

17 February 2015

Dr Kimberley Dripps  
Deputy Secretary  
Department of Environment  
GPO Box 787  
Canberra ACT 2601

Dear Kimberley,

**Re: Reef 2050 Long-Term Sustainability Plan Draft (Dated 22 January 2015)**

Thank you for the invitation to comment on the latest draft of the Reef 2050 Long Term Sustainability Plan. As you are aware Ports Australia has been an active member of the Reef 2050 Partnership Group and has been instrumental in helping shape the Plan since its inception.

Below are our observations on the process and some suggested changes to the document. We strongly urge you to take these comments on board in re-drafting the plan. I would also be happy to meet with you to discuss these comments in more detail.

**General Observations**

Since the commencement of Reef 2050, Ports Australia has been of the view that it offered a constructive prospect to secure a balanced and science-based dredging policy/strategy.

Ports Australia has consistently adopted a proactive approach and made a positive contribution to the Plan. We provided information that would demonstrate to UNESCO's World Heritage Committee the complex regulatory environmental regime under which ports operate and the effectiveness of existing management arrangements, many of which by international standards are at the leading edge. As part of our contribution to the Plan, we developed a strategy for ports and dredging that included support for the Queensland Ports Strategy (which places limits on areas for port development), agreement to prepare a Code of Practice for port related dredging, preparation of long-term dredge management plans and a commitment to enhance existing monitoring programs.

At the outset of the planning process I received unequivocal assurances that the strategies developed for the Plan would be strictly evidence based. Unfortunately, this has not been the case. The results of a range of previous scientific studies that place the impacts of dredging in context and the results of earlier monitoring of dredging projects have not been appropriately considered in the development of the Plan.

While disappointed that this is the case, I remain optimistic that these shortcomings can be addressed in the development, in partnership, of the implementation plans that will give effect to the Reef 2050 targets and actions.

Furthermore, as mentioned by other partnership members, the Plan does not clearly enough outline where long-term Reef health improvements are most needed, but rather has an unbalanced focus

on less influential matters such as port developments and dredging. While at one level this is somewhat understandable given the current political campaigns and the public debate surrounding the Reef, it will not help address the real issues in the long term and it does not reflect the evidence based approach on which the sustainability report is intended to be based. The main issues are clearly:

1. water quality from river and direct discharges associated with farming, grazing and urban (and to a lesser degree industrial) development;
2. coastal/catchment ecosystem functions that filter runoff and regulate water quality;
3. Crown of Thorns Starfish outbreaks and associated nutrient triggers; and
4. adaptation to the impacts of climate change.

Other human activities like ports and coastal development, shipping, tourism and fishing require maintained regulation, adaptive management and continual improvement. However, it is the above four key issues that will determine whether the Reef continues to decline.

### **Dredging Policy for the Great Barrier Reef Region**

As outlined at the meeting of the Partnership Group on 9 February 2015, Ports Australia strongly opposes the policy announced by Minister Hunt to ban capital dredge material disposal in the GBR Marine Park on the basis that it will prospectively produce sub-optimal outcomes in both ecological and economic terms. The Minister's unilateral move to announce this policy and include it in the Reef 2050 Plan is of concern to the Ports Australia Board and whereas previously we had been satisfied to adopt some ownership of the report, this is now problematic. It is most regrettable also because this development disempowered one of your more energetic and pro-active partners, and from our perspective, it has substantially discredited the partnership model.

We have also communicated our concerns directly with the Minister. As outlined in my letter dated 21 January 2015, we believe that the policy will strategically be quite damaging and is not sensible or soundly based given that:

- It is inconsistent with the well-established process under the London Protocol (to which Australia is a signatory) and the National Assessment Guidelines for Dredging (NAGD). As an adjunct to this comment the policy has also caused some incredulity in the international maritime technical community.
- The London Protocol and NAGD require that a comparative assessment of all dredge disposal options be undertaken to ensure the most sustainable option is chosen.
- For some dredging projects, the comparative best solution is onshore disposal or beneficial applications, but for many others such options may not be appropriate or available and may result in significantly greater environmental impacts.
- The well-managed placement of marine sediments back in the marine environment is the most common practice adopted by ports globally. A review of international practices by GHD (2013) for the Department of Environment concluded that Australian assessment/management processes for this approach were consistent with best practices
- Scientific monitoring demonstrates that dredged related impacts are predictable, short term and consistent with approval conditions (especially routine maintenance dredging).

Furthermore, land based or reuse options for dredged sediment are often not viable in northern Australia where adjacent coastal lands may have high conservation, cultural or economic value or, if viable, usually only for small amounts of material or one-off projects.

