



# **Australian Government**

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## **Australian Heritage Council**

*AHC submission on the Great Barrier Reef Strategic Assessment.*

The Australian Heritage Council (AHC) notes that the Strategic Assessment is a large and comprehensive document reflecting the challenges that the Great Barrier Reef Marine Park Authority (GBRMPA) faces in managing this very extensive and complex ecosystem. It seems clear that most of the Report is soundly based on the best available science and where uncertainty remains, the Authority has drawn on extensive expertise to assist in the assessment process. The Council congratulates the Authority on this impressive document and the effort involved in preparing it.

The assessment highlights the need to look at the cumulative effects on the GBR – something that has not been adequately done to date. The complexities of assessing such a wide range of cumulative effects are likely to be daunting, but will be the only way to accurately identify values, risks, development applications and possible mitigation and remediation actions. It is clear that some aspects of the GBR are well understood, while others need further work. Of particular relevance is the proposed research into reef resilience. While at the modelling stage, an assessment of reef resilience could help effectively target mitigation actions. The model will, however, only be as good as the data it is based on and the assessment identifies areas where further data is required.

Generally the science demonstrates considerable decline in many significant attributes of the Great Barrier Reef and these especially relate to Matters of National Environmental Significance (MNES). From the perspective of the AHC the particular concerns are those attributes that have led to the GBR being placed on the National Heritage List. In the specific case of the GBR, the area was placed on the list without a formal assessment by the AHC but was part of a block of World Heritage Sites that were added to the National Heritage List. It was assumed that the fact of World Heritage listing ensured that threshold for the criteria listed as World Heritage would certainly exceed those required for National Heritage. Departmental staff simply "mapped" appropriate criteria for National Heritage listing against the four criteria for which the GBR was accorded Outstanding Universal Value by the World Heritage Committee.

In drafting the Strategic Assessment the Authority does not specifically discuss National Heritage as a separate MNES but rather concludes that assessment of the World Heritage Area will suffice or cover all areas of the GBR National Heritage place. From the point of view of the AHC, this does raise the question about whether there are significant attributes of the Great Barrier Reef that might be overlooked because its National Heritage qualities have not been formally assessed by the AHC and only five criteria have been aligned with the existing World Heritage criteria. This leaves a question mark about what other attributes of the GBR may reach National Heritage threshold and therefore should be listed and thereby gain protection. For example criteria that may relate to Historical Heritage and Indigenous Heritage have not been assessed. The AHC would welcome an opportunity to make an assessment of the GBR against all relevant National Heritage criteria and this could assist meet the Program Report targets.



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The findings in the Strategic Assessment are matters of grave concern for the AHC as they clearly intimate a serious decline in the condition of the GBR, especially in the southern part. The threats range from a continuing decline in coral cover, in populations of significant species including turtles and dugong, in seabirds and in continuing and growing threats to the integrity of the reef ecosystems, especially from climate change and from COTS. This record of declining condition raises doubts that the concerns expressed by the UNESCO/IUCN Mission are capable of being met without a change to the present management (both practices and resources may be inadequate). When the AHC met with the Mission it was clear that one serious concern related to rapid expansion of development in the southern part of the GBR Region and there was an expectation that the process of further development would need to be slowed and to become part of a more strategic approach (in general restricting ports to existing infrastructure locations and not allowing the developments of new ports). Additional concerns were raised about consequences, particularly dredging for expansion and maintenance. The effects of dredge spoil disposal within the GBR was a concern. It is noted that the Assessment Report identifies incomplete modelling of dispersal of sea-dumped dredged material that has probably led to an underestimate of the extent and duration of such impacts. This further strengthens concern about these coastal and inshore developments. The fact that inshore reefs in the southern section of the GBR are in very poor condition adds to the concern.

While water quality improvements are noted, largely as a result of significant investment in the Reef Water Quality Plan and work with progressive farmers within the catchments, it is clear much more needs to be done. A successful program will lead to higher resilience in the GBR and provide support for resisting the growing threats from climate change. The AHC notes that this particular threat cannot be addressed by the Authority or Australia alone. We would urge the Federal Government to take the concerns for the GBR into various international arenas where bilateral or multilateral agreements may be reached to better protect the reef. Almost every aspect of MNES is adversely affected by climate change and it remains to be seen whether some conditions have reached tipping points for irreversible change.

One significant concern is that while the Assessment shows the serious decline in many attributes, the Program does not provide assurance that these concerns will be reversed. There are several specific actions that are set out in the Program Report but there seems inadequate clarity about how these will be properly resourced to ensure they might achieve their objectives. Responding to deterioration identified through the integrated monitoring framework will involve extensive collaboration and liaison between the various levels of government and research institutions involved. The document lacks clarity about what might happen when monitoring shows continuing decline (no triggers are identified that will ensure action in response to monitoring outcomes). This part of the Program Report could be rewritten to assure the reader that there is integration of monitoring, collaboration between the various levels of government/institutions, that the triggers are identified, that forward commitments will be meaningfully resourced and that any measured declines will be addressed. The question of uncertainty (in the science, in the likely deterioration and in the actions available) needs to be fully addressed.



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Much is made in the Assessment Report about the contrast in condition between the northern section of the GBR (adjacent to the largely undeveloped east coast of Cape York Peninsula) and the southern section, adjacent to the heavily industrial, highly settled and extensively transformed part of the Queensland coast. While much of the proposed Program attempts to address the causes of the declines in the southern section, little note is given to the changing circumstances of the northern GBR coast. The new Queensland Cape York Regional Plan, along with other actions by the Queensland government, will enable considerable transformation of Cape York Peninsula and that will significantly increase the risks to the GBR northern section. In a document of this kind such risks need to be identified and the proposed risk management strategies spelled out.

The assessment identifies a need for the GBR Management Authority to better inform agencies and users of their work. This is always a challenge for management authorities but is essential if the values and threats to the GBR are to be better taken into account when land (and sea) use proposals are being assessed. In particular, the mapping of high value, at risk and sensitive areas is an essential planning tool.

The Great Barrier Reef is arguably Australia's most outstanding natural asset and the threats identified are serious and imminent. Improved integrated monitoring, agreed triggers with resourced responses, better consideration of cumulative effects and greater communication between all levels of users and managers will be the only way to effectively proceed to manage this outstanding natural resource. The National response to this has to be strong and urgent.

A handwritten signature in black ink, appearing to read 'Carmen Lawrence'.

The Hon Professor Carmen Lawrence  
Chair  
30 January 2014