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Committee Secretary  
Health and Environment Committee  
Parliament House  
George Street  
BRISBANE QLD 4000

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Dear Committee

**Re: Environmental and Other Legislation (Reversal of Great Barrier Reef Protection Measures) Amendment Bill 2021**

The Executive Committee of Gecko Environment Council Assn Inc (Gecko) thanks the Committee for the opportunity to comment on the above Bill. Gecko is a not-for-profit environment association founded in 1989 and has been active for the past 31 years in protecting the environmental values and ecological sustainability of the Gold Coast, Queensland and, when appropriate, nationally. Gecko's Mission is "To actively promote, conserve and restore the natural environment and improve the sustainability of the built environment of the Gold Coast region in partnership with our member groups and the wider community."

Our organisation has over decades been concerned with the protection of the Great Barrier Reef and have participated in consultation on many issues that threaten its World Heritage values, including vegetation clearing in and around GBR catchments, climate change impacts, agricultural run-off, fisheries, mining activities, shipping and dredging.

In making this submission, Gecko recognises that the Great Barrier Reef Marine Park is not only a Queensland and Australian treasure, but one that belongs to the world, as designated by its World Heritage status. We are simply its guardians for present and future generations.

**Purpose of Bill**

The current Bill proposes to repeal all amendments made to the Environmental Protection Act 1994 and the Chemical Usage (Agricultural and Veterinary) Control Act 1988 by the state government in its Environmental Protection (Great Barrier Reef Protection Measures) and Other Legislation Amendment Act 2019.

This Bill has a narrow focus on reducing reporting requirements, cutting red tape and reducing penalties for farmers and reverting to the previous definition of the agriculture environmentally relevant activities (ERA).

According to the explanatory speech, the Bill also seeks to:

- establish an independent regulator for the industry to advise the minister when making a new ERA standard and would oversee the administering of offences when a person commits an offence with respect to fertiliser application.
- introduce an enforceable undertaking so that there is no financial penalty for a person committing a first offence.
- mandate that the Minister publish on the department's website a copy of each ERA standard made by the Minister and the recommendations by the independent regulator in relation to the ERA standard.

### **Explanatory Speech**

The Explanatory speech seeks to cast doubt on the latest scientific information which informs GBR management and selectively refers to evidence offered at the Senate Rural and Regional Affairs and Transport References Committee public hearing held in July 2020. <sup>1</sup> Mr Dametto is disinclined to discuss climate change in his speech but does rely heavily on a very limited reference to the extensive evidence offered by two witnesses, Dr Hardisty (Chief Executive Officer, Australian Institute of Marine Science) and Dr Schaffelke (Research Program Director, AIMS), who speak at length on the impacts of climate change and as well as on the impacts of agricultural run-off on water quality. The speech only focuses on their qualified comments on water quality in the outer reef and fails to refer to Dr Hardisty's unequivocal statement that "The results of our most recent 2020 survey showed that the Great Barrier Reef is in a period of prolonged decline due to the combined impacts of deteriorating water quality, cyclones, crown-of-thorns starfish outbreaks and the major threat, climate change. As outlined in our submission to this inquiry, AIMS research shows unequivocally that deteriorating water quality has a negative impact on coral reefs and other coastal marine ecosystems."

The two scientists noted, importantly for purposes of this Committee in examining the Bill, that "The Great Barrier Reef is obviously more than just coral." and that "This is a huge, huge complex ecosystem, and I think sometimes people forget that. It's 2,300 kilometres long. It's the size of a major country in its own right. "

Accordingly, the inshore reefs and seagrass beds, intertidal zone, and catchments are all part of this system. Gecko believes that any attempt to reverse the 2019 Act referred to above fails to have regard for the serious and growing impacts of climate change on a system already suffering from poor water quality, which in turn places stress on seagrass beds and creates a nutrient-enriched environment in which crown of thorns starfish thrive.

The conclusions of the 2019 Great Barrier Reef Outlook Report <sup>2</sup> were that the long-term outlook for the ecosystem of the property has further deteriorated from poor to very poor. Threats of highest risk relate to climate change, land-based run-off (water quality),

coastal development and direct use.

The federal government's 2019 Reef Report Card was only released in February 2021. While there have been some improvements in farm management practice and a willingness to adopt measures to reduce agricultural run-off, it must be noted that the regulations this Bill seeks to overthrow have not even been fully implemented yet and will only be fully in force in 2022. Accordingly, there is no way to accurately measure whether or not they have been effective in improving overall water quality or if even stricter regulation is required. Any such measures, if required, should be informed by the updated draft Reef 2050 Long-Term Sustainability Plan (the Plan) which was due for release in early 2021 but is still awaited. There is a regrettable lag time between report cards, with the 2019 report covering data from 2018-2019 but which was only available in February 2021.

### **Developments since the Bill was tabled**

The Bill was tabled on 21<sup>st</sup> April 2021 but since that time two significant events have taken place which should persuade the Committee to reject the Bill outright.