Requiring land based storage of dredged material at each port would require large areas (100's ha) of flat land, fenced for public safety. These areas are generally in nearby coastal fringe areas with high environmental value (i.e. wetlands). Dredge material takes many years to dry and settle, which effectively sterilises it from any other industrial or recreational use and limits beneficial reuse options. Recent technical studies for the Great Barrier Reef Strategic Assessment concluded that on land placement of dredged material was not a long-term viable option for the six major ports in the Great Barrier Reef region. It is disappointing that the findings of the Strategic Assessment have been ignored in developing policy positions.

Accordingly this “blanket” position that does not require the full range of disposal options to be assessed on their merits is not appropriate. It is likely to result in sub-optimal environmental outcomes being approved (e.g. alienation of large coastal areas and loss of coastal habitat).

### **Maintenance Dredging**

Given the position that the Minister has put forward in the Reef 2050 Plan with respect to capital dredge material placement, we are very concerned that there will be significant pressure applied to extend this ban to maintenance dredge material.

Dredging to ensure designated depths are maintained is critical to the continued operation of our ports that support our regional and national economies. This is particularly the case in Queensland where the majority of major commercial ports are located within the cyclone activity zone and are accordingly subject to periodic (and unpredictable) high levels of siltation bringing about immediate requirements for maintenance dredging. Even small reductions in channel depths can lead to ships being unable to carry full loads increasing the cost of importing and exporting goods.

Ports Australia appreciates that the Minister has made a clear distinction between capital and maintenance dredging. We are placing our trust in the Government that existing policies on maintenance dredging will be protected and supported. A ban on the long established maintenance process of placing natural sediments (transported from nearby shallow areas by floods and currents into deeper shipping channels and berths) at designated at-sea sites that have been used for decades would be devastating economically for ports and their client industries and render some unviable.

As such, we maintain our support for the actions currently within the draft Reef 2050 Plan (WQA16) relating to maintenance dredging and the proposal to develop a state-wide maintenance dredging program and would oppose any substantial alteration or additional restrictions to the current proposed actions.

### **Measuring the Success of the Plan**

The Plan proposes a range of actions that are intended to provide the steps necessary to achieve related targets. It is important that the effectiveness of the actions is assessed to confirm their value in meeting the targets. Unless that occurs, it is possible that a new management action will not contribute to improving the sustainability of the Reef.

The key target in relation to dredging involves improving water quality trends and monitoring. Broad scale monitoring will reveal the influence of a range of anthropogenic influences on water quality and the recognised high level of natural variability of inshore GBR areas (e.g. due to cyclones and floods). It is, however, highly unlikely to be able to differentiate the benefits (or otherwise) of actions such as banning the placement of capital material in the GBRMP or prohibition of capital

dredging in certain areas, some of which include existing ports. This is especially the case considering the lack of relevant baseline data.

Consequently, the Plan offers no mechanism to measure the benefit of many of the dredging actions to achieving the relevant target. This will be of particular relevance when scheduled reviews occur.

Ports Australia is most concerned that unnecessary and costly management actions with little environmental benefit, such as a ban on capital material placement in the GBRMP, are being applied with no capacity to enable review of their benefits.

Ports Australia considers that the targets for dredging and port planning need to be revised to enable the success of the Plan's actions to be measured and, if need be, amended. It may be better if this were to take place through the implementation plans when priorities and funding aspects can be confirmed.

### **Detailed Comments**

In addition to the two key issues on dredging outlined above, Ports Australia has a number of specific comments and suggestions on the content of the current Reef 2050 Plan. These comments are presented in table form in **Attachment A** to this letter. Where appropriate, we have provided some suggested revised text for substitution in the Plan. Ports Australia is available to work further with the Department to revise these sections of the Plan as needed.

In summary, our concerns focus on:

- There is far too much emphasis on uncertainty with respect to the impacts of dredging. The science around dredging impacts is well advanced and understood with predictive assessments and post event monitoring showing a very high degree of accuracy and precision. It is regrettable that this information was not referenced at all.
- References to the reduction in dredging projects from “five to zero” is incredibly misleading. It gives the impression that the Government has refused a number of projects due to their perceived environmental risk and that they were irresponsibly conceived in the first instance which greatly misrepresents the real reasons behind these projects not going ahead.
- The Plan contains assertions that port developments and dredging are amongst the highest risk activities facing the Reef, while issues such as river sediment discharge and over fishing are risks/threats which are now under control. This is simply not correct and is inconsistent with other parts of the Plan as well as the Outlook Report and GBR Strategic Assessment conclusions.
- The Plan appears to put forward the position that ports have been idle and outdated in their efforts to address environmental issues and that they have been whipped into shape over the course of the development of the Plan. Given the constructive nature of our participation and the key role we have played in shaping the Plan into something that was a considerable improvement on initial drafts, this narrative is incredibly disrespectful and disappointing.
- The lack of a defined mechanism to review the benefits (or otherwise) of the dredging and port related actions should be addressed. Ports Australia strongly contends that some of these actions are unnecessary, will result in poorer environmental solutions and will increase the cost of trade through GBR ports.

