, 5.9: The Existing Environment, 5.10: Relevant impacts, and 5.10.1 to 5.10.9 inclusive)

by its surrounding reef environments, which are the most vulnerable component of the ecosystem, by the proposed port expansion, specifically dredging³, maintenance dredging, the increase of offshore placement of dredge material at the existing dredged material placement area shown on Figure 1.2, and port usage (the anticipated number and size of shipping)

We submit that the draft EIS Guidelines be amended to reflect the following:

- The proposed port expansion project is allocated adjacent to the east of Magnetic Island in Cleveland Bay, a significant portion of which coastline is also part of Magnetic Island National Park.
- The Appendix to the 2010 EPBC Policy 5.1: Region Magnetic Island identifies the World heritage values of the Great Barrier Reef and the contribution of Magnetic Island (copy attached). This locational policy guideline is more specific than the "general guideline" of Appendix A: EPBC Protected Matter Report and DERM Wildlife Online Searches dated 24 January 2011 cited with the draft EIS Guideline.

This proposal is especially important given that:

- The project components will be a staged construction over a 20 year period, so dredging consequences and increased mobilised sediments build up may be cumulative.
- The area excised from the GBRMP does not adjoin Magnetic Island but leaves a buffer of an apparent 1500m (Figure 1.2 refers). Therefore, we conclude and propose that the impact on this buffer area is a critical consideration under the EPBC

Our proposal is made taking into account the findings and conclusions of the report "Townsville Port Authority Capital Dredging Works 1993 Environmental Monitoring Program", available online at <http://www.townsville-port.com.au/files/publications/TPA%20Capital%20Dredging%20Works%201993.pdf>.

We note that this report concluded that "at the conclusion of the monitoring program there had been no exceedance of trigger thresholds for partial mortality after control vs impact comparisons", that "at least in the short term, dredging works did not result in major changes in community composition of corals at the examined Magnetic Island reefs", that "no effect of dredging was detectible on the seagrasses of Cleveland Bay" and in relation to sediment data collection that "dredge related effects lay within normal variation at seagrass sites and at Middle Reef", and that "no extreme suspended sediment concentration occurred at any of the Magnetic Island bays as a direct result of dredging." ⁴

However, we also note that in the text of the report under Reactive Monitoring (Short Term Responses) of Coral Species⁵, concluded that "dredging activities also contributed to the observed stress in corals at Geoffrey and Florence Bay".. and that "these enhanced levels of coral stress (particularly as measured by moderate bleaching levels) at Geoffrey and Florence Bays during February, support the contention that at least one species was close to its tolerance limits during this period. It is therefore recommended that major dredging within close proximity of Magnetic Island reefs be avoided or closely monitored when adverse natural conditions (such as spring tides, strong winds, ground swell and/or persistent low light) coincide." (MICDA underlining)

We also note in this report that "One (coral) colony (*Merulina ampliata*) died at Geoffrey

³" ten million cubic metres of dredging: five million cubic metres is proposed for offshore disposal" Source: Preamble to Draft guidelines

⁴ Introduction pp5-6

⁵ by MG Stafford Smith, UL Kaly and JH Choat of the Department of Marine Biology JCU

Bay but this mortality was not considered to be dredge related. Partial mortality did not exceed any threshold criteria at potential impact locations. In general, partial mortality at impact locations was less than 10% for all colonies although this was exceeded by three colonies at Florence Bay, two at Geoffrey Bay, one at Middle Reef and one at Nelly Bay.”

We therefore advocate measures that operate beyond the assessment of “short term” impacts and which take into consideration the risks of tolerance limits.

We also bear in mind the case study cited in the report of the effectiveness of intensive monitoring and management for Nelly Bay Harbour dredging, but remain conscious that the proposed harbour expansion dredging is on a much larger scale with associated higher risk of impacts on the GBRMP including Magnetic Island.

2. Proposed strengthening of Draft EIS Guideline Paragraph 5.9 (r): Tourism:

A further consideration is the consequences for tourism of the dredging etc. Magnetic Island is a popular tourism destination for both the domestic and international market. Both Tourism Queensland and Townsville Enterprise Limited, the Regional Tourism Organisation, perceive Magnetic Island as a nature tourism destination, including particularly its fringing reefs which are used extensively for snorkelling and diving.

Impact on the MNES would seriously affect the sustainability of Magnetic Island as a nature tourism destination.

Add to this that Magnetic Island is recognised in EPBC policy 5.1 Appendix as “highly accessible” and this very accessibility is pivotal to it as a tourism destination, and provides a significant contribution to Australia’s obligation to facilitate presentation of the values of the Great Barrier Reef World Heritage Area. The acknowledgment of this accessibility in Draft EIS Guideline paragraph 5.9 (r) should be strengthened.

We are aware of the Queensland Government’s integrated economic/ infrastructure development policy settings which underpin the proposed Port of Townsville Port Expansion Project⁶.

Nevertheless, the potential environmental and ecological consequences of the proposed port expansion are a serious concern to our membership.

We anticipate further opportunities for consultation on this matter subsequent to the community information session in July 2011.

Yours sincerely

Lorna Hempstead AM
Hon President

cc. Vern Veitch, Councillor for Magnetic Island, Townsville City Council

cc. Mandy Johnstone MP
Member for Townsville

⁶ These include the December 2011 Queensland Regionalisation Strategy, July 2011 Townsville Futures Plan, and particularly the November 2011 Queensland Infrastructure Plan which accords the expansion of the Port of Townsville a high priority, “opening up Townsville to a higher level of national and international shipping services” and the importance of the Port of Townsville to economic growth recognised in the Townsville City Council August 2011 Townsville Land Use Proposal.