1. On 21st June 2021, the UN Educational, Scientific and Cultural Organization (UNESCO) made the recommendation that Australia's Great Barrier Reef be included on a list of world heritage in danger, according to a draft report contained in the UNESCO State of conservation of properties WHC/21/44.COM/7B. 17 May 2021. <sup>3</sup> This recommendation appears to be based on the Committee's analysis of recent reporting, including the 2019 Reef Outlook and the 2019 Report Card.

The draft report deserves a detailed reading, with a summary of events since 2015 providing useful background information for the Committee. An extract including pages 83-85 is attached as Appendix A.

Following this summary, the draft report goes on to say, "Based on the above, and noting, in particular, that both the current condition and the long-term outlook of the property have deteriorated, the World Heritage Centre and IUCN consider that the property is facing ascertained danger according to Paragraph 180 a) of the Operational Guidelines and hence recommend that the Committee inscribe the property on the List of World Heritage in Danger." It notes with the utmost concern and regret the conclusions of the 2019 Great Barrier Reef Outlook Report (2019 GBR Outlook Report) that the long-term outlook for the ecosystem of the property has further deteriorated from poor to very poor, that the deterioration of the ecological processes underpinning the Outstanding Universal Value (OUV) of the property has been more rapid and widespread than was previously evident, and that the property has suffered significantly from mass coral bleaching events in 2016, 2017 and 2020;

Among the 12 important recommendations made in the draft Report, is no. 10:

"Requests the State Party to invite a joint World Heritage Centre/IUCN Reactive Monitoring mission to develop a set of corrective measures and a Desired state of conservation for the removal of the property from the List of World Heritage in Danger(DSOCR), centred around ensuring that the revised Reef 2050 Plan addresses the

threat posed to the property by climate change and determines a pathway for accelerated actions in other areas affecting the conservation of the property;”

In a subsequent UNESCO publication, WHC/21/44.COM/7B.Add, State of Properties Inscribed on the World Heritage List. 21 June 2021, it would appear that the WH Committee will make a decision on the recommendation at the 16-31 July on-line meeting, just over 2 weeks hence.

In the light of the views expressed by the WH Committee and this deeply concerning draft report and recommendations, it would be highly imprudent to pass the proposed Bill, particularly as it seeks to undermine necessary reef protection currently under regulation.

2. A second development which is beyond the scope of an environmental organisation to comment on, is the fact that in the last few months, relations have further deteriorated between China and Australia, While this is a political development Gecko does not comment on, we are concerned by the fact that China is the host country for the extended 44th session of World Heritage Committee. There has been speculation in the media that the draft recommendation is politically motivated and could imperil constructive dialogue with the WH Committee. As such it would appear to be unwise to allow this Bill to progress any further.

### **Jobs and the Economy**

The above recent developments are of grave concern, given the value to the economy from tourism and related commercial activity and the jobs that are reliant upon a healthy Great Barrier Reef. The most recent report that is readily available which has looked at the value of the GBR is the Deloitte Access Report from 2017 <sup>5</sup>. which is based on 2015-2016 data.

<https://www2.deloitte.com/content/dam/Deloitte/au/Documents/Economics/deloitte-au-economics-great-barrier-reef-230617.pdf>

The Executive Summary states that “The Great Barrier Reef has a economic, social and icon asset value of \$56 billion. It supports 64,000 jobs and contributes \$6.4 billion to the Australian economy.” It is likely that a more up-to-date-study would estimate an even higher value.

The ability for the WH Committee to assess changes, whether as improvement or showing further decline that may have occurred since the 2019 Outlook Report and the 2019 Report Card were released has no doubt been impacted by the Covid-19 pandemic. While Australia negotiates with the WH Committee on the listing and other possible repercussions, the need to continue and increase the highest level of protection for the Reef remains. This is not the time to reduce such efforts by approving the subject Bill and the Katter Party might consider that to promote such actions might jeopardise the WH Committee’s view of the genuine commitment of the Queensland Government (and Australia as a nation) towards Reef protection. This is the time for even stronger environmental protection, including demonstrable action on climate change. Indeed, the WH Committee “strongly invites all States Parties to undertake actions to address Climate Change under the Paris Agreement consistent with their common but differentiated responsibilities and respective capabilities”.

Gecko thanks the Committee for its consideration of our views. We also wish to express our strong support for the statement that was made to the Committee by AMCS and WWF Australia on 11th June at the Public Hearing held by the Health and Environment Committee.

Yours sincerely



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Secretary

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## References

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4. <https://whc.unesco.org/archive/2021/whc21-44com-7B.Add-en.pdf> State of conservation of properties WHC/21/44.COM/7B.Add, Inscribed on the World Heritage List. 21 June 2021 (Agenda for 16-31 July on-line meeting)
5. <https://www2.deloitte.com/content/dam/Deloitte/au/Documents/Economics/deloitte-au-economics-great-barrier-reef-230617.pdf> Deloitte Access Economics. At what price? The economic, social and icon value of the Great Barrier Reef

## Appendix A

Extract from UNESCO State of conservation of properties Inscribed on the World Heritage List WHC/21/44.COM/7B.Add, p. 83-85.