We look forward to discussing these comments with you and look forward to receive further updates on the development of the Plan.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'D Anderson', with a stylized flourish at the end.

**David Anderson**  
**Chief Executive Officer**

cc: Carolyn Cameron  
Department of Environment

Adrian Jeffries  
Department of the Premier and Cabinet

**Attachment A: Detailed Comments Reef 2050 Long-Term Sustainability Plan Draft (Dated 22 January 2015)**

Section (Pg. No.)	Current Text	Concerns	Proposed Revisions to Text (new text indicated by <u>underlining</u> )
1.3 (Pg. 14)	<i>“Increasing port activities directly affect local areas and uncertainty remains around ecosystem effects.”</i>	The statement is misleading. The science around port activities, including dredging, dredging impacts is well advanced and understood with predictive assessments and post event monitoring showing a very high degree of accuracy and precision (refer to the 2014 Ports Australia Report “ <i>Dredging and Australian Ports - Subtropical and Tropical Ports</i> ”). Speculation by some commentators that impacts are greater or are not understood is not backed by science and should at best be treated as a hypothesis rather than fact. There is no basis to assume that GBR port development have ecosystem effects.	<i>Increasing port activities <u>may</u> directly affect local areas <u>and ecosystems</u>, <u>ongoing monitoring, management and avoidance measures are in place to minimise impacts.</u></i>
Foreword (Pg. 5) Exec Summary (Pg. 7) 1.2 (Pg. 12) 2.6 (Pg. 18) 2.6 (Pg. 18) 3.6.3 (Pg. 31)	<i>“Reducing the number of major capital dredging proposals to dump material in the Great Barrier Reef Marine Park from five to zero.”</i>	The statement is misleading and clumsy and repeated far too many times. Although we are aware that this narrative has been cited by the Minister, the original source of this assertion is unclear and it gives the impression that the Government has refused a number of projects due to their perceived environmental risk and that they were irresponsibly conceived in the first instance. It is clearly a partisan political statement that dates the Plan and does not reflect the reality surrounding these projects. It adds to the impression created on p30 that the ports community has been	Remove all instances where this statement has been made.

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		subject to what can almost be construed as punitive measures for the error of their ways. These statements are particularly difficult to reconcile given that they often come straight after a previous paragraph or section which describes the actual risks facing the Reef.	
Exec Summary (Pg. 8)	<i>“Developing ecosystem resilience in the face of a variable and changing climate is a key principle of the plan. By improving water quality, maintaining biodiversity and ensuring port development and shipping has minimal impact on the Reef, it is targeting activities over which governments and other stakeholders have most control.”</i>	Given the range of other sectors that are represented in the Reef 2050 partnership it is very disappointing that ports have been singled out here.	<i>“Developing ecosystem resilience in the face of a variable and changing climate is a key principle of the plan. By improving water quality, maintaining biodiversity <u>and by ensuring all sectors interacting with the Reef have minimal impact</u>, it is targeting activities over which governments and other stakeholders have most control.”</i>
Exec Summary (Pg. 9)	<i>“Integral to this approach will be sectoral plans around key activities such as port management. These plans will outline how avoidance, mitigation, management and restoration actions combine to ensure development is ecologically sustainable.”</i>	<p>This statement appears to indicate that only ports will be developing a Sectoral Plan. It is critical that specific sustainability strategies for all areas of human activity that affect the World Heritage Area are developed and included in the various initiatives to maintain and improve the health of the Reef.</p> <p>Ports Australia has consistently adopted a proactive approach and made a positive contribution to the Plan. However, this contribution has not been matched by other industries and, despite constant representations, this is yet another example of how the Plan remains disproportionately focussed on port activity. The Plan does not clearly articulate how other industry sectors,</p>	<i>“Integral to this approach will be sectoral plans <u>for each sector that interacts with the Reef</u>. These plans will outline how avoidance, mitigation, management and restoration actions combine to ensure development is ecologically sustainable.”</i>

Section (Pg. No.)	Current Text	Concerns	Proposed Revisions to Text (new text indicated by <u>underlining</u> )
		<p>whose activities pose significantly higher risks to the Reef (e.g. farming) propose to materially contribute to improvement in the health of the Great Barrier Reef (GBR). This omission has persisted notwithstanding that it was specifically raised within the Partnership Group on a number of occasions, and also directly with Agencies.</p>	
3.2 (Pg. 21)	<p><b>Table 1</b>  <i>“Over the past 40 years, management arrangements have been continually adapted to address the highest risks.”</i></p> <p>Table heading: <i>“Present”</i>  <i>Cumulative impact, ports and dredging”</i></p>	<p>The table on this page is constructed to indicate that port developments and dredging are amongst the <b>highest risk</b> activities facing the Reef, while issues such as river sediment discharge and over fishing are risks/threats which are now under control. It is widely documented that port development and dredging are not among the highest risks and the table is also inconsistent with other parts of the Plan as well as the Outlook Report and GBR Strategic Assessment conclusions. This continual over-stating of the risks posed by port development is biased and is not conducive to the Australian Government’s efforts to avoid an in-danger listing of the GBR or to provide comfort to potential investors.</p>	<p><b>Table 1</b>  <i>“Over the past 40 years, management arrangements have been continually adapted to address <u>current and emerging risks.</u>”</i></p> <p>Table heading: <i>“Present”</i>  <i>Cumulative impact, <u>land use change</u>”</i></p> <p>Dot points should be expanded to include:</p> <ul style="list-style-type: none"> <li>• Ongoing funding for Reef WQ Plan</li> <li>• Climate change Direct Action policy</li> <li>• Other initiatives that address the major threats.</li> </ul>
3.6.3 (Pg. 30)	<p><i>“When the current Australian government was elected in September 2013 there were five major capital dredging projects either planned or under active assessment that proposed to dispose of dredge material in the Marine Park. The Australian and</i></p>	<p>The tone of these two paragraphs is negative and reads as if ports have been idle and outdated in their efforts to address environmental issues and that they have been whipped into shape over the course of the development of the Plan - it implies that ports have</p>	<p><u><i>Over recent years the current Australian Government has worked in partnership with port authorities and project proponents to refine future port development projects in line with leading practice principles. This has</i></u></p>

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	<p><i>Queensland governments have reduced that number to zero. The Australian Government will use its regulatory powers to permanently ban the disposal of capital dredge material in the Great Barrier Reef Marine Park from any future major port development.</i></p> <p><i>Port planning and port operations in and around the World Heritage Area continue to be improved through implementation of the Queensland Ports Strategy, the principles developed through the Independent Review of the Port of Gladstone<sup>13</sup>, and partnership models such as the Gladstone Healthy Harbour Partnership. As a consequence, port development in the World Heritage Area and the adjacent coastal zone will be strictly controlled. Further, these initiatives incorporate a best practice approach to port planning, ensuring Outstanding Universal Value is an intrinsic consideration in port management and governance, optimisation of long established port footprints, transparent decision making and meaningful engagement with affected stakeholders.”</i></p>	<p>been a reluctant partner in the project. Given the nature of our participation in the development of the Plan this is a gross distortion. There is no acknowledgement of the journey of improvement that the ports community itself initiated over the past 20 years including through the development of a master planning framework nor of the positive contribution it has made to the Plan unlike the efforts of other industry sectors or groups.</p> <p>As per the comments on page 18, the references to the reduction in projects from 5 to zero is politically based and misleading.</p> <p>The whole tone and message of this section needs revision.</p>	<p><u><i>included the reduction in the overall number of projects, a preference for beneficial reuse of dredge material and the proposed future avoidance of placement of capital dredge material in the Great Barrier Reef Marine Park.</i></u> (Noting Ports Australia oppose this measure but the wording reflects the Minister’s current policy position)</p> <p><u><i>Port planning and port operations in and around the World Heritage Area reflect global leading practice. Governments and port authorities continue to seek improvements through implementation of the Queensland Ports Strategy, the principles developed through the Independent Review of the Port of Gladstone<sup>13</sup>, and partnership models such as the Gladstone Healthy Harbour Partnership. The Australian port industry has provided leadership and expertise in this area through the publication of “Leading Practice: Port Master Planning Approaches and Future Opportunities” to help guide port master planning. These initiatives incorporate a best practice approach to port planning, ensuring Outstanding Universal Value is an intrinsic consideration in port management and</i></u></p>

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			<i>governance, optimisation of long established port footprints, transparent decision making and meaningful engagement with affected stakeholders.”</i>
3.6.3 (pg. 31)	Ports and Dredging box	There is no recognition and acknowledgement of the comprehensive body of work that ports have undertaken to understand the science around port activities, including dredging. Key findings from studies such as the 2014 Ports Australia Report “ <i>Dredging and Australian Ports - Subtropical and Tropical Ports</i> ” should be appropriately referenced to provide more balanced commentary on Ports and Dredging. It is also interesting to see acknowledgement here of the findings of the Outlook Report which did not identify port activities and dredging as a major risk. This further highlights why any other references in the document to dredging being a high risk are misleading and need to be removed. As it currently stands the document is very confusing on the issue of ports and dredging and contains a weird mix of partisan political statements and sensible scientific findings.	Insert the following paragraph  <i>“A comprehensive review of recent dredging projects in subtropical Australia by Ports Australia (2014) identified that monitoring programs all showed reported impacts consistent with (generally no impact to a sensitive receptor), or less than, those approved or predicted. “</i>