### Current conservation issues

On 18 December 2018, the State Party submitted a letter regarding the mid-term review of the Reef 2050 Long-Term Sustainability Plan (Reef 2050 Plan) and its results, along with information that a new Reef 2050 Water Quality Improvement Plan 2017-2022 (WQIP) had been released. On 18 July 2019, the State Party submitted a position statement on climate change from the Great Barrier Reef Marine Park Authority (GBRMPA). On 6 August 2019, the World Heritage Centre sent a letter to the State Party raising concerns about the approval of the Carmichael Coal Mine, to which the State Party responded on 6 September 2019, noting that the project's approval is subject to over 180 regulatory conditions and that compliance with these conditions will be monitored.

On 30 August 2019, the State Party submitted the Great Barrier Reef Outlook Report 2019 (2019 GBR Outlook Report) and the Reef Water Quality Report Card 2017 and 2018.

On 29 November 2019, the State Party submitted a state of conservation report, available at <http://whc.unesco.org/en/list/154/documents/>, providing the following information:

- A number of factors have negatively affected the Outstanding Universal Value (OUV) of the property since 2015, including mass coral bleaching events in 2016 and 2017;
- The 2019 GBR Outlook Report concluded that the long-term outlook for the ecosystem of the property has deteriorated from poor to very poor and that climate change remains the most serious threat for the property. Other key threats are land-based run-off, coastal development and some direct human uses. It further concluded that accelerated action to mitigate climate change and improve water quality was essential to turn this outlook around. The report also concluded that the OUV of the property remained intact; however, components underpinning it have deteriorated since the inscription. Specifically, it noted a 30% loss of shallow-water coral cover following the 2016 bleaching event and the combined footprint of the 2016 and 2017 bleaching event extending over two thirds of the property. Furthermore, deterioration of the ecological processes underpinning the OUV of the property “has been more rapid and widespread than was evident in the period 2009 to 2014”;
- It is acknowledged that climate change requires effective global action under the Paris Agreement on Climate Change (2015), with the 1,5 °C target widely recognized as a critical threshold for the property;
- A mid-term review of the Reef 2050 Plan was undertaken in 2017, in light of the aforementioned bleaching events in 2016 and 2017. The updated Reef 2050 Plan, published in July 2018, recognizes the impacts of climate change on the property and the importance of global action for climate change mitigation. The next full review of the Plan is currently in progress and was due to be completed

in 2020, based on the outcomes of the mid-term review and the 2019 GBR Outlook Report;

- The Reef 2050 Plan Insights Report, an independent assessment, which considered whether the Reef 2050 Plan was effective in achieving its vision, concluded that the Plan “has provided a very sound framework for improving the effective management of the Reef’s values”. An independent assessment of management effectiveness, prepared to inform the 2019 GBR Outlook Report, noted a number of improvements resulting from the Reef 2050 Plan;
- An assessment of progress towards achieving the targets of the Reef 2050 Plan notes that while some of them are being met, significant improvements will be required to meet other targets, including those for biodiversity and water quality;
- A USD430 million WQIP is being implemented. The Reef Water Quality Report Card 2017 and 2018 concluded that, despite some advancement, progress towards achieving the 2025 targets has been very slow, with property-wide results for sediment reduction and dissolved inorganic nitrogen assessed as “very poor” and results for most of land management targets as “poor” or “very poor”;
- New legislation was approved by the Queensland Government in September 2019 to strengthen the regulatory framework for reducing nutrient and sediment releases. Changes were also introduced to the Queensland’s vegetation management laws in 2018 to prevent clearing of remnant vegetation in reef catchments;
- Additional funding commitments were made since the release of the Reef 2050 Plan Investment Framework in 2016. Total state and federal investment for the Reef 2050 Plan implementation between 2014-2024 has increased from an estimated USD1,43 billion in 2015 to an estimated USD1,94 billion in 2020;
- Additional actions have also been undertaken to build the resilience of the property, including through the Reef Restoration and Adaptation Programmes.

On 17 April 2020, the State Party submitted additional preliminary information regarding the coral bleaching events that took place in spring 2020. The World Heritage Centre and IUCN also received letters and third-party information about the Reef 2050 Plan progress and the effects of climate change on the property.

On 1 February 2021, the State Party submitted additional information, providing an update on the state of conservation of the property:

- The geographic footprint of the 2020 bleaching event was the largest to date; however, there was significant variability in the severity of bleaching;
- The Reef Water Quality Report Card 2019 has been released and demonstrates further progress towards some targets, particularly the one on the dissolved inorganic nitrogen;

- The updated Reef 2050 Plan is expected to be released in 2021, following an extensive consultation process;
- Additional investment in various programmes and projects was announced in 2020